

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 20100248104**

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

RE: Alan Goings, Respondent
Investment Company and Variable Contracts Products Representative
CRD No. 5600632

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, Alan Goings ("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 me 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

Respondent was born in [REDACTED]. Respondent entered the securities industry on September 29, 2008 as a financial services representative with MetLife Securities, Inc. ("MetLife" or the "Firm") and remained employed there until October 15, 2010. Respondent was also employed at the Firm's insurance affiliate, Metropolitan Life Insurance Company. In October 2008, Respondent was qualified as an investment company products/variable contracts limited representative and as a state securities agent through a Series 6 and Series 63 examinations, respectively.

On or about October 15, 2010 Respondent was terminated by the Firm and its insurance affiliate for failing to disclose his arrest on three felony charges for submitting false documents to a federally insured bank. Respondent also failed to update his Uniform Application for Securities Industry Registration ("Form U-4") to reflect these charges. Respondent thereby acted in contravention of Article V, Section 2 of the FINRA By-Laws and violated FINRA Rules 1122 and 2010.

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FINRA retains jurisdiction over Respondent pursuant to Article V, Section 4 of FINRA's By-Laws.

RELEVANT DISCIPLINARY HISTORY

Respondent does not have any prior disciplinary history in the securities industry.

FACTS AND VIOLATIVE CONDUCT

FINRA Rule 1122 prohibits members or associated persons with a member from filing with FINRA information regarding registration "which is incomplete or inaccurate so as to be misleading, or which could in any way tend to mislead, or fail to correct such filing after notice thereof."

Article V, Section 2(c) of the FINRA By-Laws requires that registrations filed with FINRA be kept current at all times and that amendments must be filed with FINRA "not later than 30 days after learning of the facts or circumstances giving rise to the amendment."

FINRA Rule 2010 requires the observance of high standards of commercial honor and just and equitable principles of trade.

On or about June 16, 2010, while employed at the Firm, Respondent was arrested and charged in the United States District Court for the Northern District of Indiana with three Class B Felonies for making false statements to a federally insured bank for the purpose of obtaining mortgage loans, in violation of Title 18, Section 1014, United States Code ("the felonies"). On June 18, 2010, Respondent was arraigned on the indictment and pled "not guilty" to the charges.

Between January 2006 and May 2008, Respondent knowingly made materially false statements or submitted false reports in order to obtain mortgages for three residential properties in Indiana. Respondent submitted mortgage documentation to the bank that contained inaccurate information for ABC Company. Respondent also falsified ABC Company's balance sheets to reflect that it owned certain assets that it never had, he overvalued the properties, and he failed to disclose that he was a co-owner of ABC Company.

In September 2008, Respondent began his association with the Firm. Following his arrest on the three felony charges on or about June 16, 2010, Respondent never amended his Form U-4 to answer "yes" to item 14A(1)(b), which asked whether he had ever "been charged with any felony". Respondent's failure to amend his Form U-4 resulted in it containing inaccurate, false and materially misleading information.

Respondent knew or should have known that he was required to update his Form U-4 to disclose his felony charges.

In October 2008 and December 2009, Respondent completed statements certifying that he would notify the Firm and promptly update his Form U-4 if he were arrested or charged with any criminal offense. In March 2010, Respondent also attended the Firm's quarterly compliance meetings where Form U-4 disclosures were discussed. At these compliance meetings certain slides were shown and discussed with the attendees. One of the slides instructed that a Form U-4 should be updated if an employee is involved in a "criminal action - including an arrest, being charged, convicted or plead guilty... [or] civil judicial actions."

On August 20, 2010, in accordance with the Firm's 2010 Annual Individual Compliance Review, a registered principal of the Firm researched the Respondent's background and uncovered the arrest. During the subsequent interview, Respondent admitted that he was arrested and charged with the three felonies. Respondent stated that he did not disclose his arrest and felony charges to the Firm because he was concerned about losing his job.

By willfully failing to update his Form U-4 to reflect that he had been arrested and charged with three felonies, Respondent acted in contravention of Article V, Section 2 of the FINRA By-Laws and violated FINRA Rules 1122 and 2010.

B. Respondent also consents to the imposition of the following sanctions:

a. Six-month suspension from association with any member of FINRA in any capacity; and

b. A fine of \$5,000.

The fine shall be due and payable either immediately upon reassociation with a member firm following the six-month suspension noted above, or prior to any application or request for relief from any statutory disqualification resulting from this or any other event or proceeding, whichever is earlier.

Respondent specifically and voluntarily waives any right to claim that he is unable to pay, now or at any time hereafter, the monetary sanction imposed in this matter.

C. Respondent understands that this settlement includes a finding that he willfully omitted to state a material fact on a Form U4, and that under Section 3(a)(39)(F) of the Securities Exchange Act of 1934 and Article III, Section 4 of FINRA's By-Laws, this omission makes him subject to a statutory disqualification with respect to association with a member.

- D. Respondent also 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.

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 him;
- 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.

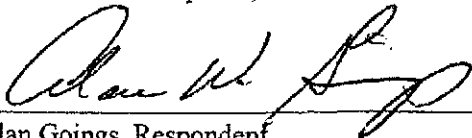
OTHER MATTERS

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 him; 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 him;
 - 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. 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. He 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.
- D. Respondent may attach a Corrective Action Statement to this AWC that is a statement of demonstrable corrective steps taken to prevent future misconduct. Respondent understands that he may not deny the charges or make any statement that is inconsistent with the AWC in this Statement. This Statement does not constitute factual or legal findings by FINRA, nor does it reflect the views of FINRA or its staff.

Respondent 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 he 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 him to submit it.

8/15/11
Date (mm/dd/yyyy)


Alan Goings, Respondent

Accepted by FINRA:

8/22/2011
Date

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


Susan Light
Senior Vice President & Chief Counsel
FINRA Department of Enforcement
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New York, NY 10005