

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2011030687301**

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

RE: Connie Louise Clarke, Respondent
CRD No. 4116064

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, I 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 me alleging violations based on the same factual findings described herein.

I.

ACCEPTANCE AND CONSENT

- A. I 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

Connie Louise Clarke ("Clarke") was first registered with a FINRA member firm in January 2000. She became registered with Hartford Equity Sales Company, Inc. ("Hartford") as an Investment Company Products/Variable Contracts Limited Representative (Series 6), Investment Company Products/Variable Contracts Limited Principal (Series 26) and a Municipal Fund Securities Principal (Series 51) on January 28, 2011. Clarke remained with Hartford until her termination on November 22, 2011. She has not been associated with a FINRA member firm since her termination from Hartford.

FINRA retains jurisdiction over Clarke pursuant to Article V, Section 4(a) of FINRA's By-Laws because the conduct that serves as the basis for this action commenced prior to Clarke's termination of registration from a FINRA member firm and this AWC has been filed within two years after the effective date of her last termination of registration from a FINRA member firm.

FACTS AND VIOLATIVE CONDUCT

On September 26, 2011 and November 4, 2011, Clarke submitted inaccurate expense reports to Hartford. The September 26, 2011 expense report included a meal where Clarke identified an attendee who was not present at the meal. The November 4, 2011 expense report included six meals where the attendees identified by Clarke were inaccurate. For two of these six meals, a person with whom Clarke was having a personal relationship was present at the meals and not identified on the expense report. Hartford discovered the discrepancies before fully reimbursing Clarke for her expenses.

Clarke was also responsible for tracking her business contacts and meetings in a Hartford system called FieldLink. From September 2011 to November 2011, Clarke made 23 inaccurate entries in FieldLink, incorrectly identifying meeting attendees and, in two instances, recording meetings that never occurred.

By submitting two inaccurate expense reports, Clarke violated FINRA Rule 2010. Additionally, Clarke caused Hartford's books and records to be inaccurate by submitting false expense reports and entering inaccurate FieldLink entries, in violation of NASD Rule 3110 and FINRA Rule 2010.

B. I also consent to the imposition of the following sanctions:

1. A five-month suspension from associating with any FINRA member firm in any capacity; and
2. A \$5,000 fine.

The fine shall be due and payable either immediately upon reassociation with a member firm following the five-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.

I specifically and voluntarily waive any right to claim that I am unable to pay, now or at any time hereafter, the monetary sanction(s) imposed in this matter.

I understand that if I am barred or suspended from associating with any FINRA member, I 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, I 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

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

- A. To have a Complaint issued specifying the allegations against me;
- 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, I specifically and voluntarily waive 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.

I 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

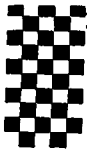
I understand that:

- 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 me; and

C. If accepted:

- 1. this AWC will become part of my permanent disciplinary record and may be considered in any future actions brought by FINRA or any other regulator against me;**
- 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. I 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. I 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: (i) testimonial obligations; or (ii) right to take legal or factual positions in litigation or other legal proceedings in which FINRA is not a party.**

- D. I may attach a Corrective Action Statement to this AWC that is a statement of demonstrable corrective steps taken to prevent future misconduct. I understand that I 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.**



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

11/12/2013
Date (mm/dd/yyyy)

C. F. Clarke
Connie Louise Clarke, Respondent

Reviewed by:

Richard E. Quinby, Esq.
Allison M. O'Neil, Esq.
Counsel for Respondent
Craig and Macauley, P.C.
Federal Reserve Plaza
600 Atlantic Avenue
Boston, MA 02210
Tel: 617-367-9500

Accepted by FINRA:

Date

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

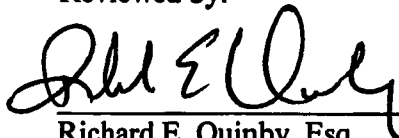
Perry C. Hubbard, Esq.
Director
FINRA Department of Enforcement
15200 Omega Drive, Suite 300
Rockville, MD 20850
Tel: 301-258-8543

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Connie Louise Clarke, Respondent

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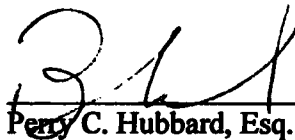


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Counsel for Respondent
Craig and Macauley, P.C.
Federal Reserve Plaza
600 Atlantic Avenue
Boston, MA 02210
Tel: 617-367-9500

Accepted by FINRA:

11/15/13
Date

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



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Director
FINRA Department of Enforcement
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