1 2	STATE OF WASHINGTON DEPARTMENT OF FINANCIAL INSTITUTIONS SECURITIES DIVISION	
3	IN THE MATTER OF DETERMINING	Order Number: S-21-3157-21-CO01
4	whether there has been a violation of the Securities Act of Washington by:	CONSENT ORDER
5	SOMMERS FINANCIAL MANAGEMENT,	
6	LLC (CRD 153223) and ADAM SOMMERS (CRD 2969821),	
7	Respondents.	
8		]
9	(CR	MMERS FINANCIAL MANAGEMENT, LLC D 153223)
10	AD.	AM SOMMERS (CRD 2969821)
11	INTRODUCTION	
12	Pursuant to the Securities Act of Washington, Chapter 21.20 RCW, the Securities Administrator	
13	of the Department of Financial Institutions, Securities Division ("Securities Division") and the	
14	Respondents, Sommers Financial Management, LLC, and Adam Sommers, do hereby enter into this	
15	Consent Order in settlement of the matters alleged herein. The Securities Division believes that entry of an	
16	agreed Consent Order is in the public interest and is appropriate for the protection of investors. The	
17	Securities Division and Respondents jointly set forth the following Findings of Fact and Conclusions of	
18	Law.	
19	FINDINGS OF FACT	
20	Respondents	
21	1. Respondent Sommers Financial Management, LLC ("Sommers Financial") is an Oregon	
22	limited liability company with a principal place of business in Scappoose, Oregon. It has been registered a	
23	CONSENT ORDER 1	DEPARTMENT OF FINANCIAL INSTITUTIONS Securities Division
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an investment adviser in Oregon since November 2010 and is also registered in Arizona and California. It 1 has never been licensed to conduct business as an investment adviser in Washington state; however, it 2 filed a licensing application on February 15, 2021. The application is in pending status. Sommers 3 Financial's Central Registration Depository (CRD) number is 153223. 4 2. Respondent Adam Sommers is the managing member and chief compliance officer of 5 Sommers Financial. Mr. Sommers has been licensed as an Oregon investment adviser representative since 6 June 2010 and is also licensed in Arizona and California; however, he has never been licensed to conduct 7 investment advisory business as an investment adviser or investment adviser representative in Washington 8 9 state. He filed an investment adviser representative application on February 22, 2021. The application is in pending status. His CRD number is 2969821. 10 Nature of the Conduct 11 3. From December 5, 2012, to the present, Sommers Financial has at all times had more than 12 five clients who are Washington residents. Presently, Sommers Financial has nineteen Washington clients. 13 4. Between December 5, 2012 and the present, Sommers Financial and Mr. Sommers 14 provided investment advice for compensation to eighteen Washington clients without being licensed in 15 Washington and without qualifying for an exemption from licensing. During this time, Sommers Financial 16 17 and Mr. Sommers received compensation for providing investment advisory services to its Washington clients. 18 Based upon the above Findings of Fact, the following Conclusions of Law are made: 19 20 **CONCLUSIONS OF LAW** 1. Sommers Financial transacted investment advisory business in Washington for compensation 21 without being registered as an investment adviser in violation of RCW 21.20.040(3). Such a violation is a 22 23 CONSENT ORDER 2 DEPARTMENT OF FINANCIAL INSTITUTIONS Securities Division PO Box 9033 24 Olympia, WA 98507-9033 360-902-8760 25

1	basis to optom on order to impose a fine purposent to DCW 21.20.205(1) and to access and desired answer to	
1	basis to enter an order to impose a fine pursuant to RCW 21.20.395(1) and to cease and desist pursuant to	
2	RCW 21.20.390(1).	
3	2. Mr. Sommers transacted investment advisory business in Washington for compensation	
4	without being registered as an investment adviser or an investment adviser representative in violation of	
5	RCW 21.20.040(3). Such a violation is a basis to enter an order to impose a fine pursuant to RCW	
6	21.20.395(1) and to cease and desist pursuant to RCW 21.20.390(1).	
7	Based on the foregoing and finding it in the public interest:	
8	CONSENT ORDER	
9	IT IS AGREED AND ORDERED that Respondents will cease and desist from violations of RCW	
10	21.20.040(3).	
11	IT IS FURTHER AGREED AND ORDERED that Respondents shall be liable for and pay a fine of	
12	\$30,000 prior to the entry of this Consent Order.	
13	IT IS FURTHER AGREED that this Consent Order alone will not constitute a bar to the approval	
14	of Respondent Sommers Financial's application to be licensed as an investment adviser in the state of	
15	Washington.	
16	IT IS FURTHER AGREED that this Consent Order alone will not constitute a bar to the approval	
17	of the investment adviser representative application of Respondent Adam Sommers.	
18	IT IS FURTHER AGREED that the Securities Division has jurisdiction to enter this Consent	
19	Order.	
20	IT IS FURTHER AGREED that Respondents enter into this Consent Order freely and voluntarily	
21	with full understanding of its terms and significance.	
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25	360-902-8760	

1	IT IS FURTHER AGREED that in consideration of the foregoing, Respondents waive their right to
2	a hearing and to judicial review of this matter pursuant to RCW 21.20.440 and Chapter 34.05 RCW.
3	AUTHORITY AND PROCEDURE
4	This Consent Order is entered pursuant to the provisions of Chapter 21.20 RCW and is subject to
5	the provisions of RCW 21.20.120 and Chapter 34.05 RCW. Respondents have been notified of their right
6	to an administrative hearing and have waived that right.
7	WILLFUL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE.
8	SIGNED this <u>13th</u> day of <u>July</u> , 2021.
9	Signed by:
10	<u>/s/</u> Adam Sommers (CRD 2969821)
11 12	Individually and as Managing Member and Chief Compliance Officer of Sommers Financial Management, LLC (CRD 153223)
13	
14	DATED and ENTERED this <u>22nd</u> day of <u>July</u> , 2021.
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16	Million Means
17	WILLIAM M. BEATTY Securities Administrator
18 19	Approved by: Presented by:
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21	An crem Bunka tollauman
22	Suzanne SarasonBrook KellermanChief of EnforcementCompliance Legal Examiner
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