

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2014040347901**

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

RE: Abed Lulu (CRD No. 2625609),
Respondent

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, Abed Lulu, ("Lulu" or "Respondent"), submits 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. Respondent hereby accepts and consents, 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

Respondent first became registered with FINRA as a General Securities Representative ("GSR") in May 1995, through an association with a member firm. From 1997 through October 2013, Lulu has been registered with FINRA as a GSR through an association with nineteen member firms. From November 2013 through February 2015, Lulu was associated with Laidlaw & Co, (UK) LTD (BD No. 119037) ("Laidlaw") as a GSR. Respondent joined Rockwell Global Capital LLC (BD No. 142485) ("Rockwell"), as a GSR in February 2015. On November 12, 2015, Rockwell filed a Form U5 Uniform Notice for Securities Industry Registration ("Form U5") reporting his termination on October 14, 2015.

Lulu is not currently registered with FINRA or associated with any FINRA member firm. FINRA retains jurisdiction over Lulu pursuant to Article V, Section 4 of the FINRA By-Laws.

RELEVANT DISCIPLINARY HISTORY

On October 13, 2004, while Respondent was associated with Harrison Securities,

Inc. (BD No. 14103) he consented to findings initiated by the Colorado Division of Securities, related to unsuitable and unauthorized trading in a customer's account, resulting in a suspension from doing any business in Colorado, for the time period November 1, 2004 through November 19, 2004.

FACTS AND VIOLATIVE CONDUCT

Article V, Section 2(c) of FINRA's By-Laws requires that every application for registration filed with FINRA be kept current at all times by supplementary amendment, which must be filed with FINRA not later than 30 days after learning of the facts or circumstances giving rise to the amendment. Question 14M of the Uniform Application for Securities Industry Registration or Transfer ("Form U4") requires registrants to disclose whether they have any unsatisfied judgments or liens against them.

FINRA Rule 1122 prohibits filing with FINRA information regarding registration which is incomplete or inaccurate so as to be misleading, or which could in any way tend to mislead, or failing to correct such filing after notice thereof.

FINRA Rule 2010 provides that a member, in the conduct of his business, shall observe high standards of commercial honor and just and equitable principles of trade.

Lulu was the subject of an Internal Revenue Service ("IRS") tax lien in the amount of \$31,518, filed by the IRS on October 2013, and a New York State ("NYS") tax lien in the amount of \$3,777, filed by NYS on May 14, 2012. Respondent, however, did not amend his Form U4 to reflect these liens until August 22, 2014. Moreover, he provided false information to his firm, by stating on his Firm's June 2014 Annual Compliance Questionnaire that he did not have any judgments or liens against him.

Respondent's failure to timely disclose the federal and state tax liens was in violation of Article V, Section 2 of FINRA's By-Laws and FINRA Rules 1122 and 2010.

B. Respondent also consents to the imposition of the following sanctions:

- a \$5,000 fine; and
- a suspension of three months from associating with any FINRA member firm in any capacity.

The fine shall be due and payable either immediately upon reassociation with a member firm following the three-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.

Respondent specifically and voluntarily waives any right to claim that he is unable to pay, now or at any time hereafter, the monetary sanction imposed in this matter.

Respondent understands that if he is suspended from associating with any FINRA member, that he becomes 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, he may not be associated with any FINRA member in any capacity, including clerical or ministerial functions, during the period of the 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

Respondent specifically and voluntarily waives 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, Respondent specifically and voluntarily waives 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.

Respondent further specifically and voluntarily waives 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.

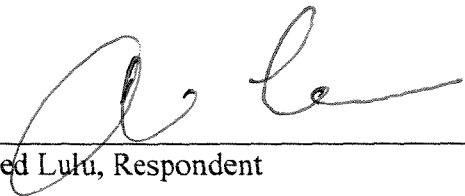
OTHER MATTERS

Respondent understands 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. Respondent 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. Respondent may attach a Corrective Action Statement to this AWC that is a statement of demonstrable corrective steps taken to prevent future misconduct. Respondent understands that he 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 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.

12/14/2015
Date (mm/dd/yyyy)


Abed Lulu, Respondent

Accepted by FINRA:

1/20/16
Date

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


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