

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2012032011101**

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

RE: Laura Anne Dudek, Respondent
Non-Registered Fingerprint Individual
CRD No. 5392967

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, I, Laura Anne Dudek ("Dudek"), 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

Dudek entered the securities industry on June 29, 2007 as a non-registered branch office administrator with Edward D. Jones & Co., L.P. (the "Firm") in its Natrona Heights, Pennsylvania office. On July 25, 2007, the Firm filed an initial Non-Registered Fingerprint ("NRF") filing reporting Dudek's employment with the Firm. On March 20, 2012, the Firm terminated Dudek's employment and reported her termination in an April 3, 2012 NRF amendment filing. Although Dudek has not been employed in the securities industry since March 20 2012, she remains subject to FINRA's jurisdiction pursuant to FINRA By-Laws Article V, Section 4, until at least March 19, 2014.

RELEVANT DISCIPLINARY HISTORY

Dudek has not been the subject of any relevant disciplinary history.

OVERVIEW

On six occasions between July 2009 and January 2011, Dudek signed the name of her family member, WD, on forms authorizing the Firm to transfer funds from his

account to accounts Dudek controlled. Dudek did not have permission or authority from WD or the Firm to sign WD's name or transfer his funds to her accounts. In total, Dudek withdrew approximately \$29,000 from WD's account and converted the funds for her own use and benefit.

In February 2012, Dudek signed WD's name on nine United States savings bonds worth \$600 and two forms authorizing the direct deposit of the proceeds of the redeemed bonds to a bank account in her name in an attempt to convert the funds for her own use and benefit. Dudek did not have permission or authority from WD or the Firm to sign WD's name or redeem the bonds.

Dudek's forgery, conversion and attempted conversion all constitute separate violations of FINRA Rule 2010.

FACTS AND VIOLATIVE CONDUCT

1. Forgery of Distribution Forms and Conversion of Funds

WD maintained an IRA account at the Firm (the "IRA Account"). Dudek was not an owner or signatory on the IRA Account and did not have authority to withdraw funds from the IRA Account.

During the period July 2009 through January 2011, Dudek signed WD's name, without permission or authorization from WD or the Firm, on six Retirement Distribution or Internal Transfer forms (the "Transfer Forms"), which she used to withdraw funds from the IRA Account. On the Transfer Forms, Dudek instructed the Firm to wire the funds to bank and brokerage accounts that she controlled.

Using the forged Transfer Forms, Dudek made the following six unauthorized withdrawals from the IRA Account: (i) \$15,000 on July 15, 2009; (ii) \$1,000 on December 11, 2009; (iii) \$3,000 on December 14, 2009; (iv) \$8,500 on January 4, 2010; (v) \$1,030 on April 19, 2010; and (vi) \$276 on January 5, 2011. In total, Dudek withdrew approximately \$29,000 from the IRA Account.¹ Dudek transferred these funds to her accounts without permission or authorization from WD or the Firm.

FINRA Rule 2010 states that "[a] member in the conduct of its business shall observe high standards of commercial honor and just and equitable principles of trade."

Dudek's forgery of WD's signature on the six Transfer Forms and her conversion of the funds from the IRA Account for her own use and benefit constitute separate violations of FINRA Rule 2010.

¹ These are the actual amounts withdrawn from the IRA Account on each date. The Firm withheld federal income taxes from each withdrawal (in varying percentages) before wiring the distribution to the bank account or brokerage account indicated on the Transfer Form.

2. Forgery of Bonds and Bond Redemption Forms
and Attempted Conversion of Funds

WD was co-owner, with two minors, of nine United States savings bonds worth a total of \$600. Dudek was not an owner, co-owner or beneficiary of any of the bonds.

In February 2012, Dudek signed WD's name, without permission or authorization from WD or the Firm, on the nine bonds and two Special Forms of Request for Payment of United States Savings and Retirement Securities (the "Bond Redemption Forms") and caused the Firm to guarantee the forged signatures on the Bond Redemption Forms as those of WD. On the Bond Redemption Forms, Dudek requested that the proceeds from the redemptions be directly deposited to a bank account held in her name, which she represented was for the benefit of the minors.

Dudek, without permission or authorization from WD or the Firm, submitted the bonds and the Bond Redemption Forms to TRS for processing. TRS, however, did not process the bond redemptions because proceeds of a United States savings bond redemption can be deposited only into an account held in the name of a bond owner and Dudek had requested that the proceeds be sent to an account held in her name. TRS returned the Bond Redemption Forms and the bonds to WD.

Dudek's forgery of WD's signature on the two Bond Redemption Forms and the nine savings bonds and her attempted conversion of the proceeds of the bonds for her own use and benefit constitute separate violations of FINRA Rule 2010.

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

A bar from association 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 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. 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 prejudgment 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

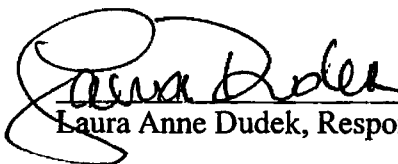
I understand that:

- 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 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.

7.29.13
Date

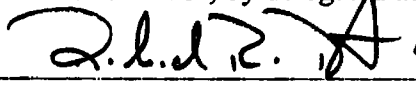


Laura Anne Dudek, Respondent

Accepted by FINRA:

8.14.13
Date

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



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