

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2009019375901**

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

RE: John Steven Bisaha
Registration Securities Representative
CRD No. 4668650

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, John Steven Bisaha (Bisaha or Respondent) submits 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 Respondent alleging violations based on the same factual findings described herein.

I.

ACCEPTANCE AND CONSENT

- A. Respondent hereby accepts and consents, 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

John Steven Bisaha became registered as a General Securities Representative (Series 7) on August 27, 2003, and worked in that capacity with different registered firms since becoming registered until August 25, 2009, when his registration was terminated. From August 27, 2008 until August 25, 2009, Bisaha was registered with Allstate Financial Services, LLC. Bisaha is not currently registered with a FINRA firm.

RELEVANT DISCIPLINARY HISTORY

Bisaha has no relevant disciplinary history.

OVERVIEW

Bisaha failed to respond to three written requests for information from FINRA seeking information about his alleged submission of false documents to his firm.

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FACTS AND VIOLATIVE CONDUCT

1. On May 18, 2010, June 7, 2010 and June 24, 2010, FINRA sent written requests for information to Bisaha, seeking documents and information relating to his alleged submission of false documents to Allstate. Allstate terminated Bisaha following an internal investigation in which it determined that Bisaha had submitted falsified customer account statements in order to receive commission payments for variable annuity transactions. The requests for information were sent by first class and certified mail to Bisaha's CRD address and other addresses which FINRA became aware of, pursuant to FINRA Rule 8210. The certified mail receipts for the 8210 request letters sent to Bisaha's CRD address were all signed by Bisaha and returned to FINRA.
 2. Bisaha communicated with FINRA staff, acknowledging his receipt of the written requests for information described above.
 3. Bisaha has failed to respond to any of FINRA's written requests for information.
 4. Bisaha's failure to respond to FINRA's written requests for information constitutes violations of FINRA Rules 8210 and 2010.
- B. Respondent also consents to the imposition of the following sanctions:
- A bar from association with any FINRA broker-dealer, in any capacity.

Respondent understands that if he is barred or suspended from associating with any FINRA member, Respondent becomes subject to a statutory disqualification as that term is defined in Article III, Section 4 of FINRA's By-Laws, incorporating Section 3(a)(39) of the Securities Exchange Act of 1934. Accordingly, Respondent 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

Respondent specifically and voluntarily waives the following rights granted under FINRA's Code of Procedure:

- A. To have a Complaint issued specifying the allegations against Respondent;
- B. To be notified of the 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, Respondent specifically and voluntarily waives 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.

Respondent further specifically and voluntarily waives 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

Respondent understands 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 Respondent; and
- C. If accepted:
 - 1. *this AWC will become part of Respondent's permanent disciplinary record and may be considered in any future actions brought by FINRA or any other regulator against Respondent;*
 - 2. *this AWC will be made available through FINRA's public disclosure program in response to public inquiries about Respondent's 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. *Respondent 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. Respondent 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 Respondent's right to take legal or factual positions in litigation or other legal proceedings in which FINRA is not a party.*

John Steven Bisaha certifies that he has read and understands all of the provisions of this AWC and has been given a full opportunity to ask questions about it; that Respondent has 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 Respondent to submit it.

23 June 2011
Date


John Steven Bisaha, Respondent

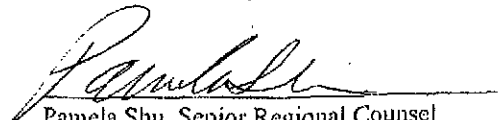
Reviewed by:

Attorney Name
Counsel for Respondent
Firm Name
Address
City/State/Zip
Phone Number

Accepted by FINRA:

July 6, 2011
Date

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


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