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

IN THE MATTER OF DETERMINING  
registration under the Securities Act of  
Washington of:

Order Number S-16-2092-17-CO01

CONSENT ORDER

MOORE WEALTH MANAGEMENT L.L.C.  
(CRD No. 143378);

Respondent.

9 THE STATE OF WASHINGTON TO: Moore Wealth Management, L.L.C., CRD No. 143378

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**INTRODUCTION**

12 Pursuant to the Securities Act of Washington, Chapter 21.20 RCW, the Securities Administrator of  
13 the Department of Financial Institutions, Securities Division (“Securities Division”) and the Respondent,  
14 Moore Wealth Management, L.L.C., do hereby enter into this Consent Order in settlement of the matters  
15 alleged herein. The Securities Division believes that entry of a Consent Order is in the public interest and  
is appropriate for the protection of investors.

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**FINDINGS OF FACT**

*Respondent*

18 1. Moore Wealth Management, L.L.C. is a Washington state registered investment adviser  
19 located in Renton, Washington. Karl Moore is a registered investment adviser representative and the  
20 principal of the firm. Moore’s Central Registration Depository (CRD) number is 274907. The firm’s CRD  
21 number is 143378.

22  
23 CONSENT ORDER

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**DEPARTMENT OF FINANCIAL INSTITUTIONS  
Securities Division  
PO Box 9033  
Olympia, WA 98507-9033  
360-902-8760**

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1 *Nature of the Conduct*

2 2. As of its most recent Form ADV filing, Moore Wealth Management provides investment  
3 advisory services to approximately 293 accounts with \$40,620,000 of assets under management.

4 3. Moore Wealth Management has 2 employees that perform advisory functions and one non-  
5 advisory employee.

6 4. In 2014, the Securities Division was notified that an unregistered individual was soliciting  
7 investment advisory business for Moore Wealth Management.

8 5. The Securities Division alerted Moore Wealth Management to the issue. Moore Wealth  
9 Management responded that the firm did not have a supervisory policy or procedure in place regarding the  
10 licensing of investment adviser representatives and an unregistered executive assistant, Kimberly Evans,  
11 thought that the individual could solicit for investment advisory clients even though the individual's  
12 registration was not yet approved. Moore Wealth Management also represented to the Securities Division  
13 that the unregistered investment adviser representative would stop soliciting until registered and drafted  
14 supervisory procedures for the registration of investment adviser representatives. In addition, Moore  
15 Wealth Management represented in writing that, since she was assisting with some of the functions of a  
16 chief compliance officer, Kimberly Evans would obtain registration as an investment adviser  
17 representative by April 30, 2016, and that any person who performed any functions of a chief compliance  
18 officer would be registered as an investment adviser representative. The Securities Division and Moore  
19 Wealth Management agreed that an examination of Moore Wealth Management would occur in  
20 approximately six months. The Securities Division relied on these representations when closing its inquiry  
21 into the matter.



1 Such conduct justifies the entry of an order to cease and desist, the imposition of a fine, and charging costs  
2 under RCW 21.20.110(1)(b).

3 2. Moore Wealth Management employed Kimberly Evans as an unregistered investment  
4 adviser representative in violation of RCW 21.20.040(5)(a). Such conduct justifies the entry of an order to  
5 cease and desist under RCW 31.20.390 and to impose a fine and charge costs under RCW 21.20.110(1)(b).

6 **CONSENT ORDER**

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

8 IT IS AGREED AND ORDERED that Respondent will cease and desist from violating RCW  
9 21.20.040, the registration provision of the Securities Act.

10 IT IS AGREED AND ORDERED that Respondent will not allow unregistered persons to perform  
11 any of the duties of a chief compliance officer or an investment adviser representative.

12 IT IS AGREED AND ORDERED that Respondent will comply with WAC 460-24A-120 by  
13 implementing written policies and procedures covering the supervision of investment adviser  
14 representatives including the review and approval of client account forms, letters, financial plans, and  
15 reports; trading activity; and employees subject to a heightened supervision plan reasonably designed to  
16 prevent violations of the Securities Act, the investment advisory rules, and the federal securities laws.

17 IT IS FURTHER AGREED AND ORDERED that Respondent shall be liable for and shall pay a  
18 fine of \$5,000.

19 IT IS FURTHER AGREED AND ORDERED that Respondent shall be liable for and shall pay  
20 costs of \$1,500.

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



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Suzanne Sarason  
Chief of Enforcement

Kristen Standifer  
Financial Legal Examiner