

FINANCIAL INDUSTRY REGULATORY AUTHORITY

OFFICE OF HEARING OFFICERS

Department of Enforcement,

Complainant,

v.

Bruce R. Geiger (CRD No. 1591606),

Respondent.

DISCIPLINARY PROCEEDING
No. 2011026440401

COMPLAINT

The Department of Enforcement alleges:

I. SUMMARY

1. From October 2005 through October 2010, while associated with Thrivent Investment Management Inc. (“Thrivent” or the “Firm”), Respondent Bruce R. Geiger falsified 115 documents relating to the accounts of 14 customers. Geiger regularly added dates to customers’ signatures after customers had signed forms, re-used customers’ signatures taken from forms that they had previously executed, and altered the dates of the customers’ signatures. In each instance, Geiger submitted the altered forms to Thrivent for processing. Geiger’s acts, practices and conduct violated NASD Rule 2110 and FINRA Rule 2010.

II. RESPONDENT AND JURISDICTION

2. From August 19, 1986 through November 30, 2010, Bruce R. Geiger was associated with Thrivent and a prior predecessor member firm (collectively referenced hereinafter as “Thrivent”). Geiger was registered with FINRA through Thrivent as an Investment Company Products/Variable Contracts Representative (“IR”) (Series 6) from June 9, 1987 through December 9, 2010, and as a General Securities Representative (“GSR”) (Series 7) from July 14, 2004 through December 9, 2010. While associated with Thrivent, Geiger worked from an office in Visalia, California. From at least April 2006, his home was designated as a branch office of Thrivent. Since December 2010, Geiger has been registered as an IR and as a GSR with another FINRA member firm.

III. FACTUAL BACKGROUND

3. From October 2005 through October 2010 (“Relevant Period”), registered representatives at Thrivent utilized: (i) an “Annuity/Settlement Option Withdrawal Service Request” form to facilitate customer requests for surrenders, partial withdrawals, full withdrawals and transfers of funds in connection with various annuity contracts or life insurance settlement options; and (ii) a “Values Distribution Request” form to facilitate customer requests for distributions from life insurance contracts.

4. Although the format of the forms changed during the Relevant Period, all versions required that the customer sign and date the form.

5. Throughout the Relevant Period, Thrivent’s procedures required original and authentic customer signatures. The procedures specifically prohibited employees from signing documents on behalf of customers, even if to do so accommodated a customer’s request.

6. On several occasions, between October 2006 and June 2009, Thrivent issued written directives and guidance, available firm-wide, to remind all of its registered representatives that documents cannot be altered in any manner and that submitting a document with altered information, or submitting a document with a non-authentic signature, violated the firm's procedures and NASD or FINRA rules.

7. Notwithstanding the procedures and reminders, Geiger altered forms by adding dates to customers' signatures after the customers had signed the forms, re-used original customers' signature pages from forms that were previously executed, and altered the dates of the customers' signatures. In many instances, Geiger altered the forms previously executed by his customers, by adding signature dates in pencil, to facilitate his practice of erasing prior dates and re-dating the customers' original signatures from previously executed forms for re-use on subsequent transactions.

8. Specifically, between October 2005 and October 2010, Geiger falsified 115 forms relating to the accounts of 14 customers to cause disbursements totaling approximately \$562,008.65. These documents and transactions are more fully described in Exhibit A, attached hereto, and incorporated into this Complaint.

9. In late 2005, and again in late 2008, Thrivent reminded Geiger that re-using signatures, altering dates, and completing forms in pencil were inconsistent with the Firm's policies and procedures. But Geiger continued to engage in each of these prohibited practices for at least five years, through October 2010.

FIRST CAUSE OF ACTION
Falsification / Alteration of Customer Documents
(Violations of NASD Rule 2110 and FINRA Rule 2010)

10. The Department realleges and incorporates by reference paragraphs 1 through 9 above.

11. NASD Rule 2110 and FINRA Rule 2010 require members and their associated persons, in the conduct of their business, to “observe high standards of commercial honor and just and equitable principles of trade.”

12. As described above and detailed in Exhibit A, from October 2005 through October 2010, Geiger falsified 115 documents by using non-authentic signatures and altered dates to effect transactions relating to the accounts of customers AMH, APH, AS, BAF, EGF, EWE, JP, LAD, LML, MLL, RAL, SHM, SM and WMJ.

13. Geiger’s repeated use of falsified documents to facilitate transactions, including but not limited to annuity or life insurance settlement option surrenders, withdrawals and transfers, and life insurance distributions, was inconsistent with Thrivent’s policies and procedures, and Geiger’s obligation to conduct his business activities in accordance with ethical standards.

14. As a result of the foregoing conduct, Respondent Geiger violated NASD Rule 2110 for customer documents altered before December 15, 2008, and FINRA Rule 2010 for customer documents altered on or after December 15, 2008.

RELIEF REQUESTED

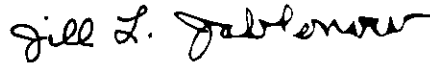
WHEREFORE, the Department respectfully requests that the Panel:

- A. make findings of fact and conclusions of law that Respondent committed the violations charged and alleged herein;

- B. order that one or more of the sanctions provided under FINRA Rule 8310(a),
including monetary sanctions, be imposed; and
- C. order that Respondent bear such costs of proceeding as are deemed fair and
appropriate under the circumstances in accordance with FINRA Rule 8330.

FINRA DEPARTMENT OF ENFORCEMENT

Date: December 30, 2014



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Bruce R. Geiger, Disciplinary Proceeding No. 2011026440401
Exhibit A to the Complaint

TOTAL Count	No. of Altered Customer Documents Charged	Customer Initials	Contract / Agreement Number	Form Number	Form Name	Date	Customer Disbursement	TOTAL Customer Disbursements
		AMH	xxx3132	10438 R12-08	Annuity / Settlement Option Withdrawal Service Request	9/28/2009	\$2,000.00	
		AMH	xxx3132	10438 R12-08	Annuity / Settlement Option Withdrawal Service Request	12/2/2009	\$4,000.00	
		AMH	xxx3132	10438 R12-08	Annuity / Settlement Option Withdrawal Service Request	12/29/2009	\$6,000.00	
		AMH	xxx3132	10438 R12-08	Annuity / Settlement Option Withdrawal Service Request	2/3/2010	\$5,000.00	
		AMH	xxx3132	10438 R12-08	Annuity / Settlement Option Withdrawal Service Request	4/2/2010	\$3,500.00	
		AMH	xxx3132	10438 R12-08	Annuity / Settlement Option Withdrawal Service Request	5/2/2010	\$4,300.00	
		AMH	xxx3132	10438 R12-08	Annuity / Settlement Option Withdrawal Service Request	6/1/2010	\$5,000.00	
		AMH	xxx3132	10438 R12-08	Annuity / Settlement Option Withdrawal Service Request	8/2/2010	\$7,000.00	
		AMH	xxx3132	10438 R12-08	Annuity / Settlement Option Withdrawal Service Request	9/26/2010	\$4,000.00	
		AMH	xxx3136	10438 R12-08	Annuity / Settlement Option Withdrawal Service Request	9/29/2010	\$4,000.00	
		AMH	xxx3132	10438 R12-08	Annuity / Settlement Option Withdrawal Service Request	10/30/2010	\$4,000.00	
	11	AMH						\$45,200.00
		APH	xxx2141	10438 R10-06	Annuity / Settlement Option Withdrawal Service Request	11/24/2006	\$6,000.00	
		APH	xxx2141	10438 R10-06	Annuity / Settlement Option Withdrawal Service Request	2/6/2007	\$10,000.00	
		APH	xxx2141	10438 R10-06	Annuity / Settlement Option Withdrawal Service Request	7/30/2007	\$10,000.00	
		APH	xxx2141	10438 R10-06	Annuity / Settlement Option Withdrawal Service Request	12/6/2007	\$16,000.00	
		APH	xxx2141	10438 R10-06	Annuity / Settlement Option Withdrawal Service Request	1/4/2008	\$6,000.00	
		APH	xxx2141	10438 R10-06	Annuity / Settlement Option Withdrawal Service Request	2/4/2008	\$7,000.00	
		APH	xxx2141	10438 R10-06	Annuity / Settlement Option Withdrawal Service Request	3/4/2008	\$10,000.00	
		APH	xxx2141	10438 R10-06	Annuity / Settlement Option Withdrawal Service Request	4/15/2008	\$2,000.00	
		APH	xxx2141	10438 R10-06	Annuity / Settlement Option Withdrawal Service Request	5/2/2008	\$10,000.00	
		APH	xxx2141	10438 R10-06	Annuity / Settlement Option Withdrawal Service Request	6/6/2008	\$10,000.00	
		APH	xxx2141	10438 R10-06	Annuity / Settlement Option Withdrawal Service Request	6/27/2008	\$10,000.00	
		APH	xxx2141	10438 R10-06	Annuity / Settlement Option Withdrawal Service Request	7/28/2008	\$5,000.00	
		APH	xxx2141	10438 R10-06	Annuity / Settlement Option Withdrawal Service Request	9/2/2008	\$7,000.00	
		APH	xxx2141	10438 R10-06	Annuity / Settlement Option Withdrawal Service Request	11/3/2008	\$13,000.00	
		APH	xxx2141	10438 R10-06	Annuity / Settlement Option Withdrawal Service Request	12/1/2008	\$10,000.00	
		APH	xxx2141	10438 R10-06	Annuity / Settlement Option Withdrawal Service Request	12/31/2008	\$7,000.00	
		APH	xxx2141	10438 R10-06	Annuity / Settlement Option Withdrawal Service Request	2/2/2009	\$6,000.00	

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		APH	xxx2141	10438 R10-06	Annuity / Settlement Option Withdrawal Service Request	3/2/2009	\$8,000.00	
		APH	xxx2141	10438 R10-06	Annuity / Settlement Option Withdrawal Service Request	4/1/2009	\$10,000.00	
		APH	xxx2141	10438 R10-06	Annuity / Settlement Option Withdrawal Service Request	5/1/2009	\$6,000.00	
		APH	xxx2141	10438 R10-06	Annuity / Settlement Option Withdrawal Service Request	5/20/2009	\$8,000.00	
		APH	xxx2141	10438 R10-06	Annuity / Settlement Option Withdrawal Service Request	6/29/2009	\$7,909.75	
	5	APH						\$38,909.75
		AS	xxx3065	10438 R12-08	Annuity / Settlement Option Withdrawal Service Request	8/3/2009	\$30,000.00	
		AS	xxx3065	10438 R12-08	Annuity / Settlement Option Withdrawal Service Request	9/22/2009	\$30,000.00	
		AS	xxx3065	10438 R12-08	Annuity / Settlement Option Withdrawal Service Request	12/7/2009	\$25,000.00	
		AS	xxx3065	10438 R12-08	Annuity / Settlement Option Withdrawal Service Request	4/7/2010	\$15,000.00	
		AS	xxx3065	10438 R12-08	Annuity / Settlement Option Withdrawal Service Request	7/27/2010	\$15,000.00	
		AS	xxx3065	10438 R12-08	Annuity / Settlement Option Withdrawal Service Request	9/21/2010	\$10,000.00	
		AS	xxx3065	10438 R12-08	Annuity / Settlement Option Withdrawal Service Request	10/19/2010	\$10,000.00	
	5	AS						\$105,000.00
		BAF	xxx7083	11090 R10-04	Values Distribution Request	10/4/2005	\$178.75	
		BAF	xxx7083	11090 R10-04	Values Distribution Request	1/4/2007	\$172.93	
		BAF	xxx7083	11090 R10-04	Values Distribution Request	3/25/2008	\$50.40	
		BAF	xxx7083	11090 R10-04	Values Distribution Request	9/10/2008	\$151.16	
		BAF	xxx7083	11090 R10-04	Values Distribution Request	3/24/2010	\$50.40	
		BAF	xxx7083	11090 R10-04	Values Distribution Request	7/17/2010	\$144.30	
	5	BAF						\$747.94
		EGF	xxx4648	11090 R10-04	Values Distribution Request	10/4/2005	\$290.81	
		EGF	xxx4648	11090 R10-04	Values Distribution Request	1/4/2007	\$284.60	
		EGF	xxx4648	11090 R10-04	Values Distribution Request	3/25/2008	\$83.71	
		EGF	xxx4648	11090 R10-04	Values Distribution Request	9/10/2008	\$260.18	
		EGF	xxx4648	11090 R10-04	Values Distribution Request	1/28/2010	\$254.41	
	5	EGF						\$1,173.71

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Exhibit A to the Complaint

TOTAL Count	No. of Altered Customer Documents Charged	Customer Initials	Contract / Agreement Number	Form Number	Form Name	Date	Customer Disbursement	TOTAL Customer Disbursements
		EWE	xxx9967	10438 R9-05 / 10438 R1-04	Annuity / Settlement Option Withdrawal Service Request	11/2/2005	\$2,845.91	
		EWE	xxx9967	10438 R9-05	Annuity / Settlement Option Withdrawal Service Request	2/2/2006	\$2,845.91	
		EWE	xxx9967	10438 R9-05	Annuity / Settlement Option Withdrawal Service Request	4/24/2006	\$2,845.91	
		EWE	xxx9966	10438 R6-06	Annuity / Settlement Option Withdrawal Service Request	8/1/2006	\$2,845.91	
		EWE	xxx9966	10438 R6-06	Annuity / Settlement Option Withdrawal Service Request	10/23/2006	\$2,845.91	
		EWE	xxx9966	10438 R6-06	Annuity / Settlement Option Withdrawal Service Request	1/29/2007	\$2,845.91	
		EWE	xxx9966	10438 R6-06	Annuity / Settlement Option Withdrawal Service Request	4/24/2007	\$2,845.91	
		EWE	xxx9966	10438 R6-06	Annuity / Settlement Option Withdrawal Service Request	7/27/2007	\$2,845.91	
		EWE	xxx9966	10438 R6-06	Annuity / Settlement Option Withdrawal Service Request	10/30/2007	\$2,845.91	
		EWE	xxx9966	10438 R6-06	Annuity / Settlement Option Withdrawal Service Request	4/26/2008	\$2,845.91	
		EWE	xxx9966	10438 R6-06	Annuity / Settlement Option Withdrawal Service Request	7/25/2008	\$2,845.91	
		EWE	xxx9966	10438 R6-06	Annuity / Settlement Option Withdrawal Service Request	10/28/2008	\$2,845.91	
		EWE	xxx9966	10438 R6-06	Annuity / Settlement Option Withdrawal Service Request	1/26/2009	\$2,845.91	
		EWE	xxx9966	10438 R6-06	Annuity / Settlement Option Withdrawal Service Request	4/24/2009	\$2,845.91	
		EWE	xxx9966	10438 R6-06	Annuity / Settlement Option Withdrawal Service Request	7/27/2009	\$2,845.91	
		EWE	xxx9966	10438 R6-06	Annuity / Settlement Option Withdrawal Service Request	11/5/2009	\$2,845.91	
		EWE	xxx9966	10438 R6-06	Annuity / Settlement Option Withdrawal Service Request	1/25/2010	\$2,845.91	
		EWE	xxx9966	10438 R6-06	Annuity / Settlement Option Withdrawal Service Request	4/29/2010	\$2,845.91	
		EWE	xxx9966	10438 R6-06	Annuity / Settlement Option Withdrawal Service Request	7/27/2010	\$2,845.91	
		EWE	xxx9966	10438 R6-06	Annuity / Settlement Option Withdrawal Service Request	10/22/2010	\$2,845.91	
		JP	xxx7847	10438 R1-10	Annuity / Settlement Option Withdrawal Service Request	9/7/2010	\$3,500.00	
		LAD	xxx5967	10438 R12-08	Annuity / Settlement Option Withdrawal Service Request	8/10/2010	\$1,500.00	
		LML	xxx0222	10438 R10-06	Annuity / Settlement Option Withdrawal Service Request	6/30/2008	\$5,747.13	

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TOTAL Count	No. of Altered Customer Documents Charged	Customer Initials	Contract / Agreement Number	Form Number	Form Name	Date	Customer Disbursement	TOTAL Customer Disbursements
		LML	xxx0222	10438 R10-06	Annuity / Settlement Option Withdrawal Service Request	4/17/2009	\$5,000.00	
		LML	xxx0222	10438 R10-06	Annuity / Settlement Option Withdrawal Service Request	7/16/2009	\$5,747.12	
		LML	xxx0222	10438 R10-06	Annuity / Settlement Option Withdrawal Service Request	4/19/2010	\$10,060.82	
	4	LML						\$20,808.00
		MLL	xxx3405	10438 R3-06	Annuity / Settlement Option Withdrawal Service Request	6/5/2007	\$2,548.00	
		MLL	xxx0021	10438 R5-07	Annuity / Settlement Option Withdrawal Service Request	5/22/2008	\$3,287.20	
		MLL	xxx0021	10438 R5-07	Annuity / Settlement Option Withdrawal Service Request	6/12/2009	\$3,287.20	
		MLL	xxx0021	10438 R5-07	Annuity / Settlement Option Withdrawal Service Request	5/17/2010	\$4,197.20	
		MLL	xxx3659	11090 R5-07	Values Distribution Request	9/10/2008	\$269.25	
		MLL	xxx3659	11090 R5-07	Values Distribution Request	9/14/2009	\$148.12	
		MLL	xxx3659	11090 R5-07	Values Distribution Request	9/10/2010	\$29.99	
	7	MLL						\$10,559.60
		RAL	xxx4470	10438 R5-07	Annuity / Settlement Option Withdrawal Service Request	7/29/2008	\$3,002.64	
		RAL	xxx4470	10438 R5-07	Annuity / Settlement Option Withdrawal Service Request	12/29/2009	\$3,400.00	
		RAL	xxx1091	10438 R5-07	Annuity / Settlement Option Withdrawal Service Request	10/8/2010	\$3,181.00	
		RAL	xxx1091	10438 R12-08	Annuity / Settlement Option Withdrawal Service Request	1/4/2010	\$2,600.00	
		RAL	xxx1091	10438 R12-08	Annuity / Settlement Option Withdrawal Service Request	5/21/2010	\$1,141.73	
		RAL	xxx1091	10438 R12-08	Annuity / Settlement Option Withdrawal Service Request	5/26/2010	\$2,100.00	
	4	RAL						\$9,324.37
		SHM	xxx0195	10438 R5-05	Annuity / Settlement Option Withdrawal Service Request	12/11/2006	\$763.00	
		SHM	xxx0195	10438 R5-05	Annuity / Settlement Option Withdrawal Service Request	1/15/2007	\$322.00	
		SHM	xxx0195	10438 R5-05	Annuity / Settlement Option Withdrawal Service Request	2/15/2007	\$60.00	
		SHM	xxx0195	10438 R5-05	Annuity / Settlement Option Withdrawal Service Request	2/15/2007	\$100.00	
		SHM	xxx0195	10438 R5-05	Annuity / Settlement Option Withdrawal Service Request	3/15/2007	\$565.00	
		SHM	xxx0195	10438 R5-05	Annuity / Settlement Option Withdrawal Service Request	3/22/2007	\$550.00	
		SHM	xxx0195	10438 R5-05	Annuity / Settlement Option Withdrawal Service Request	8/13/2007	\$151.00	
		SHM	xxx0195	10438 R5-05	Annuity / Settlement Option Withdrawal Service Request	10/19/2007	\$707.00	
		SHM	xxx0195	10438 R5-05	Annuity / Settlement Option Withdrawal Service Request	11/16/2007	\$380.00	

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		SHM	xxx0195	10438 R5-05	Annuity / Settlement Option Withdrawal Service Request	2/15/2008	\$700.00	
		SHM	xxx0195	10438 R5-07	Annuity / Settlement Option Withdrawal Service Request	3/15/2008	\$500.00	
		SHM	xxx0195	10438 R5-07	Annuity / Settlement Option Withdrawal Service Request	4/21/2008	\$650.00	
		SHM	xxx0195	10438 R5-07	Annuity / Settlement Option Withdrawal Service Request	6/12/2008	\$516.00	
		SHM	xxx0195	10438 R5-07	Annuity / Settlement Option Withdrawal Service Request	11/5/2009	\$400.00	
		SHM	xxx0195	10438 R5-07	Annuity / Settlement Option Withdrawal Service Request	12/18/2009	\$1,020.00	
		SHM	xxx0195	10438 R5-07	Annuity / Settlement Option Withdrawal Service Request	6/8/2010	\$6,000.00	
		SHM	xxx0195	10438 R5-07	Annuity / Settlement Option Withdrawal Service Request	6/15/2010	\$421.02	
		SHM	xxx0195	10438 R5-07	Annuity / Settlement Option Withdrawal Service Request	7/21/2010	\$421.20	
		SHM	xxx0195	10438 R5-07	Annuity / Settlement Option Withdrawal Service Request	9/16/2010	\$450.00	
		SHM	xxx0195	10438 R5-07	Annuity / Settlement Option Withdrawal Service Request	10/18/2010	\$1,597.12	
		SHM	xxx0195	10438 R5-07	Annuity / Settlement Option Withdrawal Service Request	10/25/2010	\$500.00	
		SM	xxx8301	10438 R9-05	Annuity / Settlement Option Withdrawal Service Request	1/31/2006	\$35,000.00	
		SM	xxx8301	10438 R9-05	Annuity / Settlement Option Withdrawal Service Request	8/10/2010	\$15,000.00	
		WMJ	xxx3174	10438 R10-06	Annuity / Settlement Option Withdrawal Service Request	3/20/2007	\$4,954.89	
		WMJ	xxx8442	10438 R10-06	Annuity / Settlement Option Withdrawal Service Request	7/30/2010	\$1,983.42	
115								\$562,008.65