

FINANCIAL INDUSTRY REGULATORY AUTHORITY

OFFICE OF HEARING OFFICERS

Department of Enforcement,

Complainant,

v.

Christopher L. Anderson
(CRD No. 4799519)

Respondent.

DISCIPLINARY PROCEEDING
No. 2014040182902

COMPLAINT

The Department of Enforcement alleges:

SUMMARY

1. Between February 25, 2014, and December 15, 2014, Respondent Christopher Anderson failed to timely and fully comply with two written FINRA Rule 8210 requests for information and failed to comply at all with two written FINRA Rule 8210 requests for testimony. Accordingly, Respondent violated FINRA Rules 8210 and 2010.

RESPONDENT AND JURISDICTION

2. Respondent entered the securities industry in May 2004 with J.P. Turner & Company, L.L.C.

3. Respondent worked at various member firms before joining J.P. Morgan Securities LLC in July 2013 as a registered representative in its Huntington, New York, branch office.

4. On February 14, 2014, J.P. Morgan Securities LLC filed a Form U5 that terminated Respondent's registration with FINRA and provided the following explanation of

termination: "Terminated by affiliate bank – non securities related. Registered rep, in the capacity of an affiliate bank employee, opened a bank account for a family member in violation of the banks (sic) friends and family policy. In addition, registered rep made unauthorized fund withdrawals from the family members (sic) bank account totaling \$20,760.00."

5. Although Respondent is no longer registered or associated with a FINRA member, he remains subject to FINRA's jurisdiction for purposes of this proceeding, pursuant to Article V, Section 4 of FINRA's By-Laws, because (1) the Complaint was filed within two years of the February 14, 2014, filing of a notice of termination and which disclosed that Respondent may have engaged in actionable misconduct, and (2) the Complaint charges him with failing to respond to FINRA requests for information during the two-year period after the date upon which he ceased to be registered or associated with a FINRA member.

**CAUSE OF ACTION
Failure to Respond to Requests for Information and Testimony
(FINRA Rules 8210 and 2010)**

6. Enforcement realleges and incorporates by reference paragraphs 1–5 above.

7. After receipt of the U5 filing, FINRA staff opened an investigation into whether Respondent may have converted funds from a family member's bank account.

8. On February 25, 2014, FINRA staff in FINRA's Office of Fraud Detection and Market Intelligence (OFDMI) sent Respondent a written request for information pursuant to FINRA Rule 8210 with a requested response deadline of March 11, 2014, to his residential address reflected in the Central Registration Depository ("CRD address").

9. The request was mailed by both U.S. first-class mail and certified mail, return receipt requested.

10. The certified mailing was returned to FINRA staff as "Unclaimed/Unable to Forward."

11. The copy sent by first-class mail was not returned and is presumed delivered.

12. Respondent failed to respond to the February 25 request.

13. On March 12, 2014, FINRA OFDMI staff sent Respondent the February 25 request for a second time pursuant to FINRA Rule 8210 to his CRD address, with a requested response deadline of March 26, 2014.

14. This second request was also sent by both U.S. first-class mail and certified mail, return receipt requested.

15. The second request sent by certified mail was returned to FINRA staff as "Unclaimed/Unable to Forward."

16. The copy sent by first-class mail was not returned and is presumed delivered.

17. Respondent failed to respond to the second request.

18. On April 21, 2014, FINRA staff initiated a Rule 9552, Notice of Suspension Proceeding, and sent a notification letter to Respondent at his CRD address by both FedEx Overnight Delivery and U.S. first-class mail. FINRA staff attached copies of the February 25 and March 12 requests and notified Respondent that he could "take corrective action by complying with the requests before the Suspension Date" of May 15, 2014.

19. When Respondent still failed to respond, FINRA staff notified Respondent on May 15, 2014, by FedEx Overnight Delivery and U.S. first-class mail, that he was suspended as of that day and would be barred as of July 24, 2014, if he did not request termination of the suspension.

20. On July 25, 2014, FINRA staff notified Respondent by U.S. first-class mail and certified mail, return receipt requested, that he was barred as of July 24, 2014.

21. On August 11, 2014, Respondent faxed to FINRA staff a letter claiming that he had submitted a response “back in March.”

22. Respondent included a copy of a one paragraph letter he claimed to have submitted in March in which he asserted that allegations of “unauthorized and/or fraudulent transactions” in his grandmother’s account were a mistake.

23. FINRA Staff had not previously received any response from Respondent.

24. Respondent’s faxed materials did not fully respond to and comply with FINRA OFDMI staff’s 8210 requests for information.

25. After receiving Respondent’s fax, FINRA staff notified Respondent by U.S. first-class and certified mail sent to his CRD address on August 18, 2014, that FINRA was vacating the bar, but that “the staff still reserves the right to ask you questions, request information, and pursue an action against you, including, but not limited to, disciplinary action for your untimely response to requests for information under FINRA Rule 8210.”

26. Respondent signed the return receipt.

27. The matter was thereafter referred to FINRA Enforcement staff to investigate.

28. On November 12, 2014, pursuant to FINRA Rule 8210, FINRA Enforcement staff sent to Respondent’s CRD address a written request for Respondent to testify at FINRA’s offices in New York, New York, on December 2, 2014.

29. The request was sent by U.S. first-class mail.

30. The first-class mailing was not returned and is presumed to be delivered.

31. Respondent failed to appear for testimony as requested.

32. On December 2, 2014, FINRA Enforcement staff sent a second request for testimony pursuant to FINRA Rule 8210 to Respondent requesting his appearance at FINRA's offices in Rockville, Maryland, on December 10, 2014.

33. The second request for testimony was sent to Respondent's CRD address by both FedEx Overnight Delivery and U.S. first-class mail.

34. The copy sent by FedEx Overnight Delivery was delivered on December 3, 2014.

35. The copy sent by first-class mail was not returned and is presumed to be delivered.

36. Respondent failed to appear for testimony as requested.

37. By virtue of the foregoing, Respondent Christopher Anderson failed to timely and fully comply with two written FINRA Rule 8210 requests for information and failed to comply at all with two written FINRA Rule 8210 requests for testimony. Accordingly, Respondent violated FINRA Rules 8210 and 2010.

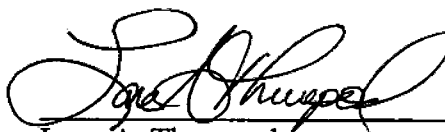
RELIEF REQUESTED

WHEREFORE, the Department respectfully requests that the Panel:

- A. make findings of fact and conclusions of law that Respondent(s) committed the violations charged and alleged herein;
- B. order that one or more of the sanctions provided under FINRA Rule 8310(a), including monetary sanctions, be imposed;
- C. order that Respondent bears such costs of proceeding as are deemed fair and appropriate under the circumstances in accordance with FINRA Rule 8330;

FINRA DEPARTMENT OF ENFORCEMENT

Date: Jan 15, 2015



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