

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 20130387032 ○ |**

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

RE: Lynne M. Triche, Respondent
Investment Company Products/Variable Contracts Representative
CRD No. 5449441

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, I, Respondent Lynne Triche, 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

Triche has been registered with FINRA through consecutive associations with FINRA member firms since December of 2007. From October 2012 through October 22, 2013, Triche was registered with FINRA as a Series 6 Investment Company Products/Variable Contracts Representative through an association with J.P. Morgan Securities LLC (BD No. 79) ("the Firm"). Triche was a registered personal banker and was dually employed by the Firm and JPMorgan Chase Bank, NA ("Chase Bank") throughout her tenure at the Firm.

Triche was last registered with FINRA member firm J.P. Morgan Securities LLC until her securities registration was terminated by that Firm on October 22, 2013. As such, Triche remains subject to FINRA jurisdiction pursuant to Article V, Section 4 of FINRA's By-Laws.

RELEVANT DISCIPLINARY HISTORY

Triche has no disciplinary history with the Securities and Exchange Commission, any state securities agency, FINRA or any other self-regulatory organization.

OVERVIEW

On July 29, 2013, August 24, 2013 and September 7, 2013, while dually employed by the Firm and Chase Bank, Triche violated FINRA Rule 2010 by misappropriating \$100 from three different Chase Bank customers (for a total misappropriation of \$300).

Additionally, during February and March of 2013, Triche violated Article V, Section 2(c) of the FINRA By-Laws and FINRA Rules 1122 and 2010 by failing to timely disclose her January 29, 2013 bankruptcy filing. Although Triche filed for Chapter 7 Bankruptcy on January 29, 2013, she did not disclose the bankruptcy to the Firm until March 27, 2013. Her untimely disclosure to the Firm, approximately two months after her bankruptcy filing, prevented the Firm from updating her Form U4 within the required 30 days of the bankruptcy filing.

FACTS AND VIOLATIVE CONDUCT

Misappropriation of Chase Bank Customers' Funds

From July through September 2013, while Triche was registered with FINRA as an Investment Company Products/Variable Contracts Representative through her association with the Firm, she processed three separate customer withdrawals that resulted in each customer being deprived of \$100 of his funds. More particularly:

- On July 29, 2013, Triche assisted Chase Bank customer, "Customer A" with Customer A's request to withdraw \$400 from his bank account. On that day, Customer A filled out a withdrawal slip for \$400, and Triche handed him \$400 in the form of two \$100 bills and ten \$20 dollar bills. Triche did not give Customer A a receipt for the withdrawal. After reviewing his account online information online, Customer A discovered that the transaction was processed for \$500.
- On August 24, 2013, Triche assisted a second Chase Bank customer, "Customer B", with a \$400 account withdrawal. Customer B signed the withdrawal slip, and received \$400 in cash from Triche. Although Customer B signed the withdrawal slip that Triche had completed, he did not review what was written on the slip. Triche did not give Customer B a receipt. While later reviewing his account information, Customer B discovered that \$500 was withdrawn from his Chase Bank account.

- On September 7, 2013, Triche assisted a third Chase Bank customer, "Customer C" with a \$600 account withdrawal. Customer C later noticed that Triche had given him only \$500 in cash. After Customer C brought this issue to Chase Bank management, Triche provided \$100 to Chase Bank management.

Based on the foregoing, Triche violated FINRA Rule 2010 by misappropriating funds from Chase Bank customers.

Failure to Timely Disclose Personal Bankruptcy Information on Form U4 Within the Required Timeframe

Article V, Section 2(c) of the FINRA By-Laws requires a person applying for registration with FINRA to disclose certain material information, including whether the individual has filed for bankruptcy. At all times, the applicant is required to keep their Form U4 current by filing amendments within 30 days of learning of material facts that are required to be disclosed. FINRA Rule 1122 forbids individuals from filing incomplete or inaccurate registration information. Failure to timely disclose all information required by the Form U4, including whether the individual has filed for bankruptcy, constitutes a violation of Article V, Section 2(c) of the FINRA By-Laws, as well as FINRA Rules 1122 and 2010.

On January 29, 2013, Triche voluntarily filed a Chapter 7 bankruptcy petition in the United States Bankruptcy Court in the Eastern District of Louisiana. The bankruptcy was discharged on or about April 30, 2013. During the time the bankruptcy petition was filed and discharged, Triche was employed at the Firm. Question 14K(1) of Form U4 asks the following question:

"Within the past 10 years have you made a compromise with creditors, filed a bankruptcy petition or been the subject of an involuntary bankruptcy petition?"

Within 30 days of her bankruptcy filing, Triche should have disclosed the filing to her Firm so that the Firm could update the response to Question 14K(1) on her Form U4 timely. Triche did not disclose the bankruptcy to the Firm until March 27, 2013, during a Firm annual branch inspection. On March 28, 2013 the Firm filed a Form U4 amendment on Triche's behalf, which disclosed the January 29, 2013 Chapter 7 bankruptcy filing.

Based on the foregoing, Triche violated Article V, Section 2(c) of the FINRA By-Laws and FINRA Rules 1122 and 2010.

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

- A bar in all capacities from association with any FINRA member firm

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 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.

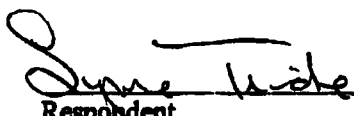
OTHER MATTERS

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; 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.

4-10-14
Date (mm/dd/yyyy)


Respondent

Accepted by FINRA:

7/11/14
Date

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

Susan Light

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