

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 20130382093 01**

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

**RE: Gregory Van Winkle
General Securities Principal
CRD No. 1056407**

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

Gregory Van Winkle entered the securities industry in November 1982 as an Investment Company and Variable Contracts Products Representative with a FINRA-registered firm. While registered with the same firm, he became registered as a Direct Participation Programs Representative in December 1984 and as a General Securities Representative in May 1986. In January 1993, Van Winkle became registered as a General Securities Principal with another FINRA-registered firm. In 1995, he became registered as a General Securities Representative and a General Securities Principal with Securities America, Inc. In September 2013, his registration with Securities America, Inc. was terminated. In September 2013, Van Winkle became registered with another firm, where he remains currently registered. Van Winkle has no disciplinary history.

OVERVIEW

Van Winkle violated FINRA Rule 2010 when he signed his customer's name to seven letters requesting disbursement of funds from a variable annuity policy.

FACTS AND VIOLATIVE CONDUCT

1. Prior to March 2013, DB was a customer of Gregory Van Winkle and Securities America, Inc. ("SAI").
2. Between March and August 2013, Van Winkle signed DB's name to seven letters authorizing the disbursement of funds to DB totaling approximately \$20,000 from her variable annuity policy with DB's knowledge and consent.
3. Van Winkle admitted signing DB's name to the disbursement letters following a request from DB to withdraw the funds.
4. During all relevant times, SAI had a written policy that provided that a representative may not sign another person's name to any document, even if his affixing of the signature is based on a customer's request.
5. In October 2012, Van Winkle completed his annual certification and acknowledged that he read and understood SAI's compliance manual and agreed to comply with all policies and procedures set forth in the manual, including the policy described in paragraph 4 above.
6. By signing the customer's name to the disbursement letters, Van Winkle violated FINRA Rule 2010.

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

A 20 business-day suspension from association with any FINRA firm in any capacity and a \$5,000 fine.

I agree to pay the monetary sanction(s) upon notice that this AWC has been accepted and that such payment(s) are 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(s) 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 Section 3(a)(39) of the Securities Exchange Act of 1934, as amended. 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;

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.

6/26/2015
Date


Gregory Van Winkle

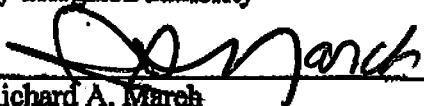
Reviewed by:


Date

Accepted by FINRA:

6-29-15
Date

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


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