

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2008016403301**

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

RE: James R. Holdman, Respondent
General Securities Principal, Registered Options Principal, and
General Securities Representative
[CRD No. 3122876]

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REGISTRATION & DISCLOSURE

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, I, James R. Holdman, 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

Respondent James R. Holdman entered the securities industry in September 11, 1998, as a General Securities Representative. Holdman was associated with member firm NWT Financial Group, LLC from June 1, 2007 through October 20, 2008, and was registered with FINRA under Article V of the By-Laws as a General Securities Principal, Registered Options Principal, and a General Securities Representative. James R. Holdman is not currently registered with a FINRA member firm, but he remains subject to the jurisdiction of FINRA until October 19, 2010,

pursuant to Article V, Section 4 of FINRA's By-Laws, which provides for a two-year period of retained jurisdiction over formerly registered persons. James R. Holdman has not previously been the subject of a formal disciplinary action by any regulatory body.

OVERVIEW

James R. Holdman failed to appear for on-the-record testimony requested pursuant to FINRA Rule 8210.

FACTS AND VIOLATIVE CONDUCT

James R. Holdman was the branch manager of the Baton Rouge, Louisiana office of member firm NWT Financial Group, LLC. In addition to his branch manager duties, Holdman also managed at least three independent hedge funds through his registered investment advisor firm, Greenwing Securities, Inc. FINRA sought information from Holdman regarding the trading activity in the accounts for the three hedge funds maintained at NWT Financial Group, LLC.

By letter dated February 17, 2009, FINRA staff requested that James R. Holdman appear for on-the-record testimony on March 3, 2009, and provide certain information to the staff regarding the hedge fund trading activity. This request for information was sent to Holdman's residential address as reflected in the Central Registration Depository and was sent pursuant to, and in accordance with, the provisions of FINRA Rule 8210. Holdman informed FINRA that he would not appear for his scheduled on-the-record testimony, and Holdman, in fact, did not appear on March 3, 2009, to provide the information requested.

By letter dated March 6, 2009, FINRA staff again requested that Holdman appear for on-the-record testimony on March 13, 2009. This request for information was sent to Holdman's residential address as reflected in the Central Registration Depository and was sent pursuant to, and in accordance with, the provisions of FINRA Rule 8210. Holdman did not appear on March 13, 2009, to provide the information requested.

Such acts, practices, and conduct constitute a violation of FINRA Rule 8210 and FINRA Rule 2010 by James R. Holdman.

- B. I also consent to the imposition of the following sanction:

A bar of James R. Holdman from association with any member of FINRA in any capacity.

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).

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.

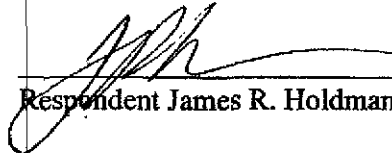
OTHER MATTERS

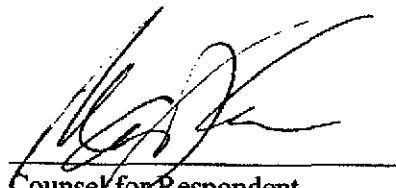
I understand that:

- 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.

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.

1-APR-05
Date

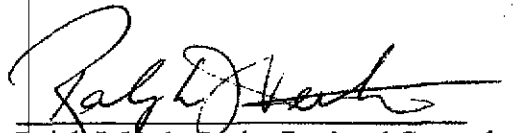

Respondent James R. Holdman


Counsel for Respondent
MacMagna J. Achee
La BN 02299

Accepted by FINRA:

April 7, 2009
Date

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


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