

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2015046182401**

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

**RE: Ana Lucia Chavarriaga, Respondent
General Securities Representative
CRD No. 4520572**

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, Ana Lucia Chavarriaga ("Respondent" or "Chavarriaga") 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 Respondent alleging violations based on the same factual findings described herein.

I.

ACCEPTANCE AND CONSENT

- A. Chavarriaga 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

Chavarriaga entered the securities industry in 2001 as a General Securities Representative with a FINRA member firm and worked at several broker-dealers before joining VectorGlobal WMG ("VectorGlobal" or the "firm") in 2011. Beginning in May 2015, Chavarriaga became the firm's Chief AML Officer, which was a position she held until her resignation from the firm on July 19, 2018. Chavarriaga is no longer associated with a FINRA member firm; however, she remains subject to FINRA's jurisdiction pursuant to Article V, Section 4 of FINRA's bylaws.

DISCIPLINARY HISTORY

Respondent does not have any disciplinary history with the Securities and Exchange Commission, any state securities regulators, FINRA, or any other self-regulatory organization.

OVERVIEW

As the firm's designated supervisor, Chavarriaga was responsible for conducting a supervisory review of the firm's fixed income trade reporting, among other responsibilities. In connection with two such reviews, Chavarriaga backdated documents and drafted false written statements that the firm provided to FINRA in response to FINRA's requests for information made pursuant to FINRA Rule 8210 ("Rule 8210").

Chavarriaga's conduct constitutes violations of Rule 8210 and FINRA Rule 2010 ("Rule 2010"), as described more fully below.

FACTS AND VIOLATIVE CONDUCT

Rules 8210 and 2010

Rule 8210(a)(1) requires members to "provide information orally, in writing, or electronically and to testify, under oath or affirmation ... if requested, with respect to any matter involved in any investigation."

Rule 2010 states that: "[a] member, in the conduct of its business, shall observe high standards of commercial honor and just and equitable principles of trade."

Providing false or misleading information in connection with a request made pursuant to FINRA Rule 8210 constitutes a violation of FINRA Rules 8210 and 2010.

Chavarriaga's Violations of Rules 8210 and 2010

Chavarriaga's Responsibilities as VectorGlobal's Designated Supervisor

Chavarriaga was responsible for reviewing and initialing the firm's Trade Reporting and Compliance Engine ("TRACE") Quality of Markets Report Cards ("report cards").¹ The report cards reflect information regarding firms' fixed income trade reporting to TRACE and allow member firms to detect potential reporting problems. VectorGlobal's written supervisory procedures required Chavarriaga to review its monthly report cards and initial and date the report cards to indicate when the review occurred.

Chavarriaga Backdated Documents in Response to a FINRA Request

On October 12, 2016, FINRA sent the firm an inquiry letter pursuant to Rule 8210 requesting, among other things, documentary evidence of the firm's supervisory reviews related to TRACE reporting. Chavarriaga was asked to retrieve the firm's report cards for January, February and March of 2015. Chavarriaga claimed that she could not locate the report cards for the months of January and March. Chavarriaga subsequently contacted FINRA Operations and obtained the January and March report cards.

¹ TRACE is a FINRA-developed system that facilitates the mandatory reporting of eligible fixed income securities. All broker-dealers who are FINRA member firms have an obligation to report transactions and TRACE collects and disseminates this data to market participants and the public.

Chavarriaga signed and dated the January and March 2015 report cards "2/16/2015" and "4/13/2015," respectively. Chavarriaga supplied the report cards to the firm, which in turn provided these report cards to FINRA on October 17, 2016. The backdated January and March 2015 report cards gave the false impression to FINRA that Chavarriaga had performed the required supervisory reviews in February and April 2015.

Chavarriaga Provided False Information to FINRA

After reviewing the firm's response, FINRA noticed inconsistencies between the dates reflected on the firm's report cards and the dates and activity reflected on FINRA's TRACE Report Center Usage Log ("Usage Log"). The Usage Log reflects the dates and times member firms and their associated persons accessed report cards. The Usage Log indicated that the firm's report cards for January and March 2015 had not been accessed by anyone at the firm. Consequently, on November 7, 2016, FINRA sent the firm an additional inquiry letter pursuant to Rule 8210 requesting information regarding the identity of the individual whose initials appeared on the report cards, what the dates appearing on the report cards represented and the dates the report cards were accessed, reviewed and initialed.

Chavarriaga prepared the answers to FINRA's inquiry letter, which falsely represented that Chavarriaga had reviewed and initialed the report cards on the handwritten dates appearing on the January and March 2015 report cards (February 16, 2015 and April 13, 2015, respectively).

Chavarriaga Admitted Backdating Report Cards and Providing False Information for the Firm's Response to a Rule 8210 Request

Chavarriaga admitted that she signed and dated the January and March 2015 report cards after receiving FINRA's October 12, 2016 letter requesting evidence of supervisory reviews. Chavarriaga also admitted that she supplied false information in connection with the firm's response to FINRA's November 7, 2016 Rule 8210 request.

Based on the foregoing conduct, Chavarriaga violated Rules 8210 and 2010.

B. Respondent also consents to the imposition of the following sanctions:

- A bar from association with any FINRA member in any capacity.

Respondent understands that if she is barred or suspended from associating with any FINRA member, she becomes 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, as amended. Accordingly, she 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

Respondent specifically and voluntarily waives the following rights granted under FINRA's Code of Procedure:

- A. To have a Complaint issued specifying the allegations against her;
- 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, Respondent specifically and voluntarily waives 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.

Respondent further specifically and voluntarily waives 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

Respondent understands 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 Respondent; and
- C. If accepted:
 - 1. this AWC will become part of Respondent's permanent disciplinary record and may be considered in any future actions brought by FINRA or any other regulator against Respondent;

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. Respondent 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. Respondent 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 Respondent's: (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. Respondent may attach a Corrective Action Statement to this AWC that is a statement of demonstrable corrective steps taken to prevent future misconduct. Respondent understands that she 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.

Respondent certifies that she has read and understands all of the provisions of this AWC and has been given a full opportunity to ask questions about it; that she agrees to the AWC's 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, have been made to induce her to submit this AWC.

01/17/2010

Date



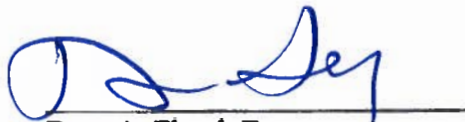
Ana Lucia Chavarriaga
Respondent

Accepted by FINRA:

2/3/2020

Date

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



Dean A. Floyd, Esq.
Senior Counsel
FINRA Department of Enforcement