

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2014039863301**

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

RE: Dennis Anthony Edmonds, Respondent
Investment Company and Variable Contracts Products Representative
CRD No. 2339956

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

Dennis Anthony Edmonds ("Edmonds") entered the securities industry in September 1991, and was registered as an investment company and variable contracts products representative. Edmonds was associated with several firms from September 1991 through May 11, 2001. On May 11, 2001, Edmonds was associated with Packerland Brokerage Services, Inc. ("Packerland") where he remained until April 25, 2006. Edmonds then became associated with J.P. Turner & Company, L.L.C. ("J.P. Turner") in May 2006. Edmonds was associated with J.P. Turner until January 5, 2012. Edmonds is currently associated with another FINRA member firm. Therefore, Edmonds remains subject to FINRA's jurisdiction pursuant to Article V, Section 4 of FINRA's By-Laws. Furthermore, Edmonds does not have a relevant disciplinary history.

OVERVIEW

From December 2004 through January 2008, Edmonds, while associated with Packerland and then J.P. Turner, participated in the sale of international asset protection trusts, without giving Packerland or J.P. Turner prior written notice of his participation in these transactions and without obtaining approval to sell this product, in violation of NASD Conduct Rule 3040 and NASD Conduct Rule 2110.

FACTS AND VIOLATIVE CONDUCT

NASD Conduct Rule 3040(b) requires associated persons to provide written notice to their member firm prior to participating in any private securities transaction. The term "private

securities transaction" means any securities transaction outside the regular course or scope of an associated person's employment with a member.

In at least December 2004, Edmonds began recommending international asset protection trusts to his clients through a marketing firm named Foster & Dunhill. The international asset protection trusts were established by individuals and the owner of the trust typically placed an insurance policy in the trust as its corpus. Edmonds signed the trust deed as the "Protector" on some of these trusts and signed agreements to make him the investment manager of the trusts (which allowed him to manage the assets of the trusts on behalf of the owners). As the investment manager, Edmonds directed that the funds in the trusts be invested in securities in the form of a foreign investment fund called Private International Wealth Management ("PIWM").

During the period of January 2005 to January 2008, Edmonds participated in the creation of asset protection trusts for five individuals, two while he was associated with Packerland and three while he was associated with J.P. Turner. During this same period, Edmonds participated in the investments of six individuals who invested over \$1.6 million in PIWM securities. Edmonds was paid a percentage of the total amount each customer deposited into an international asset protection trust as well as a percentage of any additional funds deposited by the customer into the trust after the trust was established.

Edmonds provided J.P. Turner with two outside business activity forms. The first disclosed that he had a relationship with Foster & Dunhill, which he described as "consulting with clients considering international insurance." The second described the outside business as "Insurance Sales" and further described his duties and assignments as "marketing and selling life insurance policies through various companies." Edmonds did not provide prior written notice to either Packerland or J.P. Turner of his participation in the recommendation and formation of the international asset protection trusts and the investments made in them. The international asset protection trusts were never approved as a product that could be sold by Packerland or J.P. Turner registered representatives and Edmonds participation in the trusts and the investments made in them were not reviewed or supervised by either firm.

As a result of the foregoing conduct, Edmonds violated NASD Conduct Rule 3040 and NASD Conduct Rule 2110.

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

An 11-month suspension from associating with any FINRA member firm in all capacities.

Edmonds has submitted a sworn financial statement and demonstrated an inability to pay. In light of the financial status of Edmonds, no monetary sanctions have been imposed.

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.

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.

D. I may attach a Corrective Action Statement to this AWC that is a statement of demonstrable corrective steps taken to prevent future misconduct. I understand that I may not deny the charges or make any statement that is inconsistent with the AWC in this Statement. This Statement does not constitute factual or legal findings by FINRA, nor does it reflect the views of FINRA or its staff.

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.

December 3, 2014

Date

Dr. Anthony Edmonds

Dennis Anthony Edmonds, Respondent

Reviewed by:

David Smyth

David Smyth, Esq.

Counsel for Respondent

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Accepted by FINRA:

December 6, 2016
Date

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

William Brice La Hue (TAD)
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