

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2015044416501**

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

RE: Daniel P. Glavin, Respondent
Former Registered Representative
CRD No. 4252025

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

Daniel P. Glavin ("Glavin") was first registered with a FINRA member firm in February 2001. He was registered with three FINRA member firms prior to registering with Country Capital Management Company ("CCMC") as an Investment Company and Variable Contracts Products Representative (Series 6) on August 18, 2008. Glavin remained registered with CCMC until June 7, 2013. After leaving CCMC, Glavin was registered with another FINRA member firm until September 10, 2014.

Although Glavin is no longer associated with a FINRA member firm, FINRA retains jurisdiction over him pursuant to Article V, Section 4, of FINRA's By-Laws.

OVERVIEW

Between January 2012 and June 2013, while registered with CCMC, Glavin converted approximately \$45,000 in customer funds for his personal use and fabricated documents purporting to be customer account statements. Furthermore, Glavin failed to cooperate with FINRA's investigation. By reason of the foregoing, Glavin violated FINRA Rules 2010 and 8210.

FACTS AND VIOLATIVE CONDUCT

A. Conversion and Fabrication of Documents in Violation of FINRA Rule 2010

Beginning in or about January 2012, while Glavin was registered with CCMC, a customer of Glavin's gave him approximately \$45,000 to invest in purported certificates of deposit issued by YUM! Brands (Kentucky Fried Chicken's parent company). The certificates of deposit Glavin recommended that his customer purchase did not exist and Glavin did not use the customer's funds to purchase certificates of deposit. Instead, Glavin converted the funds for his own personal use. After several demands by the customer, Glavin returned the funds to the customer.

In connection with the above, on at least six occasions through June 7, 2013, Glavin fabricated account statements purporting to show the customer's investments in the non-existent certificates of deposit and hand delivered the statements to the customer.

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 converting customer funds and creating false account statements, Glavin violated FINRA Rule 2010.

B. Failure to Provide Documents and Testimony in Violation of FINRA Rule 8210

On March 4, 2015, FINRA requested, pursuant to FINRA Rule 8210, that Glavin provide documents and information on or before March 13, 2015 and that he appear for an on-the-record interview on March 20, 2015.

As stated in his phone call with FINRA staff on March 18, 2015, and by this agreement, Glavin acknowledges that he received FINRA's requests and that he will not provide the requested documents and information or appear for on-the-record testimony at any time. By refusing to provide the requested documents and information and appear for on-the-record testimony as requested pursuant to FINRA Rule 8210, Glavin violated FINRA Rules 8210 and 2010.

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

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

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.

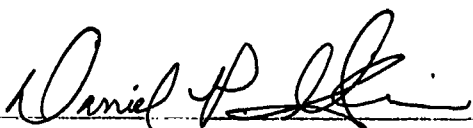
OTHER MATTERS

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.

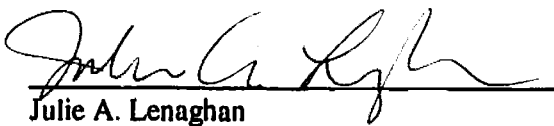
3/27/15
Date


Daniel P. Glavin, Respondent

Accepted by FINRA:

3/31/15
Date

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


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