

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER, AND CONSENT
NO. 2014039194102**

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

RE: Jeffrey Stinnett, Respondent (CRD No. 2888588)

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, I, Jeffrey Stinnett, 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

Stinnett was associated with MidAmerica Financial Services, Inc. ("MFS"), from August 2001 until March 7, 2014, most recently as a General Securities Representative, General Securities Principal, Investment Banking Representative, and Municipal Securities Principal. Although he has not been associated with any FINRA broker-dealer since that time, he remains subject to FINRA's jurisdiction under Article IV of FINRA's By-Laws.

RELEVANT DISCIPLINARY HISTORY

Stinnett has no prior disciplinary history.

OVERVIEW

Between June 2013 and November 2013, Stinnett failed to ensure that MFS performed a review of its representatives' electronic correspondence. During this time, Stinnett served as Chief Compliance Officer of MFS, which made him directly responsible for conducting this review.

Through this conduct, Stinnett violated NASD Conduct Rule 3010(d)(2) and FINRA Rule 2010.

RECEIVED

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FACTS AND VIOLATIVE CONDUCT

FINRA District 4

From June 2013 through November 2013, Stinnett served as the Chief Compliance Officer for MFS. In that capacity, he was responsible for conducting the firm's email review. At that time, MFS used a commercially available system for email archiving and review. If used properly, this system would have allowed MFS to review a randomly selected percentage of all emails to or from the firm's representatives, flag emails containing specific terms for supervisory review, and document those reviews.

Between June 2013 and November 2013, however, Stinnett failed to conduct the required review and failed to ensure that anybody else from MFS did so. Through this conduct, Stinnett violated NASD Conduct Rule 3010(d)(2) and FINRA Rule 2010.

OTHER FACTORS

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

- A suspension from associating with any FINRA broker-dealer in any principal capacity for a period of two months, and
- A fine of \$10,000.

The fine shall be due and payable either immediately upon reassociation with a member firm following the two-month suspension noted above, or prior to any application or request for relief from any statutory disqualification resulting from this or any other event or proceeding, whichever is earlier.

I understand that if I am barred or suspended from associating with any FINRA member in a limited capacity, 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 as a principal during the period of the bar or suspension (see FINRA Rules 8310 and 8311). Furthermore, because I am subject to a statutory disqualification during the suspension, if I remain associated with a member firm in a non-suspended capacity, an application to continue that association may be required.

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 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:

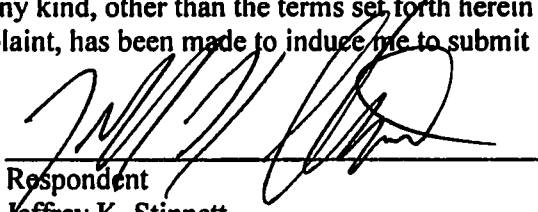
- A. Submission of this AWC is voluntary and will not resolve this matter unless and until it has been reviewed and accepted by the NAC, a Review Subcommittee of the NAC, or the Office of Disciplinary Affairs ("ODA"), pursuant to FINRA Rule 9216;
- B. If this AWC is not accepted, its submission will 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 accordance with FINRA Rule 8313;

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.

D. The Respondent may attach a Corrective Action Statement to this AWC that is a statement of demonstrable corrective steps taken to prevent future misconduct. I understand that I may not deny the charges or make any statement that is inconsistent with the AWC in this Statement. This Statement does not constitute factual or legal findings by FINRA, nor does it reflect the views of FINRA or its staff.

I certify that I have read and understood 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.

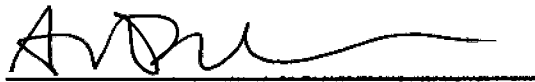
2/9/16
Date (mm/dd/yyyy)


Respondent
Jeffrey K. Stinnett

Accepted by FINRA:

2/23/16
Date

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


Adam B. Walker
Senior Regional Counsel
FINRA Department of Enforcement
120 W. 12th Street
Kansas City, Missouri 64105

(816) 802-4751
adam.b.walker@finra.org