

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2013037772802**

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

RE: Alicia M. Woppel, Respondent ("Woppel")
CRD No. 5872671

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

Woppel entered the securities industry in April 2009, when she was hired as a customer service representative handling operational and cashier duties with Chase Investment Services Corp. ("Chase Investments"), a FINRA-regulated broker dealer until its merger in or around September 2012 with JPMorgan Securities LLC, a FINRA-regulated broker-dealer (the "Firm"). In July 2011, Woppel submitted a signed Uniform Application for Securities Industry Registration ("Form U4") seeking to become registered as a Series 7 General Securities Representative.¹ Woppel was transferred from Chase Investments to the Firm on or about October 1, 2012. On July 25, 2013, the Firm filed a Uniform Termination Notice for Securities Industry Registration ("Form U5") reporting that it had terminated Woppel's association effective that day for failure to disclose two felony charges on her Form U4.

¹ After failing the Series 7 on two occasions, in 2011 and 2012 respectively, Woppel opened the window to take the Series 7 on two additional occasions in 2012. However, Woppel did not retake the exam. The final window closed on January 16, 2013.

Woppel is not currently associated with a FINRA-regulated broker-dealer. Pursuant to Article V, Section 4 of the FINRA By-Laws, Woppel remains subject to FINRA's jurisdiction until July 24, 2015.

RELEVANT DISCIPLINARY HISTORY

Woppel has no disciplinary history in the securities industry.

OVERVIEW

Woppel violated Article V, Section 2(c) of the FINRA By-Laws and FINRA Rules 1122 and 2010 by willfully failing to amend her Form U4 to report two felony charges and a felony conviction for burglary. Woppel also violated FINRA Rule 2010 by submitting two compliance affirmations to her firm in which she falsely certified that she had disclosed to the firm any arrests or criminal proceedings involving her when in fact she had not done so. Additionally, Woppel violated FINRA Rules 8210 and 2010 by failing to timely respond to a FINRA Rule 8210 request for documents and information.

FACTS AND VIOLATIVE CONDUCT

1. Woppel Failed to Amend Her Form U4 to Report Felony Charges and a Felony Conviction

Article V, Section 2(c) of the FINRA By-Laws requires an associated person to keep the Form U4 "current at all times," and file any amendments to the Form U4 "not later than 30 days after learning of the facts or circumstances giving rise to the amendment."

FINRA Rule 1122 states that "[n]o . . . person associated with a member shall file with FINRA information with respect to . . . registration which is incomplete or inaccurate so as to be misleading, or which could in any way tend to mislead, or fail to correct such filing after notice thereof."

A violation of Article V, Section 2(c) of the FINRA By-Laws and FINRA Rule 1122 constitutes a violation of FINRA Rule 2010, which requires an associated person to observe the high standards of commercial honor and just and equitable principles of trade.

Question 14A(1)(b) of the Form U4 asks an associated person whether he or she has ever "been charged with any felony." Question 14A(1)(a) asks an associated person whether he or she has ever "been convicted of or pled guilty . . . to any felony." Question 15A(9) of the Form U4 requires an associated person to "update this form by causing an amendment to be filed on a timely basis whenever changes occur to answers previously reported."

On September 24, 2011, while employed with a FINRA-regulated broker-dealer, and after having submitted her initial Form U4 application, Woppel was arrested in Cook County, Illinois and charged with two felony counts of residential burglary. On July 26, 2012, Woppel pleaded guilty to and was convicted of one felony count of residential burglary.

Woppel was required to amend her Form U4 to report the felony charges and conviction, but failed to do so. Woppel's Form U4 was amended four times for various reasons after she was charged, but none of the amendments disclosed the felony charges or, when applicable, the conviction. Woppel's failure to amend her Form U4 was willful. Woppel was fully aware of the felony charges and conviction and her obligation to report such information. Nevertheless, Woppel failed to inform the Firm of the charges or conviction or amend her Form U4 accordingly.

As a result of the foregoing conduct, Woppel violated Article V, Section 2(c) of the FINRA By-Laws and FINRA Rules 1122 and 2010.

2. Woppel Submitted Two False Compliance Affirmations to a FINRA-Regulated Broker-Dealer

FINRA Rule 2010 requires the observance of high standards of commercial honor and just and equitable principles of trade. Making false statements to a FINRA-regulated broker-dealer constitutes a violation of FINRA Rule 2010.

During the period of Woppel's employment, the Code of Conduct applicable to her FINRA-regulated broker-dealer employers required employees to immediately report any arrest or legal proceeding relating to a criminal charge. On July 18, 2012, Woppel electronically signed and submitted a "Code of Conduct 2012 Affirmation Record" in which she affirmed that she had notified her FINRA-regulated broker-dealer employer of any events required to be disclosed under the Code of Conduct. Because Woppel had failed to report the September 24, 2011 felony charges to her FINRA-regulated broker-dealer employer as required by the Code of Conduct, this statement was false. On July 8, 2013, Woppel electronically signed and submitted a substantially identical compliance affirmation to her FINRA-regulated broker-dealer employer for the year 2013, which also was false.

As a result of the foregoing conduct, Woppel violated FINRA Rule 2010.

3. Woppel Failed to Timely Respond to a FINRA Rule 8210 Request

FINRA Rule 8210 "require[s] a member, or person associated with a member, or any other person subject to FINRA's jurisdiction to provide information orally, in writing, or electronically ... with respect to any matter involved in the investigation, complaint, examination, or proceeding." The failure to timely

respond to FINRA requests for information violates FINRA Rule 8210 and 2010.

Woppel failed to timely respond to a FINRA request for documents and information sent pursuant to FINRA Rule 8210. On December 12, 2013, FINRA personally served on Woppel, via substituted service on her mother at the address provided in the Central Registration Depository, a Rule 8210 request dated November 27, 2013. The request sought documents and a written statement from Woppel regarding the allegations that she had failed to amend her Form U4 to report felony charges. The November 27, 2013 letter requested Woppel's response on or before December 18, 2013. Woppel failed to respond to the Rule 8210 request within the prescribed time period.

On December 26, 2013, having received no response from Woppel and pursuant to FINRA Rule 9552, FINRA sent Woppel a Notice of Suspension notifying her that her registration with FINRA would be suspended on January 21, 2014. The Notice of Suspension further stated that unless Woppel requested termination of the suspension, on March 31, 2014 she would be barred from associating with any FINRA-regulated broker-dealer in any capacity for failing to respond to FINRA's request for documents and information. On January 21, 2014, after Woppel failed to respond to the suspension notice, FINRA sent Woppel a letter notifying her that the suspension had taken effect. Woppel responded to the Rule 8210 request on March 17, 2014, before her suspension would have been converted into a bar, but three months after the date requested in the November 27, 2013 letter.

Woppel's failure to timely comply with FINRA's Rule 8210 request violated FINRA Rules 8210 and 2010.

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

- a sixteen-month suspension from association with any FINRA member in any capacity; and
- a fine of \$15,000.

The fine shall be due and payable either immediately upon reassociation with a member firm following the sixteen-month 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.

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 this settlement includes a finding that I willfully omitted to state a material fact on a Form U4, and that under Section 3(a)(39)(F) of the Securities Exchange Act of 1934 and Article III, Section 4 of FINRA's By-Laws, this

omission makes me subject to a statutory disqualification with respect to association with a member.

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 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 any capacity, including clerical or ministerial functions, during the period of the bar or suspension (see FINRA Rules 8310 and 8311).

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 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 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.

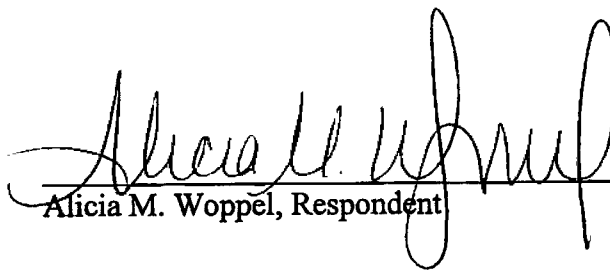
OTHER MATTERS

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 response to public inquiries about my 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. 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.

10/5/14
Date


Alicia M. Woppel, Respondent

Accepted by FINRA:

10/28/14
Date

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


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