

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2012033767401**

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

RE: Alexandre Waehneldt Artmann, Respondent
Registered Representative
CRD No. 2804856

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, I submit 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 me alleging violations based on the same factual findings described herein.

I.

ACCEPTANCE AND CONSENT

- A. I hereby accept and consent, 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

Alexandre Waehneldt Artmann first registered as a general securities representative with a FINRA member firm in July 1999. He first became registered as a general securities principal in January 2007 and as a financial operations principal in February 2007. Between May 2006 and April 1, 2013, Artmann was the chief executive officer of Tradewire Securities LLC ("Tradewire"), where he was registered as a general securities principal, general securities representative, operations principal, and financial and operations principal. Artmann is currently registered with another FINRA member firm.

OVERVIEW

In April 2013, after Tradewire had withdrawn from FINRA membership, Artmann signed a Rule 3130 certification that was inaccurately dated and that he should have known contained false statements. Artmann thereby violated FINRA Rules 3130 and 2010.

FACTS AND VIOLATIVE CONDUCT

FINRA Rule 3130 requires, amongst other things, that each member firm have its chief executive or equivalent officer certify, no later than the anniversary date of the previous year's certification, that it has processes in place to establish, maintain, review, test, and modify its written compliance policies and supervision procedures, and that the chief executive officer has conducted one or more meetings with the chief compliance officer in the preceding twelve months to discuss this process. The written certification must state, amongst other things, that: (i) the firm has processes in place to test its procedures on a periodic basis consistent with applicable rules; (ii) these processes are evidenced in a report that the chief executive or equivalent officer has reviewed; and (iii) the report has or would be submitted to the firm's board of directors and audit committee within 45 days of the execution of the certification. Because Tradewire's prior Rule 3130 certification was made on or before March 31, 2012, FINRA Rule 3130 required that Tradewire make a new certification by no later than March 31, 2013.

For the annual period ending March 31, 2013, Tradewire did not test its supervisory procedures as required by FINRA and NASD rules because it anticipated that it would complete the sale of its assets in mid-2012 and withdraw from FINRA membership before the end of the year. Tradewire took longer than anticipated in completing this process and its withdrawal from FINRA membership was not accepted until April 1, 2013.

On March 1, 2013, FINRA's Department of Enforcement asked Tradewire to provide, among other things, all documents related to its annual testing and certification of its supervisory processes.

On April 26, 2013, after Tradewire had withdrawn from FINRA membership and while Artmann was registered with another FINRA member firm, a Tradewire employee requested that Artmann sign a Rule 3130 certification for the annual period ending March 31, 2013. The other Tradewire employee told Artmann, inaccurately, that Artmann had signed the original version of the Rule 3130 certification on March 31, 2013, but that he could not locate it. Artmann dated the certification March 31, 2013, which made it appear that it had been signed by the deadline required by Rule 3130.

The certification inaccurately stated that Tradewire had processes in place to test its procedures on a periodic basis in compliance with applicable rules, and that the testing for the prior year had been evidenced in a written report. Artmann should have known that the firm had not conducted its annual testing because he had approved Tradewire's cancellation of its annual testing in mid-2012. In addition, he should have known that the

firm had not prepared the reports required by FINRA Rules 3130 and NASD Rule 3012, and that he had not reviewed them. Artmann, however, failed to appropriately review the certification that he was signing and failed to act reasonably to ensure that the statements contained therein were true.

FINRA Rule 2010 requires associated persons to observe high standards of commercial honor and just and equitable principles of trade. As described above, Artmann failed to sign the written certification required by FINRA Rule 3130 by March 31, 2013, the deadline required by the rule, and subsequently executed an annual certification that was inaccurately dated and contained false statements. Accordingly, Artmann violated FINRA Rules 3130 and 2010.

B. I also consent to the imposition of the following sanctions:

- A 45-day suspension from association with any FINRA member in a principal capacity; and,
- A fine of \$15,000.

I agree to pay the monetary sanction(s) upon notice that this AWC has been accepted and that such payment(s) are due and payable. I have submitted an Election of Payment form showing the method by which I propose to pay the fine imposed.

I specifically and voluntarily waive any right to claim that I am unable to pay, now or at any time hereafter, the monetary sanction(s) imposed in this matter.

I understand that if I am barred or suspended from associating with any FINRA member in a principal capacity, I become 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, I may not be associated with any FINRA member in a principal capacity, during the period of the bar or suspension (see FINRA Rules 8310 and 8311). Furthermore, because I am subject to a statutory disqualification during the suspension, if I remain associated with a member firm in a non-suspended capacity, an application to continue that association may be required.

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

II.

WAIVER OF PROCEDURAL RIGHTS

I specifically and voluntarily waive the following rights granted under FINRA's Code of Procedure:

- A. To have a Complaint issued specifying the allegations against me;
- 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, I specifically and voluntarily waive any right to claim bias or prejudice 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 acceptance or rejection of this AWC.

I further specifically and voluntarily waive 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

I understand 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 me; and
- C. If accepted:
 - 1. this AWC will become part of my permanent disciplinary record and may be considered in any future actions brought by FINRA or any other regulator against me;
 - 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 the subject matter thereof in accordance with FINRA Rule 8313; and

4. I 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. I 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 my: (i) testimonial obligations; or (ii) right to take legal or factual positions in litigation or other legal proceedings in which FINRA is not a party.

- D. I may attach a Corrective Action Statement to this AWC that is a statement of demonstrable corrective steps taken to prevent future misconduct. I understand that I 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 or its staff.

I certify that I have read and understand all of the provisions of this AWC and have been given a full opportunity to ask questions about it; that I have 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 me to submit it.

6/2/2016
Date (mm/dd/yyyy)

Alexandre Wachneldt Artmann
Respondent Alexandre Wachneldt Artmann

Reviewed by:

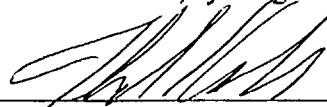


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Accepted by FINRA:

6/15/16
Date

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



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