

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2016051308001**

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

RE: Jeffrey Allen Delaney Jr., Respondent
Investment Company and Variable Contracts Products Limited Representative
CRD No. 6314925

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, I, Jeffrey Allen Delaney Jr. ("Delaney"), 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

Delaney entered the securities industry in June 2014 and has been associated with several FINRA regulated broker-dealers. In January 2015, Delaney became registered as a Series 6 Investment Company and Variable Contracts Products Limited Representative with Pruco Securities, LLC (the "Firm"), a FINRA regulated broker-dealer.

On September 12, 2016, the Firm filed a Uniform Termination Notice for Securities Industry Registration ("Form U5") reporting that Delaney's association with the Firm had been terminated effective August 25, 2016 because, among other things, he "electronically signed [a] customer's name to [a] life insurance application," and "stated [a Form] U4 inaccurate residential address ..."

Delaney is not currently associated with a FINRA regulated broker-dealer. However, pursuant to Article V, Section 4 of the FINRA By-Laws, Delaney remains subject to FINRA's jurisdiction.

RELEVANT DISCIPLINARY HISTORY

Delaney has no disciplinary history in the securities industry.

OVERVIEW

In September 2015, Delaney violated FINRA Rule 2010 by forging a policyholder's electronic signature on seven forms related to the exchange of the policyholder's existing life insurance policy held with the Firm's affiliated insurance company.

Delaney violated Article V, Section 2(c) of the FINRA By-Laws and FINRA Rules 1122 and 2010 from March 2015 to August 2016 (the "Relevant Period") by willfully reporting a false residential address on his Uniform Application for Securities Industry Registration or Transfer ("Form U4").

Delaney also violated FINRA Rule 2010 by submitting five compliance attestations to the Firm during the Relevant Period in which he falsely stated that the information contained in his Form U4, which included his residential address, was accurate.

FACTS AND VIOLATIVE CONDUCT

Forgery

Forgery of a signature is a violation of FINRA Rule 2010, which requires associated persons to observe high standards of commercial honor and just and equitable principles of trade.

In September 2015, Delaney met with RT, a customer of the Firm's affiliated insurance company (the "Firm Affiliate"), concerning the potential exchange of existing life insurance policies that RT and his wife ST held through the Firm Affiliate. Approximately nine days after meeting with RT, Delaney forged ST's electronic signature on seven forms related to the exchange of ST's life insurance policy for a new one.

The forms were subsequently submitted to the Firm Affiliate for processing. Delaney forged ST's signature on the forms without her knowledge or authorization.

By virtue of the foregoing, Delaney violated FINRA Rule 2010.

False Residential Address on the Form U4

Article V, Section 2(c) of the FINRA By-Laws requires an associated person to keep the Form U4 "current at all times." FINRA Rule 1122 states that "[n]o . . .

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."

A violation of Article V, Section 2(c) of the FINRA By-Laws and FINRA Rule 1122 constitutes a violation of FINRA Rule 2010.

The Form U4 requires the disclosure of the associated person's current residential address. The Form U4 requires an associated person to "update this form by causing an amendment to be filed on a timely basis whenever changes occur to answers previously reported."

In January 2015, when Delaney joined the Firm, he resided at an address located in Georgia (the "Georgia Address"), while his office was located in South Carolina. In March 2015, his Form U4 was amended to report that his residential address had changed from the Georgia Address to an address in South Carolina (the "South Carolina Address"). However, this information was false. During the entire period of his association with the Firm, Delaney resided at the Georgia Address. While he was associated with the Firm, he never resided at the South Carolina Address.

Delaney's reporting of the South Carolina Address as his residential address permitted him to avoid the State of Georgia's insurance licensing requirements for residents of the State. Delaney was fully aware that his reporting of the South Carolina Address as his residential address on his Form U4 was false. Delaney's false reporting of his residential address on his Form U4 was willful.

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

False Attestations

Making false statements to a FINRA regulated broker-dealer violates FINRA Rule 2010.

During the Relevant Period, Delaney submitted five periodic attestation forms to the Firm which asked Delaney to confirm the accuracy of the information on his Form U4. Each attestation form identified the South Carolina Address as Delaney's residential address on his Form U4. In each attestation form, Delaney represented to the Firm that the information in his Form U4 was "true and complete to the best of [his] knowledge." These statements were false because Delaney's Form U4 reflected a South Carolina Address that was not Delaney's true residential address.

By virtue of the foregoing, Delaney violated FINRA Rule 2010.

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

- an eight-month suspension from association with any FINRA member in any capacity; and
- a fine of \$15,000.

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.

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 misrepresented 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 misrepresentation 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 prejudice 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.

6/26/17
Date (mm/dd/yyyy)

Jeffrey Allen Delaney Jr.
Jeffrey Allen Delaney Jr., Respondent

Accepted by FINRA:

7/5/17
Date

Signed on behalf of the
Director of ODA by delegated authority

Richard Chin
Richard Chin, Chief Counsel
FINRA Department of Enforcement
One World Financial Center
200 Liberty Street, 11th Floor
New York, NY 10281-1003
Telephone: (646) 315-7322
Facsimile: (202) 689-3415