

Award
FINRA Office of Dispute Resolution

In the Matter of the Arbitration Between:

Claimant

████████████████████

Case Number: ██████████

vs.

Respondent

Larson Financial Securities, LLC

Hearing Site: Tampa, Florida

Nature of the Dispute: Associated Person vs. Member

REPRESENTATION OF PARTIES

For Claimant ██████████: Eric Litow, Esq. and Dochter Kennedy, Esq.,
AdvisorLaw, LLC, Broomfield, Colorado.

For Respondent Larson Financial Securities, LLC: Kristen Kinney, DOC, Larson
Financial Securities, LLC, St. Louis, Missouri.

CASE INFORMATION

Statement of Claim filed on or about: May 17, 2017.

████████████████████ signed the Submission Agreement: May 17, 2017.

Amended Statement of Claim filed on or about: June 28, 2017.

Respondent did not file a Statement of Answer and did not sign the Submission
Agreement.

CASE SUMMARY

Claimant asserted the cause of action of inaccurate reporting on his Central
Registration Depository ("CRD") records. The causes of action relate to Occurrence
Number ██████████ ("the underlying complaint") recorded by Respondent on Claimant's
CRD records.

RELIEF REQUESTED

In the Statement of Claim, as amended, Claimant requested: expungement of the
underlying complaint from his CRD records pursuant to FINRA Rule 2080(b)(1)(A), as
the claim, allegation, or information is factually impossible or clearly erroneous;
expungement of the underlying complaint from his CRD records pursuant to FINRA

Rule 2080(b)(1)(C), as the claim, allegation or information is false; an award of compensatory damages in the amount of \$1.00; and any and all other relief the Arbitrator deemed just and equitable.

At the hearing, Claimant withdrew his request for \$1.00 in compensatory damages.

OTHER ISSUES CONSIDERED AND DECIDED

The Arbitrator acknowledges that he has read the pleadings and other materials filed by the parties.

Respondent did not file with FINRA Office of Dispute Resolution a properly-executed Submission Agreement but is required to submit to arbitration pursuant to the Code of Arbitration Procedure ("Code") and is bound by the determination of the Arbitrator on all issues submitted.

On or about August 21, 2017, Claimant sent a copy of the Statement of Claim to the customer who filed the underlying complaint. On or about October 19, 2017, Claimant sent an additional letter to the customer, which included notice of the expungement hearing.

The Arbitrator conducted a recorded telephonic hearing on January 17, 2017, so the parties could present oral argument and evidence on Claimant's request for expungement. Respondent did not participate in the expungement hearing and did not contest the request for expungement. The customer did not participate in the expungement hearing and did not contest the request for expungement.

The Arbitrator reviewed the BrokerCheck® Report for Claimant. The Arbitrator noted that there was no settlement in this case and that the customer did not file an arbitration.

The Arbitrator noted that Claimant did not previously file a claim requesting expungement of the same disclosure in the CRD.

In recommending expungement, the Arbitrator relied upon the following documentary or other evidence:

Amended Statement of Claim; testimony of Claimant at the telephonic expungement hearing; Exhibits #1-2 (Claimant's BrokerCheck report and a letter from Respondent to the customer dated September 2, 2014); and, #12-17 (which included, among other things, email correspondence between the customer and Claimant dated November 8, 2013, the customer's Q3 2013 Client Portfolio Statement, rate of return statements, the customer's client portfolio statements, and a Personal Investment Policy Statement executed by the customer).

The Arbitrator has provided an explanation of his decision in this award. The explanation is for the information of the parties only and is not precedential in nature.

AWARD

After considering the pleadings, the testimony and evidence presented at the hearing, and the post-hearing submissions (if any), the Arbitrator has decided in full and final resolution of the issues submitted for determination as follows:

1. The Arbitrator recommends the expungement of all references to Occurrence Number [REDACTED] from registration records maintained by the CRD for Claimant [REDACTED] (CRD# [REDACTED]), with the understanding that, pursuant to Notice to Members 04-16, Claimant [REDACTED] must obtain confirmation from a court of competent jurisdiction before the CRD will execute the expungement directive.

Unless specifically waived in writing by FINRA, parties seeking judicial confirmation of an arbitration award containing expungement relief must name FINRA as an additional party and serve FINRA with all appropriate documents.

Pursuant to Rule 13805 of the Code, the Arbitrator has made the following Rule 2080 affirmative findings of fact:

The claim, allegation, or information is factually impossible or clearly erroneous; and

The claim, allegation, or information is false.

The Arbitrator has made the above Rule 2080 findings based on the following reasons:

The Arbitrator found Claimant's testimony honest and credible.

On July 9, 2014, the customer complained of an "unsuitable VUL [variable universal life insurance] recommendation" in an email sent to Respondent in which he alleged that he "would have been better off investing in a standard brokerage account." The customer did not formally file his complaint with any regulatory body.

On September 2, 2014, after completing its investigation, Respondent denied the customer's claim, finding that, based upon the customer's age, other investments, financial situation and needs, tax status, investment objectives, investment experience, investment time horizon, liquidity needs, risk tolerance, and other relevant information, the recommendation of a VUL contract appeared to have been suitable and that Claimant disclosed all material facts regarding the product. Claimant's testimony, together with the exhibits and evidence admitted into the record, confirmed Respondent's findings regarding the customer complaint.

Claimant's recommendation of the disputed investment was suitable for the customer based on the reasonable diligence of Claimant and Respondent.

Furthermore, the customer's claim that he would have "been better off in a standard brokerage account" is false, factually impossible, and clearly erroneous. There is no definition of a "standard brokerage account" and the customer did not appear at the hearing to explain himself. Exhibits #1 and #12-14, together with Claimant's testimony at the hearing, reflected that the customer's account performed at or very near overall market performance, given the chosen asset allocation.

Therefore, based upon the evidence and testimony presented by Claimant at the final hearing, the Arbitrator finds that:

The customer's allegation of an "unsuitable VUL recommendation" is clearly erroneous, factually impossible, and false, and, therefore, meets both the FINRA Rule 2080(b)(1)(A) standard and the Rule 2080(b)(1)(C) standard for expungement. In addition, the customer's allegation that he "would have been better off in a standard brokerage account" is clearly erroneous, factually impossible, and false, and, therefore, meets both the FINRA Rule 2080(b)(1)(A) standard and the Rule 2080(b)(1)(C) standard for expungement.

FEES

Pursuant to the Code, the following fees are assessed:

Filing Fees

FINRA Office of Dispute Resolution assessed a filing fee* for each claim:

Initial Claim Filing Fee	= \$ 50.00
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**The filing fee is made up of a non-refundable and a refundable portion.*

Member Fees

Member fees are assessed to each member firm that is a party in these proceedings or to the member firm(s) that employed the associated person(s) at the time of the event(s) giving rise to the dispute. Accordingly, as a party, Respondent is assessed the following:

Member Surcharge	= \$ 150.00
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Hearing Session Fees and Assessments

The Arbitrator has assessed hearing session fees for each session conducted. A session is any meeting between the parties and the arbitrator(s), including a pre-hearing conference with the arbitrator(s), that lasts four (4) hours or less. Fees associated with these proceedings are:

One (1) pre-hearing session with a single arbitrator @ \$50.00/session	= \$ 50.00
Pre-hearing conference: September 6, 2017 1 session	

One (1) hearing session on expungement request @ \$50.00/session	= \$ 50.00
Hearing Date: January 17, 2018 1 session	

Total Hearing Session Fees	= \$ 100.00
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The Arbitrator has assessed the total hearing session fees of \$100.00 to Claimant.

All balances are payable to FINRA Office of Dispute Resolution and are due upon receipt.

ARBITRATOR

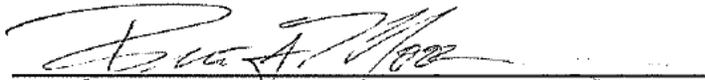
Brian G. Mooney

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Sole Public Arbitrator

I, the undersigned Arbitrator, do hereby affirm that I am the individual described herein and who executed this instrument which is my award.

Arbitrator's Signature



Brian G. Mooney
Sole Public Arbitrator

1/26/18
Signature Date

January 29, 2018

Date of Service (For FINRA Office of Dispute Resolution office use only)