

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2014043113801**

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

RE: Tina M. Lukan, Respondent
Registered Representative
CRD No. 4375312

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

Tina Marie Lukan (Lukan) first entered the securities industry in a non-registered capacity in 1999 with a member firm. In November 2001, she became associated with another member firm where she obtained her Series 7 (General Securities Representative/GSR) registration in February 2006 and her Series 24 (General Securities Principal/GSP) registration in August 2006. In June 2008, she joined Cambridge Investment Research, Inc. (BD No. 39543) (Cambridge), registered as a GSR and GSP. At all relevant times, Lukan was associated with Cambridge in the capacity of the office manager. Lukan was permitted to resign from Cambridge on September 29, 2014, and on October 27, 2014, the firm filed a Uniform Termination Notice for Securities Industry Registration (Form U5) terminating Lukan's registrations with FINRA and her association with the firm. The Firm reported on the Form U5 that Lukan was permitted to resign "for using DBA business fund for personal use."

Lukan is not currently registered with FINRA or associated with any FINRA member firm. FINRA retains jurisdiction over Lukan pursuant to Article V,

Section 4 of the FINRA By-Laws.

RELEVANT DISCIPLINARY HISTORY

Lukan has no relevant disciplinary history.

OVERVIEW

In September 2014, while registered through Cambridge, Lukan converted \$976.11, from a bank account for the Cambridge branch office where she worked.

By converting her member firm employer's funds, Lukan violated FINRA Rule 2010.

FACTS AND VIOLATIVE CONDUCT

FINRA Rule 2010 requires all associated persons to observe high standards of commercial honor and just and equitable principles of trade.

Conversion is an intentional and unauthorized taking of and/or exercise of ownership over property by one who neither owns the property nor is entitled to possess it, and constitutes a violation of Rule 2010.

While registered through Cambridge, Lukan, without permission, wrote two checks payable to herself from the branch office bank account. The first check dated September 5, 2014 was in the amount of \$276.11. The second check, dated September 9, 2014, was in the amount of \$700.00. In total, Lukan, converted \$976.11 from the branch office bank account for her personal use.

By reason of the foregoing, Lukan violated FINRA Rule 2010.

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

- A bar from associating with any FINRA member in any and all capacities.

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

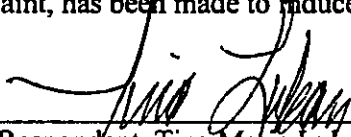
I understand that:

- 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 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.

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.

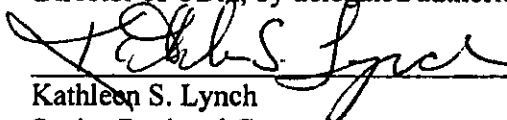
5/1/15
Date (mm/dd/yyyy)


Respondent, Tina Marie Lukan

Accepted by FINRA:

5/11/15
Date (mm/dd/yyyy)

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


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