

**NASD
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2005003107701**

**TO: Department of Enforcement
NASD**

**RE: Robert Zins, Respondent
General Securities Representative
CRD No. 2436090**

Pursuant to Rule 9216 of NASD Code of Procedure, I, Robert Zins, submit 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 me alleging violations based on the same factual findings.

I understand 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 me; and
3. If accepted:
 - a. this AWC will become part of my permanent disciplinary record and may be considered in any future actions brought by NASD or any other regulator against me;
 - b. this AWC will be made available through NASD's public disclosure program in response to public inquiries about my 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. I may not take any action or make or permit to be made any public statement, including in regulatory filings or otherwise, denying, directly or

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indirectly, any finding in this AWC or create the impression that the AWC is without factual basis. Nothing in this provision affects my testimonial obligations or right to take legal or factual positions in litigation or other legal proceedings in which NASD is not a party.

I also understand that my 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:

I entered the securities industry on February 3, 1994 as a General Securities Representative of a member of NASD. After I left this position in February 1998, I allowed my license to lapse. On February 3, 2005, I re-entered the securities industry as a General Securities Representative with Citicorp Investment Services ("Member"), a member of NASD. I remained registered with the Member in this capacity until my termination on August 26, 2005. I have no disciplinary history.

I. WAIVER OF PROCEDURAL RIGHTS

I specifically and voluntarily waive the following rights granted under NASD's Code of Procedure:

- A. To have a Formal Complaint issued specifying the allegations against me;
- 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, I specifically and voluntarily waive 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.

I further specifically and voluntarily waive 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. I hereby accept and consent, without admitting or denying the 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. Between the approximate dates of August 4, 2005 and August 15, 2005, I converted approximately \$3,750 from the bank account of J.L. and A.L. by ordering checks from their account without their knowledge or consent. I had these checks delivered to a Post Office Box that I opened. I received the checks and forged the signatures of J.L. and A.L. on three checks totaling \$3,750. I then deposited the checks into a bank account that I opened under a different name but secretly controlled. I then withdrew cash from this bank account and then deposited the cash into my personal bank account for my personal benefit and not for the benefit of the J.L. or A.L. in violation of NASD Conduct Rule 2110.
 2. Between the approximate dates of August 4, 2005 and August 15, 2005, I forged the names of J.L. and A.L. on three checks that I ordered from their bank account without their knowledge or consent. I then forged the endorsement of another individual, T.S., on the back of the checks, and then deposited the checks into a bank account that I opened in the name of T.S. without his knowledge or consent, and that I secretly controlled. These forgeries constitute separate and distinct violations of NASD Conduct Rule 2110.
- B. I also consent to the imposition, at a maximum, of the following sanctions:
- A bar in all capacities.

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

- A. I understand that if I am barred or suspended from associating with any NASD member, I become 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, I 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.)

I certify that I have read and understand all of the provisions of this AWC and have 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 me to submit it.

10/2/20
Date


Robert Zins

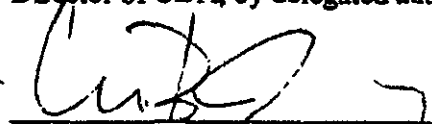
Reviewed by:

Attorney Name (if any)
Counsel for Respondent
Firm Name
Address
City/State/Zip
Phone Number

Accepted by NASD:

Date

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


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