

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
No. 2008013278101**

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

RE: Lawrence McCoy
Limited Registered Representative
CRD No. 1194902

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, I, Lawrence McCoy, 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

Between January 2004 and April 2008, McCoy was registered as an Investment Company and Variable Contracts Products Representative and as a Direct Participation Programs Limited Representative with ING Financial Partners, Inc. Since July 2008, he has not been registered with any other FINRA member. McCoy has no prior disciplinary history.

OVERVIEW

McCoy converted funds totaling approximately \$78,000 from his elderly mother-in-law in violation of NASD Rule 2110.

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FACTS AND VIOLATIVE CONDUCT

- A. 1. Between January 1998 and December 2007, Lawrence McCoy converted funds belonging to elderly public customer AN totaling approximately \$44,000, without her knowledge and consent, in violation of NASD Rule 2110. He did so by contacting the mutual fund company that held AN's funds and by requesting a redemption on fifteen separate occasions.
2. Between July 2003 and February 2006, McCoy converted additional funds belonging to public customer AN totaling \$34,000, without her knowledge and consent, in violation of NASD Rule 2110. He accomplished this by forging six of AN's checks and making them payable to Hallbrook Asset Management, a company disclosed to the firm as an outside business activity controlled by McCoy.

- B. I also consent to the imposition of a bar from association with any FINRA member in any capacity.¹

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 8313).

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

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;

¹ On August 20, 2009, a Michigan criminal court ordered that McCoy, who had previously repaid AN approximately \$40,000, pay her restitution in the amount of \$35,000.

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

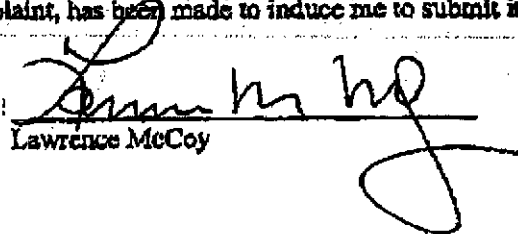
I understand that:

- 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.

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.

10-28-09
Date


Lawrence McCoy

Reviewed by:

Date

Accepted by FINRA:
10-30-09
Date

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


Richard A. March
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