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

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IN THE MATTER OF DETERMINING) Order No.: S-15-1684-15-TO01
Whether there has been a violation of the)
Securities Act of Washington by:) SUMMARY ORDER TO SUSPEND REGISTRATION AND
) NOTICE OF INTENT TO REVOKE REGISTRATION,
JUDITH FRENCH TRONSRUE, CRD #115909;) IMPOSE A FINE, AND CHARGE COSTS
)
Respondent.)

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THE STATE OF WASHINGTON TO: JUDITH FRENCH TRONSRUE, CRD# 115909

STATEMENT OF CHARGES

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Please take notice that the Securities Administrator of the state of Washington has reason to believe that Respondent, JUDITH FRENCH TRONSRUE, has violated the Securities Act of Washington. The Securities Administrator believes those violations justify the entry of an order summarily suspending her registration and giving notice of the intent to revoke Respondent's registration, to impose a fine, and to charge costs pursuant to RCW 21.20.110. The Securities Administrator finds that a delay in suspending Respondent's registration would be hazardous to the investors and to the public and that this Summary Order should be entered immediately. The Securities Administrator finds as follows:

TENTATIVE FINDINGS OF FACT

Respondents

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1. Judith French Tronsrue, has been registered as a sole proprietor investment adviser with the Washington State Securities Division since 1995. The last known address of the investment adviser is 1420 Fifth Avenue, Suite 2200, Seattle, WA 98101. The investment adviser's Central Registration Depository ("CRD") number is 115909. The Securities Division file number is 30005037.

Nature of the Conduct

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2. Each investment adviser registered with the Securities Division must make annual filings with the director after the investment adviser's fiscal year-end.

3. An investment adviser must, under WAC 460-24A-060, file with the Securities Division a

SUMMARY ORDER TO SUSPEND REGISTRATION,
NOTICE OF INTENT TO REVOKE REGISTRATION,
TO IMPOSE A FINE, AND TO CHARGE COSTS

1 fiscal year-end balance sheet within 120 days following the end of the fiscal year-end. The Securities
2 Division reviews these balance sheets to determine whether the investment adviser meets the minimum
3 financial requirements as set forth in WAC 460-24A-170.

4 4. An investment adviser must, under WAC 460-24A-205, file an updated Form ADV with
5 IARD within ninety days of its fiscal year-end. This annual amendment must include any changes to Form
6 ADV Parts 1 and 2. The Securities Division reviews the annual updates to Form ADV to determine whether
7 the investment adviser is making necessary disclosure to investors and where the adviser's books and
8 records are stored.

9 5. In addition, an investment adviser must, under WAC 460-24A-205, promptly file an updating
10 amendment to Form ADV Parts 1 and 2 as changes to the advisory business occur. Such changes include
11 changes to contact information and the location of books and records.

12 6. An investment adviser must, under WAC 460-24A-200, keep true, accurate, and current
13 books and records. When an adviser ceases operation she has a continuing obligation to preserve the books
14 and records and to notify the Securities Division of the exact address where the books and records will be
15 maintained.

16 7. Respondent has a fiscal year-end of December 31. Respondent's 2014 year-end balance
17 sheet was due by April 30, 2015 and the annual update to Form ADV was due by March 31, 2015.

18 8. Between April 16, 2015 and May 4, 2015, the Securities Division attempted to contact
19 Respondent and discovered that Respondent's contact information on the Form ADV is incorrect. When
20 Form ADV has incorrect contact information, clients are unable to contact the investment adviser. The
21 Securities Division obtained updated contact information and sent Respondent eight reminders by electronic
22 mail, two reminders by regular mail, and called her one time to remind her to file the annual update for
23 Form ADV and a balance sheet.

1 9. On May 5, 2015, Respondent telephoned the Securities Division and stated that she moved to
2 California, she did not intend to update her Form ADV or balance sheet, and stated she would file a Form
3 ADV-W to withdraw her registration. Respondent is not currently registered in California.

4 10. As of her last Form ADV, Respondent had 28 clients. The Form ADV stated that
5 Respondent's books and records regarding those clients were located in Seattle but Respondent intended to
6 move the records to a new office location; however, letters sent by the Securities Division to this address
7 were undeliverable. The Securities Division cannot verify Respondent is properly safeguarding confidential
8 client information or conducted its business lawfully when it does not know where the books and records
9 are located.

10 11. As of the date of this Summary Order, Respondent has not submitted a Form ADV-W, an
11 annual update to Form ADV, or a 2014 fiscal year-end balance sheet.

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

13 **CONCLUSIONS OF LAW**

14 1. As set forth in the Tentative Findings of Facts, Respondent has willfully violated WAC 460-
15 24A-060 by failing to file a 2014 fiscal year-end balance sheet. Such conduct is grounds for an order to
16 suspend or revoke an investment adviser registration under RCW 21.20.110(1)(b).

17 2. As set forth in the Tentative Findings of Facts, Respondent has willfully violated WAC 460-
18 24A-205 by failing to file an annual updating amendment to Form ADV and by failing to promptly update
19 her contact information on Form ADV. Such conduct is grounds for an order to suspend or revoke an
20 investment adviser registration under RCW 21.20.110(1)(b).

21 3. As set forth in the Tentative Findings of Facts, Respondent has willfully violated WAC 460-
22 24A-200 by failing to notify the Securities Division of the location of the books and records. Such conduct
23 is grounds for an order to suspend or revoke an investment adviser registration under RCW 21.20.110(1)(b).

24 4. The willful violations of WAC 460-24A-060, WAC 460-24A-200, and WAC 460-24A-205
25 and each constitute a ground for the entry of an order imposing a fine under RCW 21.20.110(1).

1 NOW, THEREFORE, IT IS HEREBY SUMMARILY ORDERED under the authority of RCW
2 21.20.110(1) and (3) that Respondent's registration is suspended pending a final determination in this
3 proceeding.

4 **AUTHORITY AND PROCEDURE**

5 This Order is entered pursuant to the provisions of chapter 21.20 RCW and is subject to the
6 provisions of Chapter 34.05 RCW. The Respondent may make a written request for a hearing as set forth in
7 the NOTICE OF OPPORTUNITY TO DEFEND AND OPPORTUNITY FOR HEARING accompanying
8 this Order. If a Respondent does not request a hearing in the allowed time, the Securities Administrator
9 intends to adopt the above Tentative Findings of Fact and Conclusions of Law as final and enter an order
10 revoking the Respondent's registration and imposing the fine and charging the costs sought.

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12 WILLFUL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE.

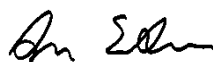
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14 DATED AND ENTERED THIS 15th day of May, 2015.

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18 _____
William M. Beatty
Securities Administrator

19 Approved by:

Presented by:

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Suzanne Sarason
Chief of Enforcement

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Kristen Standifer
Compliance Legal Examiner