

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2010024179001**

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

RE: Paul C. Larsen, Respondent
CRD No. 1066833

Quentin M. Silic, Respondent
CRD No. 4222363

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, Respondent Paul C. Larsen (Larsen) and Respondent Quentin M. Silic (Silic) (collectively, Respondents) 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 Respondents alleging violations based on the same factual findings described herein.

I.

ACCEPTANCE AND CONSENT

- A. Respondents 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

Larsen entered the securities industry in 1982. He was associated with VSR Financial Services, Inc. (VSR) from June 4, 2004 through September 13, 2010, where he was registered as a general securities representative and an investment company products and variable contracts representative. Larsen is not currently associated with a FINRA regulated firm but is within FINRA's jurisdiction pursuant to Article V, Section 4 of FINRA's By-Laws. Larsen has no relevant disciplinary history.

Silic entered the securities industry in 2000. He was associated with VSR from May 24, 2004 through April 19, 2010, where he was registered as a general securities representative and, for the period or May 24, 2004 through December

31, 2007, an investment company products and variable contracts representative. Silic was associated with another member firm from April 14, 2010 through October 28, 2010, where he was registered as a general securities representative. Silic is not currently associated with a FINRA regulated firm but is within FINRA's jurisdiction pursuant to Article V, Section 4 of FINRA's By-Laws. Silic has no relevant disciplinary history.

FACTS AND VIOLATIVE CONDUCT

On October 12, 2011, FINRA staff sent a Rule 8210 request to each of the Respondents to obtain information and documentation regarding possible undisclosed outside business activities and/or private securities transactions. The letters were sent to each Respondent's CRD address by first class and certified mail. Through counsel, Respondents advised FINRA that they would not provide FINRA staff with the requested information and documentation. By not providing requested information and documents, Respondents violated FINRA Rules 8210 and 2010.

- B. Respondents also consent to the imposition of the following sanctions:

A bar from association with any FINRA member in any capacity.

Respondents understand that if they are barred or suspended from associating with any FINRA member, they become 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, Respondents 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 of this AWC.

II.

WAIVER OF PROCEDURAL RIGHTS

Respondents specifically and voluntarily waive the following rights granted under FINRA's Code of Procedure:

- A. To have a Complaint issued specifying the allegations against them;
- 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, Respondents 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.

Respondents 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

Respondents understand that:

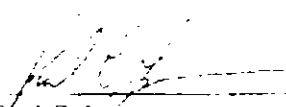
- A. Submission of this AWC is voluntary and will not resolve this matter unless and until it has been reviewed and accepted by the NAC, a Review Subcommittee of the NAC, or the Office of Disciplinary Affairs ("ODA"), pursuant to FINRA Rule 9216;
- B. If this AWC is not accepted, its submission will not be used as evidence to prove any of the allegations against Respondents; and
- C. If accepted:
 - 1. this AWC will become part of Respondents' permanent disciplinary record and may be considered in any future actions brought by FINRA or any other regulator against them;
 - 2. this AWC will be made available through FINRA's public disclosure program in response to public inquiries about Respondents' disciplinary

record;

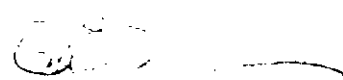
3. FINRA may make a public announcement concerning this agreement and the subject matter thereof in accordance with FINRA Rule 8313; and
4. Respondents may not take any action or make or permit to be made any public statement, including in regulatory filings or otherwise, denying, directly or indirectly, any finding in this AWC or create the impression that the AWC is without factual basis. Respondents 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 Respondents' right to take legal or factual positions in litigation or other legal proceedings in which FINRA is not a party.

Respondents certify that they have read and understand all of the provisions of this AWC and have been given a full opportunity to ask questions about it; that they 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 them to submit it.

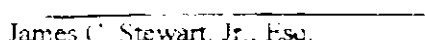
Date


Paul C. Larsen

Date


Quentin M. Silic

Reviewed by


James C. Stewart, Jr., Esq.
3811 Airport Road North, Ste. 205
Naples, Florida 34105-2512

Accepted by FINRA:

Date

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

Heather Hawker
Senior Regional Counsel
FINRA Department of Enforcement
4600 S. Syracuse St., Suite 1400
Denver, Colorado 80237-2719
(303) 446-3110
Fax No. (303) 620-9450
heather.hawker@finra.org