

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

Department of Enforcement,

Complainant,

v.

Avinesh Shankar
CRD No. 6232970,

Respondent.

Disciplinary Proceeding
No. 2024081563501

Hearing Officer—BDC

**ORDER ACCEPTING OFFER OF
SETTLEMENT**

Date: March 19, 2026

INTRODUCTION

Disciplinary Proceeding No. 2024081563501 was filed on February 17, 2026, by the Department of Enforcement of the Financial Industry Regulatory Authority (FINRA or Complainant). Respondent Avinesh Shankar submitted an Offer of Settlement (Offer) to Complainant dated March 13, 2026. Pursuant to FINRA Rule 9270(e), the Complainant and the National Adjudicatory Council (NAC), a Review Subcommittee of the NAC, or the Office of Disciplinary Affairs (ODA) have accepted the uncontested Offer. Accordingly, this Order now is issued pursuant to FINRA Rule 9270(e)(3). The findings, conclusions and sanctions set forth in this Order are those stated in the Offer as accepted by the Complainant and approved by the NAC.

Under the terms of the Offer, Respondent has consented, without admitting or denying the allegations of the Complaint, 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, to the entry of findings and violations consistent with the allegations of the Complaint, and to the imposition of the sanctions set forth below, and fully understands that this Order will become part of

Respondent's permanent disciplinary record and may be considered in any future actions brought by FINRA.

BACKGROUND

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

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.

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[ing] 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."

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.

FINDINGS AND CONCLUSIONS

It has been determined that the Offer be accepted and that findings be made as follows:

SUMMARY

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.

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.

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

FACTS

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.

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.

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.

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

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.

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.

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.

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.

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.

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.

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.

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
(FINRA Rule 2010)

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.

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.

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.

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

SECOND CAUSE OF ACTION

Forgery (FINRA Rule 2010)

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.

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

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

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

Based on the foregoing, Respondent violated FINRA Rule 2010 by forging customer signatures and converting funds.

Based on these considerations, the sanctions hereby imposed by the acceptance of the Offer are in the public interest, are sufficiently remedial to deter Respondent from any future misconduct, and represent a proper discharge by FINRA, of its regulatory responsibility under the Securities Exchange Act of 1934.

SANCTIONS

It is ordered that Respondent be barred from association 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, Respondent 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. A bar or expulsion is effective upon approval or acceptance of this Order.

SO ORDERED.

FINRA

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

Alex Wynne

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