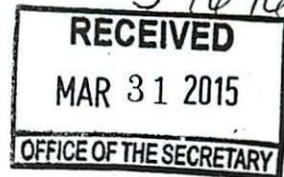


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March 26, 2015

Mr. Brent J. Fields, Secretary
The Office of the Secretary
Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549-1090

*Via Facsimile (202) 772-9324
and Certified Mail RRRR*

Re: *Application for Review; Appeal FINRA Disciplinary Action.*

Dear Mr. Fields:

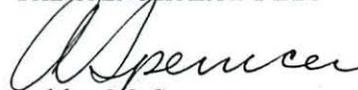
Mr. Keilen Dimone Wiley has retained The Spencer Law Firm to represent him in this Application for Review/Appeal of the FINRA Enforcement Action decision and NAC Decision. Enclosed, please find a Notice of Appearance and an Application for Review.

Pursuant to Rule 420(c), of the Commission Rules of Practice, the Application for Review does not exceed two pages in length. There are many material issues that require additional explanation and additional briefing would significantly aid the decisional process. Please provide Mr. Wiley additional time to supplement this Application for Review.

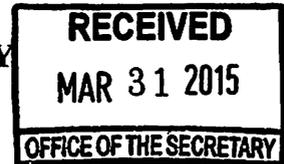
Feel free to contact should you have any questions or concerns. My contact information is listed above. Thank you.

Sincerely,

THE SPENCER LAW FIRM


Ashley M. Spencer

FINANCIAL INDUSTRY REGULATORY AUTHORITY
U.S. SECURITIES AND EXCHANGE COMMISSION



In the Matter of the Application of

**Keilen Dimone Wiley
Houston, TX 77088**

**For Review of Disciplinary Action Taken by
FINRA**

APPLICATION FOR REVIEW OF FINRA DISCIPLINARY DECISION

COMES NOW RESPONDENT, Mr. Keilen Dimone Wiley and hereby submits this Application for Review by United States Securities and Exchange Commission ("SEC"). Mr. Keilen Wiley ("Mr. Wiley") appeals the February 27, 2015 National Adjudicatory Council's Decision ("NAC Decision") which upheld the Hearing Panel majority's decision in a FINRA Disciplinary Action ("FINRA Decision"). This case is styled *In the Matter of Department of Enforcement vs. Keilen Dimone Wiley, FINRA Complaint No. 2011028061001*. Pursuant to Section 19(d)(1) of the Securities Exchange Act of 1934, 15 U.S.C. 78s(d)(1), Mr. Wiley timely files this Application for Review. Mr. Wiley respectfully requests that the SEC reverse and dismiss with prejudice the NAC Decision and the Hearing Panel Majority Decision entirely. Mr. Wiley reserves any and all rights, remedies and relief not expressly mentioned herein.

1. PROCEDURAL HISTORY

FINRA filed a two-cause complaint on February 13, 2013. A one day hearing was held in July 2013 in Dallas, Texas. In a 2-1 Decision, the Hearing Panel Majority ruled against Mr. Wiley for violating FINRA Rules 2010 and 8210 and barred him from the industry. Mr. Wiley appealed the FINRA Decision to the National Adjudicatory Council ("NAC"). The NAC

affirmed the Hearing Panel Majority's FINRA Decision on February 27, 2015. Mr. Wiley submits this Application for Review to the SEC.

2. PARTIES

Mr. Wiley may be served with process by and through his attorney of record, Dawn Meade at 4635 Southwest Freeway, Suite 900, Houston, TX 77027.

3. SUMMARY OF APPEAL

This case concerns Mr. Wiley's inherent insurance business practices which fall outside FINRA's jurisdiction and scope of authority. FINRA does not have the authority to regulate inherent insurance business practices or to determine the private contractual rights of parties. The Hearing Panel Majority abused its discretion by ruling on a case in which it has no jurisdiction or authority make such ruling.

According to the open courts provision of the Texas Constitution and the due process clause of the U.S. Constitution, Mr. Wiley's constitutional rights have been denied. FINRA inappropriately asserted jurisdiction over this case and forced Mr. Wiley to participate in the enforcement action in order to prevent a default decision against him. When Mr. Wiley registered to sell securities, he only consented to FINRA's limited jurisdiction and regulatory authority over his securities related business practices and other matters within FINRA's scope of authority. Mr. Wiley did not consent to FINRA's authority to regulate his inherent insurance business practices. FINRA found against Mr. Wiley without providing Mr. Wiley the opportunity to a fair trial by jury regarding the issues that fell outside FINRA's scope of authority and jurisdiction.

The Hearing Panel Majority made conclusions of fact that are contrary to the evidence or unsupported by evidence. The Hearing Panel Majority's findings are also contrary to the law, FINRA's own rules and the plain language of statutes. The Hearing Panel Majority abused its

authority and discretion by making rulings that are unsupported by or contrary to the evidence and the law. Because the Hearing Panel Majority made conclusions of fact that are unsupported by evidence or are contrary to the evidence and made legal conclusions contrary to the law, regulations and FINRA rules, Mr. Wiley did not have sufficient notice in this case. The Hearing Panel Majority implemented a lifetime bar based on conclusions that are unsupported by or contrary to the evidence and the law. Therefore the sanctions are excessive and oppressive and contrary public interests.

This case concerns a plethora of issues wherein, collectively or individually, warrant reversal and dismissal of the FINRA and NAC Decisions. Therefore, Mr. Wiley respectfully requests that the SEC reverse and dismiss with prejudice both decisions, the FINRA Decision and the NAC Decision.

4. REQUEST FOR SUPPLEMENTAL BRIEF

Pursuant to Rule 420(c), of the Commission Rules of Practice, the Application for Review does not exceed two pages in length, yet, there are many material issues that require additional explanation. Mr. Wiley strongly believes that supplemental briefing is required in order to assist the Commission with its decisional process and requests that the Commission grant Mr. Wiley opportunity to fully brief the material issues of this appeal.

Respectfully Submitted: March 26, 2015

THE SPENCER LAW FIRM



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