

ADMINISTRATIVE PROCEEDING FILE NO. 3-16195

## UNITED STATES OF AMERICA before the SECURITIES AND EXCHANGE COMMISSION

RECEIVED JAN 1 4 2015 OFFICE OF THE CEC TARY

In the Matter of

JUDY K. WOLF,

Respondent.

**Judge Cameron Elliot** 

DIVISION OF ENFORCEMENT'S EXHIBIT LIST

The Division of Enforcement ("Division") hereby identifies the exhibits below that it may use at the hearing of this matter scheduled to commence on February 23, 2015. The Division reserves its right to amend or supplement the below list before the hearing, should it identify

additional exhibits it may use.

| Hearing | Document Description   | Admitted |
|---------|--|----------|
| Exhibit |  |          |
| No.     |  |          |
| 251     | Draft Wachovia Retail Control Group procedures for insider trading     |          |
|         | reviews, last update October 26, 2009                                  |          |
| 252     | Wells Fargo Advisors Retail Control Group procedures for reviews for   |          |
|         | potential insider trading, last update July 23, 2010                   |          |
| 253     | Operating Procedures – reviews for potential insider trading           |          |
| 254     | Operating Procedures – reviews for potential insider trading published |          |
|         | June 19, 2012  |          |
| 255     | Judy Wolf's Burger King insider trading review file with cover page as |          |
|         | produced to Commission staff on January 14, 2013                       |          |
| 342     | Judy Wolf's November 19, 2009 email re "Links to Logs"                 |          |
| 343     | Judy Wolf's Excel spreadsheet log listing potential insider trading    |          |
|         | reviews she conducted January 2009 to present, dated April 22, 2013    |          |

1

| Hearing<br>Exhibit | Document Description  | Admitted |
|--------------------|---|----------|
| No.                |   | 1        |
| 368                | Judy Wolf's September 27, 2012 emails re Commission action against Prado  |          |
| 376                | February 28, 2013 email regarding Judy Wolf's memorandum re<br>Burger King insider trading "Summary of Events" and revisions<br>thereto   |          |
| 379                | Judy Wolf's Burger King insider trading review file; Commission's<br>complaint filed against Waldyr da Silva Prado Neto, SDNY Civil<br>Action No. 12-CIV-7094; Judy Wolf's February 28, 2013 "Summary<br>of Events" memo; and Commission's press release re action against<br>Igor Cornelsen, release number 2012-248 |          |
| 380                | Judy Wolf's September 14, 2012 email re Prado/Burger King;<br>Modesto Moya file re Burger King insider trading review   |          |
| 380A               | Copies of news articles contained within Ex. 380; PRADO-SEC-<br>025272-88   |          |
| 381                | Judy Wolf's file re Burger King insider trading with post-it "gave original to Roseann 12/28/12"  |          |
| 387                | Partial "Summary of Events" memo prepared by Judy Wolf re Burger<br>King insider trading review dated February 28, 2013   |          |
| 399                | Judy Wolf's March 25-26, 2013 emails re Real American Brands<br>insider trading review and use of her Excel spreadsheet log as a guide  |          |
| .401               | Judy Wolf's July 2010 insider trading review of ATC Technology<br>Corp. and 2012 request for information about that review  |          |
| 403                | Judy Wolf's handwritten notes re June 13, 2013 termination of<br>employment at Wells Fargo Advisors   |          |
| 500                | Order Instituting Proceedings against The Buckingham Research<br>Group, Inc. Exchange Act Release No. 63313 (Nov. 17, 2010)   |          |
| 501                | November 22, 2010 email exchange between Judy Wolf and Roseann<br>St. Jean regarding SEC enforcement action against Buckingham<br>Research for failing to have adequate policies and procedures to<br>prevent misuse of nonpublic information; PRADO-SEC-<br>JWOLFEMAIL-0270140-43                                    |          |
| 502                | November 29, 2010 email exchange between Judy Wolf, Roseann St.<br>Jean and Modesto Moya, regarding internal assessment of SEC<br>enforcement action against Buckingham Research; PRADO-SEC-<br>JWOLFEMAIL-0271027-0271030  |          |
| 503                | Buckingham Research assessment memo dated November 29, 2010;<br>PRADO-SEC-JWOLFEMAIL-0271031  |          |
| 504                | Wells Fargo Advisors' Code of Ethics and Business Conduct;<br>PRADO-SEC-082818-083584   |          |
| 505                | Judy Wolf's Team Member Acknowledgement form signed January 29, 2010  |          |
| 506                | SEC Order Instituting Proceedings against Janney Montgomery Scott   |          |

•

ز

| Hearing<br>Exhibit | Document Description   | Admitted |
|--------------------|--|----------|
| No.                |  |          |
| 507                | Judy Wolf's July 11, 2011 email re Janney Montgomery Scott case;<br>PRADO-SEC-JWOLFEMAIL-0103190-91  |          |
| 508                | Judy Wolf's July 12, 2011 emails re Janney Montgomery Scott case;<br>PRADO-SEC-JWOLFEMAIL-0103274-75   |          |
| 509                | Judy Wolf's July 13, 2011 emails re Janney Montgomery Scott case;<br>PRADO-SEC-JWOLFEMAIL-0103610-0103611 and SEC-Wolf_J-E-<br>0004616   |          |
| 510                | Judy Wolf's July 14, 2011 emails re Janney Montgomery Scott case;<br>PRADO-SEC-JWOLFEMAIL-0103776-81   |          |
| 511                | Judy Wolf's July 14, 2001 email and attached chart comparing<br>compliance procedures in Janney Montgomery Scott case vs. Well<br>Fargo Adviser's procedures. PRADO-SEC-JWOLFEMAIL-0335482         |          |
| 512                | Judy Wolf's July 21, 2011 emails re meeting to discuss Janney<br>Montgomery Scott case; PRADO-SEC-JWOLFEMAIL-0336584   |          |
| 513                | July 21, 2001 email exchange between Roseann St. John, James Aliosi<br>and Judy Wolf; PRADO-SEC-JWOLFMAIL-0336584  |          |
| 514                | Judy Wolf's July 22, 2011 updated analysis of Janney Scott<br>Montgomery case; PRADO-SEC-JWOLFEMAIL-0336641 and SEC-<br>Wolf J-E-0004289   |          |
| 515                | March 14, 2013 email regarding retrieval history of Judy Wolf's<br>Burger King trading review file sent to and retrieved from off-site<br>storage at Iron Mountain; PRADO-SEC-JWOLFEMAIL-0391506-7 |          |
| 516                | March 15, 2013 email regarding retrieval history of Judy Wolf's<br>Burger King trading review file sent to and retrieved from off-site<br>storage at Iron Mountain; PRADO-SEC-JWOLFEMAIL-0391527   |          |
| 517                | Commission staff's June 13, 2012 request for documents to Wells<br>Fargo Advisors  |          |
| 518                | Commission staff's July 20, 2012 request for documents to Wells<br>Fargo Advisors  |          |
| 519                | Commission staff's December 21, 2012 request for documents to<br>Wells Fargo Advisors  |          |
| 520                | Judy Wolf's February 28, 2013 memorandum summarizing her<br>Burger King insider trading review ; PRADO-SEC-025227  |          |
| 521                | Transcript of Judy Wolf's sworn testimony taken on March 13, 2013  |          |
| 522                | Audio recording of Judy Wolf's sworn testimony taken on March 13, 2013   |          |
| 523                | Commission staff's March 14, 2013 request for documents to Wells<br>Fargo Advisors re metadata and other items   |          |
| 524                | Keesal, Young & Logan March 25, 2013 letter to Commission staff re altered log re Burger King  |          |
| 525                | Judy Wolf's Excel spreadsheet log "Potential Insider Trading Reviews January 2009 to present"  |          |

į

4

| Hearing | Document Description  | Admitted |
|---------|---|----------|
| Exhibit |   |          |
| No      |   |          |
| 526     | Metadata for Judy Wolf's Excel spreadsheet log "Potential Insider   |          |
|         | Trading Reviews January 2009 to present" 122812"                    |          |
| 527     | Judy Wolf's Excel spreadsheet log "Insider Trading Reviews 010213"  |          |
| 528     | Metadata for Judy Wolf's Excel spreadsheet log "Insider Trading     |          |
|         | Reviews 010213"   |          |
| 529     | Wells Fargo Advisors Form U5 Termination Notice filed with FINRA    |          |
|         | re termination of Judy Wolf   |          |
| 530     | Final Judgment entered against Waldyr da Silva Prado Neto in SEC v. |          |
|         | Prado, SDNY Civil Action No. 12-CIV-7094                            |          |
| 531     | Commission staff's Wells Notice to Judy Wolf's counsel, dated       |          |
|         | January 14, 2014  |          |
| 532     | Transcript of Judy Wolf's sworn testimony taken on April 10, 2014   |          |
| 533     | Order Instituting Proceedings against Wells Fargo Advisors LLC      |          |
|         | Exchange Act Release No. 73175 (Sept. 22, 2014)                     |          |

Respectfully submitted, DIVISION OF ENFORCEMENT By its Attorneys:

141~

Donald W. Searles (323) 965-4573 David S. Brown (323) 965-3321 Securities and Exchange Commission Los Angeles Regional Office 444 South Flower Street, Suite 900 Los Angeles, CA 90071

COUNSEL FOR DIVISION OF ENFORCEMENT

DATED: January 12, 2015

4