

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2016050963401**

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

RE: Janet R. Neumire, Respondent
CKD No. 4834287

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, Respondent Janet R. Neumire 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 Neumire alleging violations based on the same factual findings described herein.

II.

ACCEPTANCE AND CONSENT

- A. Neumire hereby accepts 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

In September 2004, Neumire first became registered with FINRA as an Investment Company Products and Variable Contracts Representative through an association with a member firm. From October 2012 to August 2016, she was registered in that capacity through an association with J.P. Morgan Securities LLC (BD No. 79) ("JPM" or the "Firm").

On August 10, 2016, JPM filed a Uniform Termination Notice for Securities Industry Registration ("Form U5") reporting that Neumire had been discharged because "Registered Rep failed to disclose a reportable event on her Form U4. Registered Rep is subject to statutory disqualification."

Neumire is not currently associated with any FINRA member firm. However, Neumire remains subject to FINRA's jurisdiction pursuant to Article V, Section 4 of FINRA's By-Laws.

RELEVANT DISCIPLINARY HISTORY

Neumire has no disciplinary history with the Securities and Exchange Commission, FINRA, any self-regulatory organization, or any state securities regulator.

OVERVIEW

Neumire willfully failed to timely amend her Uniform Application for Securities Industry Registration or Transfer ("Form U4") to disclose two felony charges and one subsequent guilty plea to a felony charge. By virtue of the foregoing, Neumire violated Article V, Section 2(c) of FINRA's By-Laws and FINRA Rules 1122 and 2010.

FACTS AND VIOLATIVE CONDUCT

Article V, Section 2(c) of the FINRA By-Laws requires that registrations filed with FINRA be kept current at all times and that amendments must be filed with FINRA "not later than 30 days after learning of the facts or circumstances giving rise to the amendment."

FINRA Rule 1122 prohibits filing with FINRA information regarding 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."

FINRA Rule 2010 requires the observance of high standards of commercial honor and just and equitable principles of trade.

Neumire, while associated with JPM, willfully failed to timely amend her Form U4 to disclose two felony charges and a subsequent guilty plea. Specifically, in December 2015, Neumire was charged in the State of Louisiana with two felonies: (i) Possession of a Schedule IV Drug; and (ii) Driving While Intoxicated, 3rd Offense ("DWI"). In February 2016, Neumire entered a guilty plea to the felony DWI charge; the possession charge was dismissed.

Neumire was required to provide an affirmative response and explanation to Form U4 Disclosure Question 14A, which asks, "Have you ever ... been convicted of or pled guilty ... to any felony ... [or] been charged with any felony?" However, Neumire did not disclose the felony charges or subsequent guilty plea to JPM until July 2016.

By virtue of the foregoing, Neumire violated Article V, Section 2(c) of FINRA's By-Laws and FINRA Rules 1122 and 2010.

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

- o A three-month suspension from association with any FINRA member in any capacity; and
- o A fine of \$5,000.

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.

Respondent specifically and voluntarily waives any right to claim that Respondent is unable to pay, now or at any time hereafter, the monetary sanction imposed in this matter.

Respondent understands that if Respondent is barred or suspended from associating with any FINRA member, Respondent 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, Respondent 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 9310 and 9311).

Respondent understands that this settlement includes a finding that Respondent 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 Respondent 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.

EL

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 Respondent,
- 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 Respondent 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 Respondent has read and understands all of the provisions of this AWC and has been given a full opportunity to ask questions about it; that Respondent understands and acknowledges that FINRA does not represent or advise Respondent and Respondent cannot rely on FINRA or FINRA staff members for legal advice; that Respondent has 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 Respondent to submit it.

10/12/2017
Date (mm/dd/yyyy)

Janet Neumure
Respondent Janet R. Neumure

Accepted by FINRA:

November 3, 2017
Date

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

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