

**FINANCIAL INDUSTRY REGULATORY AUTHORITY  
LETTER OF ACCEPTANCE, WAIVER, AND CONSENT  
NO. 2019064407601**

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

RE: Chander Ketu Goel (Respondent)  
Former General Securities Representative and General Securities Principal  
CRD No. 4588999

Pursuant to FINRA Rule 9216, Respondent Chander Ketu Goel 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 in this AWC.

**I.**

**ACCEPTANCE AND CONSENT**

- A. Respondent hereby accepts and consents, 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**

In August 2011, Goel registered with FINRA as a General Securities Representative (GSR) through his association with a FINRA member. Goel registered with FINRA as a General Securities Principal (GSP) in August 2014 through his association with the same FINRA member. In August 2016, Goel associated with MML Investors Services, LLC, a FINRA member, and registered with FINRA as a GSR and GSP. On October 28, 2019, MML filed a Uniform Termination Notice for Securities Industry Registration (Form U5) on Goel's behalf, stating that respondent was discharged on October 11, 2019.

Although Respondent is not currently associated with any FINRA member, FINRA retains jurisdiction over him pursuant to Article V, Section 4 of FINRA's By-Laws.

Respondent has no disciplinary history.

**OVERVIEW**

Goel failed to provide documents and information requested by FINRA pursuant to FINRA Rule 8210. By virtue of this misconduct, Goel 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 . . . person associated with a member, or any other person subject to FINRA’s jurisdiction to provide information orally, in writing, or electronically . . . and to testify at a location specified by FINRA staff, under oath or affirmation . . . with respect to any matter involved in the investigation, complaint, examination or proceeding.” FINRA Rule 8210(c) similarly provides that “[n]o member or person shall fail to provide information . . . pursuant to this Rule.”

A failure to comply with a request for information pursuant to FINRA Rule 8210 is also a violation of FINRA Rule 2010, which requires associated persons to “observe high standards of commercial honor and just and equitable principles of trade.”

During October 2019, MML commenced an investigation of allegations concerning Goel’s disclosure of outside business activities and his insurance sales practices. On October 28, 2019, MML filed a Form U5 on Goel’s behalf, stating that respondent was discharged on October 11, 2019, in “connection with inappropriate traditional insurance sales practices.” Goel has not reassociated with a FINRA member. Although Goel appeared on March 16, 2021 for on-the-record testimony requested by FINRA, and responded to FINRA’s requests for documents and information prior to his testimony, Goel failed to respond to FINRA staff’s March 25, 2021 letter requesting the production of additional documents and information pursuant to FINRA Rule 8210 by April 8, 2021. Goel also informed FINRA staff that he did not intend to respond at any time in the future.

By failing to produce the documents and information as requested pursuant to FINRA Rule 8210, Goel violated FINRA Rules 8210 and 2010.

B. Respondent also consents to the imposition of the following sanctions:

- A bar from associating with any FINRA member in any capacity.

Respondent understands that if he is barred or suspended from associating with any FINRA member, he becomes 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, he 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 in this AWC shall be effective on a date set by FINRA. A bar or expulsion shall become effective upon approval or acceptance of this AWC.

## II.

### WAIVER OF PROCEDURAL RIGHTS

Respondent specifically and voluntarily waives the following rights granted under FINRA's Code of Procedure:

- A. To have a complaint issued specifying the allegations against him;
- 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, Respondent specifically and voluntarily waives 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 its acceptance or rejection.

Respondent further specifically and voluntarily waives 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

Respondent understands 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 Respondent; and
- C. If accepted:

1. this AWC will become part of Respondent's permanent disciplinary record and may be considered in any future action brought by FINRA or any other regulator against Respondent;
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 its subject matter in accordance with FINRA Rule 8313; and
4. Respondent 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 Respondent's testimonial obligations or right to take legal or factual positions in litigation or other legal proceedings in which FINRA is not a party.

Respondent certifies that he has read and understands all of the provisions of this AWC and has been given a full opportunity to ask questions about it; Respondent has agreed to the AWC's provisions voluntarily; and no offer, threat, inducement, or promise of any kind, other than the terms set forth in this AWC and the prospect of avoiding the issuance of a complaint, has been made to induce him to submit this AWC.

4/26/21  
Date

Chander Ketu Goel  
Chander Ketu Goel  
Respondent

Reviewed by:

 

Richard De Vita, Esq.  
Counsel for Respondent  
1228 Garden Street  
Hoboken, NJ 07030

Accepted by FINRA:

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

5/18/2021

Date



Corinna Provey  
Counsel  
FINRA  
Department of Enforcement  
200 Liberty Street  
New York, NY 10281