

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2016049590101**

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

RE: Frederick Quinn, Respondent
Former Registered Representative
CRD No. 1199551

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

Frederick Quinn ("Quinn") entered the securities industry in 1998 when he became registered with a FINRA registered firm. In 2006 Quinn became registered as a Direct Participation Programs Representative, General Securities Representative, and Investment Company Products/Variable Contracts Representative with Allstate Financial Services, LLC ("Allstate"). Quinn was terminated by Allstate effective February 29, 2016 and has not been registered with any FINRA member firm since that time. Quinn remains subject to the jurisdiction of FINRA 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

Quinn has no relevant disciplinary history.

OVERVIEW

Quinn failed to timely update his Form U4 to disclose 11 liens filed against him between 2009 and 2014 by the Internal Revenue Service and State of Ohio. As a result, Quinn violated Article V, Section 2 of FINRA By-Laws, and FINRA Rules 1122, and 2010. Quinn also violated FINRA Rule 2010 by signing two customers' names on a letter of instruction related to an annuity exchange.

FACTS AND VIOLATIVE CONDUCT

Willful Failure to Make Timely Amendments to Form U4

Article V, Section 2 of the FINRA By-Laws requires an associated person to keep his Form U4 "current at all times," and to file an amendment to the Form U4 within 30 days of learning of any disclosure event. FINRA Rule 1122 provides that the filing by a registered representative of a Form U4 that "is incomplete or inaccurate so as to be misleading, or which in any way tends to mislead, or the failure to correct such filing after notice thereof, may be deemed to be conduct inconsistent with just and equitable principles of trade and when discovered may be sufficient cause for appropriate disciplinary action."

FINRA Rule 2010 requires members and associated persons to "observe high standards of commercial honor and just and equitable principles of trade."

At all times relevant to this matter, registered representatives completing a Form U4 were asked in Question 14M: "Do you have any unsatisfied judgments or liens against you?"

Between October 2009 and October 2014, Quinn had 11 liens filed against him by the Internal Revenue Service and the State of Ohio. The total amount of those liens was \$235,018.00, and they remain unsatisfied. Quinn was required to timely file an amended Form U4 that disclosed each of his unsatisfied liens, and he failed to comply with this requirement, although he was aware of the liens. Quinn's failure to timely file amendments to his Form U4 to disclose his unsatisfied liens was, therefore, willful. Quinn did not file an amended Form U4 disclosing these liens until July of 2015, after FINRA notified Allstate of Quinn's liens.

By willfully failing to timely disclose the above-referenced tax liens on his Form U4, Quinn violated Article V, Section 2(c) of the FINRA By-Laws, and FINRA Rules 1122 and 2010.

Signing Customers' Names to a Letter of Instruction

On or about December 15, 2015 Quinn signed two customers' names to a letter of instruction requesting that a check be reissued by the transferring annuity company to the accepting annuity company as part of an annuity exchange. The

customers did not authorize Quinn to sign their names to that letter.

As a result of the foregoing conduct, Quinn violated FINRA Rule 2010.

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

- a nine (9) month suspension from association with any FINRA registered firm in any capacity; and
- a \$10,000 fine.

The fine shall be due and payable either immediately upon reassociation with a member firm, 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 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

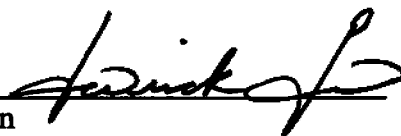
I understand that:

- 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 understand and acknowledge that FINRA does not represent or advise me and I cannot rely on FINRA or FINRA staff members for legal advice; 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.

02/16/2017
Date (mm/dd/yyyy)


Frederick Quinn

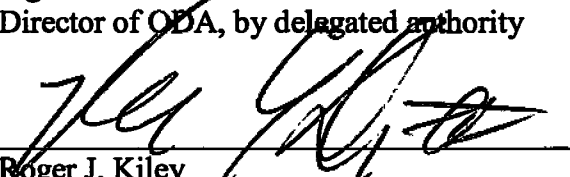
Reviewed by:

Attorney Name
Counsel for Respondent
Firm Name
Address
City/State/Zip
Phone Number

Accepted by FINRA:

3/6/17
Date

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


Roger J. Kiley
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