

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2013035899001**

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

RE: Doris A. Plansky, Respondent
Investment Company Products/Variable Contracts Limited Representative
Investment Company Products/Variable Contracts Limited Principal
(CRD No. 4222169)

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

Doris A. Plansky ("Plansky") entered the securities industry in June 2000 when she became registered with a FINRA-regulated firm, where she remained until September 2000. She became registered with Farmers Financial Solutions, LLC ("FFS") on September 8, 2000, and was contracted with FFS's affiliate, Farmers Insurance Group ("FIG"), where she worked as a District Manager Training and Administrative Assistant. With the exception of June 6, 2003 through June 29, 2004, Plansky remained registered with FFS until her termination.

On February 8, 2013, FFS filed a Uniform Termination Notice for Securities Industry Registration (Form U5), which disclosed Plansky's discharge from FFS that same day. The Form U5 indicated that, at the time of her termination, Plansky was under internal review based on notification from an affiliated insurance company that she was "involved or complacent with misconduct relating to the taking of LUTC examination(s)."

RELEVANT DISCIPLINARY HISTORY

Plansky does not have any relevant disciplinary history.

OVERVIEW

During 2011 and 2012, Plansky falsely stated on at least ten Proctored Examination Affidavits ("Proctor Affidavits") completed in connection with certain Life Underwriter Training Council ("LUTC") examinations that she had proctored the examinations despite not having done so.

FACTS AND VIOLATIVE CONDUCT

1. The LUTC Courses and Examinations

The Life Underwriter Training Council Fellowship ("LUTCF") is an industry designation owned by AB. For years, CD, a non-profit public educational institution, administered AB's LUTCF program on AB's behalf.

At all times relevant to this matter, an individual could obtain the LUTCF designation by successfully completing six LUTC courses and satisfying certain other requirements. To successfully complete an LUTC course, a student had to pass the course's final examination. The LUTC program courses were designed for insurance professionals and taught product knowledge, marketing and sales, customer service and ethics. Neither the LUTC courses nor the LUTCF designation are required to sell any specific insurance or securities products.

Each online LUTC course was administered by a moderator via the Blackboard Learning System ("Blackboard"), a learning management system that allowed students to access a virtual learning environment. CD required students to designate a proctor for their final examination. After the student designated a proctor, CD sent an email to the designated proctor containing the proctor's user identification and a password, which would be used to log into the examination.

To take an LUTC examination, the student had to log into the Blackboard system and then separately log into the examination. A student would log into the Blackboard system using their login user identification and password. The designated proctor would then log the student into the examination using the proctor's user identification and password.

At the conclusion of each LUTC examination: (a) the student had to complete a Proctor Affidavit attesting that he or she had completed the examination independently; and (b) the student's proctor had to sign the Proctor Affidavit attesting that: (i) he or she had proctored the examination; (ii) the proctor was not related to, or an employee or immediate supervisor of, the student; and (iii) the

student completed the examination independently without assistance from the proctor or any study aides.

2. Plansky Violated FINRA Rule 2010 By Making False Statements on Proctor Affidavits

FINRA Rule 2010 requires a registered person to observe high standards of commercial honor and just and equitable principles of trade.

Plansky was designated as a proctor for students taking certain LUTC examinations held on October 26, 2011, March 27, 2012, April 3, 2012 and June 14, 2012. Plansky, however, did not proctor the LUTC exams. Instead, MZ, the LUTC course moderator, proctored the exams.

Despite not having proctored the LUTC exams, Plansky falsely stated on at least ten Proctor Affidavits that she had served as the proctor for the exams. By making false attestations on the Proctor Affidavits, Plansky violated FINRA Rule 2010.

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

- A suspension of 15 business days from association with any FINRA member firm in all capacities; and
- A \$5,000 fine.

I understand that if I am 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 fine shall be due and payable either immediately upon reassociation with a member firm following the 15 business-day 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.

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 Chief Legal Officer, 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 accordance with FINRA Rule 8313;
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.

January 8, 2014
Date

Doris A. Plansky
Doris A. Plansky, Respondent

Accepted by FINRA:

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

1-28-15
Date

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