## STATE OF WASHINGTON DEPARTMENT OF FINANCIAL INSTITUTIONS SECURITIES DIVISION

3	IN THE MATTER OF DETERMINING Whether there has been a violation of the	)	Order No.: S-14-1603-16-CO05
4	Securities Act of Washington by:	)	CONSENT ORDER
		)	AS TO R. SCOTT PEDEN
5	Life Partners, Inc.; Life Partners Holdings,	)	
	Inc.; Brian Pardo; R. Scott Peden; David Barr;	)	
6	James Billington; Kim Butler; Gary Cassill;	)	
	Michael Chapman; Tomas Delos Santos; Neal	)	
7	Inscoe; John Ley; William Meyer; Steven	)	
0	Minnich; Tim Watters; Don Wells; Alliance of	)	
8	Professionals for Business, Inc.; NW	)	
9	Retirement Solutions LLC; NW Safe	)	
2	Retirement LLC; Partners Portfolio Solutions,	)	
10	Inc.; Strategic Insurance Services, LLC	)	
_		)	
11	Respondents.	)	

## **INTRODUCTION**

On March 7, 2016, the Securities Administrator of the Securities Division of the Department of Financial Institutions ("Securities Division") issued a Statement of Charges and Notice of Intent to Enter Order to Cease and Desist, to Impose Fines, and to Charge Costs ("Statement of Charges") Order Number S-14-1603-16-SC01, against Respondents Life Partners, Inc.; Life Partners Holdings, Inc.; Brian Pardo; R. Scott Peden; David Barr; James Billington; Kim Butler; Gary Cassill; Michael Chapman; Tomas Delos Santos; Neal Inscoe; John Ley; William Meyer; Steven Minnich; Tim Watters; Don Wells; Alliance of Professionals for Business, Inc.; NW Retirement Solutions LLC; NW Safe Retirement LLC; Partners Portfolio Solutions, Inc.; and Strategic Insurance Services, LLC.

Pursuant to the Securities Act of Washington, RCW 21.20, the Securities Division and Respondent R. Scott Peden do hereby enter into this Consent Order in settlement of the matters set forth in the Statement of Charges. Respondent R. Scott Peden neither admits nor denies the Findings of Fact and Conclusions of Law as set forth in the Statement of Charges, which are hereby incorporated by reference into this Consent Order.

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1	CONSENT ORDER		
1 2	Based upon the foregoing and finding it in the public interest:		
3	IT IS AGREED AND ORDERED that Respondent R. Scott Peden shall cease and desist from violations of		
4	RCW 21.20.140, the securities registration section of the Securities Act of Washington.		
-	IT IS FURTHER AGREED AND ORDERED that Respondent R. Scott Peden shall cease and desist from		
5	violations of RCW 21.20.010, the anti-fraud section of the Securities Act of Washington.		
6	IT IS FURTHER AGREED AND ORDERED that Respondent R. Scott Peden shall be liable for and shall		
7	pay a fine of \$6,250 prior to the entry of this Consent Order.		
	IT IS FURTHER AGREED AND ORDERED that Respondent R. Scott Peden shall be liable for and shall pay investigative costs of \$3,750 prior to the entry of this Consent Order.		
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9	IT IS FURTHER AGREED that the Securities Division has jurisdiction to enter this Consent Order.		
10	IT IS FURTHER AGREED that Respondent R. Scott Peden enters into this Consent Order freely and		
11	voluntarily and with a full understanding of its terms and significance.		
1 I	IT IS FURTHER AGREED that in consideration of the foregoing, Respondent R. Scott Peden waives his		
12	rights to a hearing and to judicial review of this matter pursuant to RCW 21.20.440 and Chapter 34.05 RCW.		
13	WILLFUL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE.		
14	WILLI OL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE.		
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	CONSENT ORDER AS TO R. SCOTT PEDEN 2 DEPARTMENT OF FINANCIAL INSTITUTIONS Securities Division		

1 Signed this \_\_1st\_\_\_\_\_ day of \_\_\_February\_\_\_\_\_, 2017. 2 3 Signed by: 4 \_\_\_\_\_ /s5 R. Scott Peden 6 7 SIGNED and ENTERED this 8th day of February, 2017. 8 9 Withen Sea 10 11 William M. Beatty Securities Administrator 12 13 Odom Yeston An Elm 14 15 Suzanne Sarason Adam N. Yeaton 16 Chief of Enforcement Financial Legal Examiner 17 Reviewed by: 18 19 Jack McClellan 20 Financial Legal Examiner Supervisor 21 22 23 24 25 CONSENT ORDER AS TO R. SCOTT PEDEN DEPARTMENT OF FINANCIAL INSTITUTIONS 3 Securities Division PO Box 9033

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