

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

IN THE MATTER OF DETERMINING ) Order No.: S-14-1603-16-CO05  
Whether there has been a violation of the )  
Securities Act of Washington by: ) CONSENT ORDER  
) AS TO R. SCOTT PEDEN  
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 )  
Inscoc; 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.; Strategic Insurance Services, LLC )  
)  
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 Inscoc; 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.

**CONSENT ORDER**

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

IT IS AGREED AND ORDERED that Respondent R. Scott Peden shall cease and desist from violations of 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 violations of RCW 21.20.010, the anti-fraud section of the Securities Act of Washington.

IT IS FURTHER AGREED AND ORDERED that Respondent R. Scott Peden shall be liable for and shall 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.

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

IT IS FURTHER AGREED that Respondent R. Scott Peden enters into this Consent Order freely and voluntarily and with a full understanding of its terms and significance.

IT IS FURTHER AGREED that in consideration of the foregoing, Respondent R. Scott Peden waives his rights to a hearing and to judicial review of this matter pursuant to RCW 21.20.440 and Chapter 34.05 RCW.

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

