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**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:

Blair Smith,

Respondent.

Order No.: S-14-1461-14-CO01

CONSENT ORDER

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**INTRODUCTION**

9 Pursuant to the Securities Act of Washington, RCW 21.20.390, the Securities Division of the  
10 Department of Financial Institutions (“Securities Division”) and the Respondent Blair Smith do hereby  
11 enter into this CONSENT ORDER in settlement of the matters alleged herein. Respondent Blair Smith  
12 neither admits nor denies the Findings of Fact and Conclusions of Law stated below.

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**FINDINGS OF FACT**

14

Respondent

15 1. Blair Smith (CRD. No. 2650126) is the sole proprietor of an investment advisory business  
16 which conducts business at Smith’s residence in Bellingham, Washington. Smith is in the business of  
17 providing financial planning and asset management services. Smith’s sole proprietorship (CRD No.  
18 125134) has been registered as an investment adviser in California since November 21, 1995, and as an  
19 investment adviser in Washington since January 14, 2015. According to his Form ADV Part 2 filed on  
20 January 14, 2015, Smith has approximately \$3.8 million dollars in assets under management.

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Prior Enforcement Action

22 2. On November 7, 2011, the Securities Administrator of the State of Washington issued  
23 Statement of Charges and Notice of Intent to Issue an Order to Cease and Desist, Impose Fines, and Charge  
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1 Costs (“Statement of Charges”), S-10-246-11-SC01, against Smith. The Statement of Charges alleged that  
2 for over eleven years, Smith transacted business as an investment adviser in Washington by providing  
3 investment advisory services from its principal place of business in Bellingham, Washington, without  
4 proper registration.

5 3. On November 19, 2012, the Securities Division entered into a Consent Order, S-10-246-12-  
6 CO01, with Smith in order to settle the matter. In the Consent Order, Smith agreed to cease and desist from  
7 violating RCW 21.20.040, the investment adviser registration section of the Securities Act of Washington.

8 Continuation of Unregistered Investment Advisory Services

9 4. After entering into the Consent Order in November 2012, Smith failed to register as an  
10 investment adviser with the Securities Division of the State of Washington. Nonetheless, Smith continued  
11 to provide investment advisory services for compensation from his residence in Bellingham, Washington  
12 through 2014. In June 2014, the Securities Division initiated contact with Smith and he agreed that he had  
13 violated the terms of the Consent Order by failing to register as an investment adviser in the State of  
14 Washington. In January 2015, Blair Smith completed registration as an investment adviser in Washington.

15 Books and Records Violation

16 5. Every investment adviser registered or required to be registered in the State of Washington  
17 must make and keep true, accurate, and current books and records as specified in WAC 460-24A-200(1).  
18 WAC 460-24A-200(1)(j) requires investment advisers to maintain written copies of all agreements between  
19 the investment adviser and its clients.  
20

21 6. Investment advisers must maintain and preserve the records required by WAC 460-24A-  
22 200(1) in an easily accessible place for at least five years from the end of the fiscal year, during which the  
23 last entry was made on the record. Records from the most recent two years must be maintained on the  
24 premises of the principal office of the investment adviser.  
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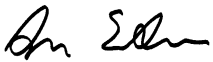
SIGNED and ENTERED this 25th day of June 2015.



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William M. Beatty  
Securities Administrator

Approved by:

Presented by:



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Suzanne Sarason  
Chief of Enforcement



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Bridgett Fisher  
Financial Legal Examiner

Reviewed by:

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Robert Kondrat  
Financial Legal Examiner Supervisor