

**FINANCIAL INDUSTRY REGULATORY AUTHORITY (FINRA)
OFFICE OF HEARING OFFICERS**

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REGISTRATION & DISCLOSURE

DEPARTMENT OF ENFORCEMENT,

COMPLAINANT,

v.

JOSHUA W. LANKFORD (CRD No. 2783571),

RESPONDENT.

**DISCIPLINARY PROCEEDING
No. 2005000075702**

HEARING OFFICER: SW

**ORDER ACCEPTING OFFER OF
SETTLEMENT**

Date: October 24, 2007

INTRODUCTION

Disciplinary Proceeding No. 2005000075702 was filed on July 23, 2007 by the Department of Enforcement of FINRA ("Complainant"). Respondent Joshua W. Lankford submitted an Offer of Settlement ("Offer") to Complainant on September 24, 2007. Pursuant to NASD Rule 9270(e) of the FINRA Code of Procedure, the Complainant and the National Adjudicatory Council ("NAC") Review Subcommittee or the Office of Disciplinary Affairs ("ODA") have accepted the uncontested Offer. Accordingly, this Order now is issued pursuant to Procedural Rule 9270(e)(3). The findings, conclusions and sanctions set forth in this Order are those stated in the Offer as accepted by the Complainant and approved by the NAC.

Under the terms of the Offer, Respondent has consented, without admitting or denying the allegations of the Complaint, and solely for the purposes of this proceeding and any other proceeding brought by or on behalf of FINRA (f/k/a NASD or National Association of Securities Dealers), or to which FINRA is a party, to the entry of findings and violations consistent with the allegations of the Complaint, and to the imposition of the sanctions set forth below, and fully

understands that this Order will become part of Respondent's permanent disciplinary record and may be considered in any future actions brought by FINRA.

BACKGROUND

Respondent has no disciplinary history with FINRA or with the United States Securities and Exchange Commission.

FINDINGS AND CONCLUSIONS

It has been determined that the Offer be accepted and that findings be made as follows:

NASD made repeated written requests to Respondent, both directly and through his counsel, for documents, information, and testimony pursuant to, and in accordance with, the provisions of NASD Rule 8210 of the FINRA Code of Procedure. Respondent failed to provide documents, information, and testimony in response to these repeated requests, in violation of Procedural Rule 8210 and NASD Conduct Rule 2110.

From on or about November 17, 2003 through on or about September 15, 2005, Respondent was registered as a General Securities Representative with FINRA member firm Barron Moore, Inc.

On or about October 24, 2005, Enforcement sent a letter to Respondent by certified mail, return receipt requested, directing him to provide documents and information pursuant to Procedural Rule 8210. The October 24 Rule 8210 request was sent to Respondent's address of record as contained in the records of the Central Registration Depository. The October 24 Rule 8210 request directed Respondent to provide, no later than November 9, 2005, a list of all bank and brokerage accounts that he owned, controlled, or had a beneficial interest in from November 1, 2004 to the date of the request, and to produce monthly account statements for each such account from November 1, 2004 through August 31, 2005. Respondent failed to produce

the documents and information requested in the October 24 Rule 8210 request by November 9, 2005 or at any time thereafter.

On or about October 26, 2005, Enforcement sent a letter to Respondent by certified mail, return receipt requested, at his CRD address. This request, which was made pursuant to Procedural Rule 8210, directed Respondent to appear for testimony under oath at Enforcement's Washington, D.C. office on December 8, 2005.

On or about November 9, 2005, Enforcement sent a letter to Respondent by certified mail, return receipt requested, at his CRD address and an alternate address. The request was made pursuant to Rule 8210. The November 9 Rule 8210 request directed Respondent to appear for testimony under oath at Enforcement's Washington, D.C. office on December 8, 2005.

On or about November 17, 2005, Enforcement received a letter from counsel for Respondent, dated November 16, 2005, which stated:

Joshua Lankford has asked me to respond to your November 9, 2005, Rule 8210 Request. As you know, Mr. Lankford resigned employment with Barron Moore, Inc., and is not currently associated with any NASD member firm. He has also launched a new business that is taking a great deal of his time. For these reasons, Mr. Lankford is not available on December 8, 2005, and declines to provide testimony to the Staff at that time.

The November 16 letter from counsel for Respondent did not propose any alternate dates for his testimony.

On or about November 21, 2005, Enforcement sent a letter to Respondent by certified mail, return receipt requested, at his CRD address and the alternate address. A copy of this letter, which was sent pursuant to Rule 8210, also was sent via first-class mail to counsel for Respondent. The November 21 Rule 8210 request responded to the November 16 letter from counsel for Respondent and notified Respondent that he remained obligated to appear for

testimony on December 8, 2005. The November 21 Rule 8210 request letter also advised Respondent that a failure to appear could subject him to sanctions, including a permanent bar from the securities industry.

On or about December 7, 2005, counsel for Respondent orally informed Enforcement staff that Respondent would not provide testimony in response to the Rule 8210 request, and that Respondent understood that a bar from the securities industry was the likely result of his failure to testify. Respondent failed to appear at Enforcement's Washington, D.C. office for testimony, either on December 8, 2005 or at any time thereafter.

Respondent never provided any documents or information in response to the October 24 Rule 8210 request. Respondent also failed to appear at Enforcement's Washington, D.C. office for testimony in response to the October 26 Rule 8210 request and the November 21 Rule 8210 request, either on December 8, 2005 or at any other time. In addition, Respondent failed to request or arrange for any alternate date for such testimony. The information and documents requested by Enforcement, and the information Enforcement would have sought from Respondent during his testimony, were material to Enforcement's investigation.

Based on the foregoing, Respondent violated NASD Procedural Rule 8210 and NASD Conduct Rule 2110.

Based on these considerations, the sanctions hereby imposed by the acceptance of the Offer are in the public interest, are sufficiently remedial to deter Respondent from any future misconduct, and represent a proper discharge by FINRA of its regulatory responsibility under the Securities Exchange Act of 1934.

SANCTIONS

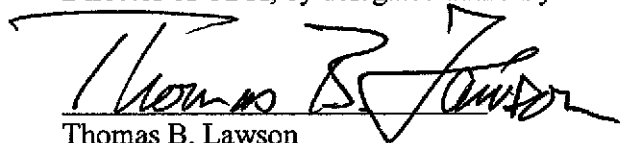
It is ordered that Respondent be barred from association with any FINRA member in any capacity.

The sanctions imposed herein shall be effective on a date set by FINRA staff. Pursuant to IM-8310-2(f), a bar or expulsion shall become effective upon approval or acceptance of this Order by the NAC.

SO ORDERED.

FINRA

Signed on behalf of the
Director of ODA, by delegated authority

A handwritten signature in black ink, appearing to read "Thomas B. Lawson", is written over a horizontal line.

Thomas B. Lawson
Chief Counsel
FINRA Department of Enforcement
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Washington, D.C. 20006