

1 STATE OF WASHINGTON
2 DEPARTMENT OF FINANCIAL INSTITUTIONS
3 SECURITIES DIVISION

4 IN THE MATTER OF DETERMINING
5 whether there has been a violation
6 of the Securities Act of Washington by:

7 William Spencer Howard III;
8 Raymond Francis Purdon,

9 Respondents.

Order Number S-09-154-12-CO01

CONSENT ORDER AS TO WILLIAM
SPENCER HOWARD III

10 **INTRODUCTION**

11 On March 1, 2011, the Securities Administrator of the State of Washington issued
12 Statement of Charges and Notice of Intent to Enter Order to Cease and Desist, Deny Future
13 Registrations, Impose Fines, and Recover Costs, S-09-154-10-SC01, hereinafter referred to as
14 the "Statement of Charges," against the Respondents William Spencer Howard III and
15 Raymond Francis Purdon. The Securities Division and Respondent William Spencer Howard III
16 do hereby agree to this Consent Order in settlement of the above captioned matter. The
17 Securities Division has, in the Statement of Charges, made certain allegations and conclusions,
18 set forth under the headings "Tentative Findings of Fact" and "Conclusions of Law."
19 Respondent William Spencer Howard III neither admits nor denies the Tentative Findings of
20 Fact and Conclusions of Law, which are hereby incorporated by reference into this Consent
21 Order.

22 **CONSENT ORDER**

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

1 IT IS AGREED AND ORDERED that the Respondent William Spencer Howard III
2 shall cease and desist from violation of RCW 21.20.010, the anti-fraud section of the
3 Securities Act of Washington.

4 IT IS FURTHER AGREED AND ORDERED that the Respondent William Spencer
5 Howard III shall cease and desist from violation of RCW 21.20.702, the suitability section of
6 the Securities Act of Washington.

7 IT IS FURTHER AGREED AND ORDERED, pursuant to RCW 21.20.110(1), that the
8 Respondent William Spencer Howard III shall not apply for registration as a broker-dealer,
9 securities salesperson, investment adviser, and/or investment adviser representative in the
10 state of Washington from the date of entry of this Consent Order by the Securities
11 Administrator.

12 IT IS FURTHER AGREED that the Respondent William Spencer Howard III enters into
13 this Consent Order freely and voluntarily and with full understanding of its terms and
14 significance.

15 IT IS FURTHER AGREED that the Securities Division has jurisdiction to enter this
16 order.

17 IT IS FURTHER AGREED that in consideration of the foregoing, the Respondent
18 William Spencer Howard III waives his right to a hearing in this matter and judicial review of
19 this order.

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21 **WILLFUL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE.**

1 SIGNED this 4th day of January, 2013.

2 Approved for Entry by:

3 /s/

4 Shannon L. McDougald, Attorney for the Respondent
Washington State Bar No. 24231

5 Signed by:

6 /s/

7 William Spencer Howard III, individually

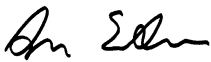
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9 DATED AND ENTERED this 11th day of January, 2013.

10 By:

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14 William M. Beatty
Securities Administrator

15 Approved by:

16 

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18 Suzanne Sarason
Chief of Enforcement

Reviewed by:

19 

20 Robert Kondrat
Financial Legal Examiner Supervisor

21 Presented by:

22 

23 Bridgett Fisher
Enforcement Attorney

24 CONSENT ORDER