

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2015044211101**

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

**RE: Joshua Brian Gladtko
Former Registered Representative
CRD No. 4305338**

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

Joshua Gladtko entered the securities industry when he became associated with a member firm in 2000. Gladtko was associated with another member firm before becoming registered as a General Securities Representative with Alzeon Financial, LLC in September, 2005, which changed names in March, 2006 to Arjent Services LLC, and again to Arjent LLC in August, 2010. Gladtko was registered with Arjent LLC until August 3, 2015.

On August 3, 2015, Arjent LLC filed a Form U5 terminating Gladtko's registration, disclosing that Gladtko had voluntarily resigned from the Firm. Gladtko is not currently registered or associated with any member firm but remains subject to FINRA's jurisdiction pursuant to Article V, Section 4 of FINRA's By-Laws.

RELEVANT DISCIPLINARY HISTORY

Gladtko has no relevant disciplinary history.

OVERVIEW

Gladtko failed to appear for on-the-record testimony pursuant to FINRA Rule 8210, in violation of FINRA Rule 8210 and 2010.

FACTS AND VIOLATIVE CONDUCT

FINRA Rule 8210 authorizes FINRA, in the course of its investigations, to require persons associated with a FINRA member to "provide information orally, in writing, or electronically...with respect to any matter involved in the investigation...."

In connection with an investigation into, among other things, the offer and sale of multiple private placement securities, FINRA staff sent a letter pursuant to FINRA Rule 8210 on August 6, 2015 requesting that Gladtko appear for on-the-record testimony on August 26, 2015. On August 25, 2015, Gladtko's counsel requested a postponement of the scheduled testimony. In response, on August 27, 2015, FINRA staff sent a letter pursuant to FINRA Rule 8210 requesting that Gladtko appear for on-the-record testimony on September 29, 2015. On September 24, 2015, Gladtko's counsel told FINRA staff that Gladtko would not attend the testimony scheduled for September 29. Gladtko did not appear for the September 29 testimony. By this agreement, Gladtko acknowledges that he will not appear for on-the-record testimony at any time.

By failing to appear for testimony as requested pursuant to FINRA Rule 8210, Gladtko violated FINRA Rules 8210 and 2010.

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

- A bar from associating with any FINRA member in any capacity.

I understand that if I am barred or suspended from associating with any FINRA member, I become subject to 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. 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 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.**

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.

10/16/2015
Date (mm/dd/yyyy)

[Signature]
Respondent

Reviewed by:

Matthew J. Brief
Matthew J. Brief
Counsel for Respondent
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New York, New York 10022
(212) 758-6160

Accepted by FINRA:

11/9/15
Date

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

[Signature]
James E. Day
Vice President and Chief Counsel
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