FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER, AND CONSENT
NO. 2026900000201

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

RE: Howard Crockett III (Respondent)
Former General Securities Representative and
Former Investment Company and Variable Contracts Products Representative
CRD No. 3022729

Pursuant to FINRA Rule 9216, Respondent Howard Crockett III 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 Respondent alleging violations based on the same factual findings described in this AWC.

I.

ACCEPTANCE AND CONSENT

A. Respondent accepts and consents to the following findings by FINRA without admitting or denying them:

BACKGROUND

Crockett first registered with FINRA in November 2000 as a General Securities Representative (GS) through an association with a member firm. In December 2023, Crockett became registered as GS and Investment Company and Variable Contracts Products Representative through an association with NYLIFE Securities LLC (CRD No. 5167). On February 5, 2026, NYLIFE Securities filed a Uniform Termination Notice for Securities Industry Registration (Form U5) stating that Crockett was permitted to resign during the firm's "investigation into allegations he personally received funds from an elderly customer and violated company policy by engaging in an unapproved outside business activity."

Crockett is not currently associated with a FINRA member but remains subject to FINRA's jurisdiction pursuant to Article V, Section 4 of FINRA's By-Laws.[1]

[1] For more information about the respondent, visit BrokerCheck® at www.finra.org/brokercheck.

OVERVIEW

From September 2024 through September 2025, Crockett engaged in an outside business activity without disclosing the activity to the firm he was associated with during that period. Crockett's outside business consulting activity included, among other things, brokering a loan and a health insurance policy for an outside company, whose owner was a customer of NYLIFE. As a result, he violated FINRA Rules 3270 and 2010 and is suspended for two months in all capacities and fined $5,000.

FACTS AND VIOLATIVE CONDUCT

This matter originated from the Form U5 NYLIFE Securities filed in February 2026.

FINRA Rule 3270 states that "[n]o registered person may be an employee, independent contractor, sole proprietor, officer, director or partner of another person, or be compensated, or have the reasonable expectation of compensation, from any other person as a result of any business activity outside the scope of the relationship with his or her member firm, unless he or she has provided prior written notice to the member, in such form as specified by the member."

A violation of FINRA Rule 3270 also is a violation of FINRA Rule 2010, which requires associated persons to "observe high standards of commercial honor and just and equitable principles of trade" in the conduct of their business.

At all relevant times, NYLIFE Securities required registered representatives to provide written notice of any outside business activity prior to engaging in the activity.

From September 2024 through September 2025, Crockett provided business consulting services to a company, which was owned and operated by a customer of NYLIFE Securities. Crockett's services for this company included brokering a loan and a health insurance policy and advising on the company's finances. Crockett received approximately $200,000 in commissions and other compensation for the consulting services he provided to this outside company. Crockett did not disclose to NYLIFE Securities that he was providing consulting services to this company until September 2025. In addition, in November 2024, Crockett falsely stated on a firm compliance questionnaire that he was complying with the firm's requirement to disclose all outside business activities.

Therefore, Crockett violated FINRA Rules 3270 and 2010.

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

- a two-month suspension from associating with any FINRA member in all capacities and
- a $5,000 fine.

The fine shall be due and payable either immediately upon reassociation with a member firm or prior to any application or request for relief from any statutory disqualification resulting from this or any other event or proceeding, whichever is earlier. FINRA's Finance Department will contact Respondent regarding payment upon Respondent's re-association with a member firm.

Respondent specifically and voluntarily waives any right to claim an inability to pay, now or at any time after the execution of this AWC, the monetary sanction imposed in this matter.

Respondent understands that if he is barred or suspended from associating with any FINRA member, he becomes subject to a statutory disqualification as that term is defined in Article III, Section 4 of FINRA's By-Laws, incorporating Section 3(a)(39) of the Securities Exchange Act of 1934. Accordingly, he may not be associated with any FINRA member in any capacity, including clerical or ministerial functions, during the period of the bar or suspension. *See* FINRA Rules 8310 and 8311.

The sanctions imposed in this AWC shall be effective on a date set by FINRA. The suspension shall become effective on the date of the notice of acceptance of this AWC.

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 him;

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, Respondent 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 its acceptance or rejection.

Respondent 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 Respondent; and

C. If accepted:

1. this AWC will become part of Respondent's permanent disciplinary record and may be considered in any future action brought by FINRA or any other regulator against Respondent;

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 its subject matter in accordance with FINRA Rule 8313;

4. this AWC may be taken into consideration by employers and other regulatory or licensing entities or authorities in their hiring, retention, licensing, or other decisions. This AWC may also have other adverse collateral consequences outside of FINRA's control; and

5. 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 right to take legal or factual positions in litigation or other legal proceedings in which FINRA is not a

party. Nothing in this provision affects Respondent's testimonial obligations in any litigation or other legal proceedings.

D. Respondent may attach a corrective action statement to this AWC that is a statement of demonstrable corrective steps taken to prevent future misconduct. Respondent understands that he 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.

Respondent certifies that he has read and understands all of the provisions of this AWC and has been given a full opportunity to ask questions about it; Respondent has agreed to the AWC's provisions voluntarily; and no offer, threat, inducement, or promise of any kind, other than the terms set forth in this AWC and the prospect of avoiding the issuance of a complaint, has been made to induce him to submit this AWC.

10/22/2026
Date

Howard Crockett III
Respondent

Reviewed by:

Van D. Turner, Jr.
Counsel for Respondent
Turner Feild, PLLC
2650 Thousand Oaks Boulevard, Suite 2325
Memphis, Tennessee 38118

Accepted by FINRA:

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

10/29/2026
Date

Robert Fair
Senior Counsel
FINRA
Department of Enforcement
581 Main St., 7th Floor
Woodbridge, NJ 07095