

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 20160484704-01**

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

RE: James Michael Griegel
CRD No. 1463581

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

James Michael Griegel ("Griegel") entered the securities industry in February 1977. In March 2002, while associated with this same FINRA member firm, Griegel acquired his Financial and Operations Principal license (Series 27). In March 2014, Griegel joined Melvin Securities, L.L.C. (the "Firm") and became registered with that Firm in April 2014.¹

On January 7, 2016, the Firm filed a Form U5 Uniform Termination Notice for Securities Industry Registration ("Form U5") with FINRA disclosing that it had terminated Griegel's employment with the Firm on January 7, 2016. Griegel's registration with the Firm ended on January 7, 2016.

Griegel is not currently associated with a FINRA member, but remains subject to FINRA's jurisdiction pursuant to Article V, Section 4 of FINRA's By-Laws.

¹ Griegel was dually registered with two FINRA member firms through July 2014.

RELEVANT DISCIPLINARY HISTORY

Griegel has no prior relevant disciplinary history.

OVERVIEW

Griegel, in his role as treasurer of the town of Sauk Village, Illinois converted approximately \$21,206 from the Sauk Village Police Department Pension Fund, for his own use and benefit, in violation of FINRA Rule 2010.

FACTS AND VIOLATIVE CONDUCT

Griegel served as the treasurer of the town of Sauk Village, Illinois from May 2013 through January 2016. In that role, he was the fiduciary responsible for maintaining Sauk Village's financial system, administering Sauk Village's finances and maintaining records in accordance with applicable law. As part of his duties as custodian of all funds belonging to Sauk Village, Griegel was charged with the responsibility of maintaining the treasurer's books and bank accounts. This role provided Griegel with access to the bank accounts related to the Sauk Village Police Department's Pension Fund. During his tenure as treasurer, Griegel forged the signatures of Sauk Village officials on police pension fund checks made payable to himself over the course of 10 months between April 2015 and January 2016. In total, Griegel converted approximately 33 checks totaling \$21,206 from the Sauk Village Police Department Pension Fund.

FINRA Rule 2010 requires associated persons to observe high standards of commercial honor and just and equitable principles of trade. Conversion is an intentional and unauthorized taking of and/or exercise of ownership over property by one who neither owns the property nor is entitled to possess it.

By converting \$21,206 from the Sauk Village Police Department Pension Fund for his own use and benefit, Griegel violated FINRA Rule 2010.

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

A bar from associating with any FINRA member firm in any capacity.

I understand that if I am barred or suspended from associating with any FINRA member, he 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. 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. A bar or expulsion shall become effective upon approval or acceptance of this AWC.

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.

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.

6/30/16
Date

James Michael Griegel
James Michael Griegel

Accepted by FINRA:

8/30/16
Date

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

David Camuzo
David Camuzo
Director
FINRA Department of Enforcement
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New York, NY 10281-1003
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