

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2016047658101**

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

RE: Beaconsfield Financial Services, Inc., Respondent
CRD No. 14634

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, Beaconsfield Financial Services, Inc. ("Beaconsfield" or the "Firm") 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 Beaconsfield alleging violations based on the same factual findings described herein.

I.

ACCEPTANCE AND CONSENT

- A. Beaconsfield 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

Beaconsfield has been a registered broker-dealer with FINRA or its predecessor since 1984. The Firm is headquartered in Canonsburg, Pennsylvania, and employs approximately 40 registered representatives. It conducts a general securities business.

RELEVANT DISCIPLINARY HISTORY

Beaconsfield has no relevant formal disciplinary history with the Securities and Exchange Commission, any self-regulatory organization or any state securities regulator.

OVERVIEW

From June 18, 2012 through February 4, 2016 (the “Relevant Period”), Beaconsfield failed to reasonably supervise a registered representative’s private securities transactions. As a result, Beaconsfield violated NASD Rules 3010 and 3040, and FINRA Rules 3110, 3280 and 2010.

FACTS AND VIOLATIVE CONDUCT

FINRA Rule 3280 and its predecessor, NASD Rule 3040, define a “private securities transaction” as “any securities transaction outside the regular course or scope of an associated person’s employment with a member.” FINRA Rule 3280(c)(2) and NASD Rule 3040(c)(2) both require a member that has approved an associated person’s participation in a private securities transaction, where the person has received or may receive selling compensation, to record such transaction on its books and records and to supervise the person’s participation in the transaction as if the transaction was executed on behalf of the member.

NASD Notice to Members (“NTM”) 94-44 and NASD NTM 96-33 clarified that member firms must supervise the securities activity of registered representatives who engage in investment advisory activities away from the firm where those representatives participate in the execution of securities transactions on behalf of their investment advisor clients.

During the Relevant Period, one of Beaconsfield’s registered representatives was associated with an unaffiliated registered investment advisor (“RIA”). The RIA was disclosed to Beaconsfield and approved as an outside business activity. Although the representative participated in securities transactions for compensation through the RIA, including transactions executed on behalf of Firm customers, Beaconsfield did not record these securities transactions on the Firm’s books and records or otherwise supervise these activities, as required.

As a result, Beaconsfield violated NASD Rule 3010 (for conduct prior to July 31, 2015) and FINRA Rule 3110 (for conduct on or after July 31, 2015); NASD Rule 3040 (for conduct prior to September 21, 2015) and FINRA Rule 3280 (for conduct on or after September 21, 2015); and FINRA Rule 2010.

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

- A censure; and
- A fine in the amount of \$12,500.

Respondent agrees to pay the monetary sanction upon notice that this AWC has been accepted and that such payment is due and payable. Respondent has submitted an Election of Payment form showing the method by which the Firm proposes to pay the fine imposed.

Beaconsfield specifically and voluntarily waives any right to claim that it is unable to pay, now or at any time hereafter, the monetary sanction imposed in this matter.

The sanctions imposed herein shall be effective on a date set by FINRA staff.

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 it;
- 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, Beaconsfield specifically and voluntarily waives any right to claim bias or prejudgment 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.

Beaconsfield 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

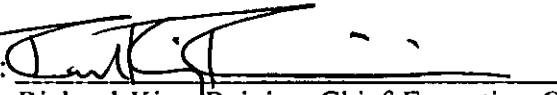
Respondent understands that:

- 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 the Firm;
- C. If accepted:
 - 1. this AWC will become part of Respondent’s permanent disciplinary record and may be considered in any future actions brought by FINRA or any other regulator against Beaconsfield;
 - 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. 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: (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.
- D. Respondent may attach a Corrective Action Statement to this AWC that is a statement of demonstrable corrective steps taken to prevent future misconduct. Beaconsfield understands that it 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.

The undersigned, on behalf of Beaconsfield, certifies that a person duly authorized to act on the Firm's behalf has read and understands all of the provisions of this AWC and has been given a full opportunity to ask questions about it; that Beaconsfield 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 the Firm to submit it.

12/13/2016
Date (mm/dd/yyyy)

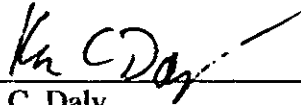
Beaconsfield Financial Services, Inc.

By: 
Richard King Rainier, Chief Executive Officer
& Chief Compliance Officer

Accepted by FINRA:

February 27, 2017
Date

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



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This Corrective Action Statement is submitted by the Respondent. It does not constitute factual or legal findings by FINRA, nor does it reflect the views of FINRA, or its staff.

In response to Investigation No. 2016047658101 Beaconsfield Financial Services has taken the following Corrective Actions:

- 1. As this matter occurred based on an Unaffiliated Registered Investment Advisor not knowing he was engaging in Private Securities Transactions, Beaconsfield Financial Services has trained the three Unaffiliated Registered Investment Advisors currently licensed as Registered Representatives with the Firm to recognize Private Securities Transactions.**
- 2. All Unaffiliated Registered Investment Advisors are now required to sign an annual attestation disclosing whether or not they are engaging in Private Securities Transactions.**
- 3. Any Unaffiliated Registered Investment Advisor that discloses that he engages in Private Securities Transactions is required to submit all documentation concerning all the Securities Transactions of the Unaffiliated Investment Advisor.**
- 4. Beaconsfield Financial Services has increased its compliance and will review all quarterly statements of any Unaffiliated Registered Investment Advisor that engages in Private Securities Transactions.**