

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2014040276902**

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

RE: Michael Inderlied, Respondent
Investment Company Products/Variable Contracts Representative
CRD No. 2131074

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

Michael Inderlied (“Inderlied”) entered the securities industry in 1991 when he became associated with a FINRA member firm. He holds the Series 6, 24, 63, and 65 securities licenses and has been associated with several FINRA member firms, including Wilbanks Securities, Inc., with which he was associated from June 2009 through January 2014. On December 10, 2015, Inderlied’s registration with the member firm with which he was registered terminated. Inderlied is not currently associated with a FINRA member firm, but remains subject to FINRA’s jurisdiction pursuant to Article V, Section 4 of FINRA’s By-Laws.

RELEVANT DISCIPLINARY HISTORY

On November 2, 2015, Inderlied entered into a Consent Order with the State of Missouri finding that he engaged in dishonest and unethical practices in the securities, investment, and/or insurance business. He was ordered to pay \$17,750 in restitution (\$10,000 of which is suspended provided he complies with the terms

of the Consent Order and the Missouri Securities Act) and a \$20,000 civil penalty (also suspended).

OVERVIEW

Inderlied failed to provide testimony as requested by FINRA staff's Rule 8210 request letter dated June 1, 2016, in violation of FINRA Rule 8210 and 2010.

FACTS AND VIOLATIVE CONDUCT

On June 1, 2016, FINRA staff sent a request to Inderlied for on-the-record testimony pursuant to FINRA Rule 8210 pertaining to allegations of unsuitable recommendations by Inderlied. As stated in his counsel's phone call with FINRA staff on June 23, 2016, written correspondence from his counsel on July 13, 2016, and by this agreement, Inderlied acknowledges that he received FINRA's request and will not appear for on-the-record testimony at any time. By failing to appear for on-the-record testimony as requested pursuant to FINRA Rule 8210, Inderlied violates FINRA Rules 8210 and 2010.

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

A bar from associating with any FINRA member firm 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. 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:

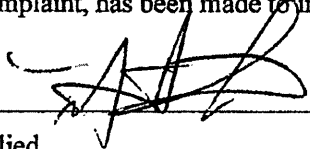
- A. Submission of this AWC is voluntary and will not resolve this matter unless and until it has been reviewed and accepted by the NAC, a Review Subcommittee of the NAC, or the Office of Disciplinary Affairs (“ODA”), pursuant to FINRA Rule 9216;
- B. If this AWC is not accepted, its submission will 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

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.

08/29/2016
Date (mm/dd/yyyy)


Michael Inderlied

Accepted by FINRA:

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

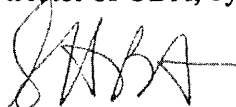
Suzanne H. Bertolett

Senior Regional Counsel
Enforcement Department
FINRA – Florida District Office

Accepted by FINRA:

09-01-2016
Date

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



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