

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2007011559701**

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

RE: USA Advanced Planners, Inc., Respondent
Broker-Dealer
CRD No. 131282

Michael Rodman, Respondent
General Securities Principal
CRD No. 1260483

Dennis Tubbergen, Respondent
General Securities Principal
CRD No. 2505625

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, USA Advanced Planners, Inc., Michael Rodman, and Dennis Tubbergen (collectively, "Respondents") 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 Respondents alleging violations based on the same factual findings described herein.

I.

ACCEPTANCE AND CONSENT

- A. Respondents hereby accept and consent, 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

USA Advanced Planners, Inc. ("USAAP") became a member of FINRA (f/k/a National Association of Securities Dealers, Inc. or NASD) and registered with the Securities and Exchange Commission ("SEC") on September 23, 2004. USAAP

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is a fully disclosed introducing broker-dealer. USAAP's membership with FINRA and registration with the SEC remain currently in effect.

Michael Rodman entered the securities industry in April 1984 as an Investment Company Products and Variable Contracts Products Representative at a FINRA firm. In June 2000, Rodman became registered as an Investment Company Products and Variable Contracts Products Principal. In December 2005, Rodman became registered with USAAP in these capacities and became registered as a General Securities Representative in February 2008 and a General Securities Principal in March 2008. Rodman currently remains registered with USAAP and therefore he is subject to FINRA's jurisdiction.

Dennis Tubbergen entered the securities industry in July 1994 as an Investment Company Products and Variable Contracts Products Representative at a FINRA firm. Tubbergen later became registered as a General Securities Representative and a General Securities Principal. In January 2006, Tubbergen became registered with USAAP in these capacities. Tubbergen currently remains registered with USAAP and therefore he is subject to FINRA's jurisdiction.

RELEVANT DISCIPLINARY HISTORY

Respondents do not have any relevant disciplinary history.

OVERVIEW

USAAP, acting through Rodman and Tubbergen, charged excessive commissions in five variable life settlement transactions, summarized below, which are securities transactions. In addition, USAAP failed to provide its life settlement customers with written notification disclosing the source and amount of remuneration it received in connection with the life settlement transactions. USAAP also failed to provide a confirmation to each variable life settlement transaction customer. Finally, USAAP failed to establish and implement an adequate supervisory system and written procedures related to variable life settlement transactions.

FACTS

Background - Variable Life Settlement Transactions

A life settlement involves the sale of an existing life insurance policy to a third party – a person or an entity other than the company that issued the policy – for more than the policy's cash surrender value, but less than the net death benefit. The third party purchasing the policy, often referred to as a "provider" or buyer, becomes the new owner of the policy and is responsible for the payment of all

future premiums.

Life settlements that involve variable products are securities transactions and therefore broker-dealers who participate in variable life settlement transactions must comply with the federal securities laws and FINRA rules. Under NASD Rule 2440 and IM-2440-1, a firm is prohibited from charging a customer more than a fair and reasonable commission in any securities transaction. Firms that charge unfair or unreasonable commissions violate the firm's obligation to observe just and equitable principles of trade. When determining commissions in any securities transaction, Rule 2440 requires a firm to take into consideration all relevant facts and circumstances regarding the transaction including market conditions, expenses, and the value of the firm's services rendered. A firm must be prepared to justify that its commission is fair as to each customer and transaction, and to demonstrate that the firm disclosed its commission to the customer in an appropriate manner.

Life Settlement Transactions by USAAP

Between September 27, 2005 and April 29, 2007, USAAP, acting through Rodman and Tubbergen, effected five variable life settlement transactions involving variable life insurance policies in which the firm charged an excessive commission. USAAP, acting through its principals Rodman and Tubbergen, determined the amount of commissions it received for the life settlement transactions described below.

1. Transaction for JM

In June 2005, Rodman was asked by the independent trustee for a family trust to evaluate two fixed whole life insurance policies owned by the trust on the life of JM, which had a total face value of \$9,000,000. At the time, JM, the insured person, was 81 years old. In July 2005, Rodman conducted a prequalification process with respect to the trust's policies on JM's life, and discussed the purchase of the whole life insurance policies with multiple potential buyers. Each of the potential buyers declined.

In November 2005, Rodman identified a potential buyer who expressed a willingness to purchase JM's policies if the two policies were converted by the issuing insurance company from fixed to variable terms. Shortly thereafter, the insured's health worsened and progress toward the sale of JM's policies was stopped. In June 2006, the trustee for the owner of JM's policies approached USAAP for reconsideration of the sale of the two policies. During the month of July 2006, Rodman negotiated the sale of the policies with multiple potential buyers. Ultimately, after the whole life policies were converted, Rodman obtained the highest gross offer for the policies. The owner of the policy was then presented with an offer that was net of USAAP's commissions (that is, the highest

gross offer obtained by Rodman less the commissions USAAP was charging for the transaction). USAAP did not disclose the amount of its commission to the owner. On August 1, 2006, the policies' owner accepted the offer presented by USAAP and on September 11, 2006, the owner received the sale proceeds, equal to the highest gross offer less the commissions charged by USAAP. On October 18, 2006, USAAP received its commission for this securities transaction equal to approximately 17% of the highest gross offer. USAAP paid approximately 90% of the commission it received to Rodman, the registered principal who determined USAAP's commission amount through negotiations with the buyer. In view of the substantial size of this transaction, the commission USAAP received for this transaction should have been set at a much lower percentage of the gross offer. Therefore, USAAP, acting through Rodman, charged commissions that were excessive, and therefore unreasonable and unfair, taking into consideration all relevant circumstances.

2. Transaction for SK

In November 2005, Tubbergen met with the owner of SK's policy and discussed the owner's desire to surrender the variable life insurance policy on SK, which had a face value of \$1,362,876. At the time, SK, the insured person, was 73 years old. In December 2005 and January 2006, USAAP conducted a prequalification process with respect to SK's policy, and from January 2006 through March 2006, Rodman negotiated with multiple potential buyers. Ultimately, Rodman, Tubbergen's supervisor for the transaction, obtained the highest gross offer for SK's policy. After Rodman told him the highest gross offer, Tubbergen communicated an offer to the owner of SK's policy that was net of USAAP's commission (that is, the highest gross offer obtained by Rodman less the commissions USAAP was charging for the transaction). USAAP did not disclose the amount of its commission to the owner. On March 8, 2006, the policy's owner accepted the offer presented by USAAP and later received the sale proceeds, equal to the highest gross offer less the commissions charged by USAAP. On November 27, 2006, USAAP received its commission for this securities transaction equal to approximately 36% of the highest gross offer. USAAP paid approximately 90% of the commission it received to Tubbergen, the registered principal who determined USAAP's commission, and Rodman, the registered principal who negotiated USAAP's commission amount with the buyer. USAAP, acting through Tubbergen and Rodman, charged commissions for this transaction that were excessive, and therefore unreasonable and unfair, taking into consideration all relevant circumstances.

3. Transaction for JI and NI

In December 2005, another firm contacted USAAP regarding the sale of the variable life insurance policy of JI and NI, husband and wife, which had a face value of \$1,250,000. The policy was owned by a family trust with an independent trustee. At the time, JI and NI, the insured persons, were both 69 years old. In December 2005 and January 2006, Rodman conducted a prequalification process with respect to JI's and NI's policy, and from January 2006 through April 2006, he negotiated with multiple potential buyers. Ultimately, Rodman obtained the highest gross offer for JI's and NI's policy. The owner of the policy was then presented with an offer that was net of USAAP's and the introducing firm's commissions (that is, the highest gross offer obtained by Rodman less the commissions USAAP and the introducing firm were charging for the transaction). USAAP did not disclose the amount of its commission to the owner. On July 28, 2006, the owner accepted the offer presented by USAAP and on September 29, 2006, the owner received the sale proceeds, equal to the highest gross offer less the commissions charged by both USAAP and the firm that introduced the transaction to USAAP. On November 13, 2006, USAAP received its commission for this securities transaction equal to approximately 17% of the highest gross offer. USAAP paid approximately 90% of the commission it received to Rodman, the registered principal who determined USAAP's commission amount through negotiations with the buyer. USAAP, acting through Rodman, charged commissions that were excessive, and therefore unreasonable and unfair, taking into consideration all relevant circumstances.

4. Transaction for the RKs

In October 2005, Rodman first discussed and began evaluating the options for the sale of the variable life insurance policy of the RKs, husband and wife, which had a face value of \$1,000,000. The policy was owned by the RKs' adult children. At the time, the RKs, the insured persons, were both about 78 years old. In October and November 2006, Rodman conducted a prequalification process with respect to the RKs' policy, and beginning in November 2006, he negotiated with multiple potential buyers. Between January 2006 and October 2006, Rodman repeatedly conducted additional processing of the policy to prepare it for sale, including getting new appraisals and obtaining signatures from the geographically dispersed owners of the policy. Ultimately, Rodman obtained the highest gross offer for the RKs' policy. The owners of the policy were then presented with an offer that was net of USAAP's commission (that is, the highest gross offer obtained by Rodman less the commissions USAAP was charging for the transaction). USAAP did not disclose the amount of its commission to the owners. On about May 26, 2006, the owners accepted the offer presented by USAAP and on November 7, 2006, the

owners received the sale proceeds, equal to the highest gross offer less the commissions charged by USAAP. On February 8, 2007, USAAP received its commission for this securities transaction equal to approximately 29% of the highest gross offer. USAAP paid approximately 90% of the commission it received to Rodman, the registered representative who determined USAAP's commission amount through negotiations with the buyer. USAAP, acting through Rodman, charged commissions that were excessive, and therefore unreasonable and unfair, taking into consideration all relevant circumstances.

5. Transaction for RG

In late June or early July 2006, Rodman was asked to locate a buyer for the sale of the variable life insurance policy of RG, which had a face value of \$750,000. The policy was owned by a trust. At the time, RG, the insured person, was 78 years old. In July 2006, Rodman conducted a prequalification process with respect to RG's policy, and between July and August 2006, he negotiated with multiple potential buyers. Ultimately, Rodman obtained the highest gross offer for the RGs' policy. The owner of the policy was then presented with an offer that was net of USAAP's commission (that is, the highest gross offer obtained by Rodman less the commissions USAAP was charging for the transaction). USAAP did not disclose the amount of its commission to the owner. On October 24, 2006, the owner accepted the offer presented by USAAP and on December 5, 2006, the owner received the sale proceeds, equal to the highest gross offer less the commissions charged by USAAP. On December 20, 2006, USAAP received its commission for this securities transaction equal to approximately 27% of the highest gross offer. USAAP paid approximately 90% of the commission it received to Rodman, the registered representative who determined USAAP's commission amount through negotiations with the buyer. USAAP, acting through Rodman, charged commissions that were excessive, and therefore unreasonable and unfair, taking into consideration all relevant circumstances.

Inadequate Supervision of Variable Life Settlement Transactions

USAAP failed to establish written supervisory procedures describing the way the firm would determine compensation in life settlement transactions. Instead, USAAP allowed its registered representatives to negotiate the compensation amounts with the buyers of the variable life insurance policies. USAAP also failed to enforce its written supervisory procedures relating to variable life transactions. In relevant part, the procedures required USAAP to confirm the sale of a variable life insurance policy to the client at or before the completion of the transaction. The firm failed to do so. Finally, USAAP failed to establish an adequate supervisory system for life settlement transactions handled by Rodman. The individual designated as Rodman's supervisor had no prior supervisory experience and no prior experience with variable life settlement transactions before USAAP designated him to supervise Rodman's activities.

VIOLATIVE CONDUCT

A. Excessive Commissions Charged on Variable Life Settlement Transactions

During the period from September 2005 through April 2007, USAAP, acting through Rodman and Tubbergen, executed five variable life settlement transactions as described above, in which they charged commissions that were excessive, and therefore unreasonable and unfair, taking into consideration all relevant circumstances. Such acts, practices and conduct constitute separate and distinct violations of NASD Conduct Rules 2440 and 2110 and IM-2440 by USAAP, Rodman and Tubbergen.

B. Failure to Disclose Commissions and Provide Confirmation for Variable Life Settlement Transactions

During the period from September 2005 through April 2007, USAAP failed to inform each customer who engaged in a life settlement of the amount of the commissions USAAP received for the transactions, either before or after the conclusion of the variable life settlement transactions. Such acts, practices and conduct constitute separate and distinct violations of NASD Conduct Rules 2230 and 2110 by USAAP.

In addition, because variable life settlement transactions are securities transactions, USAAP was required to provide each of the customers with a confirmation of each transaction. Despite this requirement, USAAP failed to provide the customers with a confirmation of the securities transaction. As a result of the foregoing conduct, USAAP willfully violated Rule 10b-10 promulgated under the Securities Exchange Act of 1934 ("Exchange Act").

C. Inadequate Supervision of Variable Life Settlement Business

During the period from September 2005 through April 2007, USAAP failed to establish and maintain a system and establish and enforce written supervisory procedures reasonably designed to achieve compliance with applicable securities laws and regulations and FINRA rules related to its variable life settlement business. Such acts, practices and conduct constitute separate and distinct violations of NASD Conduct Rules 3010 and 2110 by USAAP.

OTHER FACTORS

USAAP is paying all of its outstanding stockholders' equity to the five customers

as partial restitution, and consequently USAAP will have no remaining assets to distribute to its stockholders at its pending dissolution.

SANCTIONS

B. Respondents also consent to the imposition of the following sanctions:

A censure of USAAP and Tubbergen.

A suspension of Rodman for ten business days from association with any FINRA firm in any capacity.

USAAP and Rodman are ordered to pay, jointly and severally, partial restitution to the five customers in the amounts specified in Attachment A, in the total amount of \$351,995, plus interest at the rate set forth in Section 6621(a)(2) of the Internal Revenue Code, 26 U.S.C. 6621(a)(2), from the date USAAP received its commission payments for each customer until the date this AWC is accepted by the NAC. Of this total partial restitution to be paid to the customers, \$52,647 is imposed jointly and severally against USAAP, Rodman, and Tubbergen for the transaction involving SK's policy.

To the extent funds are not available to pay the total partial restitution plus interest immediately, Respondents shall at all times make payments in proportion to the individual amounts owed to each of the five customers as specified in Attachment A.

A registered principal on behalf of USAAP shall submit satisfactory proof of the firm's payment of partial restitution or of reasonable and documented efforts undertaken to effect partial restitution. Such proof shall be submitted to Enforcement (FINRA District No. 8) by letter that identifies USAAP and Examination Number 20070115597 and by e-mail from a work-related account of the registered principal of USAAP to EnforcementNotice@FINRA.org. This proof shall be provided to Enforcement (FINRA District No. 8) no later than 120 days after acceptance of the AWC.

If for any reason USAAP cannot locate any customer identified as being owed partial restitution after reasonable and documented efforts within 120 days from the date the AWC is accepted, or such additional period agreed to by a FINRA staff member in writing, and after USAAP has paid all partial restitution and interest to those customers who have been located, USAAP shall forward any undistributed partial restitution and interest to the appropriate escheat, unclaimed property or abandoned property fund for the state in which the customer is last

known to have resided, USAAP shall provide satisfactory proof of such action to Enforcement (FINRA District No. 8) and in the manner described above, within 14 days of forwarding the undistributed partial restitution and interest to the appropriate state authority.

Tubbergen shall submit satisfactory proof of his payment of the partial restitution or of his reasonable and documented efforts undertaken to effect the partial restitution to the owner of SK's policy. Such proof shall be submitted to Enforcement (FINRA District No. 8) by letter that identifies Tubbergen and Examination Number 20070115597 and includes a copy of the check, money order or other method of payment and by e-mail, with pdf copies of the payment documentation, to EnforcementNotice@FINRA.org. This proof shall be provided to Enforcement (FINRA District No. 8) no later than 120 days after acceptance of the AWC.

If for any reason Tubbergen cannot locate the owner of SK's policy after reasonable and documented efforts within 120 days from the date the AWC is accepted, or such additional period agreed to by a FINRA staff member in writing, Tubbergen shall forward any undistributed partial restitution and interest to the appropriate escheat, unclaimed property or abandoned property fund for the state in which the owner of SK's policy is last known to have resided. Tubbergen shall provide satisfactory proof of such action to Enforcement (FINRA District No. 8) and in the manner described above, within 14 days of forwarding the undistributed partial restitution and interest to the appropriate state authority.

Rodman shall submit satisfactory proof of his payment of the partial restitution or of his reasonable and documented efforts undertaken to effect the partial restitution. Such proof shall be submitted to Enforcement (FINRA District No. 8) by letter that identifies Rodman and Examination Number 20070115597 and includes a copy of the check, money order or other method of payment and by e-mail, with .pdf copies of the payment documentation, to EnforcementNotice@FINRA.org. This proof shall be provided to Enforcement (FINRA District No. 8) no later than 120 days after acceptance of the AWC.

If for any reason Rodman cannot locate any customer identified as being owed partial restitution after reasonable and documented efforts within 120 days from the date the AWC is accepted, or such additional period agreed to by a FINRA staff member in writing, and after Rodman has paid all partial restitution and interest to those customers who have been located, Rodman shall forward any undistributed partial restitution and interest to the appropriate escheat, unclaimed property or abandoned property fund for the state in which the customer is last known to have resided. Rodman shall provide satisfactory proof of such action to Enforcement (FINRA District No. 8) and in the manner described above, within

14 days of forwarding the undistributed partial restitution and interest to the appropriate state authority.

USAAP has submitted a sworn financial statement and demonstrated a limited ability to pay. USAAP's limited ability to pay has been considered in connection with the monetary sanctions imposed in this matter, including the order for partial restitution. In light of the financial status of USAAP, the sanctions do not include a monetary fine.

With regard to the partial restitution order, USAAP specifically and voluntarily waives any right to claim that it is unable to pay at any time hereafter the monetary sanctions imposed in this matter.

Rodman has submitted a sworn financial statement and demonstrated a limited ability to pay. Rodman's limited ability to pay has been considered in connection with the monetary sanctions imposed in this matter, including the order for partial restitution. In light of the financial status of Rodman, the sanctions do not include a monetary fine.

With regard to the partial restitution order, Rodman specifically and voluntarily waives any right to claim that he is unable to pay at any time hereafter the monetary sanctions imposed in this matter.

With regard to the partial restitution order, Tubbergen has specifically and voluntarily waived any right to claim an inability to pay at any time hereafter the monetary sanctions imposed in this matter.

The imposition of a restitution order or any other monetary sanction herein, and the timing of such ordered payments, does not preclude customers from pursuing their own actions to obtain restitution or other remedies.

Rodman understands that if he is barred or suspended from associating with any FINRA firm, he becomes subject to a statutory disqualification as that term is defined in Section 3(a)(39) of the Exchange Act, as amended. Accordingly, Rodman may not be associated with any FINRA firm in any capacity, including clerical or ministerial functions, during the period of the bar or suspension (see FINRA Rules 8310 and 8311).

USAAP understands that this settlement includes a finding that it willfully violated Rule 10b-10 promulgated under the Exchange Act and that under Article III, Section 4 of FINRA's By-Laws, this makes the firm subject to a statutory disqualification with respect to membership.

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

II.

WAIVER OF PROCEDURAL RIGHTS

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

- A. To have a Complaint issued specifying the allegations against Respondents;
- 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, Respondents specifically and voluntarily waive 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.

Respondents 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

Respondents 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;

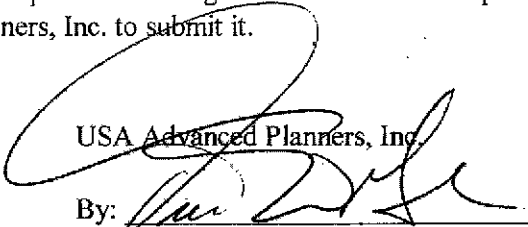
- B. If this AWC is not accepted, its submission will not be used as evidence to prove any of the allegations against Respondents; and
- C. If accepted:
 - 1. this AWC will become part of Respondents' permanent disciplinary record and may be considered in any future actions brought by FINRA or any other regulator against Respondents;
 - 2. this AWC will be made available through FINRA's public disclosure program in response to public inquiries about Respondents' 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. Respondents 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. Respondents 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 Respondents' right to take legal or factual positions in litigation or other legal proceedings in which FINRA is not a party.
- D. Respondents may attach a Corrective Action Statement to this AWC that is a statement of demonstrable corrective steps taken to prevent future misconduct. Respondents understand that they 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.
- E. The firm understands that this settlement includes a finding that it willfully violated Rule 10b-10 promulgated under the Exchange Act and that under Article III, Section 4 of FINRA's By-Laws, this makes the firm subject to a statutory disqualification with respect to membership.

The undersigned, on behalf of USA Advanced Planners, Inc., certifies that a person duly authorized to act on its behalf has read and understands all of the provisions of this AWC and has been given a full opportunity to ask questions about it; that USA Advanced Planners, Inc. 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 USA Advanced Planners, Inc. to submit it.

October 20, 2010

Date

USA Advanced Planners, Inc.

By: 

Title: E.V.T.

Reviewed by:



Shane B. Hansen, Partner

Warner Norcross & Judd LLP

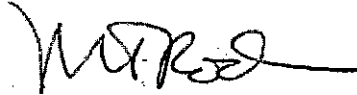
Counsel for Respondent USA Advanced Planners, Inc.

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I, Michael Rodman, 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.

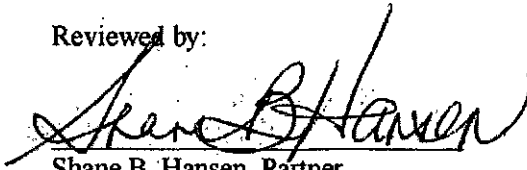
October 20, 2010

Date



Michael Rodman, Respondent

Reviewed by:



Shane B. Hansen, Partner
Warner Norcross & Judd LLP
Counsel for Respondent Michael Rodman

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Accepted by FINRA:

November 16, 2010
Date

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



Marcletta Kerr
Senior Regional Counsel
FINRA Department of Enforcement
55 West Monroe Suite 2700
Chicago, IL 60603
(o) 312.899.4400; (f) 312.899.4600

Attachment A

Schedule of Payment of Customer Restitution

Variable Life Insurance Policy's Insured	Amount of Restitution to Be Paid to Policy's Owner(s)	Date Firm Received Commission Payment
Jl and NI	\$1,350	November 13, 2006
RG	\$22,250	December 20, 2006
RKs	\$22,595	February 8, 2007
SK	\$77,800	November 27, 2006
JM	\$228,000	October 18, 2006