



1 IT IS FURTHER AGREED AND ORDERED that Mulligan Partners ERISA, LP and its agents and employees  
2 each shall cease and desist from violating RCW 21.20.010 and 21.20.140.

3 IT IS FURTHER AGREED AND ORDERED that John Mulligan and his agents and employees each shall  
4 cease and desist from violating RCW 21.20.010, 21.20.040, and 21.20.140.

5 IT IS FURTHER AGREED AND ORDERED that Mulligan Capital, Inc., Mulligan Capital Management,  
6 LLC, and Mulligan Partners, ERISA, LP shall pay investigative costs of \$25,000 prior to entry of this Consent Order.

7 IT IS FURTHER AGREED AND ORDERED that the following paragraph shall be included in the Form  
8 ADV Part 2 of Mulligan Capital Management, LLC and Mulligan Capital, Inc. until October 5, 2023: "On January 30,  
9 2012, the Securities Division of the Washington State Department of Financial Institutions entered a Statement of  
10 Charges (order number S-11-0770-11-SCO1) against Mulligan Capital, Inc., Mulligan Capital Management, LLC,  
11 Mulligan Partners ERISA, LP, and John Mulligan. The Statement of Charges alleged that the parties violated  
12 provisions of the Washington Securities Act. On advice of counsel, and without admitting or denying the allegations  
13 made in the Statement of Charges, Mulligan Capital Management, LLC, Mulligan Partners ERISA, LP, and John  
14 Mulligan each settled the matter by Consent Order."

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

16 IT IS FURTHER AGREED that Respondents, Mulligan Capital, Inc., Mulligan Capital Management, LLC,  
17 Mulligan Partners, ERISA, LP, and John Mulligan, enter into this Consent Order freely and voluntarily and with a full  
18 understanding of its terms and significance.

19 IT IS FURTHER AGREED that in consideration of the foregoing, Respondents, Mulligan Capital, Inc.,  
20 Mulligan Capital Management, LLC, Mulligan Partners, ERISA, LP, and John Mulligan, each waive their rights to a  
21 hearing and judicial review of this matter pursuant to RCW 21.20.440 and Chapter 34.05 RCW.

22  
23 **WILLFUL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE.**

1 Signed this 9th day of October 2013.

2  
3 Signed by:  
4 Mulligan Capital, Inc.

5 By: s/ John J. Mulligan

6 Title: President

7 Signed by:  
8 Mulligan Capital Management, LLC

9 By: s/ John J. Mulligan

10 Title: General Partner

11 Signed by:  
12 Mulligan Partners, ERISA, LP

13 By: s/ John J. Mulligan

14 Title: Managing Member

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16  
17 Signed by:  
18 s/ John J. Mulligan  
19 John Mulligan, individually

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SIGNED and ENTERED this 14th day of October 2013.



William M. Beatty  
Securities Administrator

Approved by:

Presented by:



Suzanne Sarason  
Chief of Enforcement

Edward R. Thunen  
Enforcement Attorney

Reviewed by:



Robert Kondrat  
Financial Legal Examiner Supervisor