

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

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

IN THE MATTER OF DETERMINING  
Whether there has been a violation of the  
Securities Act of Washington by:

Brian H. Brunhaver;  
Stacey L. Brunhaver;  
Brunhaver Financial Services, LLC

) Order No.: S-11-0656-12-FO01  
)  
) ENTRY OF FINDINGS OF FACT AND CONCLUSIONS  
) OF LAW AND FINAL ORDER TO CEASE AND DESIST,  
) TO IMPOSE FINES, AND TO CHARGE COSTS, AND  
) DENYING INVESTMENT ADVISER REGISTRATION  
) AND FUTURE REGISTRATIONS

Respondents.

---

On June 26, 2012, the Securities Administrator of the State of Washington issued Summary Order to Cease and Desist from Violating the Securities Act of Washington and Denying Registration and Statement of Charges and Notice of Intent to Deny Future Registrations, to Impose Fines, and to Charge Costs, order number S-11-0656-12-TO01, hereinafter referred to as the Summary Order. The Summary Order, together with a Notice of Opportunity to Defend and Opportunity for Hearing, hereinafter referred to as "Notice of Opportunity for Hearing" and an Application for Adjudicative Hearing, hereinafter referred to as "Application for Hearing," was served on Respondents Brian H. Brunhaver, Stacey L. Brunhaver, and Brunhaver Financial Services, LLC on June 29, 2012. The Notice of Opportunity for Hearing advised Respondents Brian H. Brunhaver, Stacey L. Brunhaver, and Brunhaver Financial Services, LLC that a written application for an administrative hearing on the Summary Order must be received within twenty days from the date of receipt of the notice. Respondent Brunhaver Financial Services, LLC waived its right to an administrative hearing in this matter, and, in lieu thereof, submitted a written statement for consideration by the Securities Administrator. Respondents Brian H. Brunhaver and Stacey L. Brunhaver each failed to request an administrative hearing within twenty days of receipt of the Summary and Notice of Opportunity for Hearing, either on the Application for Hearing provided, or otherwise.

ENTRY OF FINDINGS OF FACT AND  
CONCLUSIONS OF LAW AND FINAL  
ORDER TO CEASE AND DESIST, TO IMPOSE FINES  
AND TO CHARGE COSTS, AND DENYING INVESTMENT  
ADVISER REGISTRATION AND FUTURE REGISTRATIONS

1

DEPARTMENT OF FINANCIAL INSTITUTIONS  
Securities Division

PO Box 9033  
Olympia WA 98507-9033  
360-902-8760

1 After considering Brunhaver Financial Services, LLC's written statement, the Securities  
2 Administrator finds as follows:

3 **FINDINGS OF FACT**

4 Respondents

5 1. Brunhaver Financial Services, LLC ("BFS") (IARD #158161) is an inactive Washington  
6 limited liability company organized on September 16, 2005. During the period relevant to this order, BFS  
7 maintained a principal place of business in Snohomish, Washington.

8 2. Brian H. Brunhaver ("Brian Brunhaver") (CRD #2498928) is a Washington resident and  
9 president of BFS. Beginning in or around September, 2005, Brian Brunhaver did business as BFS.

10 3. Stacey L. Brunhaver ("Stacey Brunhaver") (CRD #4698819) is a Washington resident and  
11 Brian Brunhaver's wife.

12 Nature of the Conduct

13 *Background*

14 4. Brian Brunhaver was registered as a securities salesperson and investment adviser  
15 representative of LPL Financial Services ("LPL") between 1995 and approximately May, 2011. During  
16 that time, Stacey Brunhaver was Brian Brunhaver's unregistered assistant and, consequently, under Brian  
17 Brunhaver's supervision. While at LPL, Brian Brunhaver received compensation based on assets under  
18 management and commissions from sales of securities, including interests in real estate investment trusts  
19 ("REITs"). Brian Brunhaver sold non-traded REITs to more than two hundred clients during his time at  
20 LPL. Many clients made multiple purchases of these products. Between 2007 and his termination by  
21 LPL, Brian Brunhaver made as much as \$548,795 in commissions from sales of non-traded REITs.  
22  
23  
24

1 5. REITs are companies that own and typically operate income-producing real estate or  
2 related assets. Their structure allows investors to earn a share of the income produced through  
3 commercial real estate without having to purchase commercial real estate. Investments in REITs are not  
4 guaranteed. REITs must distribute ninety percent of their taxable income to investors. This mandatory  
5 distribution feature may be attractive to many investors in REITs. Some REITs trade on a national  
6 securities exchange and are typically referred to as exchange-traded REITS, or publicly traded REITs.  
7 Publicly traded REITs are relatively liquid investments.

8 6. Other REITs are not publicly traded. These non-traded REITs often pay higher  
9 distributions than traded REITs, but they also present special risks. Non-traded REITs are illiquid  
10 investments which have no ready market. Traded REITs provide share value transparency through their  
11 required filings with the Securities Exchange Commission. Non-traded REITs have less share value  
12 transparency. It can be difficult to determine the value of shares of non-traded REITs. Because non-  
13 traded REITs are not traded on an exchange there is no market price available. Moreover, no independent  
14 information about share value is available. Publicly traded REITs typically pay distributions from funds  
15 generated by operations. However, non-traded REITs often pay distributions in excess of their funds  
16 from operations by borrowing or from new investors' funds. This reduces the value of the non-traded  
17 REIT's shares and reduces the cash available to purchase additional assets.

19 7. Non-traded REITs also present potential conflicts of interest. Non-traded REITs typically  
20 have an external manager instead of employees. The non-traded REIT may pay this manager significant  
21 fees based on the amount of property acquisitions and assets under management. These fee incentives  
22 may not necessarily align with investors' interests. Non-traded REITs generally have higher up-front fees  
23 than publicly traded REITs. Sales commissions and up-front offering fees for non-traded REITs usually  
24

total approximately nine to ten percent of the investment, lowering the investment's value by a significant amount. Non-traded REITs may also have ongoing acquisition and management fees and other expenses.

8. In or around May, 2011, LPL terminated Brian Brunhaver, ostensibly for communicating with clients through an unapproved email account. Brian Brunhaver's termination caused LPL to transfer Brian Brunhaver's clients' accounts to another LPL representative.

9. In June, 2011, Brian Brunhaver submitted an application to the Securities Division for investment adviser registration for BFS. As of the date of this order, that application is pending.

10. In or around July, 2011, Pacific West Securities ("Pac West") hired Brian Brunhaver as an independent contractor. Pac West applied for Brian Brunhaver to be registered as an investment adviser representative and securities salesperson. In response to these applications, the Securities Division requested that Pac West submit a plan for heightened supervision of Brian Brunhaver. Pac West did not respond to this request and terminated Brian Brunhaver on or around December 31, 2011. Thus, Brian Brunhaver was never registered as an investment adviser representative or securities salesperson of Pac West in Washington.

*Brian Brunhaver's Representations in Connection with the Offer and Sale of REITs*

11. As part of his effort to sell non-traded REITs, Brian Brunhaver represented to at least fourteen clients that the REITs were safe and/or conservative investments, telling one investor there was no risk involved in purchasing a certain REIT, and another that his investment in a REIT would be "safe and sound." Brian Brunhaver told one client that REITs were similar to bonds in terms of safety, and told another client that REITs were "safer than mutual funds." Furthermore, Brian Brunhaver told a client that there was no way she could lose money investing in REITs.

1 12. Brian Brunhaver represented to at least five clients that their principal investments would  
2 be guaranteed by the REIT. Moreover, Brian Brunhaver told at least two clients that the government  
3 would guarantee their principal investments in REITs.

4 13. Brian Brunhaver guaranteed the liquidity of certain REITs' interests that were, in fact,  
5 illiquid to at least two clients. Brian Brunhaver misrepresented the liquidity of certain REITs' interests to  
6 at least three other clients, telling one client that a REIT's interests would become liquid after ten years  
7 when they are redeemable only upon the investor's death.

8 14. In an effort to sell REITs to a client, Brian Brunhaver told the client that Brian Brunhaver  
9 would waive his commission for the sale of the REIT and deposit the amount of the commission in the  
10 customer's REIT balance. Brian Brunhaver repeated this representation to the same client shortly  
11 thereafter while trying to sell additional REIT interests to the client. The client purchased REIT interests  
12 after each time Brian Brunhaver made this representation. However, on each occasion, Brian Brunhaver  
13 neither waived his commission nor deposited an amount equal to the commission in the client's REIT  
14 balance.  
15

16 *Unsuitability of REITs for Certain Clients*

17 15. LPL would not process the purchase of non-traded REITs if the transaction violated LPL's  
18 policy for acceptable exposure of its clients to non-traded REITs. This policy provided the percentage of  
19 a client's liquid net worth that could be invested in non-traded REITs based upon the client's liquid net  
20 worth and investment objective. This policy changed during Brian Brunhaver's time at LPL. At its most  
21 permissive, this policy dictated that no more than thirty five percent of a client's liquid net worth could  
22 be dedicated to non-traded REITs. However, such a client would have to have a liquid net worth in  
23

1 excess of \$5 million and seek aggressive growth for LPL to approve such a concentration. None of the  
2 clients described below in paragraphs sixteen through nineteen of the Findings of Fact met those criteria.

3 16. Brian Brunhaver recommended and sold REITs to a client which resulted in one hundred  
4 percent of her investable assets being invested in REITs. This client had no prior investment experience,  
5 had only saved money in a savings account, and had instructed Brian Brunhaver that she wanted  
6 conservative investments that would simply pay a higher rate of interest than her savings account. This  
7 client had explained to Brian Brunhaver that she would soon be retiring and would need to access her  
8 funds in the following few years.

9 17. Brian Brunhaver recommended and sold REITs to another client which resulted in  
10 approximately eighty percent of that client's liquid assets being invested in REITs. This client was an  
11 inexperienced investor and had told Brian Brunhaver that she was interested in only very conservative  
12 investments. This client also told Brian Brunhaver that her husband's income was unpredictable and,  
13 therefore, that she would need ready access to her investment funds if her husband's income declined.  
14

15 18. Brian Brunhaver recommended to a couple that they invest at least eighty percent of their  
16 liquid assets in a single non-traded REIT. This couple followed this recommendation. These clients were  
17 also inexperienced investors and had communicated their concern about losing their principal investment  
18 to Brian Brunhaver.

19 19. Furthermore, Brian Brunhaver recommended and sold REITS to another couple such that  
20 forty five and thirty five percent of their individual portfolios were comprised of REITs. The only asset  
21 this couple owned other than their portfolios at LPL was their home. Moreover, both of these investors  
22 were inexperienced and had instructed Brian Brunhaver that they wanted conservative investments. One  
23 of these investors told Brian Brunhaver that she wanted the "safest investments possible."  
24

1 20. Brian Brunhaver submitted forms to LPL as part of the purchases of non-traded REITs by  
2 the clients described above in paragraphs sixteen through nineteen of the Findings of Fact that contained  
3 inaccurate information concerning those clients' net worth, liquid net worth, investment experience, and  
4 investment objectives. Brian Brunhaver instructed at least the clients described above in paragraph  
5 nineteen of the Findings of Fact to sign blank forms which were later submitted to LPL with inaccurate  
6 information. The inaccurate information related to the purchases of clients described above in paragraphs  
7 sixteen through nineteen of the Findings of Fact was intended to make LPL believe that the purchases  
8 were consistent with LPL's policy concerning exposure to non-traded REITs.

9 21. Brian Brunhaver also recommended and sold REITs to at least two other clients who had  
10 instructed Brian Brunhaver that they wanted conservative investments. The forms Brian Brunhaver  
11 submitted to LPL for these clients indicated that neither client had a conservative investment objective.  
12

13 *Unauthorized Alteration of Account Forms*

14 22. Brian Brunhaver's clients completed standard LPL new account forms when they  
15 opened accounts with LPL through Brian Brunhaver. The new account forms asked for information  
16 concerning the client's financial resources and investment experience.

17 23. One client completed this form by indicating that she had a total annual income between  
18 \$50,000 and \$99,999, a net worth between \$50,000 and \$99,999, and a liquid net worth between \$50,000  
19 and \$99,999. Prior to submission to LPL and without the client's knowledge or consent, these answers  
20 were changed to indicate that the client had a total annual income between \$100,000 and \$249,999, a net  
21 worth between \$500,000 and \$749,999, and a liquid net worth between \$250,000 and \$499,999. This  
22 client purchased approximately \$75,000 worth of REIT interests through Brian Brunhaver.  
23

*Interference with the Securities Division's Investigation*

1  
2       24.     As part of its investigation, the Securities Division sent questionnaires to investors who  
3 had purchased REITs upon Brian Brunhaver's recommendation. Stacey Brunhaver contacted several of  
4 the recipients to offer to "help" them complete the questionnaire. Stacey Brunhaver told these clients that  
5 the questionnaires were routine and "no big deal."

6       25.     Brian Brunhaver instructed at least two clients on how to complete the Division's  
7 questionnaire. Brian Brunhaver provided inaccurate information to these two clients about the total  
8 amount they had invested in REITs, telling one client who had invested \$123,000 that she had invested  
9 \$46,000 and telling the other client who had invested \$100,000 that he had invested \$50,000. Brian  
10 Brunhaver told these clients that he had not given them "any written or verbal assurances or guarantees  
11 of the safety" of REITs when, in fact, he had. Brian Brunhaver told these clients that he had not given  
12 them "any written or verbal assurances or guarantees of the performance" of REITs when, in fact, he had.  
13 Brian Brunhaver told these clients that he had not given them "any written or verbal assurances or  
14 guarantees of [their] profit" from REITs, when, in fact, he had. Brian Brunhaver also told these clients  
15 that he had not given them "any other written or verbal assurances or guarantees" about REITs, when, in  
16 fact, he had.

17  
18       26.     These clients had a long-standing, close relationship with Brian Brunhaver that started  
19 before Brian Brunhaver began advising them and they trusted him implicitly. Brian Brunhaver told these  
20 clients that the questionnaires were routine and unimportant. These clients were unaware that a complaint  
21 had been filed against Respondents or that the questionnaires were a part of that investigation. Because of  
22 these factors and a desire to help Brian Brunhaver, these clients returned the questionnaires with the  
23 inaccurate responses to the Securities Division.



1  
2 *Making False or Misleading Statements in a Proceeding under the Securities Act*

3 27. As part of its investigation, the Securities Division sent Brian Brunhaver a letter in  
4 December, 2011 instructing him to stop any possible violations of the Securities Act of Washington and  
5 requesting information. In a response letter dated January 4, 2012, Brian Brunhaver represented to the  
6 Securities Division that he had not had any investment-related communication with Washington clients  
7 since May, 2011. In fact, Brian Brunhaver had sent multiple emails to and had had conversations with  
8 clients concerning their investments after May, 2011, including some communications that took place  
9 within one week of his January 4, 2012 letter.

10 *Provision of Investment Advisory Services*

11 28. Shortly after his termination by LPL in or around May, 2011, Brian Brunhaver sent emails  
12 to his clients to discuss the change. These emails did not state that LPL had terminated Brian Brunhaver.  
13 Instead, the emails characterized Brian Brunhaver's departure from LPL as voluntary, stating, "[a]fter  
14 long review and consideration, we have come to the conclusion that it is in our best interests to look at  
15 other avenues to provide [financial] services..." and "[w]e have decided to look at other strategic  
16 partnerships outside of LPL Financial." Brian Brunhaver sent other emails to his clients discussing his  
17 search for "partnerships." None of these emails disclosed that LPL had terminated Brian Brunhaver.

18 29. At or around this time, Brian Brunhaver began regularly contacting his clients to explain  
19 his registration status, stating that BFS's investment adviser registration would be approved very soon.  
20 Brian Brunhaver also discussed clients' portfolios in these communications.  
21

1           30.     On or around January 4, 2012, Stacey Brunhaver contacted the custodian of one of Brian  
2 Brunhaver's client's accounts at the client's request. Stacey Brunhaver successfully transferred  
3 approximately \$5,374 to the client's checking account.

4           31.     Beginning no later than January, 2012, Brian Brunhaver or Stacey Brunhaver began  
5 contacting clients by phone and attempting to arrange meetings to discuss the clients' portfolios, telling  
6 clients that BFS is "up and running" or "back in business." As of the date of this order, at least fifteen  
7 such phone calls have been made.

8           32.     Brian Brunhaver and Stacey Brunhaver, in response to questions from these clients about  
9 BFS's and Brian Brunhaver's registration status, have told clients that they can each provide investment  
10 advisory services for compensation to up to fifteen Washington clients without the benefit of registration.  
11 The claim by the Brunhavers that they did not need to be registered was not accurate.

12           33.     Beginning in or around March, 2012, Brian Brunhaver's clients began transferring their  
13 accounts from the custody of the representative to whom they had been transferred after Brian  
14 Brunhaver's termination by LPL to the retail side of TD Ameritrade, an online broker-dealer. As of the  
15 date of this order, approximately thirty of Brian Brunhaver's clients have moved their accounts to retail,  
16 mostly with TD Ameritrade. Stacey Brunhaver helped at least two clients make this move and has  
17 electronic access to at least one of those accounts at TD Ameritrade.

18           34.     In April, 2012, two of Brian Brunhaver's clients who had been contacted by Brian  
19 Brunhaver or Stacey Brunhaver made payments totaling \$2,025 from TD Ameritrade accounts to Brian  
20 Brunhaver. One of these clients opened a TD Ameritrade retail account with Stacey Brunhaver's  
21 assistance and provided access to the account to Stacey Brunhaver as well.  
22  
23  
24

## CONCLUSIONS OF LAW

Based upon the above Findings of Fact, the following Conclusions of Law are made:

1. The offer or sale of interests in real estate investment trusts as described above constitute the offer or sale of a security as defined at RCW 21.20.005(14) and (17).

2. Brian H. Brunhaver violated RCW 21.20.010 because, as set forth in paragraphs eleven through fourteen of the Findings of Fact, Brian H. Brunhaver, in connection with the offer or sale of non-traded REITs, made untrue statements of material fact or omitted to state material facts necessary to make the statements made, in light of the circumstances under which they were made, not misleading.

3. Brian H. Brunhaver, by guaranteeing clients against loss, as defined in WAC 460-22B-090(14), and set forth in paragraph twelve of the Findings of Fact, has committed a dishonest or unethical practice which is a ground, pursuant to RCW 21.20.110(1)(g), to deny any investment adviser, investment adviser representative, and securities salesperson registrations Brian H. Brunhaver may file in the future.

4. Brian H. Brunhaver violated RCW 21.20.702 because, as set forth in paragraphs fifteen through nineteen of the Findings of Fact, Brian H. Brunhaver recommended the purchase of non-traded REITs without reasonable grounds to believe that the recommendation was suitable. Such conduct is a ground for denial of any investment adviser, investment adviser representative, and securities salesperson registrations Brian H. Brunhaver may file in the future pursuant to RCW 21.20.110(1)(b).

5. Brian H. Brunhaver, as set forth in paragraphs fifteen through nineteen of the Findings of Fact, engaged in one or more dishonest or unethical practices in the securities business as defined by WAC 460-22B-090(7) by recommending that a customer purchase a security without reasonable grounds

1 to believe such a recommendation or purchase was suitable. Such practice is a ground, pursuant to RCW  
2 21.20.110(1)(g), to deny any securities salesperson registration Brian H. Brunhaver may file in the future.

3 6. Brian H. Brunhaver committed dishonest or unethical business practices, as defined by  
4 WAC 460-22B-090 and in violation of WAC 460-22B-090(3), by providing inaccurate information  
5 concerning his clients to LPL as set forth in paragraph twenty of the Findings of Fact. Such conduct is a  
6 ground, pursuant to RCW 21.20.110(1)(g), to deny any investment adviser, investment adviser  
7 representative, or securities salesperson registrations Brian H. Brunhaver may file in the future..

8 7. Brian H. Brunhaver committed dishonest or unethical business practices, as defined by  
9 WAC 460-22B-090, by altering a client's form without her consent or knowledge, as set forth in  
10 paragraphs twenty two and twenty three of the Findings of Fact. Such conduct is a ground, pursuant to  
11 RCW 21.20.110(1)(g), to deny any investment adviser, investment adviser representative, or securities  
12 salesperson registrations Brian H. Brunhaver may file in the future. Such conduct is also a ground,  
13 pursuant to RCW 21.20.110(1), to impose a fine.

14 8. As set forth in paragraph twenty seven of the Findings of Fact, Brian H. Brunhaver  
15 violated RCW 21.20.350 by making, in a proceeding under the Securities Act of Washington, statements  
16 which were false or misleading.

17 9. Brunhaver Financial Services, LLC, Brian H. Brunhaver, and Stacey L. Brunhaver each  
18 violated RCW 21.20.040(3) by transacting business in the State of Washington as an investment adviser  
19 or as an investment adviser representative, as set forth in paragraphs twenty nine through thirty four of  
20 the Findings of Fact, while not registered or exempt from registration. Such conduct is a ground, pursuant  
21 to RCW 21.20.110(1)(b), to deny Brunhaver Financial Services, LLC's investment adviser registration  
22 and any investment adviser registration it may file in the future. Such conduct is a ground, pursuant to  
23  
24

1 RCW 21.20.110(1)(b), for denial of any investment adviser, investment adviser representative, and  
2 securities salesperson registrations Brian H. Brunhaver may file in the future. Such conduct is a ground,  
3 pursuant to RCW 21.20.110(1)(b), for denial of any investment adviser, investment adviser  
4 representative, and securities salesperson registrations Stacey L. Brunhaver may file in the future.  
5

6 **FINAL ORDER**

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

8 IT IS HEREBY ORDERED that Brian H. Brunhaver and his agents and employees each shall cease  
9 from violating RCW 21.20.010, 21.20.040, and 21.20.350.

10 IT IS FURTHER ORDERED that Stacey L. Brunhaver and her agents and employees each shall  
11 cease and desist from violating RCW 21.20.040.

12 IT IS FURTHER ORDERED that Brunhaver Financial Services, LLC and its agents and employees  
13 each shall cease and desist from violating RCW 21.20.040.

14 IT IS FURTHER ORDERED that Brunhaver Financial Services, LLC's application for investment  
15 adviser registration is denied.

16 IT IS FURTHER ORDERED that any investment adviser registration Brunhaver Financial Services,  
17 LLC may file in the future will be denied.

18 IT IS FURTHER ORDERED that any investment adviser, investment adviser representative, or  
19 securities salesperson registrations Brian H. Brunhaver may file in the future will be denied.

20 IT IS FURTHER ORDERED that any investment adviser, investment adviser representative, and  
21 securities salesperson registrations Stacey L. Brunhaver may file in the future will be denied.  
22  
23  
24

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

IT IS FURTHER ORDERED that Brian H. Brunhaver shall be liable for and shall pay a fine of \$50,000.

IT IS FURTHER ORDERED that Brunhaver Financial Services, LLC, Brian H. Brunhaver, and Stacey L. Brunhaver shall be jointly and severally liable for and shall pay investigative costs of not less than \$10,000.

**AUTHORITY AND PROCEDURE**

This FINAL ORDER is entered pursuant to the provisions of RCW 21.20.110 and 21.20.390, and is subject to the provisions of RCW 21.20.120 and Chapter 34.05 RCW. Respondents have the right to petition the superior court for judicial review of this agency action under the provisions of Chapter 34.05 RCW. For the requirements for Judicial Review, see RCW 34.05.510 and sections following. Pursuant to RCW 21.20.395, a certified copy of this Order may be filed in Superior Court. If so filed, the clerk shall treat the Order in the same manner as a Superior Court judgment as to the fine, and the fine may be recorded, enforced, or satisfied in like manner.

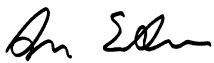
WILLFUL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE.

SIGNED and ENTERED this 25th day of July 2012.



William M. Beatty  
Securities Administrator

Approved by:



Suzanne Sarason  
Chief of Enforcement

Presented by:



Edward R. Thunen  
Enforcement Attorney

ENTRY OF FINDINGS OF FACT AND  
CONCLUSIONS OF LAW AND FINAL  
ORDER TO CEASE AND DESIST, TO IMPOSE FINES  
AND TO CHARGE COSTS, AND DENYING INVESTMENT  
ADVISER REGISTRATION AND FUTURE REGISTRATIONS

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Reviewed by:



---

Jack McClellan  
Financial Legal Examiner Supervisor

ENTRY OF FINDINGS OF FACT AND  
CONCLUSIONS OF LAW AND FINAL  
ORDER TO CEASE AND DESIST, TO IMPOSE FINES  
AND TO CHARGE COSTS, AND DENYING INVESTMENT  
ADVISER REGISTRATION AND FUTURE REGISTRATIONS