

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2013036970701**

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

RE: Pamela Grace Musiimire, Respondent
Investment Company Products/Variable Contracts Representative
CRD No. 5125577

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 Respondent 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

Pamela Grace Musiimire ("Musiimire") first entered the securities industry in April 2006. She first registered with FINRA as an investment company products/variable contracts representative (Series 6) in September 2006. She registered as a Series 6 representative with Citigroup Global Markets Inc. ("Citigroup") on May 29, 2007. Citigroup terminated her registration on May 10, 2013 and she has not been registered with a FINRA member firm since.

FINRA retains jurisdiction over Musiimire 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 Musiimire's termination of registration from a FINRA member, and this AWC has been filed within two years after the effective date of Musiimire's last termination of registration from a FINRA member.

FACTS AND VIOLATIVE CONDUCT

On March 1, 2013, Musiimire opened a checking account, booked a \$5,000 bank loan, and issued an ATM card for a bank customer without the customer's authorization. Musiimire converted the loan proceeds for her own use by withdrawing all but \$3 of the \$5,000 bank loan from the customer's account between March 1 and March 13, 2013, in part by using the ATM card she created.

On March 22, 2013, Musiimire booked a \$10,000 installment loan and generated an ATM card for another customer's account without the customer's authorization. She then opened a second account in the customer's name and generated an ATM card for that account—again without the customer's authorization. Musiimire converted for her personal use over \$9,600 by withdrawing funds from the two accounts between March 22, 2013 and April 9, 2013 using the ATM cards she created.

By converting over \$14,600 in bank funds for her personal use, Musiimire violated FINRA Rule 2010.

During the course of its investigation of this matter, FINRA requested documents, information and testimony from Musiimire, pursuant to FINRA Rule 8210, concerning the March 1, 2013 loan. In two written responses and during testimony provided to FINRA pursuant to Rule 8210, Musiimire falsely stated that her actions in connection with the March 1, 2013 loan were authorized by another customer with the same name, but undertaken by mistake in the wrong account. Based upon her false statements and testimony, Musiimire violated FINRA Rules 8210 and 2010.

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

A bar in all capacities from associating with any FINRA member.

I understand that if I am barred 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 suspension¹

The sanction imposed herein shall be effective on a date set by FINRA staff. Pursuant to FINRA Rule 8313(e), a bar 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.

¹ See FINRA Rules 8310 and 8311.

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.

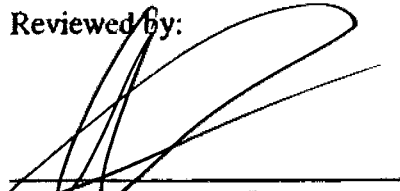
08/06/2014

Date (mm/dd/yyyy)



Pamela Grace Musiimire, Respondent

Reviewed by:



Michael Bachner, Esq.

Bachner & Associates, PC

39 Broadway, Suite 1610

New York, NY 10006

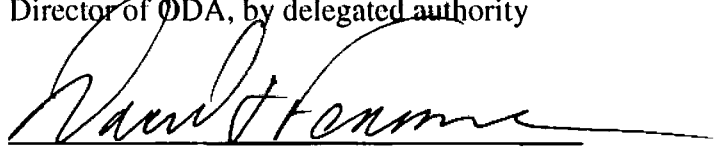
212-344-7778

Counsel to Pamela Grace Musiimire

Accepted by FINRA:

August 22, 2014
Date

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

A handwritten signature in black ink, appearing to read "David L. Fenimore", written over a horizontal line.

David L. Fenimore
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FINRA Department of Enforcement
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Rockville, MD 20850

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