

**FINRA
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2007009431201**

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REGISTRATION & DISCLOSURE

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

Re: Constance Farnsworth Bladon
General Securities Representative
CRD NO. 728860

Pursuant to NASD Rule 9216 of the FINRA Code of Procedure, Constance Farnsworth Bladon ("Bladon") 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 Bladon alleging violations based on the same factual findings described herein.

I.

ACCEPTANCE AND CONSENT

- A. Bladon 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

Bladon has been in the securities industry and registered with FINRA as a Series 7 general securities representative since May 1982. From October 1996 through December 2006, she was employed by Robert W. Baird & Co. Incorporated ("the Firm") as a general securities representative. In this capacity, she recommended and sold mutual funds and securities. Bladon was located at the Firm's branch office in Tampa, Florida.

Bladon has not been employed in the securities industry since December 14, 2006. Pursuant to FINRA By-law Article V, Section 4, FINRA retains jurisdiction over Bladon. Bladon has not been the subject of prior formal disciplinary action by FINRA.

FACTS

By letter dated September 21, 2007, Enforcement, pursuant to NASD Conduct Rule 8210, requested that Bladon provide a written statement and provide

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testimony in connection with Enforcement's investigation regarding allegations of unauthorized trading. By letter dated October 8, 2007, Bladon advised Enforcement that she had retained counsel. Thereafter, all of Enforcement's communications with Bladon were conducted through her attorney. In January, Bladon provided a written statement to Enforcement.

By letter dated March 5, 2008, Enforcement again requested, pursuant to NASD Conduct Rule 8210, that Bladon appear and testify in connection with allegations of unauthorized trading by Bladon's customers. Such testimony was scheduled for Tuesday, April 8, 2008 in New York. In advising Enforcement that she would not provide live testimony, Bladon cited as reasons for such declination the time and cost involved but Bladon did offer to provide written responses to any further written inquiries that Enforcement wished to direct to her.

Enforcement subsequently informed Bladon that Enforcement staff would be willing to take Bladon's testimony either telephonically or to travel to Tampa, Florida, where she was located, to take such testimony. Enforcement also informed Bladon that, based on the nature of the investigation and the customer allegations, Enforcement was unable to accept her offer to submit written responses to interrogatories in lieu of live testimony. By letter dated April 1, 2008, Bladon informed Enforcement that she was unwilling to provide live testimony at any location, including Tampa, Florida.

In a letter dated April 4, 2008, Enforcement informed Bladon that it was willing to take her testimony via telephone at a mutually convenient time. Bladon informed Enforcement that she would testify via telephone and a date was set for May 29, 2008. However, on May 22, 2008, Bladon advised Enforcement that she would not provide the testimony scheduled for May 29, 2008.

On May 22, 2008, Enforcement informed Bladon that in the event that she failed to appear and testify telephonically as scheduled on May 29, 2008, she would be subject to appropriate disciplinary action. By letter dated May 27, 2008, Bladon again advised Enforcement that she would not provide testimony as earlier scheduled for May 29, 2008.

By letter dated July 3, 2008, Enforcement advised Bladon that her failure to appear and testify would violate NASD Conduct Rules 2110 and 8210, and as a result, Bladon could receive a sanction of a permanent bar from the securities industry. By letter dated July 18, 2008, Bladon again advised Enforcement that she would not provide the requested testimony.

By letter dated July 21, 2008, Enforcement again requested that Bladon appear and testify telephonically in connection with this investigation. To date, Bladon has not appeared and testified as requested.

VIOLATIVE CONDUCT BY RESPONDENT

Failure to Appear for On-the-Record Interview NASD Conduct Rules 2110 and 8210

NASD Conduct Rule 8210(a)(1) requires "a member, person associated with a member, or person subject to the Association's jurisdiction to provide information orally, in writing, or electronically (if the requested information is, or is required to be, maintained in electronic form) and to testify at a location specified by Association staff, under oath or affirmation administered by a court reporter or a notary public if requested, with respect to any matter involved in the investigation, complaint, examination, or proceeding." NASD Conduct Rule 2110 requires that members and associated persons "observe high standards of commercial honor and just and equitable principles of trade." In this matter, Bladon failed to comply with multiple requests to testify. By virtue of the foregoing, Bladon violated NASD Conduct Rules 2110 and 8210(a)(1).

- B. Bladon also consents to the imposition of a permanent bar from association with any FINRA member firm in all capacities.

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

II.

WAIVER OF PROCEDURAL RIGHTS

Bladon 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 Bladon;
- 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, Bladon 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.

Bladon further specifically and voluntarily waives any right to claim that a person violated the ex parte prohibitions of NASD Procedural Rule 9143 or the separation of functions prohibitions of NASD Procedural 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

Bladon 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 Procedural Rule 9216;
- B. If this AWC is not accepted, its submission will not be used as evidence to prove any of the allegations against Bladon; and
- C. If accepted:
 - 1. this AWC will become part of Bladon 's permanent disciplinary record and may be considered in any future actions brought by FINRA or any other regulator against her;
 - 2. this AWC will be made available through FINRA's public disclosure program in response to public inquiries about Bladon'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. Bladon 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. Bladon 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 Bladon's right to take legal or factual positions in litigation or other legal proceedings in which FINRA is not a party.

Bladon 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; that Bladon has 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 Bladon to submit it.

9/15/08
Date

Constance Farnsworth Bladon
Constance Farnsworth Bladon

9-16-08
Date

Acknowledged by

William T. Kirtley
William T. Kirtley, Esq.
Attorney for Bladon

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Accepted by FINRA:

9/23/2008
Date

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

Myles L. Orosco
Myles L. Orosco
Director

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