STATE OF NEW HAMPSHIRE  
DEPARTMENT OF STATE  
BUREAU OF SECURITIES REGULATION  
25 CAPITOL STREET  
CONCORD, NH 03301  

CONSENT ORDER  
IN THE MATTER OF:  

Michael Davey, CRD # 4905761  
I-2014-000000  

I. For purposes of settling the above-referenced matter and in lieu of further administrative proceedings, Michael Davey (hereinafter referred to as “Davey”) has submitted an offer of settlement, which the State of New Hampshire, Department of State, Bureau of Securities Regulation (hereinafter referred to as the “Bureau”) has determined to accept. Accordingly, without admitting or denying the allegations and findings herein, Davey does hereby consent to the entry of this Consent Order and the following sanctions.  

STATEMENT OF ALLEGATIONS  

1. Davey was a registered representative with Metlife Securities Inc. (“MetLife”) from January 24, 2005 through September 6, 2012. Davey was licensed with the State of New Hampshire as a registered representative from March 15, 2005 through September 25, 2012. On September 6, 2012, Davey was terminated from Metlife for failing to comply with Metlife’s policy and procedures with respect to customer signatures on account documents.  

2. Upon investigation by MetLife, Davey admitted to falsifying a form that authorized an insurance company to withdraw money each month from the bank account of one of Davey’s clients to pay insurance premiums. Davey photocopied his client’s signature from another document, affixed this photocopied signature on the insurance company’s form, and submitted said form to the insurance company.  

3. In another instance, Davey admitted to signing the name of another client on an “illustration” of an insurance policy that Davey had recommended to the client and then submitted the document to the insurance company.  

4. On October 23, 2013, Davey entered into a Letter of Acceptance, Waiver and Consent with the Financial Industry Regulatory Authority (“FINRA”) related to the activities discussed above. Davey agreed to a suspension from associating with any FINRA member firm in any and all capacities for a period of three months. Davey was also fined five thousand dollars ($5,000) by FINRA.
CONCLUSIONS OF LAW

1. Davey is a ‘person’ within the meaning of RSA 421-B:2, XVI.

2. Pursuant to RSA 421-B:8, X, persons licensed under this chapter to conduct securities business shall abide by the rules of the Securities and Exchange Commission, National Association of Securities Dealers, national and regional stock exchanges, and other self-regulating organizations which have jurisdiction over the licensee, which set forth standards of conduct in the securities industry. Metlife is a member of FINRA and Davey was associated with Metlife as a broker-dealer agent. As such, Davey is required to abide by the rules of the Financial Industry Regulatory Authority, Inc. (hereinafter referred to as “FINRA”). FINRA rule 2010 states that “[a] member, in the conduct of its business, shall observe high standards of commercial honor and just and equitable principles of trade.” Davey is in violation of this FINRA rule and corresponding New Hampshire law for the falsifying of client signatures discussed above.

3. Pursuant to RSA 421-B:10, I(a) and (b)(2), the secretary of state may, by order, suspend any person’s securities licensure if he or she finds that the order is in the public interest and that the person has willfully violated or failed to comply with any provision of this title. Davey is subject to this provision.

II. In view of the foregoing, Davey agrees to the following undertakings and sanctions:

1. Davey agrees that he voluntarily entered into this Consent Order and represents and avers that no employee or representative of the Bureau has made any promise, representation, or threat to induce his execution.

2. Davey agrees to waive his right to an administrative hearing and any appeal therein under RSA 421-B.

3. Davey agrees that this Consent Order is entered into for the purpose of resolving only the matter as described herein. This Consent Order shall not be construed to restrict the Bureau’s right to initiate an administrative investigation or proceeding relative to conduct by Davey for which the Bureau has no knowledge of at the time of the final entry of this Consent Order.

4. Davey 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 allegation contained in this Consent Order or create the impression that the Consent Order is without factual basis.

5. Davey agrees to a one year suspension of his securities license in the State of New Hampshire from the date of execution of this Consent Order. After such time, Davey
may re-apply to the Bureau for licensure. Re-licensure will be at the discretion of the Bureau.

So Consent.

Executed this 27th day of February, 2014

Michael Davey

Executed this 15th day of March, 2014

STATE OF NEW HAMPSHIRE
DEPARTMENT OF STATE
BUREAU OF SECURITIES REGULATION
Barry Glennon