

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2013037772201**

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

RE: Aron Michael Coit, Respondent
CRD No. 5551021

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

Respondent Aron Michael Coit ("Respondent" or "Coit") first became registered with FINRA on September 23, 2008 as an Investment Company Products/Variable Contracts Representative (Series 6) with Pacific Select Distributors, Inc. On November 4, 2009, Coit's registration with Pacific Select Distributors, Inc. was terminated. Coit was registered with MML Investors Services, LLC from January 25, 2010 through October 25, 2012. On October 12, 2012, Coit registered with American Portfolios Financial Services, Inc. ("APFS" or the "Firm"). On July 26, 2013, APFS filed a Form U5 terminating Coit's FINRA registration with the Firm for the events discussed herein.

Coit is not currently registered with any FINRA member. FINRA retains jurisdiction over Coit pursuant to Article V, Section 4(a) of the FINRA By-Laws because (1) the conduct that serves as the basis for this action commenced prior to his termination of registration from a member firm; (2) this AWC has been filed within two years after the effective date of Coit's last termination of registration from a member firm; and (3) this AWC charges him with failing to respond completely to FINRA's request for documents and information issued pursuant to

FINRA Rule 8210 during the two-year period after the date upon which he ceased to be registered or associated with a FINRA member.

FACTS AND VIOLATIVE CONDUCT

FINRA Rule 2010 requires registered representatives in the conduct of their business, to “observe high standards of commercial honor and just and equitable principles of trade.” In July 2013, Coit created and submitted a false paystub document in support of a personal loan application with a third-party lender. By listing salary and deduction information on the paystub, Coit knowingly implied that he was a salaried employee of APFS, instead of an independent contractor. Additionally, Coit overstated his income on the falsified paystub. Coit engaged in unethical business-related conduct by creating and submitting the false paystub in his attempt to obtain a loan, in violation of FINRA Rule 2010.

Article V, Section 2(c) of the FINRA By-Laws requires registered persons to keep their Uniform Application for Securities Industry Registration or Transfer (“Form U4”) “current at all times,” and amendments to the Form U4 must be filed not later than 30 days after learning of the facts or circumstances giving rise to the amendment. FINRA Rule 1122 requires registered persons to maintain a Form U4 that is complete and accurate. On January 25, 2013, a Nebraska State court entered a default judgment against Coit and his wife in the amount of \$1,870.57. On March 7, 2013, a Nebraska State court entered a second default judgment against Coit in the amount of \$1,128.10. Finally, on May 29, 2013, a Nebraska State court entered a third default judgment against Coit in the amount of \$2,578.64. By willfully failing to disclose these three civil judgments on his Form U4 within 30 days, Coit violated FINRA Rules 1122 and 2010, as well as Article V, Section 2(c) of the FINRA By-Laws.

FINRA Rule 8210 requires members, persons associated with a member, and others subject to FINRA’s jurisdiction to provide documents, information, and investigative testimony to FINRA in connection with, among other things, an investigation or examination. During the course of FINRA’s investigation into Coit’s conduct, Coit provided partial but incomplete responses to certain document and information requests issued by the FINRA staff pursuant to FINRA Rule 8210. Specifically, Coit failed to provide responses to several of the information requests and did not produce any of the requested documents. By providing incomplete responses to the requests, Coit violated FINRA Rules 8210 and 2010.

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

A bar in all capacities from any FINRA member.

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).

I understand that this settlement includes a finding that I willfully omitted to state a material fact on a Form U4, and that under Section 3(a)(39)(F) of the Securities Exchange Act of 1934 and Article III, Section 4 of FINRA's By-Laws, this omission makes me subject to a statutory disqualification with respect to association with a member.

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 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 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.

June 11, 2014
Date (mm/dd/yyyy)

Aron Michael Coit
Respondent Aron Michael Coit

Accepted by FINRA:

June 19, 2014
Date

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

Emma Kuntz
Emma Kuntz
Principal Counsel
FINRA Department of Enforcement
15200 Omega Drive, Suite 300
Rockville, MD 20850
Tel: 301-258-8569
Fax: 301-208-8090