

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2014041811501**

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

RE: Geuris Valentin Ramos, Respondent
General Securities Representative
CRD No. 4821611

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:

BACKGROUND

Respondent Geuris Valentin Ramos entered the securities industry in February 2004, and has been registered with seven firms. Ramos has held General Securities Representative (Series 7), State Law (Series 63), and Investment Advisor (Series 65) licenses. He was registered with J.P. Morgan Securities LLC from October 2012 until July 2014, when his registration was terminated based on misconduct described herein. His last registration was terminated on October 16, 2015.

Although Ramos 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 this AWC (1) is being issued within two years after the date upon which he ceased to be registered with a FINRA member, namely October 16, 2015, and (2) charges him with misconduct committed while he was registered with a FINRA member.

FACTS AND VIOLATIVE CONDUCT

Between October 2012 and June 2014, Ramos participated in an undisclosed outside business activity involving a car leasing business. Ramos entered into an arrangement with two colleagues outside of his firm pursuant to which Ramos purchased and financed 21 cars in his own name, and turned the cars over to a leasing company operated by one of those colleagues. He paid the monthly financing or lease charges on the vehicles using money provided to him by one of his colleagues. The leasing company paid the financing and operating costs and leased the cars out to private car service operators for a monthly fee. Ramos did not receive any money from this business, but expected to receive a share of the profits once the cars were fully paid for.

FINRA Rule 3270 prohibits a registered person from, among other things, being compensated or having the expectation of compensation from any other person as a result of any business activity outside the scope of the relationship with his or her member firm without providing prior written notice to the firm. Ramos failed to notify his firm about his participation in the leasing business.

By virtue of the foregoing conduct, Ramos violated FINRA Rule 3270, and thereby also violated FINRA Rule 2010.

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

1. a 60 day suspension from association with any FINRA member firm in all capacities; and
2. a \$5,000 fine.

The sanctions imposed herein shall be effective on a date set by FINRA staff.

The fine shall be due and payable either immediately upon reassociation with a member firm following the 60 day 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 specifically and voluntarily waive any right to claim that I am unable to pay, now or at any time hereafter, the monetary sanction imposed in this matter.

I understand that if I am 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 suspension (see FINRA Rules 8310 and 8311).

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:

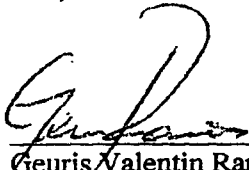
- A. Submission of this AWC is voluntary and will not resolve this matter unless and until it has been reviewed and accepted by the NAC, a Review Subcommittee of the NAC, or the Office of Disciplinary Affairs ("ODA"), pursuant to FINRA Rule 9216;
- B. If this AWC is not accepted, its submission will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

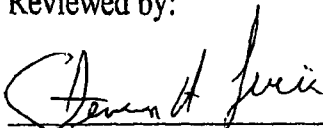
D. I may attach a Corrective Action Statement to this AWC that is a statement of demonstrable corrective steps taken to prevent future misconduct. I understand that I may not deny the charges or make any statement that is inconsistent with the AWC in this Statement. This Statement does not constitute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

I certify that I have read and 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.

1/4/16
Date


Geuris Valentin Ramos
Respondent

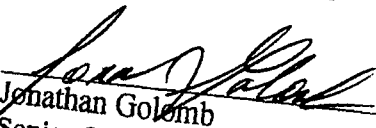
Reviewed by:


Steven A. Lucia, Esq.
Tobey Village Office Park
180 Office Parkway
Pittsford, New York 14534
(585) 270-5420

Accepted by FINRA:

Jan. 15, 2016
Date

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


Jonathan Golemb
Senior Special Counsel
FINRA Department of Enforcement
15200 Omega Drive
Rockville, MD 20832

STEVEN A. LUCIA

ATTORNEY AND COUNSELLOR AT LAW

Tobey Village Office Park
180 Office Parkway
Pittsford, New York 14534
Telephone: (585) 270-5420
E-mail: salucialaw@yahoo.com

January 6, 2016

VIA EMAIL AND US MAIL
Jonathan Golomb, Esq.
Senior Special Counsel
Financial Industry Regulatory Authority
15200 Omega Drive
3rd Floor
Rockville, MD 20850-3241

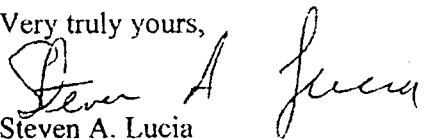
Re: Geuris Valentin Ramos; Ref.: 20140418115

Dear Mr. Golomb:

As you know, I am the attorney for Geuris Ramos. This Statement of Corrective Action is submitted by Mr. Ramos. It does not constitute factual or legal findings by FINRA, nor does it reflect the views of FINRA or its staff. We respectfully request that FINRA please consider the following with regard to the proposed Acceptance, Waiver and Consent ("AWC") agreement offered to Mr. Ramos. By his signature below, Mr. Ramos affirms that he has taken the steps detailed below with respect to the conduct at issue.

Mr. Ramos understands the serious nature of his actions and the manner in which he ran afoul of FINRA's rules. Mr. Ramos has reeducated himself with all of FINRA's rules and has reviewed FINRA disciplinary proceedings that address conduct similar to his own. He has discussed his legal obligations at length with the undersigned counsel. Mr. Ramos will not engage in any unapproved outside business activity in derogation of his employment with any member firm. He understands that any business activity outside the purview of any member firm with which he is associated must be reviewed and approved in advance by his member firm.

Very truly yours,

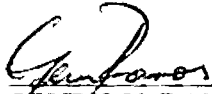

Steven A. Lucia

Jonathan Golomb, Esq.

January 6, 2016

Page 2

I have reviewed the forgoing Statement of Corrective Action and affirm that I have taken the steps detailed herein. I have been counseled by my attorney and have reviewed my obligations under the law and FINRA rules. I will insure that I never again engage in any conduct violative of the law or applicable rules.



GEURIS V. RAMOS