

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2013038527601**

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

RE: Joann Jackson, Respondent
CRD No. 2246952

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:

OVERVIEW

Respondent failed to provide documents, information, and to appear for testimony in response to FINRA Rule 8210 request letters issued by FINRA Staff. As a result, Respondent violated FINRA Rule 8210.

BACKGROUND

In 1994, Joann Jackson (CRD No. 2246952) first became registered with D.A. Davidson & Co. (CRD No. 199) as a Series 7 (General Securities Representative) and passed the Series 63 (Uniform Securities Agent State Law Examination). In 1996, she passed the Series 65 (Uniform Investment Adviser Law Examination). She was then registered with A.G. Edwards & Sons, Inc. (CRD No. 4) from October 1997 through July 2004. In July 2004, Jackson registered with Moloney

Securities Co., Inc. (CRD No. 38535) ("Moloney" or the "Firm"), working in Coeur D'Alene, Idaho, where she remained until her termination on October 2, 2013. FINRA retains jurisdiction over Jackson pursuant to Article V, Section 4 of the FINRA By-Laws because (1) this AWC has been filed within two years after the effective date of Jackson's last termination of registration from a member firm; and (2) this action charges Jackson with failing to respond to a FINRA request for information during the two-year period after the date upon which she ceased to be registered or associated with a FINRA member.

FACTS AND VIOLATIVE CONDUCT

On October 3, 2013, Moloney filed a Form U5 with FINRA that stated that Jackson was discharged on October 2, 2013 and explained: "subject admitted to borrowing money from client after providing firm with written attestation that she had not done so; misrepresented the nature of funds transfers; failed to fully respond to firm's requests for information regarding client complaint." The Form U5 also disclosed a pending customer dispute over allegations that Jackson misappropriated funds from December 2009 to September 2013, and that \$693,083.76 in damages were identified.

On October 17, 2013, during the course of FINRA's investigation into the Form U5, FINRA sent Jackson a written request pursuant to FINRA Rule 8210 for documents and information. On October 17, 2013, FINRA also sent Jackson a written request pursuant to FINRA Rule 8210 requesting that she appear for on-the-record testimony on October 30, 2013 in Rockville, Maryland. On October 23, 2013, Jackson's counsel informed FINRA that Jackson would not respond to FINRA's requests for documents, information, and testimony. As a result, Jackson violated FINRA Rule 8210.

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

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

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. 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 prejudice 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;

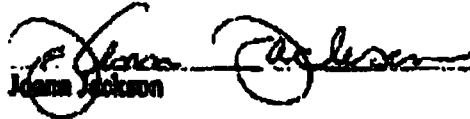
B. If this AWC is not accepted, its submission will not be used as evidence to prove any of the allegations against me; and

C. If accepted:

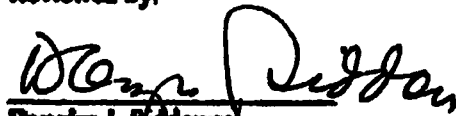
- 1. this AWC will become part of my permanent disciplinary record and may be considered in any future actions brought by FINRA or any other regulator against me;**
- 2. this AWC will be made available through FINRA's public disclosure program in response to public inquiries about my disciplinary record;**
- 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.

10/25/2013
Date (mm/dd/yyyy)


Idana Jackson

Reviewed by:


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Accepted by PINRA:

10/31/2013
Date (mm/dd/yyyy)

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


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