

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
OFFICE OF HEARING OFFICERS**

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REGISTRATION & DISCLOSURE

Department of Enforcement,

Complainant,

v.

STEVEN MAIDLOW,
CRD No. 1831371,

Respondent.

Disciplinary Proceeding
No.2006005483001

Hearing Officer Alan W. Heifetz

**ORDER ACCEPTING OFFER OF
SETTLEMENT**

Date: October 5, 2007

INTRODUCTION

Disciplinary Proceeding No. 2006005483001 was filed on May 25, 2007, by the Department of Enforcement of the Financial Industry Regulatory Authority ("FINRA"). ("Complainant"). Respondent Steven Maidlow submitted an Offer of Settlement ("Offer") to Complainant on or about August 1, 2007. Pursuant to NASD Rule 9270(e), the Complainant and the National Adjudicatory Council ("NAC"), a Review Subcommittee of the NAC, or the Office of Disciplinary Affairs ("ODA") have accepted the uncontested Offer. Accordingly, this Order now is issued pursuant to NASD 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

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proceeding brought by or on behalf of FINRA, 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

Steven K. Maidlow became registered with FINRA in May 1988 as a general securities representative. Between May 1999 and May 2006, Maidlow was registered in the same capacity with Legg Mason Wood Walker, Inc., which later merged with Citigroup Global Markets Inc. Maidlow has not been registered with any FINRA member since May 2006. FINRA has jurisdiction over Respondent pursuant to Article V, Section 4 of the Association's By-Laws, which provides for a two-year period of retained jurisdiction over formerly associated persons. Steven Maidlow does not have any disciplinary history.

FINDINGS AND CONCLUSIONS

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

(A) On or about January 3, 2006, Steven Maidlow caused \$10,000 to be electronically transferred from public customer DP's brokerage account held with the Member and sent to DP's deceased mother's estate checking account at a bank in Maine, without the knowledge and consent of the customer.

(B) Steven Maidlow removed the funds to resolve a shortfall in that account caused by his failure to liquidate certain bonds held by the estate in a timely fashion.

(C) Such acts, practices and conduct constitute separate and distinct violations of NASD Rules 2110 and 2330(a) on the part of Steven Maidlow.

(D) On or about March 24, 2006, Steven Maidlow prepared and sent public customer DP documentation in the form of a Cash Flow Detail and an Asset Appraisal Report showing that the \$10,000 previously removed from her account had been returned, when, in fact, it had not.

(E) Such acts, practices and conduct constitute separate and distinct violations of NASD Rule 2110 on the part of Steven Maidlow.

(F) On or about August 10, 2006, NASD staff sent Steven Maidlow a letter requesting that he provide certain information, pursuant to and in accordance with the provisions of NASD Procedural Rule 8210. That request for information was sent by first class and certified mail to Steven Maidlow's address of record as contained in the records of the Central Registration Depository ("CRD address") and requested that he respond by August 25, 2006. The first class mail was never returned, while the certified mail receipt was returned with a signature that appears to be that of Steven Maidlow. No response to the request was ever provided.

(G) On or about September 11, 2006, NASD staff sent Steven Maidlow a letter requesting that he provide certain information, pursuant to and in accordance with the provisions of NASD Procedural Rule 8210. That request for information was sent by first class mail and certified mail to Steven Maidlow's CRD address and requested that he respond by September 25, 2006. The first class mail was never returned, while the certified mail was returned and marked unclaimed. Steven Maidlow never provided a response to the request.

(H) The acts, practices and conduct described above constitute separate and distinct violations of NASD Conduct Rule 2110 and Procedural Rule 8210 by Respondent.

Based on the foregoing, Steven Maidlow misused customer funds in violation of NASD Rules 2110 and 2330(a); provided false documentation in violation of NASD Rule 2110; and failed to respond to requests for information in violation of NASD Rules 2110 and 8210.

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 member of FINRA in any capacity.

The sanctions imposed herein shall be effective on a date set by FINRA staff. Pursuant to IM-8310-3(e), a bar or expulsion shall become effective upon approval or acceptance of this Order.

SO ORDERED.

FINRA

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

A handwritten signature in black ink, appearing to read 'RAM', is written over a horizontal line.

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