FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
2008011713701

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

RE: Park Financial Group, Inc.
CRD No. 30582

Gordon Charles Cantley
General Securities Principal
CRD No. 1453986

David Farber
General Securities Representative and Equity Trader
CRD No. 3181573

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, Park Financial Group, Inc. ("Park"), Gordon Charles Cantley ("Cantley") and David Farber ("Farber") (collectively referred to as "Respondents") 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 Respondents alleging violations based on the same factual findings described herein.

I.

ACCEPTANCE AND CONSENT

A. Respondents 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

Park Financial Group is currently, and was during all times relevant hereto, a member of FINRA and registered as a broker/dealer with the U.S. Securities and Exchange Commission. The firm has been a FINRA member since August 1992. Park was also a member of the Municipal Securities Rulemaking Board ("MSRB") during the period from April 2002 to November 2005. During the time period relevant to this AWC, Park's primary business was proprietary trading and market-making in

microcap securities, specifically securities traded on the OTC Bulletin Board and in the Pink Sheets markets. Park is required to maintain at least $100,000 in net capital and clears all trades on a fully disclosed basis. It currently operates two offices, including its main office in Maitland, Florida and a branch office in Boca Raton, Florida, and employs 11 registered personnel.

Gordon Charles Cantley registered in the securities industry in February 1986 as a general securities representative. He registered as a Series 4 Options Principal on January 25, 1994; a Series 24 General Securities Principal on March 1, 1999; a Series 27 Financial and Operations Principal on December 8, 1999; and a Series 55 Equity Trader on April 13, 2000. In 1996, Cantley became a part owner of Park, and in March 2005 he became its sole owner. In addition to being an owner of the firm, at various times during the period from October 1996 to December 2007, Cantley also served as Park's CEO, President, Financial and Operations Principal, Chief Compliance Officer and AML Compliance Officer. Cantley left the securities industry in December 2007, when he began serving a two-year SEC-imposed bar from the securities industry.

David Farber registered in the securities industry in May 2000, when he associated with FINRA member firm Advantage Trading Group (which became North American Clearing). Previously, Farber was employed by Legg Mason in an unregistered capacity. He associated with Park in September 2001, when he registered as a general securities representative and equity trader.

RELEVANT DISCIPLINARY HISTORY

Park's relevant disciplinary history is as follows:

On June 12, 2007, FINRA accepted a Letter of Acceptance, Waiver and Consent (No. 2005002871201) in which Park and Cantley were censured and fined, jointly and severally, in the amount of $12,500 for violations of SEC Rules 15c3-1, 17a-3, 17a-4, 17a-5 and 17a-11 and NASD Rule 2110 in connection with the firm conducting a securities business while in net capital deficiency; failing to file and/or to timely file notice pursuant to SEC Rule 17a-11 that its net capital had fallen below 120% of its net capital requirement; filing materially inaccurate financial reports; and maintaining materially inaccurate net capital computations.

On April 11, 2007, the SEC instituted administrative cease-and-desist proceedings against Park and Cantley. The SEC alleged that Park and Cantley aided and abetted a pump and dump scheme in a stock, and failed to file Suspicious Activity

Reports ("SARs"), in violation of recordkeeping provisions implemented by the Bank Secrecy Act and the United States Patriot Act. Park was ordered to cease and desist from committing violations of Exchange Act Section 10(b), SEC Rule 10b-5, Exchange Act Section 17(a) and SEC Rule 17a-8. Park was also censured, ordered to disgorge $29,775.24 plus interest of $598.15, and fined $50,000.

On April 12, 2005, FINRA issued a letter of Acceptance, Waiver, and Consent (No. C07050026), in which Park was censured and fined $12,500 for its failure to establish proper procedures for its anti-money laundering ("AML") program. The firm failed to establish and implement policies, procedures, and controls reasonably designed to achieve compliance with the Bank Secrecy Act, including procedures to report suspicious activities and to provide for independent testing for compliance by a qualified outside party. The firm also conducted a securities business while failing to maintain its minimum net capital requirement, filed a materially inaccurate FOCUS report with FINRA, and maintained inaccurate books and records.

Gordon Charles Cantley has been the subject of two prior disciplinary actions, including the above-described June 2007 and April 2007, actions against Park. In connection with the SEC action, Cantley was barred from association with any broker-dealer in any capacity for two years, fined $25,000 and ordered to disgorge $8,263.70 and interest in the amount of $166.01. Cantley, who is also statutorily disqualified based on a felony conviction, is serving his two-year bar and is not currently working in the securities industry.

David Farber does not have a relevant disciplinary history.

OVERVIEW

During the period from September 2004 through April 2008 ("relevant AML period"), Park, acting through Cantley (during the period from March 2005 to June 2006), failed to develop and implement a written AML compliance program that was reasonably designed to achieve and monitor compliance with the requirements of the Bank Secrecy Act, and the implementing regulations promulgated thereunder. For example, although FINRA AML rules and Park's written procedures, mandate that the firm investigate certain "red flags" indicating possible suspicious activity and file Suspicious Activity Reports ("SARs"), in numerous instances the firm failed to detect, analyze, or report highly suspicious transactions in certain of its customer accounts. Furthermore, Park's AML program was not specifically tailored to its

business activities in that it did not adequately consider the money laundering risks posed by the activities of its customers, such as penny-stock liquidations.

Throughout the relevant AML period, Park's clientele included several stock promoters and other individuals and entities with regulatory histories for securities-related violations such as stock fraud and manipulation. Park's inadequate AML compliance program permitted numerous suspicious transactions to go undetected, uninvestigated or unreported, in violation of NASD Rules 2110 and 3011(a) and (b) and, during the period from September 2004 to November 2005, MRSB Rule G-41.

Park, acting through Cantley, also failed to retain electronic communications in the form of instant messages sent and received by certain of its registered persons, and failed to implement a supervisory system and procedures reasonably designed to review and retain such communications, in violation of SEC Rule 17a-4(b)(4) and NASD Rules 2110, 3010 and 3110.

Additionally, Park, acting through Farber, violated NASD Conduct Rule 2110 in connection with unregistered distributions involving the common stock of at least two issuers. Farber also engaged in front-running by executing transactions in personal and relative accounts while in possession of knowledge of imminent block transactions by retail customers in the same security. Park, acting through Cantley, failed to establish, maintain and enforce a supervisory system and procedures that were reasonably designed to detect and prevent sales of issuer stock by issuer affiliate customers in contravention of Section 5 of the Securities Act of 1933, and to achieve compliance with IM-2110-3, FINRA's "Front-Running Policy," in violation of NASD Rules 2110 and 3010.

Finally, Park conducted a securities business while in net capital deficiency. The firm also failed to provide notification that its net capital position was less than 120% of its minimum net capital requirement. Later, the firm failed to provide notice that it was in net capital deficiency.

FACTS AND VIOLATIVE CONDUCT

Deficient Anti-Money Laundering Compliance Program

AML Requirements

NASD Conduct Rule 3011[1], which became effective on April 24, 2002, requires FINRA members to develop and implement a written AML program reasonably designed to achieve and monitor compliance with the requirements of the Bank Secrecy Act, 31 U.S.C. §5311, *et seq.*, and the regulations promulgated thereunder. Section (a) of this Rule directs member firms to establish and implement procedures reasonably designed to detect and cause the reporting of certain suspicious transactions. FINRA has issued numerous communications to its members regarding the requirements of Rule 3011. *See* Notice to Members (NTM) 02-21 (April 2002), 02-47 (August 2002), 02-50 (August 2002), 02-78 (November 2002), 02-80 (December 2002), 03-34 (June 2003) and 06-07 (February 2006). NTM 03-34 advised members that Treasury and the SEC had jointly issued a final rule requiring broker/dealers to establish a written Customer Identification Program ("CIP") and implement the CIP by October 1, 2003.

NASD Conduct Rule 3011(a) requires FINRA members to establish and implement policies and procedures "that can be reasonably expected to detect and cause the reporting of" suspicious transactions. On July 2, 2002, the Department of Treasury issued the regulation requiring suspicious transaction reporting for broker/dealers, 31 CFR §103.19(a)(1). It required all broker/dealers to file with Treasury's Financial Crimes Enforcement Network ("FinCEN") "a report of any suspicious transaction relevant to a possible violation of law or regulation." Treasury's release stated that broker/dealers should determine whether activities and transactions raise suspicions by looking for "red flags." NTM 02-47 discussed Treasury's release, set forth the provisions of the final AML rule, and provided various examples of "red flags." This NTM further advised broker/dealers of their duty to file a SAR to report certain suspicious transactions.[2] Further, NTM 02-47 emphasized each firm's duty to detect

[1] As of December 15, 2008, all NASD Rules became FINRA Rules. Based on the fact that the conduct described herein occurred before the aforementioned date, NASD Rules are being charged.

[2] "Pursuant to the final rule, a broker/dealer must report a transaction on Form SAR-SF if 'the transaction involves $5,000 or more, is conducted or attempted to be conducted through the broker/dealer and appears to serve no business or apparent lawful purpose....'" NTM 02-47, p. 2. The obligation to file a SAR may arise from a single transaction or from a series of transactions that form a suspicious pattern of activity. *Id.* NTM 02-47 quoted FinCEN's release on the final rule relating to SARS, stating, "In its release adopting the final rule, FinCEN explicitly clarifies that 'if a broker/dealer determines that a series of transactions that would not independently trigger the suspicion of the broker/dealer, but that taken together, form a suspicious pattern of activity, the broker/dealer must file a suspicious transaction report.'"

relevant red flags and, if it detects any, to "perform additional due diligence before proceeding with the transaction."

MSRB Rule G-41 contains similar requirements for those broker/dealers, such as Park, engaged in municipal securities transactions.

AML Violations

Notwithstanding the provisions and notifications discussed above, from September 2004 through April 2008, Park's AML compliance program did not fully comply with the requirements of the Bank Secrecy Act and the regulations thereunder and violated NASD Conduct Rule 3011 in that:

1. During the relevant AML time period, Park, acting through Cantley (during the period from March 2005 to June 2006), failed establish and implement policies and procedures that were specifically tailored to the firm's business activities. For example, although many of the firm's customers traded penny stocks, the firm's policies and procedures did not contain any specific provisions regarding penny stock activity. Further, even though the firm's procedures did require it to investigate certain red flags indicating suspicious activities or transactions, and to timely file SARs regarding such activities or transactions, Park failed to adequately enforce its procedures by failing to identify, investigate or report, as appropriate, red flags in certain of its customer accounts. These red flags, which may indicate that a customer is engaged in the sale of unregistered securities, market manipulation or securities fraud, included:

    - Several customers, with significant regulatory histories involving securities-related misconduct, delivering and liquidating penny stocks;

    - Several customers who, for no apparent reason, maintained multiple accounts under a single name or multiple names;

    - Numerous transactions in which large blocks of penny stocks, and other low-priced securities of issuers with questionable operating and financial histories, were transferred into customer accounts at Park, sold and the proceeds immediately wired from the accounts;

    - Unexplained or questionable stock journals in customer accounts and unrelated accounts;

- Customer accounts with inflows of funds or other assets well beyond the known income or resources of the customers; and

- Indications in multiple instances of unregistered stock sales and possible attempted manipulations with the involvement of known stock promoters.

As a result of failing to identify and analyze the red flags required in its procedures, Park failed to file SARs for suspicious activity in several customer accounts. For example:

- In several instances, individuals and/or entities that had been found liable for securities-related violations such as fraudulent stock manipulation by the SEC and/or FINRA, delivered and/or received via journal transfer several hundred thousand to millions of shares of various penny stocks into their Park accounts. In each instance, the stock was immediately sold (sometime in multiple transactions over a several week time period), and the proceeds from the transactions were wired out of the accounts, in some cases to offshore bank accounts.

    - In one instance, an individual, who had been charged by the SEC with the unregistered sale of securities and making false statements and omitting material fact to induce investors to buy stock, opened accounts at Park in the names of two entities that he controlled. The activity in both accounts was the same. Stock certificates representing several million shares of various penny stock securities were deposited into the accounts; small amounts of the same securities were purchased; the stock was then liquidated in multiple transactions; and the proceeds of the sales, which totaled almost $2 million, were wired out of the accounts.

    - In another instance, during a five-month period, an individual, who had settled an SEC civil action wherein he was found liable for fraudulent stock manipulation, opened an account at Park; deposited shares of certain low-priced securities into the account; immediately liquidated the securities; and transferred proceeds totaling over $250,000 out of the account.

    - In a third instance, during the period from November 2004 to May 2006, five entities that were incorporated in Panama and under the common control of a Spanish citizen, opened accounts at Park; deposited millions

of shares of various penny stocks into the accounts (in some cases, the stocks were journaled between the related accounts); liquidated the securities; generated combined proceeds of over $16 million; and wired the proceeds to offshore banks located in Monaco and Andorra.

In August 2008, the SEC filed a complaint naming as defendants, among others, the individual who controlled the above-described accounts and one of the entities. The SEC alleged that the individual, who is a Spanish stock promoter, and others engaged in a scheme to manipulate stock, and that illicit proceeds from the scheme were wired to bank accounts in Andorra, a small principality between France and Spain.

- In at least three other instances, individuals, or entities controlled by the individuals, who had been barred from the securities industry by the SEC for stock manipulation, opened accounts at Park and engaged in activity identical to that in the above-describe accounts.

- Park also failed to investigate activity in several customer accounts where the inflows of funds or other assets were well beyond the known income or resources of the customers.

  - During the period from March 2007 through October 2007, eleven individuals and two entities, who resided in or were domiciled in China, opened accounts at Park. All of the individuals had similar addresses, and stated on their new account forms that they were either unemployed or self employed and had annual income between $12,000 and $65,000. Shortly after the accounts were opened, the owners primarily deposited the penny stock of one company into the accounts (in most cases the value of the stock greatly exceeded the account owners stated resources); liquidated the stock; and wired out a combined total of over $58 million in proceeds during the period from April 2007 to March 2008. The owner of one of the entities was a control person of the issuer whose stock was sold by the accounts.

Park failed to investigate any of the above-described suspicious transactions. The firm also failed to file a SAR, or document its rationale for not filing.

Such acts, practice and course of conduct constitute separate and distinct violations of NASD Conduct Rules 2110 and 3011(a) and (b) and, during the period from September 2004 to November 2005, MSRB Rule G-41 by Park Financial Group, Inc., and violations of NASD Conduct Rules 2110 and 3011(a) and (b) by Gordon Charles Cantley.

Failure to Preserve Electronic Communications in the Form of Instant Messages and Related Supervisory Violations

2. During various times during the period from August 2004 through April 2008, Park, acting through Cantley during the period from August 2004 to April 2007, failed to retain electronic correspondence in the form of instant messages for certain of its registered representatives. During the period from August 2004 through April 2006, Park had no written supervisory procedures regarding the retention or supervision of instant message communications.

Such acts, practice and course of conduct constitute separate and distinct violations of SEC Rule 17a-4 and NASD Conduct Rules 3010, 3110 and 2110 by Park Financial Group, Inc., and violations of NASD Conduct Rules 3010, 3110 and 2110 by Gordon Charles Cantley.

Unregistered Distributions of Securities, Front-Running and Related Supervisory Violations

3. During the period from 2005 to 2006, Park, acting through Farber, violated NASD Conduct Rule 2110 in connection with unregistered distributions involving the common stock of at least two issuers. Park allowed Farber to open issuer-affiliate accounts, and to sell millions of shares of restricted stock without complying with any exemption from registration or the requirements of SEC Rule 144, in violation of Section 5 of the Securities Act of 1933. Additionally, Farber engaged in front-running by executing transactions in personal and relative accounts while in possession of knowledge of imminent block transactions by retail customers in the same security.

   Park, acting through Cantley, failed to establish, maintain and enforce supervisory systems and procedures that were reasonably designed to detect and prevent sales of issuer stock by issuer-affiliated customers in contravention of Section 5 of the Securities Act of 1933, and to achieve compliance with IM-2110-3, FINRA's "Front-Running Policy."

Such acts, practice and course of conduct constitute separate and distinct violations of NASD Conduct Rule 2110 by Park Financial Group, Inc., and David Farber; and violations of NASD Conduct Rules 2110 and 3010 by Park Financial Group, Inc., and Gordon Charles Cantley.

Net Capital Violations

4. Park Financial conducted a securities business on December 21, 2007, December 24, 2007 and December 26, 2007, while failing to maintain its minimum required net capital. The firm's capital deficiency ranged from <$7,197.05> on December 21, 2007 to <$17,491.06> on December 26, 2007. Park also failed to file notice pursuant to SEC Rule 17a-11(c)(3) that its net capital had fallen below 120% of its required net capital as of December 19, 2007; and failed to file notice pursuant to SEC Rule 17a-11(b)(1) that its net capital had fallen below its required net capital as of December 21, 2007.

Such acts, practices and conduct constitute separate and distinct violations of NASD Conduct Rule 2110 and SEC Rules 15c3-1 and 17a-11 by Park Financial Group, Inc.

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

Park Financial Group: A censure, a monetary fine in the amount of $400,000, and a requirement that the firm hire an independent consultant to review its AML compliance program. Specifically, Park shall:

1. Retain, within 45 days of the date of Notice of Acceptance of this AWC, an Independent Consultant, not unacceptable to FINRA staff, to conduct a comprehensive review of the adequacy of the Firm's AML Compliance Program including, but not limited to, each of the areas that are the subject of this AWC.

2. Exclusively bear all costs, including compensation and expenses, associated with the retention of the Independent Consultant.

3. Cooperate with the Independent Consultant in all respects, including by providing staff support. Park shall place no restrictions on the Independent Consultant's communications with FINRA staff and, upon request, shall make available to FINRA staff any and all communications between the Independent Consultant and the Firm and documents reviewed by the Independent Consultant in connection with his or her engagement. Once retained, Park shall not terminate the relationship with the Independent Consultant without FINRA staff's written approval; Park shall not be in and shall not have an attorney-client relationship with the Independent Consultant and shall not seek to invoke the attorney client privilege or other doctrine or privilege to prevent the Independent Consultant fro transmitting any information, reports or documents to FINRA.

4. At the conclusion of the review, which shall be no more than 120 days after the date of Notice of Acceptance of this AWC, require the Independent Consultant to submit to the Firm and FINRA staff a Written Report. The Written Report shall address, at a minimum, (i) the adequacy of the Firm's AML Compliance Program including, but not limited to, each of the areas that are the subject of this AWC; (ii) a description of the review performed and the conclusions reached, and (iii) the Independent Consultant's recommendations for modifications and additions to the Firm's policies, systems, procedures and training; and

5. Require the Independent Consultant to enter into a written agreement that provides that for the period of engagement and for a period of two years from completion of the engagement, the Independent Consultant shall not enter into any other employment, consultant, attorney-client, auditing or other professional relationship with Park, or any of its present or former affiliates, directors, officers, employees, or agents acting in their capacity as such. Any firm with which the Independent Consultant is affiliated in performing his or her duties pursuant to this AWC shall not, without prior written consent of FINRA staff, enter in to any employment, consultant, attorney-client, auditing or other professional relationship with Park or any of its present or former affiliates, directors, officers, employees, or agents acting in their capacity as such for the period of the engagement and for a period of two years after the engagement.

6. Within 60 days after delivery of the Written Report, Park shall adopt and implement the recommendations of the Independent Consultant or, if it determines that a recommendation is unduly burdensome or impractical, propose an alternative procedure to the Independent Consultant designed to achieve the same objective. The Firm shall submit such proposed alternatives in writing simultaneously to the Independent Consultant and FINRA staff. Within 30 days of receipt of any proposed alternative procedure, the Independent Consultant shall: (i) reasonably evaluate the alternative procedure and determine whether it will achieve the same objective as the Independent Consultant's original recommendation; and (ii) provide the Firm with a written decision reflecting his or her determination. The Firm will abide by the Independent Consultant's ultimate determination with respect to any proposed alternative procedure and must adopt and implement all recommendations deemed appropriate by the Independent Consultant.

7. Within 30 days after the issuance of the later of the Independent Consultant 's Written Report or written determination regarding alternative procedures (if any),

Park shall provide FINRA staff with a written implementation report, certified by an officer of Park, attesting to, containing documentation of, and setting forth the details of the Firm's implementation of the Independent Consultant's recommendations.

8. Upon written request showing good cause, FINRA staff may extend any of the procedural dates set forth above.

Gordon Charles Cantley: A bar from association with any FINRA member in any capacity.

David Farber: A monetary fine in the amount of $25,000 and a suspension from association with any member firm in any capacity for a period of 30 calendar days.

Respondents agree to pay the monetary sanction(s) upon notice that this AWC has been accepted and that such payment(s) are due and payable. Respondents have submitted Election of Payment forms showing the method by which they propose to pay the fines imposed.

Respondents specifically and voluntarily waive any right to claim that they are unable to pay, now or at any time hereafter, the monetary sanction(s) imposed in this matter.

Respondents understand that if they are barred or suspended from associating with any FINRA member, they become subject to a statutory disqualification as that term is defined in Section 3(a)(39) of the Securities Exchange Act of 1934, as amended. Accordingly, they 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. Pursuant to FINRA Rule 8313(e), a bar or expulsion shall become effective upon approval or acceptance of this AWC.

II.

WAIVER OF PROCEDURAL RIGHTS

Respondents specifically and voluntarily waive the following rights granted under FINRA's Code of Procedure:

A. To have a Complaint issued specifying the allegations against them;

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, Respondents specifically and voluntarily waive any right to claim bias or prejudgment of the General Counsel, 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.

Respondents 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

Respondents 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 Respondents; and

C. If accepted:

1. this AWC will become part of Respondents' permanent disciplinary record and may be considered in any future actions brought by FINRA or any other regulator against them;

2. this AWC will be made available through FINRA's public disclosure program in response to public inquiries about Respondents' disciplinary record;

3. FINRA may make a public announcement concerning this agreement and the subject matter thereof in accordance with FINRA Rule 8313; and

4. Respondents 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. Respondents 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 Respondents' right to take legal or factual positions in litigation or other legal proceedings in which FINRA is not a party.

D. Respondents Park and Farber may attach a Corrective Action Statement to this AWC that is a statement of demonstrable corrective steps taken to prevent future misconduct. Respondents Park and Farber understand that they may not deny the charges or make any statement that is inconsistent with the AWC in this Statement. This Statement does not constitute factual or legal findings by FINRA, nor does it reflect the views of FINRA or its staff.

Respondents Cantley, Farber and the undersigned, who is duly authorized to act on behalf of Park Financial Group, Inc., certify that they have read and understand all of the provisions of this AWC and have been given a full opportunity to ask questions about it; that they 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 them to submit it.

Park Financial Group, Inc.

3/6/09
Date

By: _____
(Signature)

Name: Eric M. Rolinson
(Print Name)

Title: President

3/6/09
Date

Gordon C. Cantley
Gordon Charles Cantley

3/6/09
Date

David Farber

Reviewed by:

Mark D. Hanft
Counsel for Respondents

Accepted by FINRA:

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

May 1, 2009
Date

Karen E. Whitaker
Senior Regional Counsel
FINRA – Department of Enforcement
12801 North Central Expressway
Suite 1050
Dallas, TX 75243
PH: 972-716-7610
Fax: 972-716-7612
Email: Karen.whitaker@finra.org

ELECTION OF PAYMENT FORM

Respondent intends to pay the fine set forth in the attached Letter of Acceptance, Waiver and Consent by the following method (check one):

☒ A personal, business or bank check for the full amount;

☐ Wire transfer;

☐ Credit card authorization for the full amount;[1] or

☐ The installment payment plan (only if approved by FINRA staff and the Office of Disciplinary Affairs).[2]

Respectfully submitted,

Park Financial Group, Inc.

3/6/09
Date

By: _____
(Signature)

Name: Eric M. Robinson
(Print Name)

Title: President

[1] Only Mastercard, Visa and American Express are accepted for payment by credit card. If this option is chosen, the appropriate forms will be mailed to you, with an invoice, by FINRA's Finance Department. Do not include your credit card number on this form.

[2] The installment payment plan is only available for fines of $5,000 or more. Certain interest payments, minimum initial and monthly payments, and other requirements apply. You must discuss these terms with FINRA staff prior to requesting this method of payment.

ELECTION OF PAYMENT FORM

Respondent intends to pay the fine set forth in the attached Letter of Acceptance, Waiver and Consent by the following method (check one):

- ☒ A personal, business or bank check for the full amount;
- ☐ Wire transfer;
- ☐ Credit card authorization for the full amount;[1] or
- ☐ The installment payment plan (only if approved by FINRA staff and the Office of Disciplinary Affairs).[2]

Respectfully submitted,

3/6/09
Date

David Farber

[1] Only Mastercard, Visa and American Express are accepted for payment by credit card. If this option is chosen, the appropriate forms will be mailed to you, with an invoice, by FINRA's Finance Department. Do not include your credit card number on this form.

[2] The installment payment plan is only available for fines of $5,000 or more. Certain interest payments, minimum initial and monthly payments, and other requirements apply. You must discuss these terms with FINRA staff prior to requesting this method of payment.