



BEFORE THE COMMISSIONER OF COMMERCE AND INSURANCE OF THE
STATE OF TENNESSEE

TENNESSEE SECURITIES and)	
INSURANCE DIVISION,)	
Petitioner,)	
)	Docket No. 12.01-157664J
vs.)	TID No. 18-098
)	TSD No. 18-015
THOMAS H. LAWRENCE, III)	
Respondent.)	

INITIAL ORDER

This matter came to be heard on May 23, 2019, before the Honorable Shannon Barnhill, assigned by the Secretary of State, Administrative Procedures Division, sitting on behalf of the Commissioner of Commerce and Insurance. Assistant General Counsel for the Department, Robyn L. Ryan, represented the Tennessee Securities and Insurance Division (“Division”). Respondent Thomas H. Lawrence, III appeared via telephone without counsel.

Respondent was previously registered as a Tennessee resident insurance adviser with an expiration date of April 30, 2017. As of December 2016, Respondent had also been registered with the Tennessee Securities Division as a broker-dealer agent and investment advisor. The Notice of Hearing and Charges was filed on March 7, 2019. In the Notice, the Division referenced a September 2017 Order Accepting Offer of Settlement of the Financial Industry Regulatory Authority (“FINRA”) wherein Respondent accepted a voluntary suspension of his registration, a \$5,000.00 civil penalty and restitution of \$41,332.65, plus interest, for his action of borrowing money from a client. The FINRA order as well as his action in borrowing money from a client, are in violation of TENN. CODE ANN. §48-1-112, Tennessee Securities Act of 1980, which provides in part:

- (a) The commissioner may by order deny, suspend, or revoke any registration under this part if the commissioner finds that:
 - (2) The applicant or registrant or, in the case of a broker-dealer or investment adviser, any affiliate, partner, officer, director, or any

person occupying similar status or performing similar functions:

(F)(i)(b) Is the subject of an order suspending or expelling such person from a national securities exchange or national securities association registered under the Securities Exchange Act of 1934, compiled in 15 U.S.C. §78 a et seq., as amended, or is the subject of a United States post office fraud order;

(G) Has engaged in dishonest or unethical practices in the securities business;


Furthermore, these actions by Respondent are in violation of TENN. CODE ANN. §56-6-112, Tennessee Insurance Law, which provides in part:

- (a) The commissioner may place on probation, suspend, revoke, or refuse to issue or renew a license issued under this part or may levy a civil penalty in accordance with this section or take any combination of these actions, for any one (1) or more of the following causes:
 - (2) Violating any law, rule, regulation, subpoena or order of the commissioner or of another state's commissioner;
- (e) The commissioner shall retain the authority to enforce this part and impose any penalty or remedy authorized by this part and this title against any person who is under investigation for or charge with a violation of this part or this title, even if the person's license has been surrendered or has lapsed by operation of law.

At this hearing, Respondent Lawrence stated that he agreed with the revocation of his insurance license and securities registration. Respondent Lawrence stated that he lives on Social Security income alone and was home bound due to several serious health issues. He further testified that he is not in the business of securities or insurance and has no plan to return. Due to his limited income, his age, and his testimony that he is not in either business and has no plans to return, this Court will not assess civil penalties or costs. Therefore, the Petitioner shall be assessed all costs in this matter.


It is, therefore, so **ORDERD, ADJUDGED and DECREED** that Respondent's Tennessee insurance license and Tennessee securities registration are hereby permanently **REVOKED**. It is further **ORDERED** that the costs of this matter are assessed to Petitioner.

This Initial Order entered and effective this 5TH day of JUNE, 2019.



Shannon Barnhill
Administrative Law Judge

Filed in the Administrative Procedures Division, Office of the Secretary of State, this the 5TH
day of JUNE, 2019.



J. Richard Collier, Director
Administrative Procedures Division
Office of the Secretary of State