

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2012033861801**

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

RE: Casi Marie Martin, Respondent
Former Series 6 and 63 Registered Representative
CRD No. 5986401

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

Casi Marie Martin ("Martin") entered the securities industry in October 2011 when she obtained her Series 6 and 63 licenses while employed as a personal banker with J.P. Morgan Chase Bank N.A. ("Chase Bank") and a registered representative of Chase Investment Services Corp. ("CISC" or the "Firm"), a FINRA-regulated firm. Martin remained employed with Chase Bank and CISC until August 6, 2012, when she was terminated for conduct reported on a Uniform Termination Notice for Securities Industry Registration ("Form U5") dated August 30, 2012. On the August 30, 2012 Form U5, the Firm reported allegations that Martin admitted to opening credit cards under Chase Bank clients' names for personal use and transferring funds from a Chase Bank client's accounts to one of the credit cards. Martin has not been employed in any capacity in the securities industry since August 6, 2012.

Although Martin is not currently employed in the securities industry, pursuant to Article V, Section 4(a) of the FINRA By-Laws, FINRA retains jurisdiction over her until at least August 28, 2015.

RELEVANT DISCIPLINARY HISTORY

Martin has no prior disciplinary history in the securities industry.

OVERVIEW

From March 10, 2012 to August 3, 2012, Martin, a registered representative of CISC and personal banker at CISC's affiliated retail bank, Chase Bank, violated FINRA Rule 2010 by converting \$7,018.76 from bank customers by opening credit cards in the customers' names without authorization, using the credit cards for her personal use, and transferring funds from a bank customer's checking account to a credit card she opened in his name to pay for personal expenses.

FACTS AND VIOLATIVE CONDUCT

FINRA Rule 2010 provides that a member, "in the conduct of his business, shall observe high standards of commercial honor and just and equitable principles of trade." Conversion is "any unauthorized act which deprives an owner of his property permanently or for an indefinite time" or the "unauthorized and wrongful exercise of dominion and control over another's personal property, to exclusion of or inconsistent with rights of the owner."¹

From October 5, 2011 to August 6, 2012, Martin worked as a personal banker and registered representative at the Chase Bank branch office located in Jenks, Oklahoma (the "Jenks Branch Office").

On or about March 10, 2012, Martin completed and submitted a credit card application for Chase Bank customer GG, using the Jenks Branch Office as the customer's address. Chase Bank subsequently opened a credit card in GG's name. GG was not aware that Martin submitted the credit card application in his name and did not authorize Martin to open a credit card on his behalf.

Between March 10, 2012 and August 3, 2012, without GG's knowledge or authorization, Martin used GG's credit card for personal purposes, including merchandise purchases at stores in the Jenks, Oklahoma and Tulsa, Oklahoma area.

During 2012, Martin opened a credit card in the name of another Chase Bank customer, NM, without the customer's knowledge or authorization. Martin submitted a credit card application in NM's name, using the Jenks Branch Office

¹ Black's Law Dictionary (5th ed. 1979).

address as the customer's address. Chase Bank subsequently opened a credit card in NM's name.

Between March 10, 2012 and August 3, 2012, Martin made personal purchases totaling \$6,033 on GG's and NM's credit cards, without their knowledge or authorization. On or about August 3, 2012, Martin repaid the customers in full. On August 6, 2012, CISC and Chase Bank terminated Martin's employment.

On July 30, 2012, Martin also accessed NM's checking account and transferred \$985.76 from NM's checking account to his credit card to pay for personal expenses that Martin had charged on NM's card. Martin later reimbursed the \$985.76 from her personal funds.

Martin violated FINRA Rule 2010 by converting \$7,018.76 from bank customers by opening credit cards in the customers' names without authorization, using the credit cards for her personal use, and transferring funds from a bank customer's checking account to a credit card she opened in his name to pay for personal expenses.

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

A bar from association in any and all capacities with any FINRA regulated firm.

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. 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

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 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.

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.

2/26/13
Date

Casi Marie Martin
Casi Marie Martin
Respondent
Pro Se

Accepted by FINRA:

3/5/13
Date

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


Janice A. Payne
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