

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2014043840701**

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

**RE: Christel Marie Sparks, Respondent
Registered Representative
CRD No.2147336**

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, Christel Marie Sparks ("Sparks" 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 Sparks 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

Sparks entered the securities industry in March of 1996 when she became registered as an Investment Company Products/Variable Contracts Representative with Nationwide Investment Services Corporation ("Nationwide" or "Firm"). Sparks' registration with Nationwide was terminated on December 17, 2014 and she has not been registered with any other FINRA registered firm since that time. Sparks remains subject to the jurisdiction of FINRA pursuant to Article V, Section 4(a) of FINRA's By-Laws, which provides for a two-year period of retained jurisdiction over formerly-registered persons.

RELEVANT DISCIPLINARY HISTORY

Sparks has no relevant disciplinary history.

OVERVIEW

Sparks failed to update her Uniform Application for Securities Industry Registration or Transfer ("Form U4") to disclose a July 31, 2013 bankruptcy petition within 30 days of filing the petition. When confronted by her employer, Sparks provided false and misleading information claiming to have previously disclosed the bankruptcy. Sparks also provided FINRA with falsified documents and misleading testimony during her on-the-record interview ("OTR") regarding this matter. Therefore, Sparks violated Article V, Section 2 of FINRA By-Laws, and FINRA Rules 1122, 8210, and 2010.

FACTS AND VIOLATIVE CONDUCT

Article V, Section 2 of the FINRA By-Laws requires an associated person to keep her Form U4 "current at all times," and to file an amendment to the Form U4 within 30 days of learning of any disclosure event. FINRA Rule 1122 provides that the filing by a registered representative of a Form U4 that "is incomplete or inaccurate so as to be misleading, or which in any way tends to mislead, or the failure to correct such filing after notice thereof, may be deemed to be conduct inconsistent with just and equitable principles of trade and when discovered may be sufficient cause for appropriate disciplinary action."

FINRA Rule 8210 requires an associated person provide information, orally or in writing, and allow for inspection of books and records when requested to do so in connection with a FINRA investigation. Providing false documents and testimony to FINRA violates Rule 8210.

FINRA Rule 2010 requires members and associated persons to "observe high standards of commercial honor and just and equitable principles of trade." Rule 2010 applies to unethical business-related conduct, regardless of whether it specifically involves a security.

At all times relevant to this matter, registered representatives completing a Form U4 were asked in Question 14K: "Within the past 10 years: (1) have you made a compromise with creditors, filed a bankruptcy petition or been the subject of an involuntary bankruptcy petition?"

On July 31, 2013, Sparks filed for Chapter 13 bankruptcy (the "2013 bankruptcy"). Sparks willfully failed to amend her Form U4 to disclose the 2013 bankruptcy. To date, no amended Form U4 has been filed.

FINRA became aware through public records of the 2013 bankruptcy and sent a letter to Nationwide's Compliance Department ("Compliance") in October of 2014 inquiring as to why an amended Form U4 had not been filed. Nationwide in turn questioned Sparks, who claimed she previously disclosed the 2013 bankruptcy in a May 30, 2013 email to Compliance. Nationwide searched its

email system to find any such email sent by or received from Sparks on May 30, 2013 and no email could be found. Following an interview with Sparks Nationwide terminated her for violating company policies pertaining to honesty and keeping current on required Form U4 disclosures.

During an OTR with FINRA, Sparks provided a purported copy of the alleged May 30, 2013 email to Compliance and testified under oath that, among other things, she sent the May 30, 2013 disclosure email to Compliance. The document provided by Sparks to FINRA was a fabricated document, and Ms. Sparks' testimony pertaining to her alleged disclosure of the 2013 bankruptcy was false and misleading.

Sparks violated FINRA Rules 8210 and 2010 by providing a fabricated document and false and misleading testimony to FINRA. Sparks further violated Rule 2010 by providing false and misleading information to her employer. Finally, Sparks violated Article V, Section 2 of the FINRA By-Laws and FINRA Rules 1122 and 2010 when she willfully failed to disclose her 2013 bankruptcy petition.

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

A bar from association with any FINRA-registered firm in all capacities.

I understand that this settlement includes a finding that I willfully omitted to state a material fact on a Form U4, and that under Section 3(a)(39)(F) of the Securities Exchange Act of 1934 and Article III, Section 4 of FINRA's By-Laws, this omission makes me subject to a statutory disqualification with respect to association with a member.

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.

11-22-2016
Date (mm/dd/yyyy)

complaint, has been made to induce me to submit it.

Christel Marie Sparks
Respondent, Christel Marie Sparks

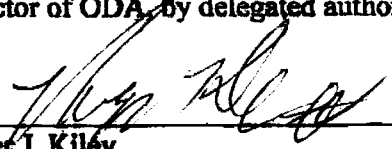
Reviewed by:

(Insert attorney information here)

Accepted by FINRA:

11/28/16
Date

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



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