

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2018058937702**

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

RE: Joseph Scott Eckhoff, Respondent
Former Investment Company and Variable Contracts Products Representative
CRD No. 6703549

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, Respondent Joseph Scott Eckhoff ("Eckhoff" or "Respondent") 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 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

Eckhoff first became registered with FINRA in October 2016 as an Investment Company and Variable Contracts Products Representative ("IR") through an association with FINRA member firm Farmers Financial Solutions, LLC (the "Firm").

On June 21, 2018, the Firm terminated Eckhoff's registration by filing a Uniform Termination Notice for Securities Industry Registration ("Form U5") stating that Eckhoff was "no longer appointed by the affiliated insurance company" due to a "[n]on-securities related termination."

Eckhoff is not currently associated with any FINRA-regulated broker-dealer. Pursuant to Article V, Section 4 of FINRA's By-Laws, however, Eckhoff remains subject to FINRA's jurisdiction.

RELEVANT DISCIPLINARY HISTORY

Eckhoff has no relevant disciplinary history with the Securities and Exchange Commission, any state securities regulators, FINRA or any other self-regulatory organization.

OVERVIEW

In 2019, Eckhoff violated FINRA Rules 8210 and 2010 by not providing certain documents and information requested pursuant to FINRA Rule 8210.

FACTS AND VIOLATIVE CONDUCT

On June 25, 2018, FINRA began an investigation after receipt of the Firm's US described above.

FINRA Rule 8210(a)(1) provides, in relevant part:

For the purpose of an investigation, complaint, examination, or proceeding authorized by the FINRA By-Laws or rules . . . FINRA staff shall have the right to . . . require a . . . person associated with a member . . . to provide information orally, in writing, or electronically . . . with respect to any matter involved in the investigation, complaint, examination, or proceeding."

FINRA Rule 8210(c) provides that "[n]o . . . person shall fail to provide information or testimony . . . pursuant to this rule."

Initially Eckhoff cooperated with FINRA's investigation by providing documents and information to FINRA. On July 3, 2019, however, FINRA sent Eckhoff a request for additional documents and information pursuant to FINRA Rule 8210. The request asked for a response by July 18, 2019. As stated during his phone call with FINRA on July 3, 2019, as confirmed in an email dated July 3, 2019 and by this agreement, Eckhoff acknowledges that he received FINRA's request and will not produce the documents or information requested at any time. To date, Eckhoff has not produced any of the documents or information requested in the July 3, 2019 letter.

By virtue of the foregoing, Eckhoff violated FINRA Rules 8210 and 2010.

B. Eckhoff also consents 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 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 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 action 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. 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 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, Joseph Scott Eckhoff, 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 understand and acknowledge that FINRA does not represent or advise me and I cannot rely on FINRA or FINRA staff members for legal advice. I have agreed to the AWC's provisions voluntarily; and 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.

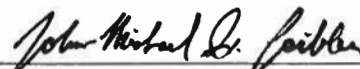
7.9.19
Date


Joseph Scott Eckhoff, Respondent

Accepted by FINRA:

7/22/2019
Date

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



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