

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2013036215902**

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

RE: Jonathan David Iseson, Respondent
General Securities Representative
CRD No. 704828

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

Jonathan David Iseson ("Iseon") entered the securities industry in December 1997, when he became associated with a FINRA member firm. Iseon was first registered as a general securities representative in January 1998. Iseon was also registered as a general securities principal, among other registrations. Iseon was employed by several FINRA member firms from December 1997 through December 2011. In January 2012, Iseon became associated with Fulcrum Securities, LLC ("Fulcrum") as a general securities representative and principal, and as an equity trader limited representative. Iseon remained with Fulcrum until March 2013. Iseon then became associated with Odeon Capital Group, LLC ("Odeon") in March 2013 and was registered by Odeon as a general securities representative and principal, equity trader limited representative and as an operations professional. Iseon is currently associated with Odeon and remains subject to FINRA's jurisdiction. Iseon does not have any relevant disciplinary history.

OVERVIEW

At various times during the period from at least February 2012 to August 2013, Iseon altered Federal Funds Wire Request ("Wire Request") forms and Letters of Authorization ("LOAs") for his parents' securities account copied their signatures from other forms, and then submitted the altered forms as authentic and genuine to two successive FINRA member firms Fulcrum and Odeon, thereby causing his FINRA member firms to maintain inaccurate records, in violation of FINRA Rules 4511 and 2010.

FACTS AND VIOLATIVE CONDUCT

During the period from at least February 2012 to August 2013, while successively associated with Fulcrum and Odeon, Iseon altered information on multiple Wire Requests and LOAs and reused

his parents' signatures from older forms on new forms. Ison wrote over information and altered forms adding new information in one or more of the following categories:

- Dollar amount;
- Date; and
- Routing number.

Ison also reused Wire Requests and LOAs instead of obtaining new forms executed by the customers. The Wire Requests and LOAs were altered in various ways as noted above and Ison photocopied the customer signatures onto the new forms. These new forms were not re-executed by the customers, but Ison submitted the Wire Requests and LOAs as originals to Fulcrum and to Odeon. In total, Ison improperly altered at least 23 forms, involving 20 forms at Fulcrum and three forms at Odeon authorizing distributions of \$56,516, in aggregate. The customers, who were Ison's parents, indicated to Fulcrum and Odeon that the Wire Requests and LOAs were altered and their signatures were reused for their convenience, and that they authorized the disbursements from their account.

As a result of the foregoing conduct, Ison violated FINRA Rules 4511 and 2010.

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

- A \$5,000 fine; and
- A two and a half month suspension from associating with any FINRA member firm in all capacities.

I agree to pay the monetary sanction upon notice that this AWC has been accepted and that such payment is due and payable. I have submitted an Election of Payment form showing the method by which I propose to pay the fine imposed.

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 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:

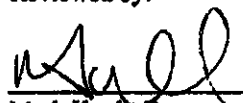
- A. Submission of this AWC is voluntary and will not resolve this matter unless and until it has been reviewed and accepted by the NAC, a Review Subcommittee of the NAC, or the Office of Disciplinary Affairs ("ODA"), pursuant to FINRA Rule 9216;
- B. If this AWC is not accepted, its submission will 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.

1.08.2016
Date


Jonathan David Iseson, Respondent

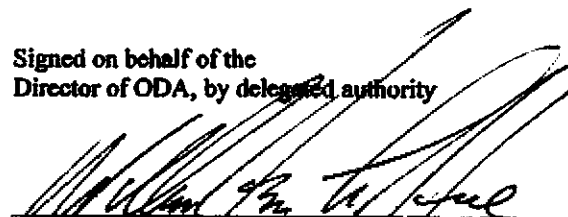
Reviewed by:


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Accepted by FINRA:

1/28/2016
Date

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


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