

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2018059379401**

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

RE: Wilfred Rodriguez Jr., Respondent
Former Registered Representative
CRD No. 2504369

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, I, Wilfred Rodriguez Jr. ("Rodriguez"), 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

Rodriguez first became registered with FINRA as a General Securities Representative (GS) in August 1994. From July 1, 2003 to August 1, 2018, he was registered as a GS through Wells Fargo Clearing Services, LLC ("Wells Fargo" or the "Firm"). On August 1, 2018, Wells Fargo filed a Uniform Termination Notice for Securities Industry Registration (Form U5) terminating Rodriguez's registration with the Firm. The Form U5 disclosed that Wells Fargo discharged Rodriguez because, "[w]ith the permission of the customer, Mr. Rodriguez moved funds between customer's related accounts in order to place authorized bond orders for the purposes of generating qualifying revenue so that [he] could retain his international financial advisor status." Rodriguez is not currently registered with FINRA, but remains subject to FINRA's jurisdiction pursuant to Article V, Section 4 of the FINRA By-Laws.

RELEVANT DISCIPLINARY HISTORY

Rodriguez does not have any formal disciplinary history with the Securities and

Exchange Commission, any self-regulatory organization, or any state securities regulator.

OVERVIEW

FINRA staff conducted an investigation into allegations that Rodriguez, among other things, converted customers' funds and concealed it by falsifying account documents with inflated account values. During the investigation, Rodriguez failed to produce documents and information requested by FINRA staff pursuant to FINRA Rule 8210 in violation of FINRA Rules 8210 and 2010.

FACTS AND VIOLATIVE CONDUCT

FINRA Rule 8210(a)(1) states, in relevant part, that FINRA may "require a...person associated with a member...to provide information orally, in writing, or electronically...with respect to any matter involved in [a FINRA] investigation." FINRA Rule 8210(c) states that "[n]o member or person shall fail to provide information...or to permit an inspection and copying of books, records, or accounts pursuant to this Rule." A failure to comply with Rule 8210 is a violation of FINRA Rule 2010.

On August 20, 2018, FINRA staff sent a request to Rodriguez for documents and information pursuant to FINRA Rule 8210, to be produced by September 19, 2018. The request was sent in connection with FINRA's investigation into allegations reported on Rodriguez's Form U5 and allegations that Rodriguez converted funds of foreign customers and provided falsified account statements with inflated account values to the same customers. Rodriguez failed to produce the requested documents and information by September 19, 2018. On September 20, 2018, FINRA staff sent a second request to Rodriguez pursuant to FINRA Rule 8210 for the same documents and information to be produced by September 28, 2018. On September 26, 2018, Rodriguez sent an email to FINRA staff acknowledging that he "received this weekend the request for information and documentation." The following day, FINRA staff spoke with Rodriguez's counsel, who stated that Rodriguez would not produce the requested documents and information. As stated by Rodriguez and his counsel, and by this agreement, Rodriguez acknowledges that he received FINRA's requests and will not produce the documents and information requested.

By virtue of the foregoing, Rodriguez violates FINRA Rules 8210 and 2010.

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

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

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 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:

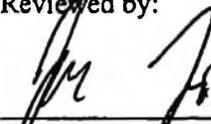
- A. Submission of this AWC is voluntary and will not resolve this matter unless and until it has been reviewed and accepted by the NAC, a Review Subcommittee of the NAC, or the Office of Disciplinary Affairs ("ODA"), pursuant to FINRA Rule 9216;
- B. If this AWC is not accepted, its submission will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

Oct 5, 2018
Date (mm/dd/yyyy)


Wilfred Rodriguez Jr., Respondent

Reviewed by:



Carl H. Lida
Joshua H. Lida
Counsels for Respondent
Lida Law, PLLC
7805 SW 6th Court
Plantation, Florida 33324
(954) 472-5001

Accepted by FINRA:

10/9/2018
Date

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



Phil Huynh
Principal Counsel
FINRA Department of Enforcement
Brookfield Place
200 Liberty Street
New York, NY 10281-1003
(212) 416-1754; (202) 721-8328