

**UNITED STATES OF AMERICA**  
**Before the**  
**SECURITIES AND EXCHANGE COMMISSION**

**SECURITIES EXCHANGE ACT OF 1934**  
**Release No. 102674 / March 14, 2025**

**INVESTMENT ADVISERS ACT OF 1940**  
**Release No. 6864 / March 14, 2025**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-22463**

**In the Matter of**

**JOHN S. WINSLOW,**

**Respondent.**

**ORDER INSTITUTING  
ADMINISTRATIVE PROCEEDINGS  
PURSUANT TO SECTION 15(b) OF THE  
SECURITIES EXCHANGE ACT OF 1934  
AND SECTION 203(f) OF THE  
INVESTMENT ADVISERS ACT OF 1940,  
MAKING FINDINGS, AND IMPOSING  
REMEDIAL SANCTIONS**

**I.**

The Securities and Exchange Commission (“Commission”) deems it appropriate and in the public interest that public administrative proceedings be, and hereby are, instituted pursuant to Section 15(b) of the Securities Exchange Act of 1934 (“Exchange Act”) and Section 203(f) of the Investment Advisers Act of 1940 (“Advisers Act”) against John S. Winslow (“Respondent”).

**II.**

In anticipation of the institution of these proceedings, Respondent has submitted an Offer of Settlement (the “Offer”) which the Commission has determined to accept. Solely for the purpose of these proceedings and any other proceedings brought by or on behalf of the Commission, or to which the Commission is a party, Respondent admits the Commission’s jurisdiction over him and the subject matter of these proceedings, and the findings contained in paragraphs III.2-4 below, and consents to the entry of this Order Instituting Administrative Proceedings Pursuant to Section 15(b) of the Securities Exchange Act of 1934 and Section 203(f) of the Investment Advisers Act of 1940, Making Findings, and Imposing Remedial Sanctions (“Order”), as set forth below.

### III.

On the basis of this Order and Respondent's Offer, the Commission finds that:

1. Winslow, age 56, is a resident of Fox Island, Washington. Winslow was first employed in the securities industry in 1998 and has been employed by several companies that were dually registered as broker-dealers and investment advisers. From September 2013 to December 2021, Winslow was an investment adviser representative and registered representative of Edward Jones & Co., L.P., a dually registered broker-dealer and investment adviser.

2. On December 6, 2022, a final judgment was entered by consent against Respondent, ordering him to cease and desist from violating RCW 21.20.010, the anti-fraud section of the Securities Act of Washington, as set forth in the judgment entered in the administrative action entitled In the Matter of Determining Whether There Has Been a Violation of the Securities Act of Washington by John Scott Winslow, Order Number S-21-3243-22-CO02 (the "Washington Order") by the State of Washington Department of Financial Institutions, Securities Division.

3. The Washington Order found that from 2013 to 2021, Winslow was a securities salesperson and investment adviser representative for a retired senior citizen (the "Client"). It further found that between 2017 and 2020, the Client transferred more than \$550,000 to Winslow's personal bank account and to one of his personal businesses after Winslow told the Client that he needed money to buy a house and that he would repay the Client more than she made on her Edward Jones investments. The Washington Order found that Winslow did not provide the Client with a written agreement for the alleged loan and that Winslow did not repay the Client. The Washington Order also found that Winslow liquidated annuities that were held by the Client and caused the Client to incur nearly \$4,000 in surrender charges, and that a resulting \$370,000 was paid out of the Client's account to purchase gold coins through an online account using Winslow's email address, \$360,000 of which were shipped to Winslow's post office box. Further, the Washington Order found that in connection with the sale of securities in the Client's accounts, Winslow made false and misleading statements in the Client's account records regarding certain of the transactions.

4. The Washington Order barred Winslow from making an application for or being granted a broker-dealer, securities salesperson, investment adviser, and/or investment adviser representative license, based on its finding that Winslow had violated RCW 21.20.010, the anti-fraud section of the Securities Act of Washington, by employing a device, scheme, or artifice to defraud; making an untrue statement of a material fact or omitting to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading; or engaging in an act, practice, or course of business which operated or would operate as a fraud or deceit upon another person.

#### IV.

In view of the foregoing, the Commission deems it appropriate and in the public interest to impose the sanctions agreed to in Respondent Winslow's Offer.

Accordingly, it is hereby ORDERED pursuant to Section 15(b)(6) of the Exchange Act, and Section 203(f) of the Advisers Act, that Respondent Winslow be, and hereby is barred from association with any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization;

Any application for reentry by the Respondent will be made to the appropriate self-regulatory organization, or if there is none, to the Commission by contacting the Division of Enforcement's Office of Chief Counsel at [ENF-Reentry@sec.gov](mailto:ENF-Reentry@sec.gov), and will be subject to the applicable laws and regulations governing the reentry process. Reentry may be conditioned upon a number of factors, including, but not limited to, compliance with the Commission's order and payment of any or all of the following: (a) any disgorgement or civil penalties ordered by a Court against the Respondent in any action brought by the Commission; (b) any disgorgement amounts ordered against the Respondent for which the Commission waived payment; (c) any arbitration award related to the conduct that served as the basis for the Commission order; (d) any self-regulatory organization arbitration award to a customer, whether or not related to the conduct that served as the basis for the Commission order; and (e) any restitution order by a self-regulatory organization, whether or not related to the conduct that served as the basis for the Commission order.

By the Commission.

Vanessa A. Countryman  
Secretary