

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2015044618501**

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

RE: Cinthia Elizabeth Marquez, ("Respondent" or "Marquez")
Investment Company Products/Variable Contracts Representative
CRD No. 6183962

0 02/19/16 PM 3:35 FIN

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, 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 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

Marquez worked as a business banker for J.P. Morgan Chase Bank ("Chase") from June 2005 until February 2015. Marquez entered the securities industry in September 2013, when she registered as a Series 6 Investment Company Products/Variable Contracts Representative with J.P. Morgan Securities LLC ("JP Morgan" or the "Firm"), a FINRA regulated broker-dealer. On February 27, 2015, JP Morgan filed a Uniform Termination Notice for Securities Industry Registration ("Form U5") on Marquez's behalf disclosing that Marquez's employment with JP Morgan was terminated on February 6, 2015. Although Marquez has not reassociated with another FINRA regulated broker-dealer, pursuant to Article V, Section 4(a) of FINRA's By-Laws, FINRA retains jurisdiction over Marquez.

RELEVANT DISCIPLINARY HISTORY

Marquez has no relevant disciplinary history in the securities industry.

OVERVIEW

From September 2013 through January 2015 (the "Relevant Period"), Marquez served as corporate secretary and director for a private company without disclosing such participation to, or receiving approval for such participation from, her employing FINRA regulated broker-dealer. Through the foregoing, Marquez violated FINRA Rules 3270 and 2010.

Additionally, in November 2013, Marquez falsely stated to her employing FINRA regulated broker-dealer in an annual compliance questionnaire that she was not involved in any outside business activities. Through the foregoing, Marquez violated FINRA Rule 2010.

FACTS AND VIOLATIVE CONDUCT

1. Unapproved Outside Business Activity

FINRA Rule 3270 provides, in relevant part:

No registered person may be an employee, independent contractor, sole proprietor, officer, director or partner of another person, or be compensated, or have the reasonable expectation of compensation, from any other person as a result of any business activity outside the scope of the relationship with his or her member firm, unless he or she has provided prior written notice to the member, in such form as specified by the member.

FINRA Rule 2010 requires associated persons to "observe high standards of commercial honor and just and equitable principles of trade." A violation of FINRA Rule 3270 is considered inconsistent with high standards of commercial honor and just and equitable principles of trade.

During the Relevant Period, Marquez was the corporate secretary and a named director for a private company incorporated in the State of Florida in August 2013 to build and install kitchen cabinets in a number of new residential developments. As corporate secretary and director, she assisted with opening a bank account for the company, writing checks for the company as needed, and assisting with dissolution of the company and the winding-up of affairs.

JP Morgan's written policies and procedures require representatives to disclose to, and seek approval from, the Firm any affiliation with another business—paid or unpaid—as a director, officer or holder of an official position.

Marquez never disclosed to JP Morgan that she held an officer or director position with the private company, and never received permission from JP Morgan for the same.

Through the foregoing, Marquez violated FINRA Rules 3270 and 2010.

2. False Compliance Questionnaire

Providing misleading or false answers to a FINRA regulated broker-dealer on compliance questionnaires is a violation of FINRA Rule 2010.

On November 26, 2013, Marquez completed JP Morgan's annual compliance questionnaire. The questionnaire asked Marquez: "Do you have any Outside Business Activities that need to be disclosed?" Marquez responded "no." This statement was false because, at the time, Marquez was the corporate secretary and director in a private company that built and installed kitchen cabinets in residential developments, and was also a 50% partner in a private trucking company, neither of which were disclosed to JP Morgan in the 2013 annual compliance questionnaire.

Through the foregoing, Marquez violated FINRA Rule 2010.

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

- A three month suspension from associating with any FINRA member in any capacity, and
- a \$5,000 fine.

The fine shall be due and payable either immediately upon reassociation with a member firm following the three month suspension noted above, or prior to any application or request for relief from any statutory disqualification resulting from this or any other event or proceeding, whichever is earlier.

I specifically and voluntarily waive any right to claim that I am unable to pay, now or at any time hereafter, the monetary sanction imposed in this matter.

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.

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

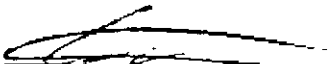
C. If accepted:

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.

D. I may attach a Corrective Action Statement to this AWC that is a statement of demonstrable corrective steps taken to prevent future misconduct. I understand that I may not deny the charges or make any statement that is inconsistent with the AWC in this Statement. This Statement does not constitute factual or legal findings by FINRA, nor does it reflect the views of FINRA or its staff.

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.

02/16/2016
Date (mm/dd/yyyy)


Cinthia Elizabeth Marquez, Respondent

Accepted by FINRA:

3/1/16
Date

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


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