

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2006006804301**

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REGISTRATION & DISCLOSURE

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

RE: Leland A. Dykes, Respondent
General Securities Principal
CRD No. 2230072

Pursuant to NASD Rule 9216 of FINRA's Code of Procedure, Leland A. Dykes ("Dykes" or "Respondent") submits 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 Respondent alleging violations based on the same factual findings described herein.

I.

ACCEPTANCE AND CONSENT

- A. 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

Leland Dykes entered the securities industry in April 1992, when he associated with a FINRA member firm. He subsequently registered with four other member firms before associating with his current employer member firm, One Financial Securities, Ltd., of which he serves as President and is a 75% owner. During his career in the securities industry, Dykes has obtained Series 7, 24, 27 and 63 securities licenses.

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RELEVANT PRIOR DISCIPLINARY HISTORY

On August 6, 2007, the Texas State Securities Board ("TSSB") issued an Order against Dykes and One Financial Securities, Ltd., wherein the registration of the firm as a dealer and Dykes' registration as an agent were revoked for failure to provide requested documents to the TSSB.

OVERVIEW

This matter involves a registered principal, who is also a 75% owner and President of a FINRA member firm, who misused investor funds; willfully failed to disclose certain material information on his Form U4; and failed to respond to FINRA's requests for information.

FACTS AND VIOLATIVE CONDUCT

1. During the period from February 2003 to March 2004, Leland A. Dykes raised over \$450,000 from at least two individuals, including a customer of One Financial Securities. Dykes represented to the investors that their funds would be utilized to invest in pharmaceutical companies or to purchase medical receivables. Dykes also represented to the investors that they would receive a return on their investments; however, he failed to adequately disclose all potential risks associated with the investment. Dykes subsequently utilized the investors' funds for, among other things, personal and other expenses and to make purported interest/return of principal payments to the investors.

Such acts, practice and course of conduct constitute violations of NASD Rules 2110 and 2330 by Leland A. Dykes.

2. During the period from October 2001 through at least April 2008, Leland A. Dykes willfully failed to update his Form U4 to disclose material information. Specifically, Dykes failed to disclose a September 2001 federal tax lien that was not released until October 2007; a January 2003 bankruptcy filing that was not discharged until December 2004; a May 2004 arbitration award against him; a June 2004 judgment against him; two customer complaints against him that alleged sales practice violations and damages exceeding \$5,000; and a Texas State Securities Board Notice of Hearing and subsequent Order, pursuant to which his registration as an agent in the State of Texas was revoked.

Such acts, practices and conduct constitute separate and distinct violations of NASD Conduct Rule 2110 and IM-1000-1 by Leland A. Dykes.

3. On October 3, 2007, and again on October 18, 2007, FINRA staff sent letters to Dykes requesting, pursuant to NASD Procedural Rule 8210, that he provide certain information regarding the findings in paragraphs 1 and 2 above. Dykes failed to provide the requested information.

Such acts, practice and course of conduct constitute violations of NASD Conduct Rule 2110 and NASD Procedural Rule 8210 by Leland A. Dykes.

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

A bar from association with any FINRA member in any capacity.

Pursuant to NASD IM-8310-3(e), a bar or expulsion shall become effective upon approval or acceptance of this AWC.

Respondent understands that if he is barred or suspended from associating with any FINRA member, he 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, he 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 NASD Rule 8310 and IM-8310-1.)

Respondent also understand that this settlement includes a finding that, during the period from October 2001 through at least April 2008, he willfully failed to disclose material facts on a Form U4, and that under Section 15(b)(4)(A) of the Securities Exchange Act of 1934 and Article III, Section 4(f) of the FINRA By-Laws, these nondisclosures make him subject to a statutory disqualification with respect to association with a member.

II.

WAIVER OF PROCEDURAL RIGHTS

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

- A. To have a Formal Complaint issued specifying the allegations against him;

- 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 National Adjudicatory Council ("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 prejudice 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 NASD Rule 9143 or the separation of functions prohibitions of NASD 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

Respondent understands that:

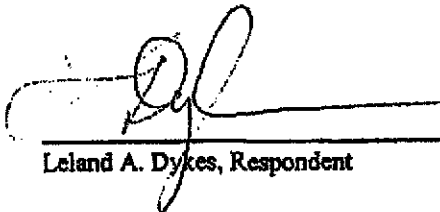
- A. Submission of this AWC is voluntary and will not resolve this matter unless and until it has been reviewed and accepted by the NAC, a Review Subcommittee of the NAC, or the Office of Disciplinary Affairs ("ODA"), pursuant to NASD Rule 9216;
- B. If this AWC is not accepted, its submission will not be used as evidence to prove any of the allegations against me; and
- C. If accepted:
 - 1. this AWC will become part of Respondent's permanent disciplinary record and may be considered in any future actions brought by FINRA or any other regulator against Respondent;

Letter of Acceptance, Waiver and Consent
2006006804301/Leland A. Dykes

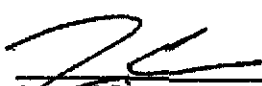
2. this AWC will be made available through FINRA's public disclosure program in response to public inquiries about Respondent's disciplinary record;
3. FINRA may make a public announcement concerning this agreement and the subject matter thereof in accordance with NASD Rule 8310 and IM-8310-3; and
4. Respondent 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. Respondent 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 Respondent's right to take legal or factual positions in litigation or other legal proceedings in which FINRA is not a party.

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.

4/30/08
Date


Leland A. Dykes, Respondent

Reviewed by:

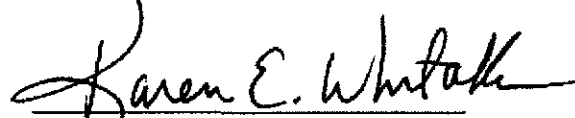

Counsel for Respondent

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2006006804301/Leland A. Dykes

Accepted by FINRA:

6/3/2008
Date

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

A handwritten signature in black ink, reading "Karen E. Whitaker", written over a horizontal line.

Karen E. Whitaker
Senior Regional Counsel
FINRA Department of Enforcement
12801 North Central Expressway
Suite 1050
Dallas, TX 75243
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Fax Number: 972-716-7612