

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

Department of Enforcement,

Complainant,

v.

MEREDITH WEBBER
CRD No. 2435263,

Respondent.

Disciplinary Proceeding
No. 2024082788802

Hearing Officer— MJD

**ORDER ACCEPTING OFFER OF
SETTLEMENT**

Date: July 28, 2025

INTRODUCTION

Disciplinary Proceeding No. 2024082788802 was filed on April 24, 2025, by the Department of Enforcement of the Financial Industry Regulatory Authority (FINRA or Complainant). Respondent Meredith Webber submitted an Offer of Settlement (Offer) to Complainant dated July 22, 2025. 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

Webber first registered with FINRA in 1997 as a General Securities Representative through her association with a member firm.

From September 2022 through July 2024, Webber was registered as a General Securities Sales Supervisor, a General Securities Representative, and a General Securities Principal through an association with Raymond James Financial Services, Inc. (Raymond James).

On July 17, 2024, Raymond James filed a Uniform Termination Notice for Securities Industry Registration (Form U5) terminating Webber's registration through the firm and disclosing that Webber had been terminated for "accepting a loan from a customer without seeking firm approval."

On August 14, 2024, Raymond James filed a Form U5 amendment disclosing that the firm was conducting an internal review into Webber's "potential misappropriation of client assets."

Although Webber is no longer registered or associated with a FINRA member, she remains subject to FINRA's jurisdiction for purposes of this proceeding pursuant to Article V, Section 4 of FINRA's By-Laws because (1) the Complaint was filed within two years after July 17, 2024, which was the effective date of termination of Webber's registration; and (2) the Complaint charges Webber with failing to respond to FINRA's requests for documents and information and failing to appear for on-the-record testimony during the two-year period after the date on which she ceased to be registered or associated with a FINRA member.

FINDINGS AND CONCLUSIONS

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

SUMMARY

Respondent Meredith Webber failed to respond to requests for documents and information that FINRA made pursuant to FINRA Rule 8210 and failed to provide on-the-record (OTR) testimony that FINRA requested pursuant to FINRA Rule 8210 as part of FINRA's investigation into whether Webber misappropriated funds from two elderly customers. As a result, Webber violated FINRA Rules 8210 and 2010.

FIRST CAUSE OF ACTION

Failure to Provide Documents and Information (Violation of FINRA Rule 8210 and 2010)

FINRA Rule 8210(a)(1) provides that for the purpose of an investigation, complaint, examination, or proceeding authorized by the FINRA By-Laws or rules, FINRA staff shall have the right to require any person subject to FINRA's jurisdiction to "provide information orally, in writing, or electronically... with respect to any matter involved in the investigation, complaint, examination, or proceeding."

FINRA Rule 8210(a)(2) provides that FINRA may "inspect and copy the books, records, and accounts of such member or person with respect to any matter involved in the investigation, complaint, examination, or proceeding that is in such member's or person's possession, custody, or control."

FINRA Rule 8210(c) provides that "[n]o member or person shall fail to provide information ...pursuant to this Rule."

FINRA Rule 8210(d) specifies that notice under Rule 8210 shall be deemed received by a currently or formerly registered person to whom it is directed by mailing or otherwise

transmitting the notice to the last known residential address of the person as reflected in FINRA's Central Registration Depository system (CRD).

A violation of FINRA Rule 8210 also constitutes a violation of FINRA Rule 2010, which requires associated persons to "observe high standards of commercial honor and just and equitable principles of trade" in the conduct of their business.

In September 2024, FINRA was investigating whether Webber misappropriated assets from two elderly customers.

On September 30, 2024, as part of its investigation, FINRA sent a request for documents and information pursuant to FINRA Rule 8210 (First 8210 Request) by first-class mail and FedEx to Webber's last known residential address as reflected in CRD (Webber's CRD Address).

In the First 8210 Request FINRA asked for, among other things, documentation related to Webber's receipt of loan funds from an elderly customer, bank account statements, phone records, and electronic communications.

The first-class mailing of the First 8210 Request was not returned.

The FedEx mailing of the First 8210 Request was returned after three delivery attempts.

Webber's response to the First 8210 Request was due on October 14, 2024.

Webber did not provide any of the documents or information FINRA requested in response to the First 8210 Request or respond to the request in any way.

On October 15, 2024, after Webber did not respond to the First 8210 Request, FINRA sent Webber a second request for documents and information pursuant to FINRA Rule 8210 (Second 8210 Request) by first-class mail, FedEx, and certified mail to Webber's CRD Address.

The information and documents requested in the Second 8210 Request were identical to those requested in the First 8210 Request.

The first-class mailing of the Second 8210 Request was not returned.

The FedEx mailing of the Second 8210 Request was returned after three delivery attempts.

The certified mailing of the Second 8210 Request was returned as unclaimed.

Webber's response to the Second 8210 Request was due on October 30, 2024.

Webber did not produce any documents or information in response to the Second 8210 Request or respond to the request in any way.

On November 8, 2024, after Webber did not comply with the Second 8210 Request, FINRA sent Webber a third request for documents and information pursuant to FINRA Rule 8210 (Third 8210 Request) by first-class mail and certified mail to Webber's CRD Address.

The information and documents requested in the Third 8210 Request were identical to those requested in the First and Second 8210 Requests.

Webber's response to the Third 8210 Request was due November 22, 2024.

The first-class mailing of the Third 8210 Request was not returned.

The certified mailing of the Third 8210 Request was marked as "left with individual" on November 13, 2024.

Webber did not provide any of the documents or information FINRA requested in response to the First, Second, or Third 8210 Requests or respond to the requests in any way.

The information and documents FINRA requested were material to FINRA's investigation because they directly related to whether Webber misappropriated two elderly customers' funds and were necessary for FINRA to complete its investigation.

Webber's failure to provide the requested documents and information impeded FINRA's investigation into her potential misconduct.

By failing to respond to FINRA's request for documents and information, Webber violated FINRA Rules 8210 and 2010.

SECOND CAUSE OF ACTION
Failure to Appear for Testimony
(Violation of FINRA Rules 8210 and 2010)

FINRA Rule 8210(a)(1) provides that for the purpose of an investigation, complaint, examination, or proceeding authorized by the FINRA By-Laws or rules, FINRA staff shall have the right to require any person subject to FINRA's jurisdiction to "testify at a location specified by FINRA staff, under oath or affirmation administered by a court reporter or notary public if requested, with respect to any matter involved in the investigation, complaint, examination, or proceeding."

On September 30, 2024, as part of its investigation into whether Webber misappropriated assets from two elderly customers, FINRA sent a request to Webber, pursuant to FINRA Rule 8210, requesting that she appear by videoconference to provide OTR testimony on October 23, 2024 (First OTR Request).

FINRA sent the First OTR Request by first-class mail and FedEx to Webber's CRD Address.

The first-class mailing of the First OTR Request was not returned.

The FedEx mailing of the First OTR Request was returned after three delivery attempts.

Webber did not appear for testimony on October 23, 2024, nor did she request that FINRA reschedule the testimony.

On October 24, 2024, FINRA sent a second request pursuant to FINRA Rule 8210 requesting that Webber appear by videoconference to provide on-the-record testimony on November 6, 2024 (Second OTR Request).

FINRA sent the Second OTR Request by first-class mail, certified mail, and FedEx to Webber's CRD Address.

The first-class mailing of the Second OTR Request was not returned.

The FedEx mailing of the Second OTR Request was marked delivered.

The certified mailing of the Second OTR Request was delivered and signed for.

On the morning of November 6, 2024, Webber left a voicemail for FINRA staff stating that she could not appear for testimony that day. In her voicemail, Webber also provided an email address at which she could be contacted.

Webber did not appear for testimony on November 6, 2024.

On November 7, 2024, FINRA staff sent an email to Webber at the email address she provided in her November 6, 2024 voicemail and requested that Webber identify a specific date and time for her on-the-record testimony the week of December 9, 2024.

On November 12, 2024, Webber responded to FINRA staff's email and identified December 4, 2024, as an available date for her on-the-record testimony.

On November 12, 2024, FINRA staff responded to Webber's email and explained that they were not available on December 4, 2024, and requested that she identify a date the week of December 9, 2024.

On November 18, 2024, Webber responded to FINRA staff's email and identified December 11, 2024, as a date she was available for her on-the-record testimony.

On November 18, 2024, FINRA sent a third request pursuant to FINRA Rule 8210 requesting that Webber appear by videoconference to provide on-the-record testimony on December 11, 2024 (Third OTR Request) to Webber's CRD Address.

FINRA sent the Third OTR Request by first-class mail and certified mail to Webber's CRD Address and emailed a courtesy copy to her via email.

The first-class mailing of the Third OTR Request was not returned.

The certified mailing of the Third OTR Request was marked "delivered, left with individual."

On December 4, 2024, Webber emailed FINRA staff and stated she was not available for on-the-record testimony on December 11, 2024. Webber did not provide an alternative date or request that the testimony be rescheduled.

On December 5, 2024, FINRA staff emailed Webber informing her that staff would be proceeding with the December 11, 2024 testimony as scheduled.

Webber did not appear for testimony on December 11, 2024.

The testimony requested of Webber pursuant to FINRA Rule 8210 in the First, Second, and Third OTR Requests was material to FINRA's investigation because it directly related to whether Webber misappropriated assets from two elderly customers and was necessary for FINRA to complete its investigation.

Webber's failure to appear for on-the-record testimony impeded FINRA's investigation into her potential misconduct.

By failing to appear for on-the-record testimony, Webber violated FINRA Rules 8210 and 2010.

Based on the foregoing, Respondent violated FINRA Rules 8210 and 2010.

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

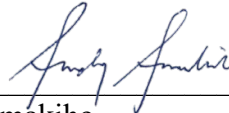
It is ordered that Respondent be barred from associating in any capacity with any FINRA member.

The sanction imposed herein shall be effective on a date set by FINRA staff. A bar or expulsion shall become effective upon approval or acceptance of this Order.

SO ORDERED.

FINRA

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



Andy Amakihe
Senior Attorney
FINRA Department of Enforcement
3 Second Street | Suite 900
Jersey City, NJ 07311