

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2015044649361**

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

**RE: Cynthia Jan Reinbold, Respondent
CRD No. 1038378**

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, I, Cynthia Jan Reinbold ("Reinbold" or "Respondent") 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

Reinbold entered the securities industry in June 1980 when she became associated with a FINRA member firm. From April 17, 2012 through January 29, 2015, Reinbold was associated with Raymond James Financial Services, Inc. ("RJFS") and registered with FINRA. RJFS filed a Uniform Termination Notice for Securities Industry Registration ("Form U5") for Reinbold on February 27, 2015, terminating her association with the firm as of January 29, 2015. Reinbold holds Series 7 and 63 licenses.

Although Reinbold is not currently associated with a FINRA member, she remains subject to FINRA's jurisdiction 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

Reinbold does not have any prior disciplinary history.

OVERVIEW

While associated with RJFS, Reinbold falsified a firm document, causing RJFS to maintain inaccurate books and records, in violation of FINRA Rules 2010 and 4511(a). While associated with another FINRA member firm prior to RJFS, Reinbold failed to timely amend her Uniform Application for Securities Industry Registration or Transfer ("Form U4") to disclose compromises with creditors, in violation of Article V, Section 2(c) of FINRA's By-Laws, and FINRA Rules 1122 and 2010.

FACTS AND VIOLATIVE CONDUCT

Falsification of Transfer on Death Agreement

In December 2012, Reinbold met with BC, who was elderly, expressed a desire to open two accounts at RJFS, and that upon death, he wished to transfer all of his RJFS assets from both accounts to his son MIH. During the meeting, BC completed and signed new account documents for two accounts and one Transfer on Death Agreement ("TOD"). The TOD listed BC's son MIH as the 100% beneficiary. After the meeting, Reinbold realized that she would need two TODs - one for each account; therefore, Reinbold thereafter made a copy of the previously signed TOD (prior to an account number being added to the form) that she intended to submit to the firm with second new account she was opening for BC. The two new accounts and the one TOD were ultimately submitted to the new accounts department in early 2013 and account numbers were assigned for the two accounts. Reinbold, however, forgot to submit the second TOD to the firm and misplaced it in MIH's client file. Two years later, and after BC had passed away, Reinbold discovered the unfiled TOD in MIH's file when she was opening an additional account for MIH. The form did not reflect any account number because no account numbers had been assigned at the time Reinbold had copied the document two years earlier. Reinbold then entered the account number of the second BC account onto the TOD and submitted it to the firm for processing.

RJFS had a written supervisory procedure prohibiting its registrants from signing any documents on behalf of a customer or altering firm documents in any manner, which Reinbold acknowledged upon her employment at the firm. Further, on March 23, 2012, Reinbold received a Cautionary Action Letter from FINRA warning her that she had improperly accepted signed, but otherwise blank account opening documents for a customer, completed the documents and submitted them to a FINRA member firm for processing in order to open multiple accounts for the customer.

By entering the account number on the TOD that had been signed two years prior, and submitting the form to RJFS for processing, Reinbold caused RJFS to maintain inaccurate books and records in contravention of Section 17(a) of the Securities Exchange Act of 1934 and Rule 17a-3 thereunder.

As a result of the foregoing, Reinbold violated FINRA Rules 2010 and 4511(a).

Failure to Timely Amend Form U4 to Disclose Compromises With Creditors

Article V, Section 2(c) of FINRA's By-Laws requires associated persons to keep their Form U4 applications "current at all times," and that any amendment to Forms U4 "be filed with [FINRA] no later than 30 days after learning of the facts or circumstances giving rise to the amendment." FINRA Rule 1122 requires applicants to fully and accurately disclose all information required on Form U4 and a filing that "is incomplete or inaccurate so as to be misleading, or which could in any way tend to mislead" may be deemed conduct inconsistent with just and equitable principles of trade. Furthermore, a representative has an affirmative obligation to fully disclose all material facts in response to the questions on Form U4, and a false response on a Form U4 or failing to amend a Form U4, when there has been a material change in a disclosure, is a violation of FINRA Rules 1122 and 2010, and Article V, Section 2(c) of the FINRA By-Laws. FINRA Rule 2010 provides that "[a] member, in the conduct of his business, shall observe high standards of commercial honor and just and equitable principles of trade."

Although the Form U4 in effect in 2010 and 2011 required registered representatives to disclose any compromises with creditors during the last ten years, Reinbold failed to timely amend her Form U4 to disclose four compromises with creditors. More specifically, on April 1, 2010, Reinbold entered into a compromise with Chase Bank in the amount of \$1,500. On May 1, 2010, Reinbold entered into a compromise with WFNNB Victoria Secret in the amount of \$415.91. On May 1, 2010, Reinbold entered into a compromise with WFNNB Express in the amount of \$752.20. On May 1, 2010, Reinbold entered into a compromise with WFNNB Halle in the amount of \$365. Reinbold was aware of the compromises with the above-listed four creditors on the dates that she entered into the compromises. Despite signing eight Form U4 amendments between April 9, 2010 and August 16, 2011, Reinbold failed to disclose the above-described compromises with creditors on her Form U4. The compromises, which should have been disclosed on Reinbold's Form U4 in May and June of 2010 at the latest, were discovered by RJFS during its hiring process of Reinbold and disclosed on her initial Form U4 filed by RJFS, dated April 17, 2012.

As a result of the foregoing conduct, Reinbold failed to timely amend her Form U4 to disclose the compromises with creditors, in violation of Article V, Section 2(c) of FINRA's By-Laws, and FINRA Rules 1122 and 2010.

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

A six-month suspension from association with any FINRA member in any capacity.

Respondent has submitted a sworn financial statement and demonstrated an inability to pay. In light of the financial status of Respondent, no monetary sanctions have been imposed.

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.

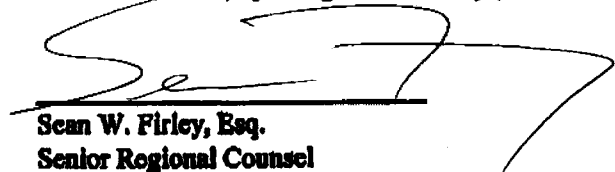
I certify that I have read and understand all of the provisions of this AWC and have been given a full opportunity to ask questions about it; that I have agreed to its provisions voluntarily; and that no offer, threat, inducement, or promise of any kind, other than the terms set forth herein and the prospect of avoiding the issuance of a Complaint, has been made to induce me to submit it.

8/4/15
Date (mm/dd/yyyy)

Cynthia Jan Reinbold
Cynthia Jan Reinbold, Respondent

8/5/15
Date

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



Sean W. Firley, Esq.
Senior Regional Counsel
FINRA Department of Enforcement
5200 Town Center Circle
Tower I, Suite 200
Boca Raton, FL 33486
Phone: (561) 443-8120
Fax: (561) 443-7998
sean.firley@finra.org