

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER, AND CONSENT
NO. 2020065342802**

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

RE: Raymond E. Jennison, Jr. (Respondent)
Former General Securities Representative
CRD No. 867502

Pursuant to FINRA Rule 9216, Respondent Raymond E. Jennison, Jr. 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 in this AWC.

I.

ACCEPTANCE AND CONSENT

- A. Respondent accepts and consents to the following findings by FINRA without admitting or denying them:

BACKGROUND

Jennison first became registered with FINRA in 1979. He was registered as a General Securities Representative, among other capacities, through an association with First Canterbury Securities, Inc. (CRD No. 13121) from December 1983 until March 2021, when his registration was terminated due to the cancellation of First Canterbury's membership.

In 1998, the NASD accepted an AWC in which Jennison consented to the entry of findings that he, jointly with his member firm, failed to maintain the firm's minimum net capital required by SEC Rule 15c3-1(a)(2)(iii). Jennison was fined \$1,000, which fine was joint and several with his member firm.

In 2011, FINRA accepted an AWC in which Jennison consented to the entry of findings that he, jointly with his member firm: (1) violated NASD Rules 3012 and 2110 and FINRA Rule 2010 by failing to prepare an annual report to senior management regarding its supervisory control procedures; (2) violated NASD Rules 3012, 3013, 2110, and IM-3013, and FINRA Rules 3130 and 2010, by failing to maintain an executed certification by its chief executive officer that the firm had processes in place to establish, maintain, review, test, and modify written compliance; and (3) violated NASD Rules 1021(e), 3012, and 2110, and FINRA Rule 2010, by failing to identify a second principal and a senior or independent individual responsible for supervising Jennison, the firm's

producing manager. Jennison was fined \$7,500, which fine was joint and several with his member firm.¹

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

OVERVIEW

Jennison refused to appear for on-the-record testimony requested pursuant to FINRA Rule 8210, in violation of FINRA Rules 8210 and 2010.

FACTS AND VIOLATIVE CONDUCT

FINRA Rule 8210(a)(1) states, in relevant part, that FINRA may require a person subject to its jurisdiction "to provide information orally, in writing, or electronically ... and to testify at a location specified by FINRA staff ... with respect to any matter involved in [a FINRA] investigation [or] examination." FINRA Rule 8210(c) further states that "[n]o ... person shall fail to provide information or testimony ... pursuant to this Rule." A violation of FINRA Rule 8210 is also a violation of FINRA Rule 2010, which requires member firms and associated persons, in the conduct of their business, to "observe high standards of commercial honor and just and equitable principles of trade."

On May 18, 2022, FINRA sent a request to Jennison for on-the-record testimony pursuant to FINRA Rule 8210. As stated during his phone call with FINRA on May 19, 2022, and by this agreement, Jennison acknowledges that he received FINRA's request and will not appear for on-the-record testimony at any time. By refusing to appear for on-the-record testimony as requested pursuant to FINRA Rule 8210, Jennison violated FINRA Rules 8210 and 2010.

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

- a bar from associating with any FINRA member in all capacities.

Respondent understands that if he is 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, he 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 sanction imposed in this AWC shall be effective on a date set by FINRA. A bar or expulsion shall become effective upon approval or acceptance of this AWC.

¹For more information about the Respondent, including prior regulatory events, visit BrokerCheck® at www.finra.org/brokercheck.

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 him;
- 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 its acceptance or rejection.

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

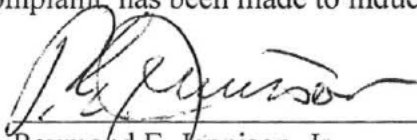
Respondent understands that:

- 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 its subject matter 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 right to take legal or factual positions in litigation or other legal proceedings in which FINRA is not a party. Nothing in this provision affects Respondent's testimonial obligations in any litigation or other legal proceedings.

Respondent certifies that he has read and understands 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 him and Respondent cannot rely on FINRA 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 in this AWC and the prospect of avoiding the issuance of a complaint, has been made to induce him to submit this AWC.

July 26, 2022
Date



Raymond E. Jennison, Jr.
Respondent

Accepted by FINRA:

September 16, 2022

Date

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



Albert Anthony Starkus III

Senior Counsel

FINRA

Department of Enforcement

12801 N. Central Expwy., Suite 1050

Dallas, TX 75243