1 STATE OF WASHINGTON DEPARTMENT OF FINANCIAL INSTITUTIONS 2 **SECURITIES DIVISION** 3 4 IN THE MATTER OF DETERMINING Order Number S-07-466-07-SC01 whether there has been a violation 5 of the Securities Act of Washington by: STATEMENT OF CHARGES AND NOTICE OF INTENT TO ISSUE AN ORDER TO CEASE AND DESIST, Michael James Gilhooly; 6 RJJ Pasadena Securities, Inc., IMPOSE FINES, AND CHARGE COSTS 7 Respondents. 8 9 THE STATE OF WASHINGTON TO: Michael James Gilhooly RJJ Pasadena Securities, Inc. 10 11 STATEMENT OF CHARGES 12 Please take notice that the Securities Administrator of the State of Washington has reason to 13 believe that Respondents, Michael James Gilhooly and RJJ Pasadena Securities, Inc., have each violated 14 the Securities Act of Washington and that their violations justify the entry of an order of the Securities 15 Administrator under RCW 21.20.390 against each to cease and desist from such violations. The 16 Securities Administrator finds as follows: 17 TENTATIVE FINDINGS OF FACT 18 Respondents 19 1. RJJ Pasadena Securities, Inc. ("RJJ Pasadena Securities") is a broker-dealer and 20 investment adviser with its principal place of business at 625 Fair Oaks Avenue, Suite 125, South 21 Pasadena, California. RJJ Pasadena Securities has never been registered with Washington State as a 22

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broker-dealer or investment adviser. RJJ Pasadena Securities' license number with FINRA is: CRD # 8425.

2. Michael James Gilhooly ("Gilhooly") is an individual residing in Pasadena, California. Gilhooly has been employed by RJJ Pasadena Securities since August 2001 and is currently a Principal/Director. Prior to this, Gilhooly was employed by other broker-dealers including employment as Vice President of Sutro & Co., Incorporated from September 1999 to August 2001, Account Executive of Crowell, Weedon & Co. from June 1995 to September 1999, and as a securities salesperson with Gilford Securities Incorporated from January 1994 to June 1995. Gilhooly was registered as a securities salesperson with the Washington State Securities Division from May 1998 through December 1998. Gilhooly's license number with FINRA is: CRD # 2452559.

Nature of the Conduct

- 3. Investor, currently a customer of RJJ Pasadena Securities, was formerly a resident of Burbank, California. While residing in California, Investor employed Gilhooly as her securities salesperson during his employment with Crowell, Weedon & Co. Investor retained Gilhooly as her securities salesperson when he transferred to Sutro & Co., Incorporated and then to RJJ Pasadena Securities in August 2001.
- 4. In August 2001, Investor opened two IRA accounts at RJJ Pasadena Securities. In November 2001, February 2002 and April 2002, Investor opened a total of four trust accounts with RJJ Pasadena Securities.
- 5. In September 2005, Investor moved to Sequim, Washington. Investor provided notice of this change of residence to RJJ Pasadena Securities, via a letter dated November 9, 2005. RJJ Pasadena Securities received said notice.

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1	13.	RJJ Pasadena Securities, Inc. violated RCW 21.20.040 when it effected transactions for a
Washing	gton (customer while not registered as a broker-dealer in the State of Washington.

14. Michael James Gilhooly violated RCW 21.20.040 when he represented RJJ Pasadena Securities, Inc. in effecting sales of securities for a Washington customer while not registered as a securities salesperson or broker-dealer in the State of Washington.

NOTICE OF INTENT TO ISSUE AN ORDER TO CEASE AND DESIST

Pursuant to RCW 21.20.390(1), and based upon the above Tentative Findings of Fact and Conclusions of Law, the Securities Administrator intends to order that Respondents, Michael James Gilhooly and RJJ Pasadena Securities, Inc., and their agents and employees, shall each cease and desist from violations of RCW 21.20.040.

NOTICE OF INTENT TO IMPOSE FINES

Pursuant to RCW 21.20.395, and based upon the above Tentative Findings of Fact and Conclusions of Law, the Securities Administrator intends to order that the Respondents, Michael James Gilhooly and RJJ Pasadena Securities, Inc. shall each be liable for and pay a fine of \$40,000.

NOTICE OF INTENT TO CHARGE COSTS

Pursuant to RCW 21.20.390(5), and based upon the above Tentative Findings of Fact and Conclusions of Law, the Securities Administrator intends to order that the Respondents, Michael James Gilhooly and RJJ Pasadena Securities, Inc. shall be liable for and pay the Securities Division the costs, fees and other expenses incurred in the conduct of the investigation of this matter in an amount not less than \$1,500.

AUTHORITY AND PROCEDURE

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1	This Statement of Charges is entered pursuant to the provisions of RCW 21.20.390 and RCW		
2	21.20.395, and is subject to the provisions of RCW 34.05. The Respondents may each make a written		
3	request for a hearing as set forth in the NOTICE OF OPPORTUNITY TO DEFEND AND		
4	OPPORTUNITY FOR HEARING accompanying this Statement of Charges.		
5	If a Respondent does not request a hearing, the Securities Administrator intends to adopt the above		
6	Tentative Findings of Fact and Conclusions of Law as final, enter a permanent cease and desist order as to		
7	that Respondent, and impose the fines and costs sought.		
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9	DATED AND ENTERED this 6th day of February, 2008.		
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11	Quidel E, Stevenson		
12	MICHAEL E. STEVENSON Securities Administrator		
13	Approved by:	resented by:	
14	An Edm	Bridgett Fisher	
15		ridgett Fisher	
16		nforcement Attorney	
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