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**FINANCIAL INDUSTRY REGULATORY AUTHORITY
OFFICE OF HEARING OFFICERS**

Department of Enforcement,

Complainant,

v.

Kris Lynn Lewis
(CRD No. 4505097),

Respondent.

DISCIPLINARY PROCEEDING
No. 2015047154001

COMPLAINT

The Department of Enforcement alleges:

SUMMARY

1. Respondent Kris Lynn Lewis willfully failed to timely amend her Uniform Application for Securities Industry Registration ("Form U4") to disclose that [REDACTED]. By virtue of the foregoing conduct, Lewis willfully violated Article V, Section 2(c) of FINRA's By-Laws and FINRA Rules 1122 and 2010.

2. Lewis also made false attestations on a firm questionnaire and a FINRA examination-related Personal Activity Questionnaire ("PAQ") by denying [REDACTED] in violation of FINRA Rule 2010.

RESPONDENT AND JURISDICTION

3. Lewis first registered with a FINRA member firm as a General Securities Representative (Series 7) on May 1, 2002.

4. Between May 1, 2002 and February 13, 2009, she was registered as a Series 7 with two different FINRA member firms.

5. On April 14, 2009, Lewis registered as a Series 7 with ING Financial Partners, Inc. which was renamed Voya Financial Advisors, Inc. in or around October 2014 (collectively, “Voya”).

6. On September 29, 2015, Voya filed a Uniform Termination Notice for Securities Registration (“Form U5”) terminating Lewis’ registration “due to the occurrence of a statutory disqualification event.”

7. Lewis is currently registered as a Series 7 with FINRA member firm, St. Bernard Financial Services, Inc.

**FIRST CAUSE OF ACTION
(Willful Failure to Timely Amend Form U4)
(FINRA Rule 2010)**

8. 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 amendments to Form U4s “be filed with [FINRA] not later than 30 days after learning of the facts or circumstances giving rise to the amendment.”

9. FINRA Rule 1122 provides that “[n]o member or person associated with a member shall file with FINRA information with respect to membership or 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.”

10. 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.”

11. At all relevant times, [REDACTED]

[REDACTED]

12. On August 31, 2011, Lewis was [REDACTED]

[REDACTED]

13. In September 2011, [REDACTED]

[REDACTED]

14. On or about January 30, 2012, [REDACTED]

[REDACTED]

15. From October 2011 to September 28, 2015, Lewis willfully failed to amend her Form U4 to disclose the material fact that [REDACTED]

16. At all relevant times, [REDACTED]

[REDACTED]

17. On April 20, 2012, [REDACTED]

[REDACTED]

18. From May 21, 2012 to September 28, 2015, Lewis willfully failed to amend her Form U4 to disclose the material fact that she [REDACTED]

19. Lewis knew she had an obligation to amend her Form U4 within 30 days of learning of her [REDACTED]

20. Between 2012 and 2015, Lewis attested in four Annual Business Questionnaire Advisory ("ABQ") issued by Voya that she understood her obligation to amend her Form U4 to disclose [REDACTED]

21. Lewis completed the ABQs on April 19, 2012, July 28, 2013, June 2, 2014, and June 4, 2015.

22. Lewis completed all four ABQs electronically.

23. In the April 2012 and July 2013 ABQs, Voya asked Lewis, "Do you know that according to FINRA Rules, you have an ongoing obligation to immediately notify your supervisor and the Compliance Department and amend your Form U4 within 30 days for changes that include, but are not limited to, the following: name changes...compromise with creditors.. [REDACTED]"

24. In the April 2012 and July 2013 ABQs, Lewis responded "Yes" to this question, thereby attesting that she understood this obligation.

25. In the June 2014 and June 2015 ABQs, Voya asked Lewis, "Do you know that according to FINRA Rules, you have an ongoing obligation to immediately notify your supervisor and the Compliance Department to amend your Form U4 for changes or occurrences that include, but are not limited to, the following: name changes...compromise with creditors.. [REDACTED]"

26. In the June 2014 and June 2015 ABQs, Lewis responded "Yes" to this question, thereby attesting that she understood this obligation.

27. In all four ABQs, Voya asked Lewis, "Do you know that you are required to immediately report [REDACTED] to [the Firm's] Compliance Department?"

28. In all four ABQs, Lewis responded "Yes" to this question, thereby attesting that she understood this obligation.

29. Lewis intentionally failed to amend her Form U4 within 30 days of learning of the [REDACTED] because she believed she would be terminated from Voya if she reported the events.

30. By virtue of the foregoing, Lewis willfully violated Article V, Section 2(c) of FINRA's By-Laws, and FINRA Rule 1122 and 2010.

**SECOND CAUSE OF ACTION
(Providing False Information to FINRA)
(FINRA Rule 2010)**

31. The Department realleges and incorporates by reference paragraphs 1 to 30 above.

32. In connection with an examination of Voya, FINRA staff issued a PAQ to Kris Lewis for her to complete and sign.

33. Lewis answered the questions in the PAQ by hand.

34. Lewis signed and completed the PAQ on October 30, 2014, above an attestation reciting that the information provided was "accurate and truthful."

35. [REDACTED]
[REDACTED]
[REDACTED]

36. In response to Question [REDACTED] on the PAQ, Lewis answered, "No."

37. Lewis' answer to this question was false because she [REDACTED]
[REDACTED].

38. Lewis knowingly provided a false answer to the Question [REDACTED] in the PAQ.

39. By virtue of the foregoing, Lewis violated FINRA Rule 2010.

**THIRD CAUSE OF ACTION
(False Attestation on Firm's Annual Compliance Questionnaire)
(FINRA Rule 2010)**

40. The Department realleges and incorporates by reference paragraphs 1 to 39 above.

41. In the June 2015 ABQ, Voya asked Lewis "Have you notified your Supervisor and the Firm's Compliance Department of all U4 amendments as described in the previous question?"

42. In response to this question, Lewis answered, "Yes."

43. Lewis' answer to this question was false because she did not report her [REDACTED] to Voya's Compliance Department.

44. Lewis' answer to this question was also false because she did not report her [REDACTED] to her Voya supervisors.

45. Lewis knowingly provided a false answer to this question in her June 2015 ABQ.

46. By virtue of the foregoing, Lewis violated FINRA Rule 2010.

RELIEF REQUESTED

WHEREFORE, the Department respectfully requests that the Panel:

A. make findings of fact and conclusions of law that Respondent committed the violations charged and alleged herein;

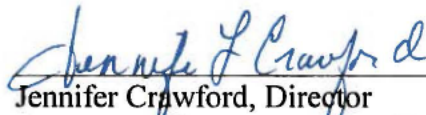
B. make specific findings that Respondent's conduct, as alleged in the First Cause of Action, was willful; the omitted information was material; and, the omission to state material facts was on a Form U4 application;

C. order that one or more of the sanctions provided under FINRA Rule 8310(a) be imposed, including that Respondent be required to disgorge fully any and all ill-gotten gains and/or make full and complete restitution, together with interest;

D. order that Respondent bears such costs of proceeding as are deemed fair and appropriate under the circumstances in accordance with FINRA Rule 8330.

FINRA DEPARTMENT OF ENFORCEMENT

Date: March 15, 2017

A handwritten signature in blue ink, reading "Jennifer L. Crawford", is written over a horizontal line.

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