

1
2 **STATE OF WASHINGTON**
3 **DEPARTMENT OF FINANCIAL INSTITUTIONS**
4 **SECURITIES DIVISION**

5 IN THE MATTER OF DETERMINING
6 whether there has been a violation
7 of the Securities Act of Washington by:

8 Hillstone Capital, LLC;
9 Hillstone Real Estate Fund I, LLLP;
10 Hillstone Pinnacle Fund I, LLLP;
11 HS REO 101, LLC;
12 HS REO 102, LLC;
13 HS REO 104, LLC;
14 HS REO 105, LLC;
15 HS REO 109, LLC;
16 HS REO 112, LLC;
17 HS REO 701, LLC;
18 FlypShield, LLC;
19 Blake E. Robbins;
20 Christina M. Robbins;
21 Clifford B. Sullivan,

22 Respondents.

Order Number S-18-2479-21-CO02

23 CONSENT ORDER AS TO:
24 Christina M. Robbins

25 **INTRODUCTION**

On August 17, 2021, 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-18-2479-21-SC01, against Respondent Christina M. Robbins (“Robbins”) and others. Pursuant to the Securities Act of Washington, RCW 21.20, the Securities Division and Respondent Robbins does hereby enter into this CONSENT ORDER in settlement of the matters set forth in the Statement of Charges which are hereby incorporated by reference into this Consent Order. Respondent Robbins neither admits nor denies the Findings of Fact and Conclusions of Law as set forth in the Statement of Charges.

1 **CONSENT ORDER**

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

3 IT IS AGREED AND ORDERED that Respondent Christina M. Robbins and her agents and employees
4 each shall cease and desist from violating RCW 21.20.040, the section of the Securities Act of Washington requiring
5 registration of securities salespersons and broker-dealers.

6 IT IS FURTHER AGREED AND ORDERED that Respondent Christina M. Robbins and her agents and
7 employees each shall cease and desist from violating RCW 21.20.010, the anti-fraud section of the Securities Act of
8 Washington.

9 IT IS FURTHER AGREED that Respondent Christina M. Robbins shall pay investigative costs of \$2,000
10 prior to the entry of this Consent Order.

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

12 IT IS FURTHER AGREED that Respondent Christina M. Robbins enters into this Consent Order freely
13 and voluntarily and with a full understanding of its terms and significance.

14 IT IS FURTHER AGREED that in consideration of the foregoing, Respondent Christina M. Robbins
15 waives her right to a hearing and to judicial review of this matter pursuant to RCW 21.20.440 and Chapter 34.05
16 RCW.

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

18 Dated this 3rd day of February, 2022 by

19 /s/
Christina M. Robbins, individually

Signed and Entered this 17th day of March, 2022.



William M. Beatty
Securities Administrator

Approved by:



Brian Guerard
Chief of Enforcement

Presented by:



Martin Cordell
Financial Legal Examiner

Reviewed by:



Adam Yeaton
Acting FLE Supervisor