

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER, AND CONSENT
NO. 2025086713301**

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

RE: Jayme Frances Lemaire (Respondent)
Former General Securities Representative
CRD No. 4336052

Pursuant to FINRA Rule 9216, Respondent Jayme Frances Lemaire 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

Lemaire first registered with FINRA in 2001. From April 2021 until July 2025, Lemaire was registered as a General Securities Representative, General Securities Principal, and Investment Company and Variable Contracts Products Principal through an association with Raymond James Financial Services, Inc. (CRD No. 6694). On July 15, 2025, Raymond James filed a Uniform Termination Notice for Securities Industry Registration (Form U5) terminating Lemaire's registration due to "[c]onduct inconsistent with firm policies on borrowing from clients."

From July 11, 2025 through July 22, 2025, Lemaire was registered through an association with Lincoln Investment (CRD No. 519). On July 22, 2025, Lincoln Investment filed a Form U5 terminating Lemaire's registration because she "provided inaccurate and/or incomplete information at the time of onboarding regarding her termination from Raymond James." From July 24, 2025 through October 20, 2025, Lemaire was registered through an association with International Assets Advisory, LLC (CRD No. 10645). Lemaire is not currently registered or associated with any FINRA member. However, she remains subject to FINRA's jurisdiction pursuant to Article V, Section 4 of FINRA's By-Laws.

On August 7, 2026, Lemaire entered into a Consent Order with the Banking Commissioner of Connecticut barring her from broker-dealer and investment advisory activities in Connecticut and fining her \$30,000 for engaging in dishonest or unethical

business practices by borrowing from customers and by accepting cash gifts from customers, and for making false or misleading statements on a Form U4.¹

OVERVIEW

Lemaire refused to provide information and documents requested pursuant to FINRA Rule 8210 in connection with FINRA's investigation into whether Lemaire improperly borrowed funds from senior customers. As a result, Lemaire violated FINRA Rules 8210 and 2010 and is barred from associating with any FINRA member in all capacities.

FACTS AND VIOLATIVE CONDUCT

This matter originated from FINRA's review of the Form U5 filed by Raymond James on Lemaire's behalf in July 2025.

FINRA's Rule 8210(a)(1) states, in relevant part, that FINRA may require a "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, complaint, [or] examination[.]" FINRA Rule 8210(a)(2) states, in relevant part, that FINRA staff shall have the right to "inspect and copy the books, records, and accounts of such ... person with respect to any matter involved in [a FINRA] investigation, complaint, [or] examination." FINRA Rule 8210(c) provides that "[n]o member or person shall fail to provide information ... or to permit an inspection and copying of books, records, or accounts pursuant to this Rule." A violation of FINRA Rule 8210 is also a violation of FINRA Rule 2010, which requires persons associated with a FINRA member to "observe high standards of commercial honor and just and equitable principals of trade" in the conduct of their business.

On January 21, 2026, in connection with its investigation into Lemaire's borrowing from senior customers and other financial transactions with customers, FINRA sent Lemaire a request for information and documents pursuant to FINRA Rule 8210. Lemaire neither requested an extension of time to respond, nor provided any of the requested information or documents. As stated during her counsel's phone call with FINRA staff on May 22, 2026, and by this agreement, Lemaire acknowledges that she received FINRA's request and will not produce the information or documents requested. By refusing to produce the information and documents as requested pursuant to FINRA Rule 8210, Lemaire 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 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

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

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. The bar shall become effective on the date of the notice of 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 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;

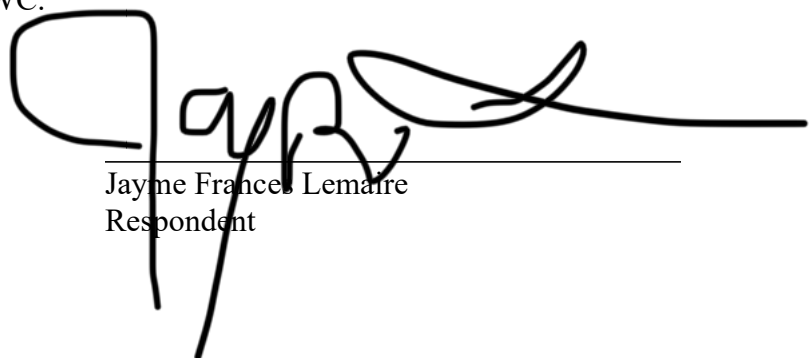
B. If this AWC is not accepted, its submission will not be used as evidence to prove any of the allegations against Respondent; and

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;
4. this AWC may be taken into consideration by employers and other regulatory or licensing entities or authorities in their hiring, retention, licensing, or other decisions. This AWC may also have other adverse collateral consequences outside of FINRA's control; and
5. 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 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.

9/14/26
Date


Jayme Frances Lemaire
Respondent

Reviewed by:



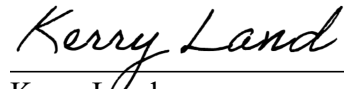
John G. Cataldo, Esq.
Counsel for Respondent
D'Ambrosio LLP
185 Devonshire Street, 2nd Floor
Boston, MA 02110

Accepted by FINRA:

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

September 17, 2026

Date



Kerry Land
Senior Counsel
FINRA
Department of Enforcement
Brookfield Place, 200 Liberty Street
New York, NY 10281