

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2019061567201**

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

**RE: Dean Harrison Grant, Respondent
Former Investment Company and Variable Contracts Products Representative
CRD No. 1945209**

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, I submit 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 me alleging violations based on the same factual findings described herein.

I.

ACCEPTANCE AND CONSENT

- A. I hereby accept and consent, without admitting or denying the findings, 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, prior to a hearing and without an adjudication of any issue of law or fact, to the entry of the following findings by FINRA:

BACKGROUND

Grant first became registered with FINRA as an Investment Company and Variable Contracts Products Representative ("IR") on August 5, 1992 through an association with member firm NYLife Securities LLC (BD No. 5167) ("NYLS"). Grant was registered through an association with NYLS until October 04, 2013. From September 30, 2014 through January 25, 2019, Grant was registered as an IR through an association with member firm M Holdings Securities, Inc. (BD No. 43285).

Grant is not currently associated with any FINRA member firm. However, he remains subject to FINRA's jurisdiction pursuant to Article V, Section 4 of FINRA's By-Laws.

RELEVANT DISCIPLINARY HISTORY

Grant has no prior disciplinary history with the SEC, FINRA, any other self-regulatory organization or any state securities regulator.

OVERVIEW

Grant, through his counsel, informed FINRA staff in writing that he would not produce information and documents requested pursuant to FINRA Rule 8210. As a result, Grant violates FINRA Rules 8210 and 2010.

FACTS AND VIOLATIVE CONDUCT

FINRA Rule 8210(a)(1) states, in relevant part, that FINRA has the right to "require a . . . person associated with a member, or any other person subject to FINRA's jurisdiction to provide information orally, in writing, or electronically and to testify at a location specified by FINRA staff, under oath or affirmation with respect to any matter involved in the investigation, complaint, examination or proceeding." FINRA Rule 8210(c) similarly provides that "[n]o member or person shall fail to provide information or testimony or to permit an inspection and copying of books, records, or accounts pursuant to this Rule."

A failure to comply with a request for information or testimony pursuant to FINRA Rule 8210 is also a violation of FINRA Rule 2010. FINRA Rule 2010 requires associated persons to observe high standards of commercial honor and just and equitable principles of trade.

On February 13, 2019, after allegations that Grant converted funds from customers, forged documents and failed to disclose certain liens on his Uniform Application for Securities Industry Registration or Transfer (Form U4), FINRA staff sent a letter to Grant requesting that he provide information and documents pursuant to FINRA Rule 8210 by February 27, 2019. Grant failed to respond to the request by the February 27, 2019 deadline.

On February 28, 2019, FINRA staff sent a second request to Grant pursuant to FINRA Rule 8210 for the same information and documents. On March 14, 2019, Grant provided only a partial response, and failed to provide certain information and documents requested by FINRA.

On March 15, 2019, FINRA staff sent a third request to Grant pursuant to Rule 8210 in order obtain the outstanding information and documents. On March 19, 2019, Grant again provided only a partial response and failed to provide certain information and documents requested by FINRA.

Through an email from Grant's counsel dated April 12, 2019, a telephone conversation with Grant's counsel on April 15, 2019, and by this agreement, Grant acknowledges that he received FINRA's requests and will not provide any of the information or documents he previously failed to provide to FINRA at any time.

By refusing to provide the information and documents requested pursuant to FINRA Rule 8210, Respondent violates FINRA Rules 8210 and 2010.

B. I also consent to the imposition of the following sanctions:

- A bar from association with any FINRA member firm in any capacity.

I understand that if I am barred or suspended from associating with any FINRA member, I become 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, I 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 shall become effective upon approval or acceptance of this AWC.

II.

WAIVER OF PROCEDURAL RIGHTS

I specifically and voluntarily waive the following rights granted under FINRA's Code of Procedure:

- A. To have a Complaint issued specifying the allegations against me;
- 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, I specifically and voluntarily waive 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 acceptance or rejection of this AWC.

I further specifically and voluntarily waive 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.

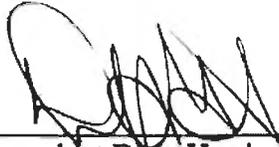
OTHER MATTERS

I understand 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 me; and**
- C. If accepted:**
 - 1. this AWC will become part of my permanent disciplinary record and may be considered in any future actions brought by FINRA or any other regulator against me;**
 - 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 the subject matter thereof in accordance with FINRA Rule 8313; and**
 - 4. I 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. I 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 my: (i) testimonial obligations; or (ii) right to take legal or factual positions in litigation or other legal proceedings in which FINRA is not a party.**

I certify that I have read and understand all of the provisions of this AWC and have been given a full opportunity to ask questions about it; that I have agreed to its provisions voluntarily; and that no offer, threat, inducement, or promise of any kind, other than the terms set forth herein and the prospect of avoiding the issuance of a Complaint, has been made to induce me to submit it.

04/22/2019
Date (mm/dd/yyyy)


Respondent Dean Harrison Grant

Reviewed by:


Carl S. Cansino
Counsel for Dean Harrison Grant
The Cansino Law Firm
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Accepted by FINRA:


May 13, 2019
Date

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


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