

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2014043517201**

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

RE: Rohit Bansal, Respondent
CRD No. 6376630

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, I, Rohit Bansal, 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

Rohit Bansal ("Bansal" or "Respondent") became associated as a non-registered person with FINRA member Goldman, Sachs & Co. ("GS" or the "Firm") on July 24, 2014. The Firm then filed a Uniform Application for Securities Industry Registration ("Form U4") on September 10, 2014, to permit Bansal to sit for the Investment Banking Representative Examination (Series 79). On November 19, 2014, the Firm filed a Uniform Termination Notice for Securities Industry Registration ("Form U5"), reporting that on October 03, 2014, Bansal was terminated for having "improperly received and transmitted confidential information...obtained from a former colleague at a federal regulator...".

Bansal is not currently employed by a FINRA member. Pursuant to Article V, Section 4 of FINRA's By-Laws, FINRA retains jurisdiction over Bansal.

RELEVANT DISCIPLINARY HISTORY

In November 2015, the United States Attorney for the Southern District of New York announced that Bansal pled guilty to one count of theft of government property, for theft of confidential information from the Federal Reserve Bank of New York ("FRBNY").

In November 2015, pursuant to sections 8(e) and (i)(3) of the Federal Deposit Insurance Act, as amended (the "FDI Act"), 12 U.S.C. § 1818(e) and (i)(3), the Board of Governors of the Federal Reserve System (the "Board of Governors") issued an Order of Prohibition in which Bansal was barred from participating in the banking industry following his guilty plea for theft of government property.

OVERVIEW

From August 2007 through March 2014, Bansal was employed as a supervisory manager at the FRBNY. Thereafter, from July 2014 until October 2014, Bansal was employed as an associate at the Firm. In November 2015, Bansal pled guilty to one count of theft of government property for receiving, utilizing, and disseminating confidential supervisory information related to the FRBNY and Board of Governors in an effort to further his employment at the Firm. As a result of his misuse of confidential supervisory information, Bansal violated FINRA Rule 2010.

FACTS AND VIOLATIVE CONDUCT

From August 2007 through March 2014, Bansal was employed as a supervisory manager at the FRBNY, where he had responsibility for supervising certain banks. Thereafter, from July 2014 until October 2014, Bansal was employed as an associate at the Firm, which, among other things, provided advice on regulatory issues to certain client banks, including banks supervised by the FRBNY.

In November 2015, the United States Attorney for the Southern District of New York announced that Bansal pled guilty to one count of theft of government property, the value of which property did not exceed \$1,000. According to the Information filed in federal court, Bansal received, utilized, and disseminated confidential supervisory information related to the FRBNY and Board of Governors in an effort to further his employment at the Firm.

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

Based upon the conduct described above, including the misuse of confidential supervisory information, Bansal violated FINRA Rule 2010.

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

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. 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.

6/9/14
Date

Rohit Bansal
Respondent
Rohit Bansal

Reviewed by:

E. Scott Morvillo
E. Scott Morvillo, Esq.
Morvillo LLP
500 5th Avenue, 43rd Floor
New York, NY 10110
(212) 796-6345
smorvillo@morvillolaw.com

Accepted by FINRA:

6/16/16
Date

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

Susan Light
Susan Light,
Sr. Vice President & Chief Counsel
FINRA Department of Enforcement
One World Financial Center
200 Liberty Street, 11th Floor
New York, NY 10281
Phone: (646) 315-7333