

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
OFFICE OF HEARING OFFICERS**

Department of Enforcement,

Complainant,

v.

Avinesh Shankar
CRD No. 6232970,

Respondent.

Disciplinary Proceeding
No. 2024081563501

COMPLAINT

The Department of Enforcement alleges:

SUMMARY

1. Between November 2022 and January 2024 (the “Relevant Period”), while registered with member firm Pruco Securities, LLC (“Pruco” or “the firm”), Avinesh Shankar forged 64 customers’ signatures on 115 annuity applications without the customers’ prior knowledge or consent.

2. Shankar submitted the forged annuity applications to the firm and received from the firm advanced payment on commissions for the associated annuities. The annuities were never funded. In total, Shankar received \$511,609.74 in commissions to which he was not entitled.

3. By virtue of the foregoing, Shankar violated FINRA Rule 2010 by forging customer signatures and converting funds.

RESPONDENT AND JURISDICTION

4. Shankar first became registered with FINRA through an association with a FINRA member firm in 2013.

5. In October 2019, he became registered with FINRA as a General Securities Representative and an Investment Company and Variable Contracts Products Representative through an association with Pruco.

6. Pruco terminated Shankar's registration by filing a Uniform Termination Notice for Securities Industry Registration ("Form U5") on March 13, 2024. The Form U5 states that Shankar was discharged for "submit[ting] numerous annuity applications containing inaccurate information and non-genuine electronic customer signatures for over 30 different customers resulting in his receipt of commissions to which he was not otherwise entitled, which were recaptured by the Company on multiple occasions."

7. Although Respondent is no longer registered or associated with a FINRA member, he remains subject to FINRA's jurisdiction for purposes of this proceeding, pursuant to Article V, Section 4 of FINRA's By-Laws, because the Complaint was filed within two years after March 13, 2024, which was the effective date of termination of Respondent's registration with Pruco.

FACTS

8. Between November 21, 2022, and January 23, 2024, for each of the 115 annuity applications listed in Appendix A, Shankar signed the customers' names on the annuity applications using electronic signature software. None of these customers had given Shankar permission to submit the applications or sign their names and were not aware that he was doing so.

9. Shankar submitted the forged annuity applications to the firm without the customers' knowledge. For each of the annuity applications, the associated annuity was unfunded at the time of application and remained unfunded.

10. The firm paid Shankar advanced commissions after receipt of 114 of the 115 annuity applications. In total, Shankar received from the firm \$511,609.74 in advanced commissions as a result of the forged annuity applications.

11. Throughout the Relevant Period, when the annuity distributor contacted Shankar to inquire about the delay in customers funding their annuities, Shankar provided false explanations.

12. For example, between November 21, 2022, and December 20, 2023, Shankar forged Customer 1's signature on six variable annuity applications and submitted those applications to the firm without Customer 1's knowledge or agreement to fund the associated annuities. These annuities were, in fact, never funded. Shankar received an advanced commission payment for each submitted application. In total, he received advanced commissions of \$29,714.20 for the forged applications associated with Customer 1.

13. Customer 1 did not give Shankar permission to sign his name on the applications and was not aware that Shankar had submitted the applications on his behalf.

14. Between March 21, 2023, and June 21, 2023, Shankar forged Customer 2's signature on five variable annuity applications and submitted those applications to the firm without Customer 2's knowledge or agreement to fund the associated annuities. These annuities were never funded. Shankar received an advanced commission payment for each submitted application. In total, he received advanced commissions of \$20,613.30 for the forged applications associated with Customer 2.

15. Customer 2 did not give Shankar permission to sign her name on the applications and was not aware that Shankar had submitted the applications on her behalf.

16. The same was true for the other 62 customers listed on Appendix A. Between December 2022 and January 2024, Shankar forged Customers 3 through 64's signatures on an additional 104 annuity applications and submitted those applications to the firm without those customers' knowledge or agreement to fund the associated annuities. These annuities were never funded. Shankar received an advanced commission payment for each submitted application. In total, he received additional advanced commissions of \$461,282.24 for the forged applications associated with Customers 3 through 64.

17. Customers 3 through 64 did not give Shankar permission to sign their names on the applications and were not aware that Shankar had submitted the applications on their behalf.

18. When each of the 115 annuities remained unfunded for 90 days after Shankar's submission of the annuity application, Pruco attempted to recoup the advanced commissions by deducting them from Shankar's next paycheck. When Shankar's paycheck did not cover the amount of unearned commissions, the firm carried over the balance to the next paycheck. At the time of his termination, Shankar owed the firm \$163,910.71 for unearned commissions he received in connection with the forged annuity applications.

19. In January 2024, the firm confronted Shankar about some of the forged annuity applications. He eventually admitted to the firm that he had forged customer signatures and did so to earn commissions. The firm subsequently terminated Shankar on February 20, 2024.

FIRST CAUSE OF ACTION
Conversion
(Violation of FINRA Rule 2010)

20. The Department of Enforcement realleges and incorporates by reference all prior paragraphs.

21. FINRA Rule 2010 requires associated persons to observe high standards of commercial honor and just and equitable principles of trade in the conduct of their business.

22. Conversion is an intentional and unauthorized taking of and/or exercise of ownership over property by one who neither owns the property nor is entitled to possess it. Conversion is inconsistent with high standards of commercial honor and just and equitable principles of trade.

23. Between November 2022 and January 2024, Shankar intentionally forged customer signatures on annuity applications and submitted them to the firm in order to receive advanced commission payments for the associated annuities. Based on the forged annuity applications, Pruco paid advanced commissions to Shankar of \$511,609.74 to which he was not entitled. Shankar thereby converted \$511,609.74.

24. As a result of the foregoing conduct, Shankar violated FINRA Rule 2010.

SECOND CAUSE OF ACTION
Forgery
(Violation of FINRA Rule 2010)

25. The Department of Enforcement realleges and incorporates by reference all prior paragraphs.

26. Forgery occurs when one person signs or affixes, or causes to be signed or affixed, another person's name or initials on a document without the other person's prior permission.

27. Forgery is inconsistent with high standards of commercial honor and just and equitable principles of trade.

28. Between November 2022 and January 2024, Shankar signed 64 customer names without the customers' permission on 115 annuity applications.

29. As a result of the foregoing conduct, Shankar violated FINRA Rule 2010.

RELIEF REQUESTED

WHEREFORE, the Department of Enforcement respectfully requests that the Panel:

- A. make findings of fact and conclusions of law that Respondent committed the violations charged and alleged herein;
- B. order that one or more of the sanctions provided under FINRA Rule 8310(a), including monetary sanctions, be imposed; and
- C. order that Shankar bear such costs of proceeding as are deemed fair and appropriate under the circumstances in accordance with FINRA Rule 8330.

FINRA DEPARTMENT OF ENFORCEMENT

Date: February 17, 2026



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Appendix A

Alias in Complaint	Contract Number	Product Type	Forgery Date	Commission Report Date ¹	Commission Amount
Customer 1	FI0102116	Variable	11/21/2022	12/2/2022	\$5,000.00
Customer 1	FI0114413	Variable	2/27/2023	3/10/2023	\$5,000.00
Customer 1	FI0128761	Variable	5/31/2023	6/9/2023	\$5,000.00
Customer 1	FI0131721	Variable	6/20/2023	6/30/2023	\$4,714.20
Customer 1	FI0131737	Variable	6/20/2023	6/30/2023	\$5,000.00
Customer 1	FI0158226	Variable	12/20/2023	12/29/2023	\$5,000.00
Customer 2	FI0118081	Variable	3/21/2023	3/31/2023	\$5,000.00
Customer 2	FI0127764	Variable	5/24/2023	6/2/2023	\$5,000.00
Customer 2	FI0127765	Variable	5/24/2023	6/2/2023	\$5,000.00
Customer 2	FI0129574	Variable	6/6/2023	6/16/2023	\$3,183.30
Customer 2	FI0131785	Variable	6/21/2023	6/30/2023	\$2,430.00
Customer 3	FI0164037	Variable	1/23/2024	2/2/2024	\$5,000.00
Customer 4	FI0106348	Variable	12/22/2022	12/30/2022	\$4,495.50
Customer 5	FI0128035	Variable	5/25/2023	6/2/2023	\$3,645.00
Customer 5	FI0138290	Variable	8/7/2023	8/18/2023	\$5,000.00
Customer 5	FI0138333	Variable	8/7/2023	8/18/2023	\$5,000.00
Customer 6	FI0149067	Variable	9/26/2023	11/3/2023	\$5,000.00
Customer 7	FI0141421	Variable	8/29/2023	9/8/2023	\$5,000.00
Customer 7	FI0143202	Variable	9/12/2023	9/22/2023	\$4,906.17
Customer 8	FI0148729	Variable	10/24/2023	11/3/2023	\$5,000.00
Customer 8	FI0148727	Fixed	10/24/2023	11/3/2023	\$5,000.00
Customer 9	FI0143356	Variable	9/13/2023	9/22/2023	\$4,914.00
Customer 9	FI0143357	Fixed	9/13/2023	9/22/2023	\$4,914.00
Customer 10	56304751/ FI0142443	Variable	9/6/2023	9/29/2023	\$5,000.00
Customer 11	FI0117109	Variable	3/15/2023	3/24/2023	\$2,430.00
Customer 11	FI0130701	Variable	6/13/2023	6/23/2023	\$2,430.00
Customer 11	FI0130702	Variable	6/13/2023	6/23/2023	\$3,402.00
Customer 12	FI0133689	Variable	7/5/2023	7/14/2023	\$5,000.00
Customer 12	FI0134688	Variable	7/12/2023	7/21/2023	\$3,645.00
Customer 12	FI0134879	Variable	7/13/2023	7/21/2023	\$5,000.00
Customer 13	FI0152623	Variable	11/17/2023	12/1/2023	\$5,000.00
Customer 14	FI0155557	Variable	12/6/2023	12/15/2023	\$4,860.00
Customer 14	FI0155755	Variable	12/6/2023	12/15/2023	\$5,000.00
Customer 15	FI0117099	Variable	3/15/2023	3/24/2023	\$3,450.60
Customer 15	FI0117190	Variable	3/16/2023	3/31/2023	\$2,430.00
Customer 15	FI0121695	Variable	4/13/2023	4/21/2023	\$4,908.60
Customer 15	FI0127797	Variable	5/23/2023	6/2/2023	\$2,235.60
Customer 15	5917775 / FI0127873	Variable	5/24/2023	6/2/2023	\$2,794.50
Customer 15	6151992 / FI0140412	Variable	8/22/2023	9/1/2023	\$2,794.50

¹ Pruco generated weekly Commission Reports every Friday, which captured commissions earned the previous week. Pruco paid commissions biweekly on paydays (every other Friday).

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Customer 15	6152197 / FI0140411	Variable	8/22/2023	9/1/2023	\$2,430.00
Customer 15	59593031	Variable	1/3/2024	Not Advanced	N/A
Customer 16	FI0157816	Variable	12/19/2023	12/29/2023	\$5,000.00
Customer 16	FI0157814	Variable	12/19/2023	12/29/2023	\$5,000.00
Customer 17	FI0155496	Variable	12/6/2023	12/15/2023	\$4,617.00
Customer 18	FI0144348	Variable	9/20/2023	9/29/2023	\$4,860.00
Customer 18	FI0144354	Variable	9/20/2023	9/29/2023	\$4,860.00
Customer 19	FI0156626	Variable	12/13/2023	12/22/2023	\$5,000.00
Customer 20	FI0141609	Variable	8/30/2023	9/8/2023	\$5,000.00
Customer 21	FI0154162	Variable	11/29/2023	12/8/2023	\$5,000.00
Customer 22	FI0144150	Variable	9/19/2023	9/29/2023	\$4,355.36
Customer 23	FI0156624	Variable	12/13/2023	12/22/2023	\$4,860.00
Customer 24	FI0143204	Variable	9/12/2023	9/22/2023	\$4,556.25
Customer 25	FI0163783	Fixed	7/18/2023	11/3/2023	\$558.90
Customer 26	FI0119418	Variable	3/29/2023	4/7/2023	\$4,787.10
Customer 26	FI0132736	Variable	6/27/2023	7/7/2023	\$4,787.10
Customer 27	FI0143838	Variable	9/17/2023	9/29/2023	\$4,422.60
Customer 28	FI0157544	Variable	12/18/2023	12/29/2023	\$4,981.50
Customer 29	FI0157543	Variable	12/18/2023	12/29/2023	\$5,000.00
Customer 30	FI0141666	Variable	8/30/2023	9/8/2023	\$4,179.60
Customer 31	FI0131841	Variable	6/21/2023	6/30/2023	\$5,000.00
Customer 31	FI0131842	Variable	6/21/2023	6/30/2023	\$5,000.00
Customer 31	FI0131843	Variable	6/21/2023	6/30/2023	\$5,000.00
Customer 32	FI0139645	Variable	8/16/2023	8/25/2023	\$4,762.80
Customer 33	FI0139644	Variable	8/16/2023	10/27/2023	\$5,000.00
Customer 34	FI0159917	Variable	1/4/2024	1/12/2024	\$5,000.00
Customer 35	FI0161375	Variable	1/11/2024	1/19/2024	\$4,860.00
Customer 36	FI0142446	Variable	9/6/2023	9/15/2023	\$3,061.80
Customer 37	FI0143971	Variable	9/18/2023	9/29/2023	\$4,617.00
Customer 38	FI0142612	Variable	9/7/2023	9/15/2023	\$5,000.00
Customer 38	FI0148108	Fixed	10/18/2023	11/3/2023	\$5,000.00
Customer 39	FI0148108	Variable	7/26/2023	11/3/2023	\$5,000.00
Customer 39	FI0136603	Variable	7/26/2023	8/4/2023	\$5,000.00
Customer 40	FI0146796	Variable	10/10/2023	10/20/2023	\$4,422.60
Customer 41	FI0145992	Variable	10/3/2023	10/13/2023	\$5,000.00
Customer 41	FI0146795	Variable	10/10/2023	10/20/2023	\$4,301.10
Customer 42	FI0152583	Variable	11/18/2023	12/1/2023	\$5,000.00
Customer 43	FI0152584	Variable	11/18/2023	12/1/2023	\$5,000.00
Customer 44	FI0140591	Variable	8/23/2023	9/1/2023	\$5,000.00
Customer 44	FI0140592	Variable	8/23/2023	9/1/2023	\$5,000.00
Customer 45	FI0136793	Variable	7/27/2023	8/4/2023	\$5,000.00
Customer 45	FI0137607	Variable	8/2/2023	8/11/2023	\$5,000.00
Customer 46	FI0140818	Variable	8/24/2023	9/1/2023	\$3,450.60
Customer 47	FI0144259	Variable	9/19/2023	9/29/2023	\$4,505.88
Customer 48	FI0114961	Variable	3/2/2023	3/10/2023	\$5,000.00
Customer 48	FI0121685	Variable	4/13/2023	4/21/2023	\$3,402.00
Customer 48	FI0128719	Variable	5/31/2023	6/9/2023	\$5,000.00

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Customer 48	FI0149974	Variable	11/2/2023	11/10/2023	\$4,908.40
Customer 49	FI0150554	Variable	11/7/2023	11/17/2023	\$5,000.00
Customer 50	FI0150555	Variable	11/7/2023	11/17/2023	\$5,000.00
Customer 50	FI0150873	Variable	11/8/2023	11/17/2023	\$4,860.00
Customer 51	FI0156801	Fixed	12/13/2023	12/22/2023	\$5,000.00
Customer 52	FI0123441	Variable	4/25/2023	5/5/2023	\$4,932.90
Customer 52	FI0123591	Variable	4/26/2023	5/5/2023	\$5,000.00
Customer 52	FI0150869	Fixed	11/8/2023	11/17/2023	\$4,365.90
Customer 53	FI0149064	Variable	10/26/2023	11/3/2023	\$5,000.00
Customer 54	FI0118312	Variable	3/21/2023	3/31/2023	\$4,617.00
Customer 54	FI0129567	Variable	6/6/2023	6/16/2023	\$5,000.00
Customer 54	FI0129568	Variable	6/6/2023	6/16/2023	\$4,811.40
Customer 55	FI0160559	Fixed	1/8/2024	1/19/2024	\$5,000.00
Customer 56	FI0160558	Fixed	1/8/2024	1/19/2024	\$5,000.00
Customer 57	FI0154126	Variable	11/29/2023	12/8/2023	\$4,374.00
Customer 57	FI0154127	Variable	11/29/2023	12/8/2023	\$5,000.00
Customer 58	FI0162436	Fixed	1/16/2024	1/26/2024	\$2,736.00
Customer 58	FI0162434	Fixed	1/16/2024	1/26/2024	\$2,736.00
Customer 59	FI0106115	Variable	12/21/2022	12/30/2022	\$5,000.00
Customer 59	FI0123489	Variable	4/25/2023	5/5/2023	\$5,000.00
Customer 59	FI0148210	Fixed	10/19/2023	10/27/2023	\$5,000.00
Customer 60	FI0161139	Fixed	1/10/2024	12/8/2023	\$706.98
Customer 61	FI0151927	Variable	11/15/2023	11/24/2023	\$5,000.00
Customer 61	FI0152049	Fixed	11/15/2023	11/24/2023	\$5,000.00
Customer 62	FI0149759	Fixed	11/1/2023	11/10/2023	\$3,591.00
Customer 63	FI0164035	Variable	1/23/2024	2/2/2024	\$5,000.00
Customer 63	FI0164034	Variable	1/23/2024	2/2/2024	\$5,000.00
Customer 64	FI0157487	Variable	12/18/2023	12/29/2023	\$4,374.00
Customer 64	FI0157486	Variable	12/18/2023	12/29/2023	\$4,374.00

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