

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2013038611701**

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

RE: Justin M. Weseloh, Respondent
CRD No. 5321024

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

In June 2008, Justin M. Weseloh (CRD No. 5321024) first became registered with FINRA as a Series 6 (Investment Company Products/Variable Contracts Limited Representative) with Signator Investors, Inc. (CRD No. 468). In March 2010, Weseloh became registered with member firm Ameriprise Financial Services, Inc. (CRD No. 6363), working out of a branch office in Independence, Ohio that operated under the business entity "The Partners Group." Ameriprise terminated Weseloh's registration on September 19, 2013.

FINRA retains jurisdiction over Weseloh pursuant to Article V, Section 4 of the FINRA By-Laws because the conduct that serves as the basis for this action commenced prior to his termination of registration from a member firm and this AWC has been filed within two years after the effective date of his last termination of registration from a member firm.

FACTS AND VIOLATIVE CONDUCT

From March 2010 until September 2013, Weseloh was employed by The Partners Group as an Office Manager. His responsibilities included managing the office's clerical staff, bookkeeping functions, payroll, vendors, and marketing. Weseloh's salary was \$45,000 per year. Pursuant to Ameriprise policy, Weseloh was prohibited from advising clients and receiving client transaction-based compensation, including commission payments.

As part of his payroll management duties, Weseloh sent gross payroll and commission figures for all of The Partners Group's employees to a third-party payroll company. The payroll company paid the employees directly from The Partners Group's banking account based on the figures provided by Weseloh. Between January 2011 and September 2013, Weseloh knowingly sent the payroll company inflated salary figures as well as commission figures for himself even though he was not allowed to receive commission payments pursuant to Ameriprise policy. This caused The Partner's Group to pay him salary and commissions in the amounts he requested. In total, Weseloh wrongfully took approximately \$84,000 (gross) from The Partners Group, including approximately \$21,000 in salary payments and \$63,000 in commissions.

As a result of the foregoing conduct, Weseloh violated FINRA Rule 2010 (standards of commercial honor and principles of trade).

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

1. A bar from associating with any FINRA member in all capacities; and
2. An undertaking to cooperate with FINRA Department of Enforcement staff (the "Staff") in its continuing investigation of FINRA matter number 20140402693, including but not limited to testifying truthfully at any hearings in this matter, participating in meetings and/or interviews with and by the Staff, and providing the Staff with any requested documents, all without requiring the Staff to rely on FINRA Rule 8210.

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).

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

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;

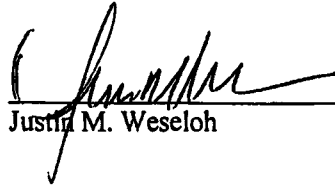
B. If this AWC is not accepted, its submission will not be used as evidence to prove any of the allegations against me; and

C. If accepted:

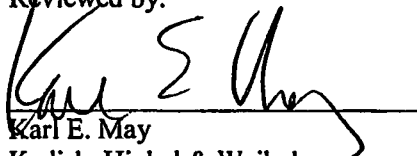
1. this AWC will become part of my permanent disciplinary record and may be considered in any future actions brought by FINRA or any other regulator against me;
2. this AWC will be made available through FINRA's public disclosure program in response to public inquiries about my disciplinary record;
3. 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.

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.

01/13/2014
Date (mm/dd/yyyy)


Justin M. Weseloh

Reviewed by:

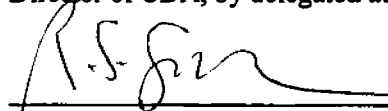

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6/16/2014
Date (mm/dd/yyyy)

Accepted by FINRA:

6/17/2014
Date (mm/dd/yyyy)

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


Rebecca S. Giltner
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