

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2012034371401**

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

RE: Craig Robert Morrison, Respondent
Investment Company Products/Variable Contracts Limited Representative
CRD No. 4490109

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

Craig Robert Morrison ("Morrison") entered the securities industry in January 2002, when he was associated with a FINRA member. Morrison acquired a Series 6 license on January 21, 2002, a Series 65 license on March 29, 2004, and a Series 63 license on January 29, 2008. Morrison was associated with several FINRA members since 2002, including ING Financial Partners, Inc. ("ING") from December 17, 2010 through October 10, 2012. Although Morrison is not currently associated with a FINRA member, he remains subject to the jurisdiction of FINRA, pursuant to Article V, Section 4(a) of FINRA's By-Laws, which provides for a two-year period of retained jurisdiction over formerly-registered persons.

RELEVANT DISCIPLINARY HISTORY

On May 15, 2013, the State of Florida, Office of Financial Regulation entered a Final Order adopting the Stipulation and Consent Agreement in the Matter of Craig R. Morrison (0243-SR-02/13). Morrison agreed to cease and desist from

any and all future violations of Chapter 517, Florida Statutes, and the administrative rules promulgated thereunder, and to an administrative fine of \$10,000.

FACTS AND VIOLATIVE CONDUCT

From August 2012 through September 2012, while associated with ING, Morrison falsified approximately ten documents of four customers by recycling the customers' signatures from previously signed documents and pasting their signatures onto new asset allocation change/fund transfer forms, beneficiary designation forms and a Roth 403(b) salary reduction agreement. Morrison pasted the signatures without authorization, for transactions the customers otherwise had approved. As a result of the foregoing conduct, Morrison violated FINRA Rules 4511 and 2010.

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

- A \$5,000 fine and three-month suspension from association with any FINRA member in all capacities.

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

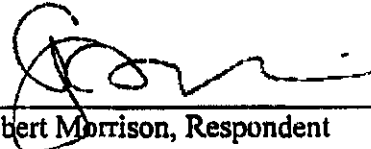
the subject matter thereof in accordance with FINRA Rule 8313; and

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.

- 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.

06/15/2013
Date


Craig Robert Morrison, Respondent

Accepted by FINRA:

06/20/13
Date

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


Kevin D. Rosen, Principal Regional Counsel
FINRA Department of Enforcement
Crystal Corporate Center
2500 North Military Trail, Suite 302
Boca Raton, Florida 33431
(561) 443-8015; Fax (561) 443-7998

Corrective Action Statement

Addendum to FINRA Letter of Acceptance, Waiver and Consent No. 2012034371401

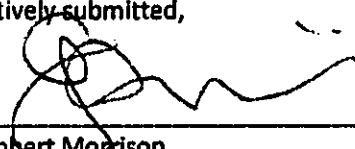
Craig Robert Morrison, Respondent
Investment Company Products/Variable Contracts Limited Representative
CRD No. 4490109

In accepting the findings and disciplinary action resulting from the consequences of my actions that, although reflected the processing of approved transactions from my customers, was done in a fashion that was in violation of FINRA Rules 4511 and 2010.

Corrective steps have been taken to prevent any such future misconduct, as follows:

- 1) A commitment to never facilitate customer's instructions, whether received orally or in writing, in a manner that is not in compliance with the rules and regulations prescribed by the regulatory bodies governing my profession, and/or the respective FINRA member companies with whom I will be conducting business.
- 2) Since being made aware of the violations and their severity, I have encountered several situations in which an original or additional signature(s) has been required, denoting consent or authorization to process a particular transaction(s). In each case, regardless of the perceived time and logistics convenience, or the circumstances involving the consent of the customer, each and every situation has resulted in full compliance with securing signatures directly from the customer.
- 3) The lesson learned, as taught through my experiences with the State of Florida Office of Financial Regulation and FINRA will have a lasting impact on my professional protocol. I regret that any of my past poor judgment has reflected negatively on my personal integrity or that of my profession and submit my apologies as well as my promise to comply fully in the future.

Respectively submitted,



Craig Robert Morrison

06/15/2013
Date

This Corrective Action Statement is submitted by the respondent. It does not constitute factual or legal findings by FINRA, nor does it reflect the views of FINRA, or its staff