

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER, AND CONSENT
NO. 2021070227901**

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

RE: Glenn E. Brandon, Jr. (Respondent)
Former General Securities Representative and Former General Securities Sales
Supervisor
CRD No. 1051682

Pursuant to FINRA Rule 9216, Respondent Glenn E. Brandon, Jr. 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 hereby accepts and consents, 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

Brandon entered the securities industry in 1982 when he associated with a FINRA member as a general securities representative. In 2015, Brandon associated with BB&T Securities, LLC (BB&T) and registered as both a General Securities Representative and General Securities Sales Supervisor. On February 2, 2021, BB&T filed a Form U5 terminating Brandon's association with the firm and registration with FINRA. Although Brandon is not currently registered with FINRA or associated with a FINRA member, he remains subject to FINRA's jurisdiction pursuant to Article V, Section 4(a) of FINRA's By-Laws, which provides for a two-year period of retained jurisdiction over formerly registered persons.¹

OVERVIEW

Brandon violated FINRA Rules 8210 and 2010 by refusing to provide documents and information requested pursuant to FINRA Rule 8210 in connection with FINRA's investigation regarding whether Brandon engaged in outside business activities that were not disclosed to or approved by his FINRA member firm.

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

FACTS AND VIOLATIVE CONDUCT

This matter originated from FINRA's cause examination investigation into the Form U5 filing terminating Brandon's association with BB&T.

FINRA Rule 8210 authorizes FINRA, in the course of its investigations, to require persons over whom FINRA possesses jurisdiction to "provide information orally, in writing, or electronically... with respect to any matter involved in the investigation." Further, the rule provides that no 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." FINRA Rule 2010 provides that "[a] member, in the conduct of its business, shall observe high standards of commercial honor and just and equitable principles of trade." It is well-established that a person who is subject to the requirement to provide information pursuant to FINRA Rule 8210, and upon whom a Rule 8210 request is properly served, violates both FINRA Rule 8210 and FINRA Rule 2010 if he does not provide the information requested.²

Following Brandon's termination of his association with BB&T, FINRA began an investigation into whether Brandon engaged in outside business activities that were not disclosed to or approved by BB&T. In connection with that investigation, on August 5, 2021, FINRA sent a request to Respondent for the production of information or documents pursuant to FINRA Rule 8210. As stated during his counsel's phone call with FINRA on September 20, 2021, and by this agreement, Respondent acknowledges that he received FINRA's request and will not produce the information or documents requested. By refusing to produce the information or documents as requested pursuant to FINRA Rule 8210, Respondent violated FINRA Rules 8210 and 2010.

B. Respondent also consents to the imposition of the following sanctions:

- a bar from associating 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, he 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. A bar or expulsion shall become effective upon approval or acceptance of this AWC.

² *DOE v. Rebecca Amy Reichman*, 2011 FINRA Discip. LEXIS 18, *29 (NAC Jul. 21, 2011) (citing *CMG Inst. Trading, LLC*, Exchange Act. Rel. No. 59325, 2009 SEC LEXIS 215, *30 (Jan. 30, 2009); and *Stephen J. Gluckman*, 54 S.E.C. 175, 185 (1999)).

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 him;
- 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 prejudice 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; and
4. 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.

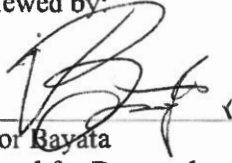
Respondent certifies that he has read and understands all of the provisions of this AWC and has been given a full opportunity to ask questions about it; Respondent has agreed to the AWC's provisions voluntarily; and no offer, threat, inducement, or promise of any kind, other than the terms set forth in this AWC and the prospect of avoiding the issuance of a complaint, has been made to induce him to submit this AWC.

Date

10-1-2021

Glenn E. Brandon, Jr.
Respondent

Reviewed by:



Victor Bayata
Counsel for Respondent
Vernon Litigation Group
8985 Fontana Del Sol Way
Naples, FL 34109

Accepted by FINRA:

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

October 15, 2021
Date



Jennifer C. Wang
Counsel
FINRA
Department of Enforcement
12801 N. Central Expwy, Suite 1050
Dallas, TX 75243