

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2014043072601**

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

RE: Ryan Alexander Logan, Respondent
General Securities Representative
CRD No. 4950854

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

Logan associated with Northwestern Mutual Investment Services ("NMIS" or "Firm") on May 9, 2011 and became registered as a General Securities (Series 7) Representative on August 16, 2011. Logan remained associated with NMIS through May 9, 2014. From June 12, 2014, to the present, Logan has been associated with another member firm.

RELEVANT DISCIPLINARY HISTORY

Logan does not have any relevant disciplinary history.

OVERVIEW

In May 2014, shortly before he terminated his association with NMIS, Logan altered his clients' telephone numbers and email addresses in the Firm's database, thereby causing the Firm's books and records to contain inaccurate information in violation of Section 17(a) of the Securities and Exchange Act of 1934 and Rule 17a-3 thereunder. By causing

the Firm's records to be inaccurate and by failing to uphold high standards of commercial honor, Logan violated FINRA Rules 4511(a) and 2010.

FACTS AND VIOLATIVE CONDUCT

Logan terminated his registration with the Firm and his contract with the Firm's insurance affiliate on May 9, 2014. Within about one week after Logan's resignation, the Firm determined that the telephone numbers and email addresses for Logan's clients, maintained in the Firm's database, were inaccurate.

The contact information was incorrect because, from May 7, 2014 through May 9, 2014, Logan, while working remotely, accessed the Firm's computer system and altered telephone numbers and email addresses in the Firm's database, belonging to at least 41 customers of the Firm and/or its insurance affiliate. Logan made these changes without the knowledge or authorization of the affected clients or the Firm.

FINRA Rule 4511(a) requires member firms to make and preserve books and records as required under the FINRA Rules, the Exchange Act and the applicable Exchange Act rules. Exchange Act Rule 17a-3(a)(17)(i)(A) requires firms to maintain account records that include, among other things, customer telephone numbers. Moreover, the recordkeeping rules require that a firm's records be accurate regardless of whether the specific information is mandated.

FINRA Rule 2010 requires members and their associated persons to observe high standards of commercial honor and just and equitable principles of trade.

By altering the telephone numbers and email records, Logan failed to uphold high standards of commercial honor in violation of FINRA Rule 2010 and by causing the Firm's books and records to be inaccurate, Logan violated FINRA Rules 4511(a) and 2010.

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

- A 30 business-day suspension from association with any FINRA member in any capacity, and
- a \$5,000 fine

I agree to pay the monetary sanction upon notice that this AWC has been accepted and that such payment is due and payable. I have submitted an Election of Payment form showing the method by which I propose to pay the fine imposed.

I specifically and voluntarily waive any right to claim that I am unable to pay, now or at any time hereafter, the monetary sanction imposed in this matter.

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.

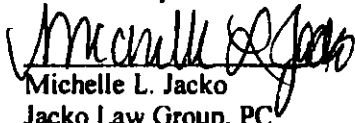
3/28/2016

Date



Ryan Alexander Logan (CRD No. 4950854)
Respondent

Reviewed by:



Michelle L. Jacko
Jacko Law Group, PC
1350 Columbia Street, Suite 300
San Diego, CA 92101
Tel: 619.298.2880
Email: michelle.jacko@jackolg.com

Accepted by FINRA:

4/1/2016

Date

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



Joel T. Kornfeld
Senior Regional Counsel
FINRA Department of Enforcement
300 South Grand Ave., Suite 1600
Los Angeles, CA 90071-3126
Tel: 213.613.2643
Fax: 213.617.1570
Email: joel.kornfeld@finra.org