

**FINANCIAL INDUSTRY REGULATORY AUTHORITY  
LETTER OF ACCEPTANCE, WAIVER AND CONSENT  
NO. 2016051002701**

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

RE: Angelina Ozlem Todurge, Respondent  
General Securities Representative ("GSR")  
CRD No. 4678713

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**

Angelina Ozlem Todurge ("Todurge") became registered with FINRA as a GSR in 2003 through an association with a FINRA member firm. Beginning in 2005, Todurge was registered with FINRA through associations with three other FINRA member firms until December 2014, when she became associated with J.P. Morgan Securities LLC ("JPM" or the "Firm") in Palm Beach, Florida as a registered representative.

By Uniform Termination Notice for Securities Industry Registration ("Form U5") filed on August 15, 2016, the Firm reported that it terminated Todurge's employment because Todurge "failed to report the receipt of funds from a third party which were errantly wired to registered rep's Chase bank account. Registered Rep then used the funds for personal use." Since her termination from the Firm, Todurge has not been registered with a FINRA regulated broker dealer, but remains subject to FINRA's jurisdiction pursuant to Article V, Section 4 of FINRA's By-Laws.

## **RELEVANT DISCIPLINARY HISTORY**

Todurge has no prior disciplinary history with FINRA, the U.S. Securities and Exchange Commission, any state securities agency or any other self-regulatory organization.

## **OVERVIEW**

Todurge failed to provide documents and information requested by FINRA pursuant to FINRA Rule 8210. This conduct violated FINRA Rules 8210 and 2010.

## **FACTS AND VIOLATIVE CONDUCT**

On January 23, 2017, FINRA Staff sent a letter request to Todurge at her last known address listed in FINRA's Central Registration Depository ("CRD"), pursuant to FINRA Rule 8210, for documents and information concerning allegations that she converted \$13,000 for her personal use.

Todurge's response to FINRA's January 23, 2017 request was due on January 31, 2017. Todurge did not respond on January 31, 2017 or since that date. On February 7, 2017, FINRA Staff sent a Second Request for documents and information to Todurge at her last known address as listed in CRD, with a due date of February 14, 2017. Todurge did not respond on February 14, 2017 or since that date. During a telephone call with FINRA Staff on February 14, 2017, Todurge acknowledged receipt of FINRA's requests and stated she will not produce the requested information.

By failing to produce the documents and information requested pursuant to FINRA Rule 8210 on January 23, 2017 and February 7, 2017, Todurge 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 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;
- 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.

## II.

### 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 understand and acknowledge that FINRA does not represent or advise me and I cannot rely on FINRA or FINRA staff members for legal advice; 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.

03/23/2017

March \_\_, 2017

Angelina Ozlem Todurge

Angelina Ozlem Todurge

Accepted by FINRA:

April 17, 2017  
Date

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

Susan Light

Susan Light  
Senior Vice President and Chief Counsel  
FINRA Department of Enforcement  
Brookfield Place  
200 Liberty Street  
New York, New York 10281  
(646) 315-7333