

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2014041726701**

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

RE: Heedo Han (also known as Joshua Han), Respondent
Former Investment Company and Variable Contracts Products Representative
CRD No. 2302622

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, I, Heedo Han also known as Joshua Han ("Han"), 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

Han entered the securities industry in October 1991 when he became dually employed by two FINRA member firms. In December 1992, Han became registered as an Investment Company Products/Variable Contracts Representative ("IR") with both entities where he remained until July 1998. In July 1998, Han became associated with NYLIFE Securities, LLC ("NYLIFE"), a FINRA member, where he served as an IR until May 28, 2014. During Han's association with NYLIFE, he was also employed as an insurance agent with an insurance company affiliated with NYLIFE.

On June 26, 2014, NYLIFE filed a Uniform Termination Notice for Securities Industry Registration ("Form U5") reporting the termination of Han's employment after a review of Han's insurance business identified several insurance applications that contained inaccurate information. On March 19, 2015, NYLIFE filed a Form U5 Amendment reporting, for the first time, a customer complaint the Firm received on February 19, 2015. The complaint alleged that

Han signed a customer's name on insurance documents and failed to disclose material information relating to the purchased insurance products. Han is not currently associated with a FINRA-registered entity. Pursuant to Article V, Section 4 of the FINRA By-Laws, FINRA retains jurisdiction over Han until at least March 17, 2017.

RELEVANT DISCIPLINARY HISTORY

Han has no relevant disciplinary history.

OVERVIEW

During a FINRA investigation into allegations that Han forged and falsified insurance application documents and failed to amend his Uniform Application for Securities Industry Registration and Transfer ("Form U4") to report tax liens and a bankruptcy filing, Han failed to provide information and testimony requested pursuant to FINRA Rule 8210.

By failing to respond to requests for information and testimony, Han violated FINRA Rules 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, or person subject to FINRA's jurisdiction to "provide information orally, in writing, or electronically ... and to testify at a location specified by FINRA Staff, under oath or affirmation ... with respect to any matter involved in the investigation." FINRA Rule 2010 requires that members and associated persons "observe high standards of commercial honor and just and equitable principles of trade." Failure to comply with requests for information and requests to appear and provide testimony pursuant to FINRA Rules 8210 is also a violation of FINRA Rule 2010.

By letter dated March 24, 2015 (the March 24th Letter"), which Han received, FINRA requested, pursuant to FINRA Rule 8210, that Han provide information and documents by April 6, 2015, concerning Han's conduct while he was associated with NYLIFE. Han failed to provide the requested information.

By letter dated March 25, 2015 (the "March 25th Letter"), which Han received, FINRA requested that Han appear on April 29, 2015 at a FINRA office in New York, New York, and provide testimony pursuant to FINRA Rule 8210.

On April 6, 2015, in response to the March 24th Letter and March 25th Letter, Han, through his counsel, informed FINRA that Han would not provide the requested information and would not appear and provide testimony. To date, Han has failed to provide the requested information as required pursuant to FINRA Rule 8210. On April 29, 2015, Han failed to appear and provide testimony as required pursuant to FINRA Rule 8210.

By failing to provide information and testimony, requested pursuant to FINRA Rule 8210, Han violated FINRA Rules 8210 and 2010.

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

- A bar from association with any FINRA member in all capacities.

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.

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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:

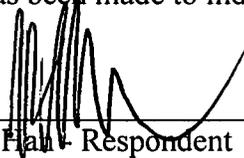
- A. Submission of this AWC is voluntary and will not resolve this matter unless and until it has been reviewed and accepted by the NAC, a Review Subcommittee of the NAC, or the Office of Disciplinary Affairs ("ODA"), pursuant to FINRA Rule 9216;
- B. If this AWC is not accepted, its submission will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

5-26-15

Date


Heedo Han - Respondent

Reviewed by:



Peter Beck, Esq.
Counsel for Respondent
3580 Wilshire Blvd., 17th floor
Los Angeles, CA 90010
Phone: (213) 637-0120

Accepted by FINRA:

6/12/15

Date

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



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