

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2019063287401**

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

RE: Genesis Zschocher, Respondent
Former Non-Registered Fingerprinted Person
CRD No. 7091780

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

I.

ACCEPTANCE AND CONSENT

- A. Respondent hereby accepts and consents, 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

On March 29, 2019, CUNA Brokerage Services, Inc. ("CUNA" or "the Firm") submitted a Non-Registered Fingerprint ("NRF") Initial Filing, stating that Zschocher began her employment with the Firm as a Coordinator on March 19, 2019. On July 9, 2019, the Firm submitted an NRF Amendment Filing, stating that Zschocher's employment with CUNA terminated on July 8, 2019.

Zschocher 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.

RELEVANT DISCIPLINARY HISTORY

Respondent does not have any disciplinary history with the Securities and Exchange Commission, any state securities regulators, FINRA, or any other self-regulatory organization.

OVERVIEW

Zschocher misrepresented to CUNA the results of multiple FINRA Securities Industry Essentials ("SIE") Exams, both orally and in writing. Through this conduct, Zschocher violated FINRA Rule 2010.

FACTS AND VIOLATIVE CONDUCT

FINRA Rule 2010 requires persons subject to FINRA's jurisdiction to observe high standards of commercial honor and just and equitable principles of trade.

Zschocher joined CUNA as a Non-Registered Fingerprinted Person in the position of Coordinator in March 2019. As a condition of her employment, Zschocher was required to successfully complete several licensing and qualifications exams, including the SIE Exam, by July 2019.

Zschocher first attempted the SIE Exam on May 16, 2019, and a score of 70% or above was required to pass. Zschocher failed the exam and advised the Firm of that failure on May 20, 2019. At that time, Zschocher orally represented to CUNA that she had received a score of 69%, which was not accurate.

Zschocher attempted the SIE Exam again on June 24, 2019. She failed this exam, receiving a score of 48%. That same day, Zschocher informed her CUNA supervisor that she had again failed the exam, and was instructed to bring her printed score report to the office the next day. Prior to meeting with her supervisor, however, Zschocher created a modified version of her official score report for that exam, reflecting an inaccurate score of 69%. On June 27, Zschocher provided this falsified score report to her CUNA supervisor.

By virtue of misrepresenting to CUNA the results of her SIE Exam, both orally and in writing, Zschocher violated FINRA Rule 2010.

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

1. Suspension from associating with a broker-dealer in any capacity for two months; and
2. A deferred 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 an inability to pay, now or at any time hereafter, the monetary sanctions imposed in this matter.

Respondent understands that if she is barred or suspended from associating with any FINRA member, she 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, she 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.

II.

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

03/04/2020
Date

Genesis E. Zschocher
Genesis Zschocher
Respondent

Accepted by FINRA:

March 31, 2020
Date

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

Nicholas A. Jablonski

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