STATE OF WASHINGTON DEPARTMENT OF FINANCIAL INSTITUTIONS **SECURITIES DIVISION**

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IN THE MATTER OF DETERMINING

of the Securities Act of Washington by:

LAGUNA S.A.; JILL JENSEN AMES; KATHERINE SWANBERG: JEFF FINCH.

whether there has been a violation

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Order Number S-09-133-10-CO01

CONSENT ORDER AS TO KATHERINE SWANBERG

Respondents.

INTRODUCTION

On December 23, 2009, the Securities Administrator of the State of Washington issued Statement of Charges and Notice of Intent to Enter an Order to Cease and Desist, Impose Fines, and Recover Costs, S-09-133-09-SC01, hereinafter referred to as "Statement of Charges," against Respondents Laguna S.A; Jill Jensen Ames; Katherine Swanberg; and Jeff Finch. The Securities Division and Respondent Katherine Swanberg do hereby enter into this Consent Order in settlement of the above-captioned matter. The Securities Division made certain allegations and conclusions in the Statement of Charges, set forth under the headings "Tentative Findings of Fact" and "Conclusions of Law." Respondent Katherine Swanberg neither admits nor denies the Findings of Fact and Conclusions of Law, which are hereby incorporated by reference into this Consent Order.

CONSENT ORDER

Based upon the foregoing and finding it in the public interest:

DEPARTMENT OF FINANCIAL INSTITUTIONS Securities Division PO Box 9033 Olympia, WA 98507-9033 360-902-8760

IT IS AGREED AND ORDERED that Respondent Katherine Swanberg and her agents and employees each shall cease and desist from violating RCW 21.20.140, the provision of the Securities Act of Washington making it unlawful to sell unregistered securities.

IT IS FURTHER AGREED AND ORDERED that Respondent Katherine Swanberg and her agents and employees each shall cease and desist from violating RCW 21.20.040, the section of the Securities Act of Washington requiring registration of securities salespersons, broker-dealers, investment advisers, and investment adviser representatives.

IT IS FURTHER AGREED AND ORDERED that Respondent Katherine Swanberg and her agents and employees each shall cease and desist from violating RCW 21.20.010, the anti-fraud section of the Securities Act of Washington.

IT IS FURTHER AGREED AND ORDERED that Respondent Katherine Swanberg shall be liable for and pay a fine of \$5,000 on or before the date of entry of this Consent Order.

IT IS FURTHER AGREED that the Securities Division has jurisdiction to enter this Consent Order.

IT IS FURTHER AGREED that Respondent Katherine Swanberg enters into this Consent Order freely and voluntarily and with full understanding of its terms and significance.

IT IS FURTHER AGREED that in consideration of the foregoing, Respondent Katherine Swanberg waives her right to a hearing in this matter and judicial review of this matter pursuant to RCW 21.20.440 and RCW 34.05.

WILLFUL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE.

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CONSENT ORDER AS TO KATHERINE **SWANBERG**

DEPARTMENT OF FINANCIAL INSTITUTIONS Securities Division PO Box 9033 Olympia, WA 98507-9033 360-902-8760

1	SIGNED this 28th day of February, 2010.
2	Signed by:
3 4 5	_/s/ KATHERINE SWANBERG, individually
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7	SIGNED and ENTERED this 9 th day of March, 2010.
8 9	An Elle
10	SUZANNE E. SARASON Chief of Enforcement
11 12 13	Presented by: Old M Valle State State
14	Enforcement Attorney
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