

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

Department of Enforcement,

Complainant,

v.

Bradley D. Buchanan (CRD No. 5521070),

Respondent.

DISCIPLINARY PROCEEDING
No. 2008015279301

HEARING OFFICER – RSH

**ORDER ACCEPTING OFFER OF
SETTLEMENT**

Date: June 16, 2010

INTRODUCTION

Disciplinary Proceeding No. 2008015279301 was filed on April 30, 2010, by the Department of Enforcement of the Financial Industry Regulatory Authority (FINRA) (Complainant). Respondent Bradley D. Buchanan submitted an Offer of Settlement (Offer) to Complainant on May 28, 2010. 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

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the sanction 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

Respondent entered the securities industry in April 2008 when he became employed with Country Capital Management Company ("CCMC" or the "Firm"). In May 2008, Respondent became registered as an Investment Company and Variable Products Representative (Series 6), and he remained in that position until his employment was terminated on September 25, 2008. Respondent is not currently employed in the securities industry, but remains subject to FINRA jurisdiction pursuant to Article V, Section 4 of the NASD By-laws. Respondent has no prior disciplinary history in the securities industry.

On or about May 28, 2010, an Offer was executed by Respondent, pursuant to which, Respondent consented, without admitting or denying the allegations, to findings that he violated NASD Rule 2110, by filing a false insurance claim. Additionally, Respondent consented to findings that he violated FINRA Rules 8210 and 2010, by failing to appear and provide testimony in this matter.

Respondent consented to a sanction of a bar from association with any FINRA-regulated broker-dealer in any capacity.

FINDINGS AND CONCLUSIONS

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

During his employment with the Firm, Respondent was also employed by a CCMC affiliate, Country Mutual Insurance Company ("Country Insurance"). In June 2008, while dually employed by the Firm and Country Insurance, Respondent wrote a tenant's insurance policy for

himself. On this policy, he valued four lithographs at \$2,500 each, and reported that he had purchased each lithograph for \$2,000 in 2007. The policy application was signed in Respondent's name on or about June 5, 2008.

On or about August 2, 2008, Respondent submitted to Country Insurance a claim against his tenant's policy, alleging that someone had broken into his residence on July 31, 2008 and stolen the four lithographs, as well as other property. On a document he provided to the insurer, which was dated August 2, 2008 and signed by Respondent, Respondent stated that he purchased the four lithographs on January 25 and January 26, 2008, with cash, and that the current price of each was \$2,500. Respondent also submitted receipts to the insurer, purportedly from the seller of the lithographs, which indicated that the purchase price for the four lithographs was \$10,000, exclusive of fees and shipping charges.

The seller of the lithographs, however, provided the insurer with an invoice confirming that, with fees and shipping costs, Respondent paid a total purchase price of \$63.76 in January 2008 for the four lithographs.

In or about September 2008, while his claim was being investigated by the insurer, Respondent withdrew his claim.

Based on the foregoing, Respondent violated NASD Rule 2110.

By letter dated November 27, 2009, Enforcement, during its investigation of this matter, requested, pursuant to Rule 8210, that Respondent appear and provide testimony on January 12, 2010. This letter was sent to Respondent's last known address as listed on Central Records Depository ("the CRD Address") by certified mail, return receipt requested, and by first class mail (the "November 27, 2009 letter"). A copy of the November 27, 2009 letter was also sent by certified mail, return receipt requested to two other addresses that Enforcement was aware

Respondent had used in the past, based on earlier responses to Enforcement's requests for written statements.

Respondent sent Enforcement an email response to the November 27, 2009 letter. In his email response, dated December 1, 2009, Respondent indicated that he would not be appearing and providing testimony to Enforcement as requested, and that he would have no further communication with FINRA on this matter. Respondent did not appear for testimony on January 12, 2010.

Based on the foregoing, Respondent violated FINRA Rules 8210 and 2010.

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

SANCTIONS

It is ordered that Respondent be barred from association with any FINRA-regulated broker-dealer 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 Order.

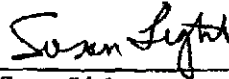
SO ORDERED.

FINRA

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

Date: _____

6/16/10



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