

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER, AND CONSENT
NO. 2021072888301**

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

RE: Frenise L. Mann (Respondent)
Former General Securities Representative
CRD No. 6972542

Pursuant to FINRA Rule 9216, Respondent Frenise L. Mann 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

Mann first registered with FINRA in January 2019 through an association with Thrivent Investment Management Inc. as a General Securities Representative. Thrivent terminated Mann's registration by filing a Uniform Termination Notice for Securities Industry Registration (Form U5) on October 19, 2021, disclosing that at the time of her voluntary termination Mann was under internal review for potentially changing a client address to her own personal address, and potentially affixing client electronic signatures on certain documents. From October 22, 2021 to December 16, 2021, Mann was registered with FINRA as a General Securities Representative through association with another FINRA member. Although Mann is not currently associated with a FINRA member, FINRA retains jurisdiction over her pursuant to Article V, Section 4 of FINRA's By-Laws.¹

OVERVIEW

At various points between April 2019 and August 2021, Mann electronically signed the names of eight customers, without the customers' prior permission, on twelve forms; electronically signed the names of approximately 70 customers, with the customers' prior permission, on approximately 110 forms; inaccurately recorded her own address as that of a customer on an account application form; and copied and reused ink signatures of three customers on four forms with the customers' prior permission. Therefore, Mann violated FINRA Rule 2010. Her actions also caused firm records to be inaccurate. Therefore, Mann also violated FINRA Rules 4511 and 2010.

¹ For more information about the respondent, visit BrokerCheck® at www.finra.org/brokercheck.

Separately, in December 2019, Mann impersonated a customer in a phone call to Thrivent in violation of FINRA Rule 2010.

FACTS AND VIOLATIVE CONDUCT

This matter originated from the October 19, 2021 Form U5 referenced above.

FINRA Rule 2010 states that “a member, in the conduct of its business, shall observe high standards of commercial honor and just and equitable principles of trade.” Forgery occurs when one person signs another person’s name or initials on a document without the other person’s prior permission. Forgery is a violation of FINRA Rule 2010.

Falsification occurs when a person creates a document or entry in a firm’s system that creates a false appearance by including altered or untrue information. Signing or affixing another person’s name to a document with the other person’s prior permission, but without indicating that it is being done on someone else’s behalf, constitutes falsification. Falsification is a violation of FINRA Rule 2010.

Impersonation occurs when an associated person pretends to be a customer for the purpose of obtaining customer information. Impersonation is a violation of FINRA Rule 2010.

FINRA Rule 4511 requires members to “make and preserve books and records as required under the FINRA rules, the Exchange Act and the applicable Exchange Act rules.” Exchange Act Rule 17a-3(a) requires firms to maintain, among other things, customer account records. Inherent in the obligation to make and preserve books and records is the requirement that they be accurate. A registered representative who falsifies firm records causes the firm to maintain inaccurate records and, thereby, violates FINRA Rule 4511. A violation of FINRA Rule 4511 is also a violation of FINRA Rule 2010.

Between June 2020 and May 2021, Mann electronically signed twelve forms for eight customers, without the customers’ prior permission. Between April 2019 and August 2021, Mann electronically signed approximately 110 forms for approximately 70 customers, with the customers’ prior permission. In December 2020, in a new account application for one customer, with permission of the customer, Mann inaccurately recorded her own address as that of the customer, at that customer’s request. In addition, between November 2019 and February 2020, Mann photocopied and then reused the signatures of three customers on four insurance application forms, with the customers’ prior permission.

Mann received a letter of reprimand from the firm in March 2021, after it detected signature irregularities, but she continued some of the misconduct described herein thereafter.

Although the majority of the forms referenced above pertained to insurance products,

approximately ten of the forms involved securities products and, accordingly, were required books and records of the firm.

All of the foregoing transactions were authorized and none of the customers were harmed or complained.

By reason of the forgery and falsification described above, Mann violated FINRA Rule 2010. In addition, by causing Thrivent to maintain inaccurate books and records, Mann violated FINRA Rules 4511 and 2010.

In addition, in December 2019, Mann called Thrivent and impersonated a customer in an effort to obtain information about the customer's account, without permission of the customer. Thrivent ended the call before providing any information about the customer's account. By impersonating a customer, Mann violated FINRA Rule 2010.

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

- a six-month suspension from associating with any FINRA member in all capacities and
- a \$7,500 deferred 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. Respondent specifically and voluntarily waives any right to claim an inability to pay, now or at any time after the execution of this AWC, the monetary sanction 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 in this AWC shall be effective on a date set by FINRA.

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 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:

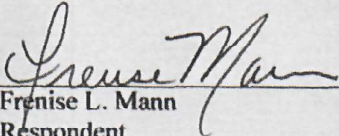
- A. Submission of this AWC is voluntary and will not resolve this matter unless and until it has been reviewed and accepted by the NAC, a Review Subcommittee of the NAC, or the Office of Disciplinary Affairs (ODA), pursuant to FINRA Rule 9216;
- B. If this AWC is not accepted, its submission will not 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.

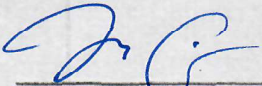
D. Respondent may attach a corrective action statement to this AWC that is a statement of demonstrable corrective steps taken to prevent future misconduct. Respondent understands that she may not deny the charges or make any statement that is inconsistent with the AWC in this statement. This statement does not constitute factual or legal findings by FINRA, nor does it reflect the views of FINRA.

Respondent certifies that she has read and understands all of the provisions of this AWC and has been given a full opportunity to ask questions about it; 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 her to submit this AWC.

11-5-2023
Date


Frenise L. Mann
Respondent

Reviewed by:

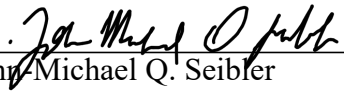
 2023/11/06
Michael Giarrusso
Counsel for Respondent
Eccleston Law, LLC
55 West Monroe St STE 610
Chicago, IL 60603

Accepted by FINRA:

11/21/2023

Date

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



John Michael Q. Seibler
Principal Counsel
FINRA
Department of Enforcement
15200 Omega DR STE 300
Rockville, MD 20850