

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2015045713303**

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

RE: Edward O. Daniel, Respondent
Former General Securities Representative
CRD No. 808225

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, I, Edward O. Daniel, 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

Edward O. Daniel ("Daniel") entered the securities industry in February 1975, when he became associated with a FINRA member firm; Daniel became registered as a General Securities Representative with that firm in 1977. After working for another member firm between 1993 and 2009, Daniel became registered with Wells Fargo Clearing Services, LLC (f/k/a Wells Fargo Advisors, LLC) ("Wells Fargo") on January 2, 2009. On September 6, 2016, Wells Fargo filed a Form U5 disclosing Daniel's voluntary termination from the firm. On October 24, 2016, Wells Fargo filed an amended Form U5 disclosing a customer arbitration filed against Wells Fargo, alleging that Daniel "made unsuitable investments between 2011 and 2015."

Daniel is not currently associated with any FINRA member firm, but remains subject to FINRA's jurisdiction pursuant to Article V, Section 4 of FINRA's By-Laws.

RELEVANT DISCIPLINARY HISTORY

Daniel does not have any prior disciplinary history.

OVERVIEW

Daniel failed to provide documents and information requested by FINRA pursuant to FINRA Rule 8210. As a result, Daniel violated FINRA Rules 8210 and 2010.

FACTS AND VIOLATIVE CONDUCT

On June 18, 2018, during the course of an investigation into whether Daniel made unsuitable recommendations to purchase securities to a Wells Fargo customer, FINRA staff sent a letter to Daniel, pursuant to FINRA Rule 8210, requesting that he produce documents and information to FINRA staff by July 6, 2018. On June 28, 2018, Daniel submitted a response to FINRA staff, but failed to provide a complete response to the requests.

FINRA staff sent a second letter pursuant to FINRA Rule 8210 to Daniel on July 8, 2018, requesting that Daniel provide a complete response to the June 18 letter by July 16, 2018. On July 9, 2018, Daniel acknowledged receipt of the July 8 letter. After FINRA staff granted Daniel an extension of time to respond, on July 16, 2018, his counsel informed FINRA staff that Daniel would not produce the requested information. As stated in his counsel's email and phone communications with FINRA staff on July 16, 2018, and by this agreement, Daniel acknowledges that he received FINRA's request and will not produce the information requested at any time.

By failing to produce the information requested pursuant to FINRA Rule 8210, Respondent 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 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 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.

08-15-2018
Date (mm/dd/yyyy)

Edward O. Daniel
Edward O. Daniel

Reviewed by:

A handwritten signature in black ink, appearing to read "Brian Rubin", is written above a horizontal line.

Brian Rubin, Esq.
Eversheds Sutherland
700 6th St., NW
Washington, D.C. 20001

Accepted by FINRA:

9/7/18
Date

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

Mitka Baker
Mitka T. Baker, Senior Counsel
FINRA Department of Enforcement
15200 Omega Drive
Suite 300
Rockville, MD 20850