

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2015046865001**

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

RE: Craig Leonard Buttignoli, Respondent
CRD No. 2159204

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

Craig Leonard Buttignoli started his career in the securities industry in January 2001. In October 2004, Buttignoli became associated with Sigma Financial Corporation, until the firm terminated his employment by filing a Form U5 on September 4, 2015. While Buttignoli was employed in the industry, he held the Series 7 and 63 licenses. Buttignoli is not currently associated with a member firm, but FINRA retains jurisdiction over him pursuant to Article V, Section 4(a) of FINRA's By-Laws.

OVERVIEW

From August 2010 through September 2015 (the "relevant period"), Buttignoli violated FINRA Rules 1122 and 2010, and Article V, Section 2(c) of FINRA's By-Laws, by willfully failing to disclose felony convictions on his Form U4 Amendments. Buttignoli also falsely denied being convicted of misdemeanor and felony offenses on his 2011, 2012, and 2013 annual firm questionnaires and thereby violated FINRA Rule 2010.

FACTS AND VIOLATIVE CONDUCT

On August 19, 2010, Buttignoli was convicted of felony assault, felony child abuse, and misdemeanor domestic violence. Buttignoli's felony convictions made him subject to statutory disqualification; thus, he was required to amend his Form U4 within ten days of his convictions. He failed to do so.

Moreover, during the relevant period, Buttignoli filed three Form U4 Amendments to disclose unrelated information. Each time he falsely responded "No" to Question 14A(1) of the form, which specifically asks, among other things, whether the representative has ever been charged with or convicted of any felony. Buttignoli likewise responded "No" to pertinent questions in his 2011, 2012 and 2013 annual regulatory firm questionnaires, each of which asked, "Have you been charged with or convicted of any misdemeanor or felony (other than minor traffic offenses)?"

FINRA Rule 1122 states, "No. . . person associated with a member shall file with FINRA information with respect to. . . registration which is incomplete or inaccurate so as to be misleading, or which could in any way tend to mislead, or fail to correct such filing after notice thereof." Article V, Section 2(c) of the FINRA By-Laws requires an associated person to keep Form U4 "current at all times by supplemental amendments" and that amendments involving a statutory disqualification be filed not later than 10 days after such disqualification occurs. In addition, filing a false or misleading Form U4 violates the "high standards of commercial honor and just and equitable principles of trade" to which FINRA holds its members under FINRA Rule 2010.

By willfully failing to disclose his 2012 criminal felony convictions on his Form U4 filings, Buttignoli violated Article V, Section 2(c) of FINRA's By-Laws and FINRA Rules 1122 and 2010. In addition, by knowingly providing a false response to his firm in three consecutive annual regulatory questionnaires, Buttignoli failed to observe high standards of commercial honor and just and equitable principles of trade, and thus violated FINRA Rule 2010.

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

- a one-year suspension from associating with a FINRA member firm in any capacity; and
- a fine of \$10,000.

The fine shall be due and payable either immediately upon reassociation with a member firm following the one-year 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(s) 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).

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.

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.

07/03/2016
Date (mm/dd/yyyy)

Craig J Buttignoli
Craig Leonard Buttignoli

Accepted by FINRA:

7/26/16
Date

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

Mitka T. Baker
Mitka T. Baker
Principal Counsel
FINRA Department of Enforcement
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