

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2017052704401**

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

RE: John S. Jumper, Respondent
General Securities Principal, General Securities Representative,
Municipal Securities Principal, Operations Professional
CRD No. 2809649

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, I, John S. Jumper ("Jumper") 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

Jumper entered the securities industry on December 21, 1999 as a General Securities Representative of a FINRA member firm. Jumper became associated with Alluvion Securities, LLC ("Alluvion" or the "Firm") on July 31, 2007 and registered with FINRA on September 11, 2007 as a General Securities Principal, General Securities Representative and Municipal Securities Principal. Thereafter, on December 16, 2011, he also became registered with FINRA as an Operations Professional. Jumper is Alluvion's Chief Executive Officer, Chief Financial Officer and Chief Compliance Officer and continues to be registered with FINRA in the above-referenced capacities.

RELEVANT DISCIPLINARY HISTORY

On November 11, 2015, Jumper entered into an Order Accepting Offer of Settlement through which he was fined \$15,000 and suspended for two months in all principal capacities and consented to the entry of findings for violating FINRA

Rules 2010 and 4110(b)(1) and NASD Rule 3010 for allowing Alluvion to conduct a securities business while below its minimum net capital requirement, and failing to establish, maintain and enforce a supervisory system and written supervisory procedures reasonably designed to achieve compliance with the requirements of FINRA rules and the federal securities laws concerning net capital compliance.

On June 12, 2013, Jumper entered into an AWC through which he consented to the entry of findings that he, on behalf of Alluvion, failed to (1) timely deliver to customers a copy of the Official Statement (“OS”) by no later than the settlement of their transactions; (2) submit an OS to the Electronic Municipal Market Access (“EMMA”) system within one business day after receipt of the OS from the issuer, but by no later than the closing date; (3) disclose an underwriter during the first quarter of 2011; and (4) establish and maintain a system reasonably designed to achieve compliance with applicable securities laws and regulations, and with applicable MSRB rules. Jumper was censured and fined \$10,000 by FINRA for violating MSRB Rule G-27.

OVERVIEW

During the course of an ongoing FINRA investigation, Jumper appeared for on-the-record testimony (“OTR”) but refused to provide complete testimony and left the OTR before its completion. As a result, Jumper violated 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 member, person associated with a member, or any other person subject to FINRA’s jurisdiction to provide information orally, in writing, or electronically... with respect to any matter involved in the investigation...”

FINRA Rule 8210(c) states 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.” Failure to comply with a request to appear and provide testimony pursuant to FINRA Rule 8210 is also a violation of FINRA Rule 2010, which requires members and associated persons to “observe high standards of commercial honor and just and equitable principles of trade.”

On January 12, 2017, FINRA sent a letter to Jumper requesting, pursuant to FINRA Rule 8210, that he appear and provide sworn testimony on January 27, 2017. The OTR sought information related to allegations that Jumper misappropriated funds from a pension plan for his personal use and to infuse capital into Alluvion.

Although Jumper appeared for the OTR on January 27, 2017, he did not provide complete testimony to FINRA staff as required by FINRA Rule 8210. Specifically, during the OTR, Jumper, through his attorney, stated that Jumper did not intend to proceed further on that date or at any future date and left prior to the completion of his testimony.

By refusing provide testimony, Jumper 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 all capacities.

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:

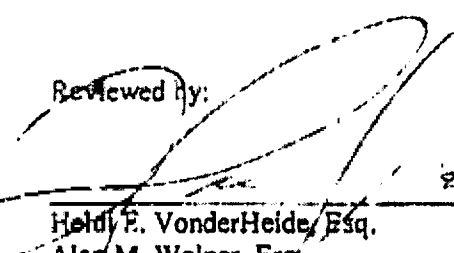
- A. Submission of this AWC is voluntary and will not resolve this matter unless and until it has been reviewed and accepted by the NAC, a Review Subcommittee of the NAC, or the Office of Disciplinary Affairs ("ODA"), pursuant to FINRA Rule 9216;
- B. If this AWC is not accepted, its submission will 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.

2/1/2017
Date (mm/dd/yyyy)


John S. Jumper, Respondent

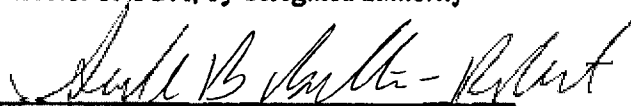
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Accepted by FINRA:

February 3, 2017
Date

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


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