

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2014042148801**

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

RE: Ismail Elmas, Respondent
CRD No. 2702531

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.

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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

Ismail Elmas ("Elmas" or "Respondent") entered the securities industry in 1996 as an Investment Company and Variable Contracts Products Representative ("IR") with a FINRA member firm. In February 1999, Elmas also became registered as a General Securities Representative ("GS") with that same FINRA member firm. Thereafter, Elmas was registered with four other FINRA member firms before he became registered as a GS and IR with Cuso Financial Services, L.P. ("the Firm") on January 23, 2013. On August 8, 2014, the Firm filed a Uniform Termination Notice for Securities Industry Registration ("Form U5") with FINRA disclosing that the Firm had terminated Elmas' employment with the Firm on July 29, 2014.

Elmas is not currently associated with a FINRA member firm, but remains subject to FINRA's jurisdiction pursuant to Article V, Section 4 of FINRA's By-Laws.

RELEVANT DISCIPLINARY HISTORY

Elmas has no prior relevant disciplinary history.

OVERVIEW

Elmas failed to provide documents and information requested by FINRA staff in letters dated August 11, 2014 and August 19, 2014, in violation of FINRA Rules 8210 and 2010.

FACTS AND VIOLATIVE CONDUCT

On August 11, 2014, during the course of an investigation into allegations that Elmas converted client funds for personal use and participated in an unauthorized outside business activity, FINRA sent a letter to Elmas, pursuant to FINRA Rule 8210, requesting documents and information by August 18, 2014. Elmas did not respond to the August 11, 2014 letter.

On August 19, 2014, FINRA staff sent Elmas a second request for the documents and information requested in the August 11, 2014 letter, pursuant to FINRA Rule 8210. Elmas' response to the August 19, 2014 letter was due by August 26, 2014.

On or about August 28, 2014, counsel for Elmas notified FINRA that Elmas would not be providing the documents and information requested in the letters dated August 11, 2014 and August 19, 2014. To date, Elmas has not provided FINRA with any documents or information.

FINRA Rule 8210 authorizes FINRA, in the course of its investigations, to require persons associated with a FINRA member to "provide information orally, in writing, or electronically...with respect to any matter involved in the investigation."

In addition, FINRA Rule 2010 provides that "[a] member, in the conduct of its business, shall observe high standards of commercial honor and just and equitable principles of trade."

By failing to provide the documents and information that were requested pursuant to the August 11, 2014 and August 19, 2014 letters, Elmas violated FINRA Rules 8210 and 2010.

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

A bar from associating with any FINRA member firm in any capacity.

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 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.

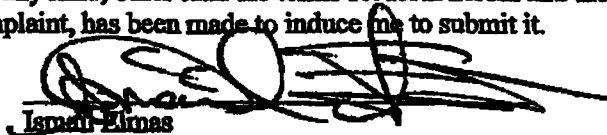
OTHER MATTERS

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 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.

Sept 15, 2014
Date


Israel Elnas

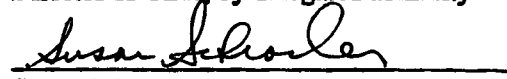
Reviewed by:

David G. Barger 9/15/2014
David G. Barger, Esq.
Tysons Litigation Group
Greenberg Traurig, LLP
1750 Tysons Boulevard, Suite 1200 | McLean, VA 22102
Tel: 703-749-1307

Accepted by FINRA:

9/25/14
Date

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


Susan Schroeder
Senior Vice President and Counsel
FINRA Department of Enforcement
One World Financial Center
200 Liberty Street
New York, NY 10281-1003
Tel: 646-315-7466