

**NASD
OFFICE OF HEARING OFFICERS**

Department of Enforcement,

Complainant,

v.

Paul R. Hunt
CRD No. 4304579

Respondent.

Disciplinary Proceeding
No. 2005000308801

Hearing Officer:

COMPLAINT

Upon information and belief, Complainant alleges as follows:

1. Respondent Hunt was registered with NASD member Edward Jones as a general securities representative from February 13, 2001 until November 18, 2004. His employment end date with Edward Jones was November 17, 2004. He is not currently registered with an NASD member firm. NASD retains jurisdiction over Hunt pursuant to Article V, Section 4 of NASD Bylaws.

**FIRST CAUSE OF COMPLAINT
Unauthorized Transactions
NASD Conduct Rule 2110, IM-2310-2**

2. In or about August and September 2004, Respondent Hunt effected or caused to be effected the following purchases and sales in the joint account of customers E&LW, without the customers' prior knowledge or authorization:
 - The sale of 709 shares of Weingarten Realty Investors stock for \$22,292.14 on August 20, 2004;
 - the purchase of 1000 shares of Cabelas, Inc. stock for \$27,967.38 on August 23, 2004;
 - the sale of 1000 shares of Cabelas, Inc. stock for \$24,606.98 on September 21, 2004;

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- the purchase of 300 shares of Stryker Corporation stock for \$14,896.69 on September 21, 2004.
3. Each such unauthorized purchase or sale constitutes separate and distinct violations of NASD Conduct Rules 2110 and IM-2310-2 by Respondent Hunt.

SECOND CAUSE OF COMPLAINT
Failure to Respond to Information Requests
NASD Procedural Rule 8210; NASD Conduct Rule 2110

4. By letters dated March 21, 2005 and August 11, 2005, sent via first class and certified mail to Respondent Hunt's CRD address at [REDACTED] the staff requested Hunt, pursuant to Rule 8210, to provide specified information concerning his handling of E&LW's account, among other things. Hunt's response to the March 21, 2005 request was due by April 4, 2005; his response to the August 11, 2005 request was due by August 22, 2005. Both of the certified mailings were returned to the District 7 staff, marked "Unclaimed". Neither of the first class mailings was returned.
5. To date, Respondent Hunt has not responded to either of the staff's Rule 8210 requests.
6. Respondent Hunt's failure to respond to the staff's Rule 8210 information requests constitutes separate and distinct violations of NASD Procedural Rule 8210 and NASD Conduct Rule 2110 by Respondent Hunt.

PRAYER FOR RELIEF

WHEREFORE, Complainant respectfully requests:

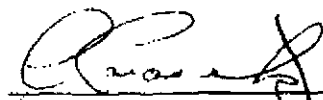
- A. Findings of fact and conclusions of law that Respondent Hunt committed the violations charged and alleged herein;
- B. An order imposing sanctions upon the Respondent in accordance with NASD Rule 8310.
- C. An order requiring Respondent to disgorge fully any and all ill-gotten gains and/or make full and complete restitution, together with interest;

D. An order imposing such costs of any proceeding as are deemed fair and appropriate under the circumstances in accordance with NASD Rule 8330; and

E. An order imposing any other fitting sanction.

NASD Department of Enforcement

Date: August 31, 2005



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