

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2011028461601**

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

RE: Joshua Adam Garber, Respondent
CRD No. 4893622

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, Respondent Bradley P. Garber ("Garber" 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

Garber first began working in the securities industry in 2004. From December 2004 through his termination in May 2008, Garber was registered as an Investment Company Products/Variable Contracts Representative ("IR") through his association with Pruco Securities, LLC ("Pruco" or the "Firm" (BD No. 5685). In May 2008, Garber joined Cadaret, Grant & Co., Inc. ("Cadaret") (BD No. 10641) as an IR. He remained at Cadaret until August 2011.

Garber is not currently associated with any FINRA member firm.

RELEVANT DISCIPLINARY HISTORY

Garber does not have any relevant disciplinary history.

OVERVIEW

This matter concerns Garber's violation of FINRA Rules 8210 and 2010 in connection with his failure to respond to a request for documents and information.

FACTS AND VIOLATIVE CONDUCT

Violation of FINRA Rules 8210 and 2010 – Failure to Respond

On September 25, 2012, FINRA Enforcement staff (the "Staff") sent Garber a letter requesting that he provide the Staff with documents and information concerning an ongoing investigation. The September 25th request was made pursuant to FINRA Rule 8210. A response was due on or before October 9, 2012. Garber failed to provide the requested documents and information.

By reason of the foregoing, Garber violated FINRA Rules 8210 and 2010.

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

- A bar in all capacities from any association with a FINRA member firm.

Respondent understands that if he is barred or suspended from associating with any FINRA member, he 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, he 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 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 prejudice 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

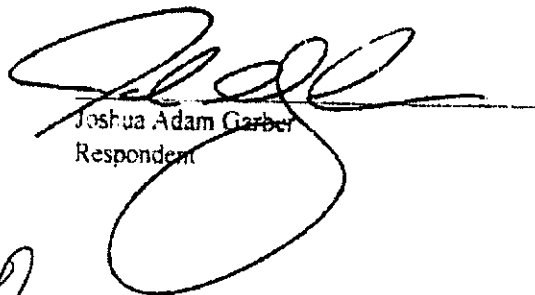
Respondent understands that:

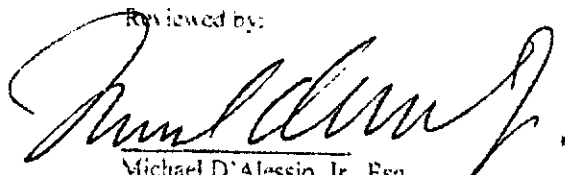
- A. Submission of this AWC is voluntary and will not resolve this matter unless and until it has been reviewed and accepted by the NAC, a Review Subcommittee of the NAC, or the Office of Disciplinary Affairs ("ODA"), pursuant to FINRA Rule 9216;
- B. If this AWC is not accepted, its submission will not be used as evidence to prove any of the allegations against him;
- 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 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 my right to take legal or factual positions in litigation or other legal proceedings in which FINRA is not a party; and

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 Respondent to submit it.

JAN. 23, 2013
Date


Joshua Adam Garber
Respondent

Reviewed by:

Michael D'Alessio, Jr., Esq.
Counsel for Respondent
560 Main Street
Chatham, NJ 07928
(973) 507-9909

Accepted by FINRA:

Date 1/30/2013

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


Susan Schroeder, Sr. VP & Deputy Chief of
Enforcement
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