

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2012033979801**

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

RE: Monte Miron, Respondent
CRD No. 853546

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, I [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 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

Miron first became registered as a general securities representative with member firm Dean Witter Reynolds Inc. in September 1982. After his termination from Dean Witter Reynolds Inc. in 1998, he was registered with 11 firms between October 1998 and August 2012. In August 2012, Miron became registered with Mass Mutual Securities, where he remained until his resignation in February 2013. Miron has not been registered with a member firm since.

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

FACTS AND VIOLATIVE CONDUCT

1. Unauthorized Trading

Between September 2012 and January 2013, Miron made 237 unauthorized trades in the accounts of two firm customers. Miron did not obtain written authorization to make these trades prior to executing them, and the firm did not allow registered representatives to have control, either formally or informally, over client accounts. By making these unauthorized trades in his customers' accounts, Miron violated FINRA Rule 2010.

2. Causing Firm to Maintain Inaccurate Books and Records

The 237 unauthorized trades were mismarked by Miron as "unsolicited." By not properly marking the 237 trades in question as "solicited," Miron caused the firm's books and records to be inaccurate, in violation of NASD Rule 3110 and FINRA Rule 2010.

3. Willfully Failing to Timely Disclose Three Credit Compromises

FINRA By-Laws provide that an individual must file amendments to his Form U4 no later than 30 days after learning of the facts and circumstances giving rise to the amendment. Miron was the subject of three credit compromises from May 2010 through March 2012 that required reporting on his Form U4. The credit compromise of May 14, 2010 was not reported on Miron's U4 until June 30, 2011, the credit compromise of November 15, 2010 was not reported until December 22, 2011, and the credit compromise of March 11, 2012 was not reported until August 17, 2012. In each instance, Miron willfully failed to timely update his U4 by disclosing the credit compromise. By failing to report each of these credit compromises within the appropriate 30-day time period on his Form U-4, Miron willfully violated FINRA Rules 1122 and 2010.

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

A bar from associating with any member firm in any and all capacities.

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

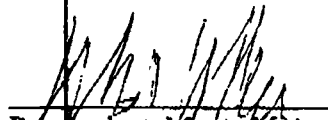
I understand that:

- 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.

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.

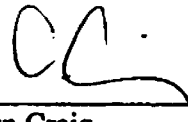
12/14/2014
Date (mm/dd/yyyy)


Respondent, Monte Miron

Accepted by FINRA:

3/7/2014
Date

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



Carolyn Craig
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FINRA – Department of Enforcement
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