

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2006006777802**

TO: Department of Enforcement
Financial Industry Regulatory Authority ("FINRA")

RE: Don M. Roman (CRD No. 1713951)
General Securities Representative

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, I, Don M. Roman, submit this Letter of Acceptance, Waiver and Consent ("AWC") for the purpose of proposing a settlement of the alleged rule violations described below. This AWC is submitted on the condition that, if accepted, FINRA will not bring any future actions against me alleging violations based on the same factual findings described herein.

I.

ACCEPTANCE AND CONSENT

- A. Respondent Don M. Roman (hereinafter "Roman" or "Respondent") hereby accepts and consents, without admitting or denying the findings, and solely for the purposes of this proceeding and any other proceeding brought by or on behalf of FINRA, or to which FINRA 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 FINRA:

BACKGROUND

Respondent Roman entered the securities industry in May 1987 as an associated person with a FINRA member firm. In July 1987, he became registered with FINRA as an Investment Company/Variable Contracts Representative. On November 2, 1998, Roman became associated with FINRA member MetLife Securities, Inc. ("MSI") and registered through the firm as a General Securities Representative. Roman remains registered with the firm.

On February 13, 1997, Roman was fined \$150 by the Commissioner of Insurance for the State of Georgia, for having failed to timely renew his state insurance license.

OVERVIEW

Between January 1, 2003 and May 17, 2007, while associated with MSI, Roman informed several individuals, including some MSI customers, of opportunities to invest in three development-stage companies, specifically: Cornerstone Services Group, Inc., Intrepid Holdings, Inc. (successor in interest to Cornerstone Services Group, Inc.), and Chicken Little Fund Group, LLC. MSI had no business relationship with any of the three companies.

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For those individuals whom Roman notified of the investment opportunities and who expressed interest in investing, Roman directed them to contact the subject companies directly and provided them with the applicable contact information.

A total of fourteen individuals ultimately invested in one or more of the subject companies after learning of the investment opportunities from Roman. The total amount of their investments was approximately \$200,000. In the case of some of these individuals, Roman further facilitated their investment by either: (i) assisting them in transferring funds to the subject companies to fund their purchase of securities; (ii) forwarding applicable private placement memoranda and subscription agreement forms; or (iii) communicating with the subject companies on their behalf.

NASD Conduct Rule 3040 requires that an associated person provide written notice to his employer member firm prior to participating in any securities transaction that is outside the regular course or scope of his employment with the firm. The securities transactions described above were outside the course and scope of Roman's employment with MSI, and Roman participated in those transactions without providing the requisite notice to MSI.

Such acts, practices, and conduct constitute violations of NASD Conduct Rules 3040 and 2110 by Roman.

B. Respondent also consents to the imposition of the following sanctions:

A suspension from associating with any FINRA member firm in any capacity for a period of one month.

Respondent has submitted a sworn financial statement and demonstrated an inability to pay. In light of the financial status of Respondent, no monetary sanctions have been imposed.

I understand that if I am barred or suspended from associating with any FINRA 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 FINRA member in any capacity, including clerical or ministerial functions, during the period of the bar or suspension (see FINRA Rules 8310 and 8311).

The sanctions imposed herein shall be effective on a date set by FINRA staff.

II.

WAIVER OF PROCEDURAL RIGHTS

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

A. To have a Complaint issued specifying the allegations against me;

- B. To be notified of the 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 National Adjudicatory Council ("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 FINRA Rule 9143 or the separation of functions prohibitions of FINRA 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.

III.

OTHER MATTERS

I understand that:

- A. Submission of this AWC is voluntary and will not resolve this matter unless and until it has been reviewed and accepted by the NAC, a Review Subcommittee of the NAC, or the Office of Disciplinary Affairs ("ODA"), pursuant to FINRA Rule 9216;
- B. If this AWC is not accepted, its submission will not be used as evidence to prove any of the allegations against me; and
- C. If accepted:
 - 1. this AWC will become part of my permanent disciplinary record and may be considered in any future actions brought by FINRA or any other regulator against me;
 - 2. this AWC will be made available through FINRA's public disclosure program in response to public inquiries about my disciplinary record;
 - 3. FINRA may make a public announcement concerning this agreement and the subject matter thereof in accordance with FINRA Rule 8313; and

4. 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 indirectly, any finding in this AWC or create the impression that the AWC is without factual basis. I may not take any position in any proceeding brought by or on behalf of FINRA, or to which FINRA is a party, that is inconsistent with any part of this AWC. Nothing in this provision affects my right to take legal or factual positions in litigation or other legal proceedings in which FINRA is not a party.
- D. I may attach a Corrective Action Statement to this AWC that is a statement of demonstrable corrective steps taken to prevent future misconduct. I understand that I may not deny the charges or make any statement that is inconsistent with the AWC in this Statement. This Statement does not constitute factual or legal findings by FINRA, nor does it reflect the views of FINRA or its staff.

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; that I have agreed to its provisions voluntarily; and that no offer, threat, inducement, or promise of any kind, other than the terms set forth herein and the prospect of avoiding the issuance of a Complaint, has been made to induce me to submit it.

05/18/10
Date

Don M. Roman
Don M. Roman, Respondent

Accepted by FINRA:

June 14, 2010
Date

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

Mark J. Fernandez
Mark J. Fernandez
Senior Regional Counsel
FINRA Department of Enforcement
1100 Poydras Street
Energy Centre, Suite 850
New Orleans, LA 70163-1108
Tel: (504) 522-6527
Fax: (202) 721-6522

THIS CORRECTIVE ACTION STATEMENT IS SUMMITTED BY THE RESPONDENT. IT DOES NOT CONSTITUTE FACTUAL OR LEGAL FINDINGS BY FINRA, NOR DOES IT REFLECT THE VIEWS OF FINRA, OR ITS STAFF.

STATEMENT OF CORRECTIVE ACTION

To: Department of Enforcement
Financial Industry Regulatory Authority (FINRA)

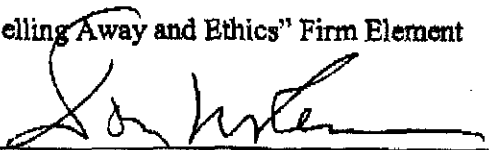
From: Don M. Roman (CRD No. 1713951)
General Securities Representative

Re: Examination No. 20060067778

Date: 05/12/10

I have taken the following steps to correct the conduct which is the subject of the charges contained in this action.

1. Since April 16, 2007, I have been engaged in a comprehensive Enhanced Supervision Plan with my Firm to ensure my understanding of and compliance with all applicable NASD Conduct Rules, in particular NASD Rules 3040 and 2110, which require that an associated person provide written notice to his employer firm prior to participating in any securities transaction that is outside the regular course or scope of his employment with the firm.
2. As part of said Enhanced Supervision Plan (ESP), I have met semi-annually or quarterly with my Agency Managing Director (MD), where I have performed the following:
 - a. Completed the Firm's Annual Individual Compliance Review (AICR).
 - b. Completed an Annual Certification Statement (ACS).
 - c. Updated an Outside Business Activity (OBA) Disclosure Form.
 - d. Completed a IAR Quarterly Holdings Report.
 - e. Reviewed with Agency Management a sampling of my client files and financial plans to ensure that no alternative investments were recommended to a client or prospect.
3. I have completed the Firm's "OBA, Selling Away and Ethics" Firm Element tutorial.


Don M. Roman, Respondent

05/18/10
Date