

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 20130365120**

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

RE: Barbara Josephine Stark, Respondent
CRD No. 1328134

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

I first became registered with FINRA in 1984. From October 13, 2008 to March 22, 2013, I was registered with Ameriprise Financial Services, Inc. (the "Firm"). I have not been associated with a FINRA regulated broker-dealer since my employment termination from the Firm on March 22, 2013. FINRA retains jurisdiction over Respondent pursuant to Article V, Section 4(a) of the By-Laws.

I have no prior disciplinary history.

FACTS AND VIOLATIVE CONDUCT

On June 5, 2013, Enforcement sent a letter to Respondent, Barbara Josephine Stark, pursuant to FINRA Rule 8210, requesting that Respondent appear for testimony on June 12, 2013 in connection with an allegation that the Respondent misappropriated client funds. This letter was sent by email, first class mail and certified mail, return receipt requested, to Respondent at Respondent's counsel's office.

On June 6, 2013, Respondent advised FINRA, through her counsel, that Respondent

would not respond to FINRA's request for testimony.

Respondent failed to appear for testimony on June 12, 2017, and has not provided testimony or documents to date.

By virtue of this conduct, Respondent violated FINRA Rule 8210. In addition, the Respondent violated FINRA Rule 2010, which requires the observance of high standards of commercial honor and just and equitable principles of trade.

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

- A bar from association with any FINRA regulated broker-dealer in any capacity.

Pursuant to FINRA Rule 8313(c), a bar or expulsion shall become effective upon approval or acceptance of this AWC.

I understand that if I am barred or suspended from associating with any FINRA member, I become subject to a statutory disqualification as that term is defined in Section 3(a)(39) of the Securities Exchange Act of 1934, as amended. Accordingly, I 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

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

- A. To have a Formal Complaint issued specifying the allegations against me;
- B. To be notified of the Formal 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 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.

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 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 her;
 - 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: (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.

I certify that I have read and understand all of the provisions of this AWC and I 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.

6/13/2013
Date

Barbara Josephine Stark
Barbara Josephine Stark
Respondent

Reviewed by:

C. Kelsch
Chad Kelsch, Esq.
Fuller, Scaver, Swanson & Kelsch, P.A.
The Colonnade, Suite 1025
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Golden Valley, MN 55416

Accepted by FINRA:

July 8, 2013
Date

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

Susan Light
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