

**FINANCIAL INDUSTRY REGULATORY AUTHORITY (FINRA)
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2008012927501**

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REGISTRATION & DISCLOSURE

**To: Department of Enforcement
Financial Industry Regulatory Authority**

**Re: Michael D. Reis
General Securities Representative
CRD No. 4684384**

Pursuant to FINRA Rule 9216 of FINRA Code of Procedure, I, Michael Reis (Reis), 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

Reis entered the securities industry in July 2003. From January 3, 2007 through September 21, 2009, Reis was associated with Puritan Securities, Inc. and registered with FINRA as a general securities representative.

Reis is not currently associated with any FINRA member. However, FINRA retains jurisdiction over Reis pursuant to Article V, Section 4 of the FINRA By-Laws.

Relevant Prior Disciplinary History

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

Overview

Reis violated NASD Procedural Rule 8210 and NASD Conduct Rule 2010 by failing to respond to requests for information from FINRA staff.

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Facts and Violative Conduct

1. On November 25, 2008, FINRA staff sent a letter to Reis requesting his appearance for an on-the-record interview on December 10, 2008 at the FINRA office in Kansas City, Missouri. The interview was scheduled to question Reis about his involvement in the sale of Coadum Capital Fund II and Coadum Capital Fund III and other potential misconduct. This letter was sent pursuant to and in accordance with NASD Procedural Rule 8210.
2. On December 5, 2008, the staff sent a second letter to Reis requesting his appearance for an on-the-record interview on December 10, 2008 at the FINRA office in Kansas City, Missouri. The interview was scheduled to question Reis about his involvement in the sale of Coadum Capital Fund II and Coadum Capital Fund III and other potential misconduct. This letter was sent pursuant to and in accordance with NASD Procedural Rule 8210.
3. Reis did not appear for the interview as requested.
4. Through this conduct, Reis violated NASD Procedural Rule 8210 and NASD Conduct Rule 2110.

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(e), 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 Rule 8310.)

