

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER, AND CONSENT
NO. 2023078749801**

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

RE: Michael Gerard Gravelyn (Respondent)
Former Investment Company and Variable Contracts Products Representative
CRD No. 6569005

Pursuant to FINRA Rule 9216, Respondent Michael Gerard Gravelyn 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

Gravelyn first became registered with FINRA as an Investment Company and Variable Contracts Products Representative in May 2017 through an association with Northwestern Mutual Investment Services (CRD No. 2881). On May 11, 2023, Northwestern Mutual filed a Uniform Termination Notice for Securities Industry Registration (Form U5) disclosing that Gravelyn had been permitted to resign after a review of his business practices revealed that he had violated company policy.

Although Gravelyn is no longer registered or associated with a FINRA member firm, he remains subject to FINRA's jurisdiction pursuant to Article V, Section 4 of FINRA's By-laws.¹

OVERVIEW

Gravelyn failed to provide documents and information that was requested pursuant to FINRA Rule 8210, in violation of FINRA Rules 8210 and 2010.

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

FACTS AND VIOLATIVE CONDUCT

FINRA Rule 8210(a)(1) states, in relevant part, that FINRA may “require a member, person associated with a member, or any other person subject to FINRA’s jurisdiction to provide information orally, in writing, or electronically . . . with respect to any matter involved in [a FINRA] investigation[.]” FINRA Rule 8210(c) provides 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 their associated persons to “observe high standards of commercial honor and just and equitable principles of trade” in the conduct of their business.

On February 15, 2024, in connection with an investigation into the circumstances giving rise to the Form U5 filed by Northwestern Mutual, FINRA sent a request to Gravelyn, pursuant to FINRA Rule 8210 for the production of documents and information. When Gravelyn did not respond, FINRA sent a second letter on March 22, 2024, requesting the same documents and information. As stated by Gravelyn’s counsel during a telephone call with FINRA staff on April 10, 2024, and in a follow-up email to FINRA on April 10, 2024, and by this agreement, Gravelyn acknowledges that he received FINRA’s requests and will not produce the information or documents requested at any time.

By refusing to produce the information or documents as requested pursuant to FINRA Rule 8210, Gravelyn 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 sanctions 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.

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

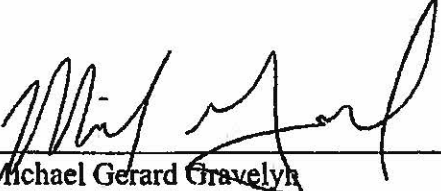
Respondent understands that:

- 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.

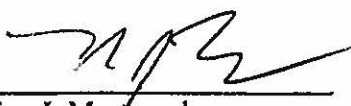
Respondent certifies that he has read and understands all of the provisions of this AWC and has been given a full opportunity to ask questions about it; Respondent has agreed to the AWC's provisions voluntarily; and no offer, threat, inducement, or promise of any kind, other than the terms set forth in this AWC and the prospect of avoiding the issuance of a complaint, has been made to induce him to submit this AWC.

04-25-2024
Date



Michael Gerard Gravelyn
Respondent

Reviewed by:



Brian J. Masternak
Warner Norcross & Judd
150 Ottawa Avenue, NW, Suite 1500
Grand Rapids, MI 49503

Accepted by FINRA:

5/2/2024
Date

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

Kathryn S. Gostinger
Kathryn S. Gostinger
Senior Counsel
FINRA
Department of Enforcement
55 W. Monroe St., 27th Floor
Chicago, IL 60603