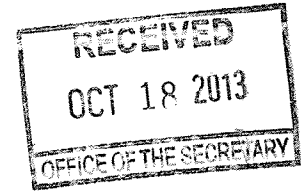


UNITED STATES OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING  
File No. 3-15518



In the Matter of

DIEGO F. HERNANDEZ,  
THE WEALTH  
MANAGEMENT PARTNERS, LLC,  
WEALTH FINANCIAL, LIMITED  
LIABILITY COMPANY,  
DFHR INVESTMENTS, INC, AND  
HD MILE HIGH MARKETING, INC.

ANSWER OF RESPONDENTS

Respondents Diego F. Hernandez, The Wealth Management Partners, LLC, Wealth Financial, Limited Liability Company, DFHR Investments, Inc. and HD Mile High Marketing, Inc., pursuant to Rule 220 of the Commission's Rules of Practice, hereby answer the allegations set forth in Division II of the Order Instituting Administrative and Cease-and-Desist Proceedings Pursuant to Section 8A of the Securities Act of 1933, Sections 15(b) and 21C of the Securities Exchange Act of 1934, Section 203(f) of the Investment Advisors Act of 1940, and Section 9(b) of the Investment Company Act of 1940 and Notice of Hearing (hereinafter referred to as the "Allegations") as follows:

1. Respondents deny the allegations contained in paragraph 1 of the Allegations.
2. Respondents deny the allegations contained in paragraph 2 of the Allegations.
3. Respondents deny that Mr. Hernandez resides in Lone Tree, Colorado but admit the remaining allegations contained in paragraph 3 of the Allegations.
4. Respondents deny that Wealth Management Partners, LLC ("Wealth Management")

acted as an unregistered broker-dealer in connection with the offer and sale of securities to investors between April 2012 and January 2013 but admit the remaining allegations contained in paragraph 4 of the Allegations.

5. Respondents deny that Wealth Financial, Limited Liability Company (“Wealth Financial”) acted as an unregistered broker-dealer in connection with the offer and sale of securities to investors between April 2012 and January 2013 but admit the remaining allegations contained in paragraph 5 of the Allegations.

6. Respondents deny that DFHR Investments, Inc. (“DFHR”) acted as an unregistered broker-dealer in connection with the offer and sale of securities to investors between July 2011 and January 2012 but admit the remaining allegations contained in paragraph 6 of the Allegations.

7. Respondents admit the allegations contained in paragraph 7 of the Allegations.

8. Respondents admit that Peak Training Center, Inc. (“Peak Training”) is a Colorado corporation with its principal place of business in Lakewood, Colorado, that Mr. Hernandez is a 49% owner of Peak Training, that Mr. Hernandez opened and controlled its bank accounts, that Peak Training received funds that originally came from noteholders, that Peak Training has never conducted a registered offering or registered a class of securities with the Commission and that Peak Training has no disciplinary history with the Commission but deny the remaining allegations contained in paragraph 8 of the Allegations.

9. Respondents admit that from August 2005 to April 2012, Mr. Hernandez was a registered representative associated with a broker-dealer registered with the Commission and that from April 12, 2012 to January 31, 2013, and that Mr. Hernandez was a registered

representative associated with a dually-registered broker-dealer and investment adviser registered with the Commission but deny all remaining allegations contained in paragraph 9 of the Allegations.

10. Respondents admit that in 2009, Mr. Hernandez incorporated DFHR and controlled it and its bank accounts but deny all remaining allegations contained in paragraph 10 of the Allegations.

11. Respondents admit that in 2011, Mr. Hernandez incorporated HD Mile High Marketing, Inc. (“HD”) and controlled it and its bank accounts but deny all remaining allegations contained in paragraph 11 of the Allegations.

12. Respondents admit that in March 2012, Mr. Hernandez organized Wealth Management and controlled it and its bank accounts but deny all remaining allegations contained in paragraph 12 of the Allegations.

13. Respondents admit that in 2012, Mr. Hernandez organized Peak Training and controlled its bank accounts but deny all remaining allegations contained in paragraph 13 of the Allegations.

14. Respondents admit that in February of 2013, Mr. Hernandez organized Wealth Financial and controlled it and its bank accounts but deny all remaining allegations contained in paragraph 14 of the Allegations.

15. Respondents deny the allegations contained in paragraph 15 of the Allegations.

16. Respondents deny the allegations contained in paragraph 16 of the Allegations.

17. Respondents deny the allegations contained in paragraph 17 of the Allegations.

18. Respondents admit that Mr. Hernandez has advised clients to surrender out of their

existing annuities and that he has assisted investors with completing the paperwork to complete their surrenders but denies the remaining allegations contained in paragraph 18 of the Allegations.

19. Respondents admit that two noteholders received a six or eight percent bonus but deny the remaining allegations contained in paragraph 19 of the Allegations.

20. Respondents are without sufficient information to admit or deny the allegations contained in paragraph 20 of the Allegations, and therefore deny them.

21. Respondents admit that Mr. Hernandez controlled the Respondents' bank accounts and that noteholders' funds went into those bank accounts but deny all remaining allegations contained in paragraph 21 of the Allegations.

22. Respondents admit that the noteholders were passive and had no control over the use of their funds but are without sufficient information to admit or deny the remaining allegations contained in paragraph 22 of the Allegations and therefore deny them.

23. Respondents deny the allegations contained in paragraph 23 of the Allegations.

24. Respondents deny the allegations contained in paragraph 24 of the Allegations.

25. Respondents admit that some of the account statements, the form for which was copied from an unrelated source, from Wealth Management or Wealth Financial mistakenly contained the term "corporate bond" but deny all remaining allegations contained in paragraph 25 of the Allegations.

26. Respondents deny the allegations contained in paragraph 26 of the Allegations.

27. Respondents deny the allegations contained in paragraph 27 of the Allegations.

28. Respondents deny the allegations contained in paragraph 28 of the Allegations.

29. Respondents deny the allegations contained in paragraph 29 of the Allegations.

30. Respondents deny the allegations contained in paragraph 30 of the Allegations.

31. Respondents deny the allegations contained in paragraph 31 of the Allegations.

32. Respondents are without sufficient information to admit or deny the allegations contained in paragraph 32 of the Allegations, and therefore deny them.

33. Respondents deny the allegations contained in paragraph 33 of the Allegations.

34. Respondents admit that Mr. Hernandez knew that the notes were not liquid or risk-free but deny all remaining allegations contained in paragraph 34 of the Allegations.

35. Respondents admit that noteholders' funds were spent on a variety of business expenses, that Mr. Hernandez mistakenly spent some money from Respondents' accounts for personal expenses rather than taking salary or a draw and that some expenditures were cash withdrawals, payment for a personal debt that was later reimbursed, payments to Respondents' employees, payments for marketing in restaurants and bars, payments related to vehicles, residential/office rent payments and the redemption of some promissory notes but deny the remaining allegations contained in paragraph 35 of the Allegations.

36. Respondents admit that Mr. Hernandez deposited a noteholder's check made payable to Wealth Financial in a Wealth Financial account but deny all remaining allegations contained in paragraph 36 of the Allegations.

37. Respondents admit that Mr. Hernandez sent a letter to the noteholders, the contents of which speak for themselves, but deny all remaining allegations contained in paragraph 37 of the Allegations.

38. Respondents admit that Mr. Hernandez was involved with individuals, Wealth

Management, Wealth Financial and DFHR throughout the time period of July 2011 through April 2013, that he met with noteholders, explained investments, drafted some account statements the form for which was copied from an unrelated source, accepted deposits and controlled Respondents' bank accounts into which noteholders' funds were placed and from which noteholder funds were spent but deny all remaining allegations contained in paragraph 38 of the Allegations.

39. Respondents deny the allegations contained in paragraph 39 of the Allegations.

40. Respondents are without sufficient information to admit or deny the allegations contained in paragraph 40 of the Allegations and therefore deny them.

41. Respondents admit the allegations contained in paragraph 41 of the Allegations.

42. Respondents deny that any sales occurred and are without sufficient information to admit or deny the remaining allegations contained in paragraph 42 of the Allegations and therefore deny them

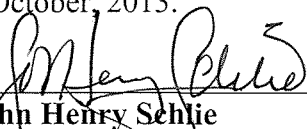
43. Respondents deny the allegations contained in paragraph 43 of the Allegations.

44. Respondents deny the allegations contained in paragraph 44 of the Allegations.

45. Respondents deny the allegations contained in paragraph 45 of the Allegations.

46. Respondents deny all allegations not specifically admitted herein.

Respectfully submitted this 17<sup>th</sup> day of October, 2013.

  
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