

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NOs. 2007009843401**

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REGISTRATION & DISCLOSURE

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

RE: Gordon Robert Moore, Respondent
CRD No. 4372211

Pursuant to Rule 9216 of FINRA Code of Procedure, Respondent, Gordon Robert Moore (Moore) 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 Moore alleging violations based on the same factual findings described herein.

I.

ACCEPTANCE AND CONSENT

- A. Moore 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

Moore was associated with AXA Advisors, LLC (AXA) from on or about June 1, 2001 through on or about July 23, 2007, where he was registered as both a General Securities Representative and a General Securities Principal. Moore is not currently associated with a member of FINRA.

RELEVANT DISCIPLINARY HISTORY

In August 2008, the Securities and Exchange Commission (SEC) instituted a public administrative proceeding against Moore related to Moore's conviction of one count of securities fraud, one count of theft, and one count of computer crime. Moore was sentenced by the District Court, City and County of Denver, Colorado, to two years probation and ordered to pay restitution. Moore submitted an offer of settlement in the SEC proceeding and was barred from association with any broker, dealer, or investment

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adviser.

FACTS AND VIOLATIVE CONDUCT

1. Falsification of Documents

During the years 2004 through 2007, Moore falsified documents concerning the 401(k) accounts of at least fifty-nine (59) employees of the SV School District. Moore falsely represented the employment status of the account holders, and affixed, without authorization, the signature of an SV payroll/human resources representative on each of the falsified forms.

As a result of the above acts, practices and conduct, Moore violated NASD Conduct Rule 2110.

2. Failure to Respond to Written Rule 8210 Request

On January 3, 2008, and January 23, 2008, FINRA staff sent Moore a written request for certain information and documents relevant and necessary to staff's investigation of allegations that Moore falsified documents related to rollovers of 401(k) plans to 403(b) plans. The requests were sent in conformance with and pursuant to NASD Procedural Rule 8210. Through counsel, Moore advised staff that he would not respond to FINRA's Rule 8210 requests. To date, Moore has failed to respond to either the January 3, or the January 23, 2008, Rule 8210 request.

As a result of the above acts, practices and conduct, Moore violated NASD Procedural Rule 8210 and NASD Conduct Rule 2110.

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

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

Moore understands that if he is barred from associating with any FINRA member, he becomes 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, Moore may not be associated with any FINRA member in any capacity, including clerical or ministerial functions, during the period of the bar. (See NASD Rules 8310 and IM-8310-1).

II.

WAIVER OF PROCEDURAL RIGHTS

Moore 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, Moore 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.

Moore further specifically and voluntarily waives 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.

III.

OTHER MATTERS

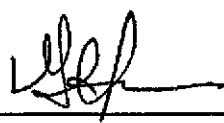
Moore understands that:

- 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 him; and
- C. If accepted:
1. this AWC will become part of Moore's permanent disciplinary record and may be considered in any future actions brought by FINRA or any other regulator against him;
 2. this AWC will be made available through FINRA's public disclosure program in response to public inquiries about Moore'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. Moore 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. Nothing in this provision affects Moore's right to take legal or factual positions in litigation or other legal proceedings in which FINRA is not a party.

Moore certifies that he has read and understands all of the provisions of this AWC and has been given a full opportunity to ask questions about it; that Moore has agreed to its provisions voluntarily; and that no offer, threat, inducement, or promise of any kind, other than the terms set forth herein, has been made to induce him to submit this AWC.

Sept. 12, 2008
Date



Gordon Robert Moore

Approved by Counsel:



John M. Richilano, Esq.

October 10, 2008
Date

Accepted by FINRA:

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



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