

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

In the Matter of the Application of:

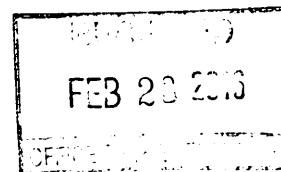
CHRISTOPHER A. PARRIS

For Review of Action taken by

FINRA

No:

3-17128



APPLICATION FOR REVIEW

Pursuant to FINRA Rule 9527, Section 19 of the Securities and Exchange Act of 1934, C.F.R. §201.420, and Rule 420 of the SEC Rules of Practice, Christopher A. Parris submits this Application for Review of the bar from association entered against him by FINRA in connection with Examination No. 20150460564 (the “Exam”).

1. In 2015, FINRA began a routine examination of First American Securities, Inc. (“FAS”). FAS is wholly owned by First American Holdings LLC (“FAH”). During the Exam, FINRA served several requests for documents on Mr. Parris pursuant to Rule 8210 (“8210 Requests”).

2. Mr. Parris is, in turn, a minority owner of FAH, and so does not appear on Schedule A to FAS’s Form BD. Mr. Parris is not registered with FAS, or with any other FINRA member firm, and has not applied for registration with FAS or any other FINRA member firm. Mr. Parris is not an officer, director or employee of FAS or any other FINRA member firm. Mr. Parris is not engaged in the investment banking or securities business of FAS or any FINRA member firm. Mr. Parris plays no role in the day-to-day management of FAS, and does not directly or indirectly control FAS, as his ownership interest in FAS is purely “passive.” As a result, Mr. Parris is not an associated person of FAS or any other FINRA member firm.

3. Because Mr. Parris was neither a registered person nor an associated person of FAS, as those terms are defined under FINRA's By-Laws, he is not subject to FINRA's jurisdiction; thus, he was not compelled to respond to FINRA's 8210 Requests. Moreover, FINRA was not able to compel him to do so. Nonetheless, to aid FINRA with the Exam, Mr. Parris voluntarily agreed to produce certain documents in response to the 8210 Requests. Mr. Parris also voluntarily agreed to testify on the record before FINRA.

4. Despite his cooperation, and despite the fact Mr. Parris is not subject to FINRA's jurisdiction, on October 16, 2015, FINRA served Mr. Parris with a notice of suspension, pursuant to FINRA Rule 9552, in which FINRA stated its belief that Mr. Parris had failed to fully comply with the 8210 Requests. Mr. Parris subsequently voluntarily provided FINRA with additional documents and information and, given that production, on January 19, 2016, requested that FINRA terminate the suspension entered on October 16, 2015.

5. By letter dated January 21, 2016, FINRA notified Mr. Parris that his request to terminate the suspension was denied, and that his suspension was converted into a bar.

6. FINRA's determination to bar Mr. Parris was erroneous for the following reasons: (1) Mr. Parris was neither registered nor associated with a FINRA member firm; (2) accordingly, FINRA lacked jurisdiction over Mr. Parris necessary to compel production of documents and information under Rule 8210; (3) because Mr. Parris was not subject to Rule 8210, he could not have violated that Rule by failing to respond; (4) nonetheless, Mr. Parris complied with FINRA's demands and voluntarily produced all the information and documents relevant to the Exam; (5) FINRA lacked the authority to summarily determine the scope of its own jurisdictional reach; and (6) FINRA lacked the authority to bar Mr. Parris based on its *sua sponte*, summary, determination of jurisdiction over Mr. Parris.

7. Mr. Parris can be served at the following address:

c/o Alan M. Wolper
Ulmer & Berne LLP
500 West Madison, Suite 3600
Chicago, IL 60661
312-658-6564
Fax: 312-658-6565
awolper@ulmer.com

Respectfully submitted this 22nd day of February, 2016.

ULMER & BERNE LLP



Alan M. Wolper
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500 West Madison Street, Suite 3600
Chicago, Illinois 60661
(312) 658-6500 – General
(312) 658-6565 – Fax

Counsel for Mr. Parris

CERTIFICATE OF SERVICE

I hereby certify that Christopher A. Parris' APPLICATION FOR REVIEW has been sent to the following parties entitled to notice as follows:

Securities and Exchange Commission
Office of the Secretary
100 F. Street N.E.
Washington D.C. 20549
Mail Stop 1090
Fax: 202-772-9183
(One copy via fax; original and three copies via overnight mail)

Alan Lawhead, Esq.
Office of the General Counsel
FINRA 1735 K Street, NW
Washington DC 20006
(One copy via fax; one copy via overnight mail)

This 22nd day of February, 2016.



Alan M. Wolper



Financial Industry Regulatory Authority

VIA E-MAIL TO AWOLPER@ULMER.COM AND CERTIFIED AND FIRST CLASS MAIL

January 21, 2016

Mr. Christopher A. Parris
c/o Alan M. Wolper, Esq.
Ulmer & Berne LLP
500 West Madison Street, Suite 3600
Chicago, IL 60661

Re: Bar from Association with any FINRA member (FINRA Rule 9552)
Christopher A. Parris, CRD No. 4552325
Matter No. 20150460564

Dear Mr. Parris:

Please be advised that, pursuant to FINRA Rule 9552(h) and, in accordance with FINRA's Notice of Suspension letter dated October 16, 2015 and the Suspension from Association letter dated November 9, 2015, you were barred from associating with any FINRA member in any capacity on January 19, 2016.

If you seek to appeal this regulatory action to the U.S. Securities and Exchange Commission (SEC), you must file an application with the SEC at the address listed below. To comply with the SEC's rule regarding timeliness, you must file the application for review within thirty days of your receipt of this letter. Also, a copy of the application, as well as copies of all documents you file with the SEC in connection with this matter, must be sent to FINRA. The SEC and FINRA addresses are as follows:

Office of the Secretary
U.S. Securities and Exchange Commission
100 F Street, NE
Mail Stop 1090
Washington, DC 20549

Alan Lawhead, Esq.
Office of General Counsel
FINRA
1735 K Street, NW
Washington, DC 20006

Any documents provided to the SEC via facsimile or overnight mail should also be provided to FINRA by similar means.

Mr. Christopher A. Parris
c/o Alan M. Wolper, Esq.
January 21, 2016
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If you file an application for review with the SEC, the application must identify the FINRA case number and set forth in summary form a brief statement of alleged errors in the determination and the supporting reasons. You must also include an address where you may be served and phone number where you may be reached during business hours. If your address or phone number changes, you must advise the SEC and FINRA. Attorneys must file a notice of appearance.

Questions regarding the appeal process may be directed to the Office of the Secretary at the SEC. The phone number of that office is (202) 551-5400.

Very truly yours,



Mark A. Koerner
Regional Chief Counsel

cc: Edward Wegener, Regional Director (District 8 – Chicago)