

NASD
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2005000838001

**To: Department of Enforcement
NASD**

**Re: Jane M. Andrashie
General Securities Representative
CRD # 2709918**

Pursuant to Rule 9216 of NASD Code of Procedure, Jane M. Andrashie ("Andrashie" or "Respondent") submits this Letter of Acceptance, Waiver and Consent ("AWC") for the purpose of proposing a settlement of the alleged rule violations described in Part II below. This AWC is submitted on the condition that, if accepted, NASD will not bring any future actions against Respondent alleging violations based on the same factual findings.

Respondent understands that:

1. Submission of this AWC is voluntary and will not resolve this matter unless and until it has been reviewed and accepted by NASD's Department of Enforcement and National Adjudicatory Council ("NAC") Review Subcommittee or Office of Disciplinary Affairs ("ODA") pursuant to NASD Rule 9216;
2. If this AWC is not accepted, its submission will not be used as evidence to prove any of the allegations against Respondent; and
3. If accepted:
 - a. This AWC will become part of Respondent's permanent disciplinary record and may be considered in any future actions brought by NASD or any other regulator against Respondent;
 - b. This AWC will be made available through NASD's public disclosure program in response to public inquiries about Respondent's disciplinary record;
 - c. NASD may make a public announcement concerning this agreement and the subject matter thereof in accordance with NASD Rule 8310 and IM-8310-2; and
 - d. Respondent may not take any action or make or permit to be made any public statement including in regulatory findings or otherwise,

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denying, directly or indirectly, any allegation in this AWC or create the impression that the AWC is without factual basis. Nothing in this provision affects Respondent's testimonial obligations or right to take legal or factual positions in litigation in which NASD is not a party.

Respondent also understands that her experience in the securities industry and disciplinary history may be factors that will be considered in deciding whether to accept this AWC. That experience and history are as follows:

Jane Marie Andrashie ("Andrashie") became registered as an Investment Company/ Variable Contracts Representative (Series 6) on March 4, 1996, and became registered as a General Securities Representative on March 6, 2001. Andrashie became registered in those capacities with Coordinated Capital Securities ("Member"), a member of NASD from April 1995 until February 28, 2005 when she was terminated. Andrashie is not currently associated with an NASD Member and has no disciplinary history.

I.

WAIVER OF PROCEDURAL RIGHTS

Respondent specifically and voluntarily waives the following rights granted under NASD's Code of Procedure:

- A. To have a Formal Complaint issued specifying the allegations against Respondent;
- B. To be notified of the Formal Complaint and have the opportunity to answer the allegations in writing;
- C. To defend against the allegations in a disciplinary hearing before a hearing panel, to have a written record of the hearing made and to have a written decision issued; and
- D. To appeal any such decision to the NAC and then to the U.S. Securities and Exchange Commission and a U.S. Court of Appeals.

Further, Respondent specifically and voluntarily waives any right to claim bias or prejudgment of the General Counsel, the NAC, or any member of the NAC, in connection with such person's or body's participation in discussions regarding the terms and conditions of this AWC, or other consideration of this AWC, including acceptance or rejection of this AWC.

Respondent further specifically and voluntarily waives any right to claim that a person violated the ex parte prohibitions of Rule 9143 or the separation of functions prohibitions of Rule 9144, in connection with such person's or body's participation in discussions regarding the terms and conditions of this AWC, or other consideration of this AWC, including its acceptance or rejection.

II.

ACCEPTANCE AND CONSENT

A. Respondent hereby accepts and consents, without admitting or denying the allegations or findings, and solely for the purposes of this proceeding and any other proceeding brought by or on behalf of NASD, or to which NASD is a party, prior to a hearing and without an adjudication of any issue of law or fact, to the entry of the following findings by NASD:

1. During all times relevant to the allegations herein, Andrashie was employed by the Member and its affiliate, an insurance general agency that was not a Member of NASD. Andrashie worked as an administrative assistant of the insurance general agency with control over its checking account and responsibility for paying expenses. From approximately October 18, 1999 until approximately December 5, 2003, Andrashie misappropriated funds in that she wrote 55 checks totaling \$14,305 that were drawn on the checking account of the insurance agency affiliated with the Member, which checks were payable to herself that she deposited into her bank account for her personal use without the knowledge and consent of the account holder, in violation of NASD Conduct Rule 2110.

B. Respondent also consents to the imposition, at a maximum, of the sanctions of a bar from association in any capacity with any member of NASD.

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

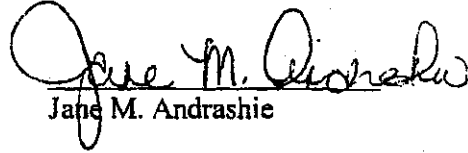
III.

OTHER MATTERS

Respondent understands that if she is barred or suspended from associating with any NASD member, she becomes subject to a statutory disqualification as that term is defined in Section 3(a)(39) of the Securities Exchange Act of 1934, as amended. Accordingly, Respondent may not be associated with any NASD member in any capacity, including clerical or ministerial functions, during the period of the bar or suspension. (See NASD Rule 8310 and IM-8310-1.)

Respondent certifies that she has read and understands all of the provisions of this AWC and has been given a full opportunity to ask questions about it, and that no offer, threat, inducement, or promise of any kind, other than the terms set forth herein, has been made to induce Respondent to submit it.

Dec 10, 2005
Date


Jane M. Andrashie

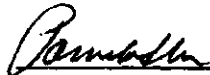
Reviewed by:

Counsel for Respondent

Accepted by NASD:

12-22-05
Date

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


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