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FINANCIAL INDUSTRY REGULATORY AUTHORITY (FINRA)
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2008012446901

REGISTRATION & DISCLOSURE

To: Department of Enforcement
Financial Industry Regulatory Authority

Re: Christopher J. Guetzkow
General Securities Representative
CRD No. 4183327

RECEIVED
JUL 13 2009
FINRA District 4

Pursuant to FINRA Rule 9216 of FINRA Code of Procedure, I, Christopher J. Guetzkow (Guetzkow), 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. I 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

Guetzkow entered the securities industry in May 2000. From February 8, 2005 through December 31, 2007, Guetzkow was associated with ING Financial Partners, Inc. (ING) as a sales representative and was registered with FINRA as a general securities representative. Guetzkow is not currently associated with any FINRA member. However, FINRA retains jurisdiction over Guetzkow pursuant to Article V, Section 4 of the FINRA By-Laws.

Relevant Disciplinary History

Guetzkow has not been the subject of prior formal disciplinary action by FINRA.

Overview

Guetzkow failed to amend his Form U4 to disclose two judgments entered against him. This conduct violates Article V, Section 2 of the NASD Bylaws and NASD Conduct Rule 2110.

In addition, Guetzkow failed to appear for an on-the-record interview (OTR) scheduled for January 9, 2009. This conduct violates FINRA Rules 8210 and 2010.

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Facts and Violative Conduct

On February 1, 2005, Guetzkow completed a Form U4. Question 14M. of the Form U4 asked: "Do you have any unsatisfied judgments or liens against you?" Guetzkow checked the "NO" box.

The Form U4 that Guetzkow completed contained the following statement: "I understand and certify that the representations in this form apply to all employers with whom I seek registration as indicated in Section 1 ... I agree to update this form by causing an amendment to be filed on a timely basis whenever changes occur to answers previously reported."

Guetzkow subsequently completed Form U4 amendments on July 12, 2005, relating to an address change, and on September 27, 2007, relating to becoming registered with the state of Arizona. Guetzkow did not make any further disclosures on his Form U4.

Guetzkow and his brother, RLG, entered into a promissory note, on behalf of their company HomeLink Mortgage Corp. (HomeLink Mortgage), with HLB. HLB is a Utah limited liability company that, among other things, provides financing for businesses. The promissory note was in the amount of \$212,565.12. Guetzkow and RLG both signed a Guaranty on the promissory note.

HomeLink Mortgage, RLG and Guetzkow subsequently failed to honor the terms of the promissory note and the Guaranty.

JB, the owner of HLB, filed a lawsuit against HomeLink Mortgage, RLG and Guetzkow in the Hennepin County, Minnesota District Court on April 20, 2005. On June 14, 2005, the Hennepin County District Court entered a joint and several Judgment against HomeLink Mortgage, RLG and Guetzkow, in the amount of \$75,250, along with \$8,624 in attorney's fees. The Judgment remained unsatisfied until at least January 1, 2006.

Guetzkow did not amend his Form U4 to reflect the Judgment relating to the JB lawsuit. Through this conduct Guetzkow violated Article V, Section 2 of the NASD Bylaws and NASD Conduct Rule 2110.

HomeLink Mortgage, RLG and Guetzkow were a party to a lease for office space in Utah. The lease was with PDLC, and was dated October 24, 2002. Because of an apparent default in the lease, HomeLink Mortgage, RLG and Guetzkow entered into a "Settlement Agreement and Release of All Claims" (the Settlement Agreement) on September 15, 2004. According to the terms of the Settlement Agreement, HomeLink Mortgage, RLG and Guetzkow paid PDLC \$3,000 on the date of the settlement, and were required to pay \$37,000 in monthly installments

of first \$900 per month, and then \$1,800 per month, until the balance of \$37,000 was paid off.

On November 14, 2006, the Fourth Judicial District of Utah County, State of Utah, entered a "Judgment" against HomeLink Mortgage, RLG and Guetzkow. The Court entered a joint and several Judgment against RLG and Guetzkow for \$43,250.98, plus attorney's fees and interest. The Judgment remained unsatisfied until at least January 29, 2007.

Guetzkow did not amend his Form U4 to reflect the November 14, 2006, Judgment against him. Through this conduct Guetzkow violated Article V, Section 2 of the NASD Bylaws and NASD Conduct Rule 2110.

After FINRA opened an investigation, FINRA staff scheduled an OTR of Guetzkow. Specifically, on December 23, 2008, FINRA staff sent Guetzkow a letter requesting his appearance for an OTR. The letter was sent pursuant to and in accordance with FINRA Rule 8210. The letter requested Guetzkow's appearance for an OTR on January 9, 2009, at the FINRA office in Kansas City, Missouri. Guetzkow did not appear for his OTR on January 9, 2009.

Guetzkow received actual notice of the January 9, 2009 OTR, which was scheduled pursuant to the December 23, 2008 letter. The December 23, 2008 letter scheduling the OTR for January 9, 2009, was sent to Guetzkow's residential address, as listed in CRD. The letter was sent certified mail, return receipt requested, and first class mail. Guetzkow signed the receipt for the certified mailing, and the first class mailing was not returned. Guetzkow advised FINRA staff that he received the notice, and was not going to appear at the OTR.

Through this conduct, Guetzkow violated FINRA Rules 8210 and 2010.

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

- a bar from association with any FINRA member in any capacity.

The sanctions imposed herein shall be effective on a date set by FINRA staff. Pursuant to FINRA Rule 8313, a bar or expulsion shall become effective upon approval or acceptance of this AWC.

II. WAIVER OF PROCEDURAL RIGHTS

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

- A. To have a Formal Complaint issued specifying the allegations against me;
- 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, 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:

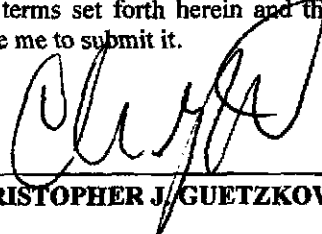
- A. Submission of this AWC is voluntary and will not resolve this matter unless and until it has been reviewed and accepted by the NAC, a Review Subcommittee of the NAC, or the Office of Disciplinary Affairs (ODA), pursuant to FINRA Rule 9216;
- B. If this AWC is not accepted, its submission will not 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 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.)

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.

6-22-09

Date


CHRISTOPHER J. GUETZKOW

Reviewed by:



Counsel for Christopher J. Guetzkow

Accepted by FINRA:

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

7-17-09

Date


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