

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2009016781201**

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

RE: Dane Carl Sternecker, Respondent
General Securities Representative
CRD No. 4272168

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, Dane Carl Sternecker (Sternecker or Respondent) 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 herein.

I.

ACCEPTANCE AND CONSENT

- A. Respondent 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

Sternecker became registered as a general securities representative (Series 7) on September 14, 2000. He was employed in that capacity by Ameriprise Financial Services, Inc. from September 2000 until January 28, 2009 and has not been registered in the securities industry since that time. Sternecker has no prior disciplinary history.

OVERVIEW

After concluding a meeting with customer VC to discuss her investments, Sternecker attempted to confirm VC's total investments. On June 25, 2008, without VC's knowledge or consent, Sternecker initiated a telephone call to the representative at a different investment company in which VC had invested funds. During that telephone call, Sternecker asked an Ameriprise office assistant to impersonate VC, which induced the representative to provide information about VC's investments at that investment company. Upon receiving a report by the office assistant of being asked to impersonate VC, Ameriprise investigated the matter and terminated Sternecker's registration.

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FACTS AND VIOLATIVE CONDUCT

1. During all relevant times, Sternecker was a Registered Representative employed by Ameriprise.
 2. On or about June 25, 2008, Sternecker met with customer VC to discuss her investments. VC provided Sternecker with certain information about her investments outside of Ameriprise. After the meeting with VC, Sternecker attempted to determine the total amount of VC's investments.
 3. On or about June 25, 2008, without VC's knowledge or consent, Sternecker made a telephone call to the representative at another investment firm and inquired about VC's investments there. Sternecker requested an Ameriprise office assistant to impersonate VC and authorize the representative at the other firm to provide Sternecker with information about VC over the telephone. As part of the impersonation of VC, the office assistant answered security questions about VC. Those answers came from information that Sternecker had obtained in his meeting with VC earlier that day. The security answers provided by the office assistant induced the other firm's representative to provide Sternecker with VC's investment information.
 4. Shortly after the phone call was made to VC's other firm, the Ameriprise office assistant reported to her manager that she had impersonated VC and had done so at Sternecker's request. This led to an investigation by Ameriprise. After Sternecker admitted to his misconduct, Ameriprise terminated his registration.
 5. Sternecker's actions described in Paragraphs 1 through 4, in requesting an office assistant to impersonate VC without VC's knowledge or consent, constitute separate and distinct violations of NASD Rule 2110.
- B. Respondent also consents to the imposition of the following sanctions:

A 30 business-day suspension from associating with any FINRA broker-dealer in any capacity and a \$5,000 fine.

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

The fine shall be due and payable either immediately upon reassociation with member firm following the 30 business-day suspension noted above, 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.

Respondent specifically and voluntarily waives any right to claim that he is unable to pay, now or at any time hereafter, 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, Respondent 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).

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 Respondent;
- 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 General Counsel, 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.

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 actions brought by FINRA or any other regulator against Respondent;

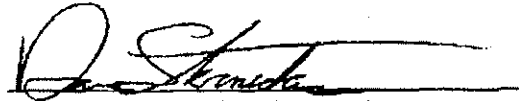
2. this AWC will be made available through FINRA's public disclosure program in response to public inquiries about Respondent's disciplinary record;

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

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; that Respondent has 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 Respondent to submit it.

Dec 16, 2010
Date


Dane Carl Sternecker, Respondent

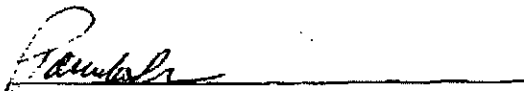
Reviewed by:

Attorney Name
Counsel for Respondent
Firm Name
Address
City/State/Zip
Phone Number

Accepted by FINRA:

January 4, 2011
Date

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


Pamela Shu
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FINRA Department of Enforcement
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