

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
OFFICE OF HEARING OFFICERS**

Department of Enforcement,

Complainant,

v.

Verne Dickerson,
CRD No. 5508658,

Respondent.

Disciplinary Proceeding
No. 2008013978501

Hearing Officer Andrew H. Perkins

**ORDER ACCEPTING OFFER OF
SETTLEMENT**

Date: February 10, 2009

INTRODUCTION

Disciplinary Proceeding No. 2008013978501 was filed on December 31, 2008, by the Department of Enforcement of the Financial Industry Regulatory Authority (FINRA) (Complainant). Respondent Verne Dickerson submitted an Offer of Settlement (Offer) to Complainant on January 27, 2009. Pursuant to FINRA Rule 9270(e), the Complainant and the National Adjudicatory Council (NAC), a Review Subcommittee of the NAC, or the Office of Disciplinary Affairs (ODA) have accepted the uncontested Offer. Accordingly, this Order now is issued pursuant to FINRA Rule 9270(e)(3). The findings, conclusions and sanctions set forth in this Order are those stated in the Offer as accepted by the Complainant and approved by the NAC.

Under the terms of the Offer, Respondent has consented, without admitting or denying the allegations of the Complaint, 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, to the entry of

findings and violations consistent with the allegations of the Complaint, and to the imposition of the sanctions set forth below, and fully understands that this Order will become part of Respondent's permanent disciplinary record and may be considered in any future actions brought by FINRA.

BACKGROUND

Dickerson (CRD No. 5508658) first entered the securities industry on or about June 11, 2008 when he associated with member firm, ING Financial Partners Inc. (ING or Firm), as a non-registered employee. ING terminated Dickerson's employment with the Firm on June 24, 2008. Dickerson has not been associated with any member of FINRA since. FINRA has jurisdiction over Dickerson and the instant conduct pursuant to Article V, Section 4, of the FINRA By-Laws.

FINDINGS AND CONCLUSIONS

It has been determined that the Offer be accepted and that findings be made as follows:

Violations of NASD Rule 2110 and IM-1000-1

On December 17, 2001, a felony arrest warrant was issued for Dickerson's arrest, charging him with felony grand larceny for allegedly stealing a black leather jacket from a Kohl's department store in Virginia. The felony charge against Dickerson was later amended to petit larceny, a misdemeanor, to which Dickerson pleaded guilty. Dickerson was placed on first time offender probation, and the matter was dismissed after he completed his required probation.

Form U-4 (rev. 10/2005) asks registered representatives the following questions:

- 14A. (1) Have you ever: (a) been convicted or pled guilty or no lo contendere ("no contest") in a domestic, foreign, or military court to any felony? (b) been charged with any felony?

14B. (1) Have you ever: (a) been convicted or pled guilty or no lo contendere ("no contest") in a domestic, foreign, or military court to a misdemeanor involving: investments or an investment-related business or any fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses? (b) been charged with a misdemeanor specified in 14B(1)(a)?

On or about June 11, 2008, Dickerson completed the Form U-4 and the background disclosure form in connection with his application for employment with ING. Dickerson answered "No" to Questions 14A and 14B on his Form U-4. In so doing, Dickerson failed to disclose the felony and misdemeanor charges and the misdemeanor guilty plea and conviction. This failure rendered the form inaccurate so as to be misleading.

When Dickerson completed his Firm background disclosure form, he answered "Yes" to the following two questions: "Have you ever been arrested?"; and "Have you ever been charged or convicted of any misdemeanor or felony?" In explaining his answers, however, Dickerson wrote only that he was charged with being drunk in public, paid a fine, and was not required to appear in court. Dickerson did not disclose any other criminal matters. Dickerson intentionally failed to disclose his complete criminal history on his background disclosure form and his Form U-4.

On or about June 17, 2008, the Firm obtained Dickerson's Department of Justice Report and learned from it that Dickerson had made misstatements on the Firm's background disclosure form and on his Form U-4. Dickerson's Department of Justice Report stated that he had been arrested on January 8, 2000 for possession of marijuana and on December 13, 2001 for felony grand larceny. The Firm terminated Dickerson's employment on June 24, 2008.

Violations of NASD Rules 8210 and 2110

By letter dated July 31, 2008, FINRA's Member Regulation Department issued a request to Dickerson, pursuant to NASD Rule 8210, requesting that he provide certain information relating to his termination from the Firm. The request letter, dated July 31, 2008, was sent via certified mail, return receipt requested, and regular first-class U.S. mail to Dickerson's CRD address. The signature card was signed by Dickerson. The copy of the letter sent by first class mail was not returned as undeliverable.

By letter dated October 10, 2008 sent via certified mail, return receipt requested, and regular first-class U.S. mail to Dickerson's CRD Address, Enforcement requested that he provide certain information relating to his termination from the Firm, pursuant to NASD Rule 8210. The certified copy of the request letter was returned to Enforcement as "unclaimed." The copy of the request letter sent by first class mail was not returned as undeliverable.

In a telephone conversation with the Staff on October 27, 2008, Dickerson admitted that he received the Department's October 10, 2008 Rule 8210 request. Dickerson failed to respond to either request letter.

Based on the foregoing, Respondent:

1. Willfully violated NASD Rule 2110 and IM-1000-1; and
2. Violated NASD Rules 2110 and 8210.

Based on these considerations, the sanctions hereby imposed by the acceptance of the Offer are in the public interest, are sufficiently remedial to deter Respondent from any future misconduct, and represent a proper discharge by FINRA, of its regulatory responsibility under the Securities Exchange Act of 1934.

SANCTIONS

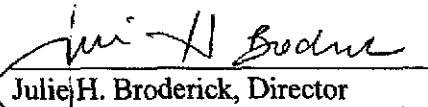
It is ordered that Respondent be barred from associating in any capacity with any FINRA member.

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 Order.

SO ORDERED.

FINRA

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


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