

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
OFFICE OF HEARING OFFICERS**

Department of Enforcement,

Complainant,

v.

Skipper Cameron Wilmot (CRD No. 5531511),

Respondent.

DISCIPLINARY PROCEEDING
No. 2011026512201

HEARING OFFICER: AHP

**ORDER ACCEPTING OFFER OF
SETTLEMENT**

Date: October 26, 2011

INTRODUCTION

Disciplinary Proceeding No. 2011026512201 was filed on September 23, 2011 by the Department of Enforcement of the Financial Industry Regulatory Authority (FINRA) (Complainant). Respondent Skipper Cameron Wilmot submitted an Offer of Settlement (Offer) to Complainant dated October 21, 2011. Pursuant to FINRA Rule 9270(e), the Complainant and the National Adjudicatory Council (NAC), a Review Subcommittee of the NAC, or the Office of Disciplinary Affairs (ODA) have accepted the uncontested Offer. Accordingly, this Order now is issued pursuant to FINRA Rule 9270(e)(3). The findings, conclusions and sanctions set forth in this Order are those stated in the Offer as accepted by the Complainant and approved by the NAC.

Under the terms of the Offer, Respondent has consented, without admitting or denying the allegations of the Complaint, 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, to the entry of findings and violations consistent with the allegations of the Complaint, and to the imposition of

the sanctions set forth below, and fully understands that this Order will become part of Respondent's permanent disciplinary record and may be considered in any future actions brought by FINRA.

BACKGROUND

Wilmot entered the securities industry in January 2010 with FINRA regulated firm The Huntington Investment Company (HIC). He submitted a Form U-4 in February 2010 and became registered as an Investment Company and Variable Contracts Products Representative (Series 6) in May 2010. HNB, an affiliate of HIC, employed him as a personal banker starting in October 2008.

HIC terminated Wilmot on January 11, 2011, and he has not been associated with any FINRA regulated firm since that date. FINRA nonetheless retains jurisdiction over Wilmot in this proceeding pursuant to Article V, Section 4 of FINRA's By-Laws because the conduct that serves as the basis for this action commenced prior to his termination of registration from a FINRA regulated broker-dealer and the Complaint has been filed within two years after the effective date of Wilmot's last termination of registration from a FINRA regulated broker-dealer.

FINDINGS AND CONCLUSIONS

It has been determined that the Offer be accepted and that findings be made as follows:

SUMMARY

1. From May 2010 to December 2010, without authorization Skipper Cameron Wilmot refunded fees in personal checking accounts he held at the Huntington National Bank (HNB) converting \$1,567 in HNB's fees for his own use in violation of FINRA Rule 2010. In addition, Wilmot failed to respond to requests for information and documents, in violation of FINRA Rules 8210 and 2010.

Conversion of Funds—Violation of FINRA Rule 2010

2. Between May 26, 2010 and December 14, 2010, Wilmot used another bank employee's user ID to log in to HNB's computer system and reverse overdraft and extended overdraft fees in four of his personal checking accounts at HNB without authorization, thus depriving HNB of fees owed to it.
3. The improperly reversed overdraft fees (\$23 or \$37.50 each) and extended overdraft fees (\$7 each) totaled \$1,567.
4. In January 2011, HIC terminated Wilmot's registration when it learned from HNB that Wilmot's employment with HNB had been terminated for the above misconduct.
5. In a written response to FINRA dated May 2, 2011, Wilmot admitted that, when his manager was not present, he used another person's name and password to log in to HNB's computer system and reverse fees in his own accounts in violation of HNB's policies.
6. As a result of the foregoing conduct, Respondent Wilmot violated FINRA Rule 2010.

Failures to Respond to Rule 8210 Requests for Information and Documents— Violations of FINRA Rules 8210 and 2010

7. By letter dated May 24, 2011, FINRA staff requested, pursuant to FINRA Rule 8210, information and documents related to Wilmot's misconduct that is the subject of this Complaint. This Rule 8210 request was sent via U.S. Postal Service certified (return receipt requested) mail and first-class mail to [REDACTED] [REDACTED] which is Wilmot's address of record as contained in the records of the Central

Registration Depository (“CRD address”). The May 24, 2011 request included a response due date of June 13, 2011. The May 24, 2011 certified letter mailed to the CRD address was returned to FINRA marked “unclaimed,” with a stamp indicating notice of the letter was made on May 26 and June 11, 2011. The certified mail receipt was returned to FINRA, with an illegible written name but no date of delivery. The first-class letter was not returned. Wilmot failed to respond to the May 24, 2011 request.

8. FINRA staff mailed a second request letter to Wilmot, pursuant to Rule 8210, dated June 14, 2011. This request also was sent by U.S. Postal Service certified (return receipt requested) mail and first-class mail to Wilmot’s CRD address. This request asked that Wilmot provide the information and documents previously requested in the May 24, 2011 Rule 8210 request. The June 14, 2011 request had a response due date of July 1, 2011. The certified mail receipt was returned to FINRA with an illegible signature indicating the letter had been delivered. The request sent via first-class mail to the CRD address was not returned to FINRA. Wilmot did not respond to the June 14, 2011 request.

9. By virtue of this conduct, Wilmot’s failures to respond to the above requests constitute two separate and distinct violations of FINRA Rules 8210 and 2010.

Based on the foregoing, Respondent violated FINRA Rules 2010 and 8210.

Based on these considerations, the sanctions hereby imposed by the acceptance of the Offer are in the public interest, are sufficiently remedial to deter Respondent from any future

misconduct, and represent a proper discharge by FINRA, of its regulatory responsibility under the Securities Exchange Act of 1934.

SANCTIONS

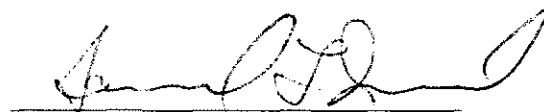
It is ordered that Respondent be barred from associating with any FINRA member in any capacity.

Pursuant to FINRA Rule 8313(e), a bar shall become effective upon approval or acceptance of this Order.

SO ORDERED.

FINRA

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



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10/26/11
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