



STATE OF MISSOURI
OFFICE OF SECRETARY OF STATE

IN THE MATTER OF:)
)
HUNTLEIGH SECURITIES CORPORATION,)
CRD No. 7456)
)
Respondent.) Case No. AP-10-33
)

ORDER WAIVING PENALTIES

Now on the 7th day of February, 2014, the Commissioner of Securities, having reviewed this matter, issues the following findings and order:

1. On December 13, 2010, the Commissioner of Securities approved a Consent Order entered into by the Enforcement Section of the Securities Division of the Office of Secretary of State (the "Enforcement Section") and Respondent.
2. Per the terms of this Consent Order, Respondent was ordered to pay \$300,000 as a civil penalty, which was divided as follows:
 - a. \$200,000 was suspended and would only become payable if Respondent failed to comply with the Consent Order or the Securities Act; and
 - b. \$100,000 was to be paid in quarterly payments equal to the amount Respondent's net capital exceeded \$400,000 until the full \$100,000 was paid.
3. If the full \$100,000 was not paid within three years, the Consent Order allowed Respondent to petition the Commissioner to reduce, or fully waive, any remaining amounts.
4. On January 9, 2014, Respondent filed a Request to Waive Penalties. In support of its Request, Respondent alleged that it lacked the money to pay the penalty, noted that it has incurred meaningful costs to comply with other provisions of the December 2010 Consent Order, and that it has sought to strictly comply with the Consent Order.

5. As examples of its attempts to strictly comply with the Consent Order, Respondent noted that it hired an outside consultant, implemented recommendations of the outside consultant related to supervisory and documentation procedures, underwent and paid for biannual audits by the Securities Division that did not result in new enforcement actions, and implemented new procedures for private securities transactions and heightened supervision of outside business activities.
6. The Enforcement Section has filed no pleading disagreeing with any assertion in Respondent's Request or otherwise opposing it.
7. Accordingly, the \$100,000 civil penalty in the December 13, 2010 Consent Order is hereby **WAIVED** in full.

SO ORDERED:

WITNESS MY HAND AND OFFICIAL SEAL OF MY OFFICE AT JEFFERSON CITY, MISSOURI THIS SEVENTH DAY OF FEBRUARY 2014.

JASON KANDER
SECRETARY OF STATE



Andrew M. Hartnett

ANDREW M. HARTNETT
COMMISSIONER OF SECURITIES

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of February 2014, a copy of the foregoing Order Waiving Penalties in the above styled case was **mailed by Certified U.S. mail to:**

Jonathon F. Dalton
600 Washington Avenue
Suite 2500
St. Louis, Missouri 63101
COUNSEL FOR RESPONDENT
HUNTLEIGH SECURITIES CORPORATION

and by hand delivery to:

Mary S. Hosmer
Assistant Commissioner
Missouri Securities Division



John Hale, Securities Office Manager