

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2014040186601**

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

RE: Joel Blum (CRD No. 4905379),
Respondent

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, I, Joel Blum ("Blum") 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

Blum entered the securities industry in 2004 and is currently registered through FINRA member firm Ameriprise Financial Services Inc., where he has been employed since February 2014. Blum has been registered with FINRA through various member firms as a General Securities Representative since January 2005.

RELEVANT DISCIPLINARY HISTORY

Blum has no formal disciplinary history with the Securities and Exchange Commission, any state securities agency, or any self-regulatory agency.

OVERVIEW

In December 2013, Blum exercised discretion without written authorization in three client accounts. He also mismarked two order tickets, inaccurately indicating that the transactions were unsolicited. Blum thereby violated NASD Conduct Rule 2510 and FINRA Rules 4511(a) and 2010.

FACTS AND VIOLATIVE CONDUCT

NASD Conduct Rule 2510(b) states that a registered representative may not exercise discretion in a customer's account "unless such customer has given prior written authorization" and such discretionary authority has been approved, in writing, by the member firm. FINRA Rule 4511 requires accuracy in a member's books and records, including in the marking of order tickets to indicate whether a trade is solicited or unsolicited.

In December 2013, Blum executed a total of eight discretionary transactions in the accounts of three customers without written authorization to do so. He also mismarked two order tickets in connection with these transactions indicating that the trades were unsolicited when, in fact, the trades were solicited. As a result of the foregoing conduct, Blum violated NASD Conduct Rule 2510 and FINRA Rules 4511(a) and 2010.

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

- A suspension in all capacities for 20 calendar days; and
- A fine in the amount of \$10,000.

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).

I agree to pay the monetary sanction upon notice that this AWC has been accepted and that such payment is 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 imposed in this matter.

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 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.

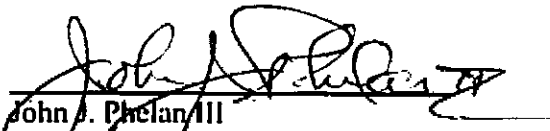
2/12/15

Date (mm/dd/yyyy)



Respondent

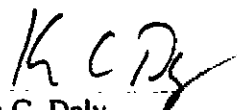
Reviewed by:


John J. Phelan III
2385 NW Executive Center Dr.
Suite 100
Boca Raton, FL 33431
(561) 739-9852 (telephone)

Accepted by FINRA:

March 10, 2015
Date

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


Karen C. Daly
Principal Regional Counsel
FINRA Department of Enforcement
1835 Market Street
Philadelphia, PA 19103
215-963-1990 (telephone)
215-496-0434 (facsimile)

Joel E. Blum

February 13, 2015

Via U.S. Mail and email: Karen.Daly@FINRA.org

Karen C. Daly, Principal Regional Counsel
FINRA Department of Enforcement
1893 Market Street
Philadelphia, PA 19103

Re: 2014040186601/Joel E. Blum CRD # 4905379
Corrective Action Statement

Dear Ms Daly:

The Corrective Action Statement is submitted by the undersigned, Joel Blum, the Respondent. It does not constitute factual or legal findings by FINRA, nor does it reflect the views of FINRA, or its staff.

The following corrective action has been taken to prevent further possible violations as alleged in the accompanying AWC:

First, the Respondent has been terminated by Merrill Lynch, his employer at the time of the charged violations. There can, therefore be no repetition of any of the conduct alleged at that firm.

Second, Respondent's new employer Ameriprise, has been fully informed of the facts as set forth in the AWC and as set forth in the Respondent's two earlier letters to the FINRA staff. The Respondent is also working under the close supervision of a senior staff member in order to prevent any possible recurrence.

Third, the investigation of these matters, the FINRA Enforcement actions and the termination of employment have brought home to the Respondent the critical nature of most careful compliance with the rules at issue in the AWC and with all regulations affecting his business. There will be no repeat of any violations.

Very truly yours,



Joel E. Blum