

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2012030565001 and 20130360548**

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

RE: Ashley L. Robinson, Respondent
General Securities Representative
CRD No. 5925998

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, I, Ashley L. Robinson (Robinson or Respondent), 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 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

Robinson was registered with FINRA member OC Securities, Inc. (OC Securities or the Firm) as a General Securities Representative (Series 7) from October 14, 2011 until February 28, 2013. Robinson is not currently registered or associated with a FINRA member firm. FINRA retains jurisdiction over Robinson through February 27, 2015. Robinson has no disciplinary history.

OVERVIEW

Robinson violated FINRA Rules 8210 and 2010 by failing to respond to FINRA staff's requests for information and documents.

FACTS AND VIOLATIVE CONDUCT

1. In connection with a FINRA investigation into deposits and liquidations of certain penny stocks at OC Securities and whether the Firm failed to implement and enforce its anti-money laundering (AML) procedures to cause the reporting of suspicious activity and to achieve compliance with the Bank Secrecy Act, the staff requested that Robinson provide information and documents pursuant to FINRA Rule 8210.
 2. On November 15, 2012 and December 12, 2012, the FINRA staff sent Robinson two separate requests for information, pursuant to FINRA Rule 8210. Robinson provided written responses, dated November 26, 2012 and January 4, 2013, respectively to each of the staff's request for information.
 3. In light of further information gathered in the staff's investigation, on February 5, 2013, the FINRA staff sent Robinson another request for information and documents pursuant to FINRA Rule 8210. Specifically, the staff requested that Robinson provide certain bank statements, tax returns and other financial information relating to compensation Robinson and others earned in connection with the liquidation of certain penny stocks in customer accounts at OC Securities. Robinson's response to the staff's February 5, 2013 request was due on or before February 20, 2013.
 4. FINRA staff received a letter from Robinson, dated February 20, 2013, in which Robinson stated that she would not provide the financial information responsive to the staff's request.
 5. Robinson has declined to provide information and documents that are necessary to the staff's investigation and the failure to provide information responsive to the staff's request has impeded the staff's investigation.
 6. By refusing to provide the requested documents and information as specified in the staff's February 5, 2013 letter, Robinson violated FINRA Rules 8210 and 2010.
- B. Respondent also consents to the imposition of the following sanction:

A bar from association with any FINRA member firm.

Respondent understands that if she is barred or suspended from associating with any FINRA member, she becomes subject to a statutory disqualification as that term is defined in Section 3(a)(39) of the Securities Exchange Act of 1934, as amended. Accordingly, she 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).

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 Respondent;
- 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 Respondent; 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 Respondent;**
 - 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 Respondent’s: (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.**

Respondent certifies that she has read and understand all of the provisions of his AWC and has been given a full opportunity to ask questions about it; that Respondent 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 her to submit it.

7/9/13
Date (mm/dd/yyyy)

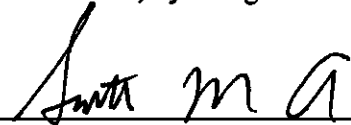


Ashley L. Robinson
Respondent

Accepted by FINRA:

10/18/13
Date

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



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