

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2014042558101**

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

RE: William Andrew Hightower, Respondent
General Securities Representative
CRD No. 2152369

Pursuant to FINRA Rule 9216 of FINRA’s Code of Procedure, I, William Andrew Hightower, 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

William Andrew Hightower (“Hightower”) first entered the securities industry in 1991 when he associated with a FINRA member firm. Hightower left the industry in 1991 but reentered the industry in 1994 with a different FINRA member firm. He obtained his Series 7 in 1994 and was registered with FINRA as a General Securities Representative. In June 2007 Hightower associated with UBS Financial Services, Inc. (“UBS”), which filed a related Uniform Application for Securities Industry Registration or Transfer (“Form U4”). UBS filed a Uniform Termination Notice for Securities Industry Registration (“Form U5”) terminating Hightower’s registration on September 12, 2013. Hightower was associated with a different FINRA member firm from September 2013 until June 17, 2015, when that member firm filed a Form U5 terminating his association with that firm and his registration with FINRA. Hightower is not currently associated with any member firm. Although Hightower is not currently associated with a FINRA member or registered with FINRA, he remains subject to the jurisdiction of FINRA 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.

RELEVANT DISCIPLINARY HISTORY

Hightower has no relevant disciplinary history.

OVERVIEW

Hightower failed to respond fully to a request for documents and information made by FINRA staff pursuant to FINRA Rule 8210. Through this conduct, Hightower violated FINRA Rules 8210 and 2010.

FACTS AND VIOLATIVE CONDUCT

In late 2014, FINRA staff began an investigation into allegations that Hightower, while associated with a FINRA member firm, improperly referred customers to an unapproved private securities transaction. In connection with that investigation, by letter dated June 19, 2015, FINRA staff requested, pursuant to FINRA Rule 8210, that Hightower provide certain documents and information on or before July 6, 2015. Hightower partially responded by letter from his counsel dated July 20, 2015, but failed to provide certain documents and information requested by FINRA staff. Specifically, Hightower failed to provide, among other things, a list of any customers he referred to the private securities transaction.

By letter dated July 29, 2015, FINRA staff sent a second letter to Hightower requesting, pursuant to FINRA Rule 8210, that he provide the missing documents and information on or before August 12, 2015.

On August 10, 2015, Hightower's counsel informed FINRA staff that Hightower would not provide the remaining requested documents and information at any time. Hightower did not provide the requested documents and information on August 12, 2015, and to date, Hightower has failed to provide any of the requested documents and information.

By failing to fully respond to FINRA's multiple requests for documents and information, Hightower violated FINRA Rules 8210 and 2010.

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

A bar from association with any FINRA member 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

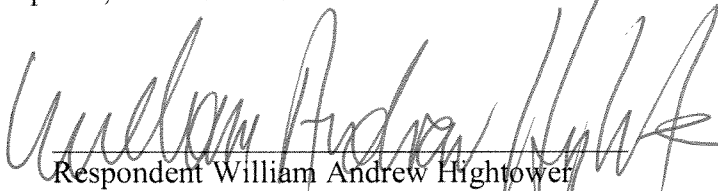
I understand that:

- 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.

9/29/15
Date


Respondent William Andrew Hightower

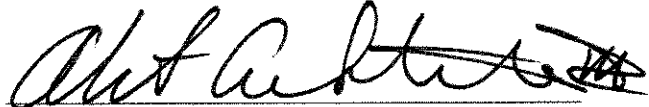
Reviewed by:


Andrew R. Harvin
Counsel for Respondent
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Accepted by FINRA:

October 7, 2015
Date

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



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