

State of Missouri
Office of Secretary of State

Case No. AP-07-20

IN THE MATTER OF:

STRAND, ATKINSON, WILLIAMS & YORK, INC.
200 SW Market Street, Suite 1900
Portland, OR 97201,

Respondent.

CONSENT ORDER

1. The Missouri Securities Division (the "Securities Division") alleges that Strand, Atkinson, Williams & York, Inc. ("Strand") transacted business in the State of Missouri as a broker-dealer in violation of Section 409.4-401(a), RSMo. Supp. 2006.
2. The Securities Division alleges that Stand employed or associated with agents who transacted business in this state on behalf of Stand in violation of Section 409.402(d).
3. Strand, Atkinson, Williams & York desires to settle the allegations and the matters raised by the Securities Division relating to Strand's alleged unregistered activities.
4. Strand and the Securities Division consent to the issuance of this Consent Order.
5. Strand, without admitting nor denying it violated Missouri law, stipulates and agrees to the issuance of this Consent Order without further proceedings in this matter, agreeing to be fully bound by the terms and conditions specified herein.
6. Strand waives its right to a hearing with respect to this matter.
7. Strand stipulates and agrees that it waives any rights that it may have to seek judicial review or otherwise challenge or contest the terms and conditions of this Order. Further, Strand specifically forever releases and holds harmless the Missouri Office of Secretary of State, Secretary of State, Commissioner of Securities and their respective representatives and agents from any and all liability and claims arising out of, pertaining to or relating to this matter.
8. Strand stipulates and agrees that, should the facts contained herein prove to be false or incomplete, the Missouri Securities Division preserves the right to pursue any and all legal or administrative remedies at its disposal.

STIPULATIONS OF FACT

9. Strand is a broker-dealer with an address of 200 SW Market Street, Suite 1900, Portland, OR 97201.
10. Strand has never been registered as a broker-dealer in the State of Missouri.
11. Strand transacted business in the State of Missouri as broker-dealer from September 2003 through December 2005 without being registered as a broker-dealer in the State of Missouri.
12. From September 2003 through December 2005, Strand employed or associated with unregistered broker-dealer representatives who transacted business on behalf of the firm.
13. During the time period September 2003 to December 2005, Strand had five clients that were Missouri residents and transacted business with the firm.
14. While unregistered, Strand charged \$3,939.88 for the transactions effected with Missouri clients.

JURISDICTIONAL BASIS

15. Section 409.6-601(a), RSMo Supp. 2006, provides that the Securities Act of 2003 shall be administered by the commissioner of securities (the "Commissioner").
16. Section 409.6-604(a), RSMo Supp. 2006, provides that if the Commissioner determines that a person is engaging in an act, practice or course of business constituting a violation of the Securities Act, the Commissioner may issue an order directing the person to take action necessary or appropriate to comply with the Securities Act.
17. Section 409.6-604(h), RSMo Supp. 2006 provides that the Commissioner is authorized to issue administrative consent orders in the settlement of any proceeding in the public interest under this act.

CONCLUSIONS OF LAW

17. Strand violated Section 409.4.401(a), RSMo Supp. 2006 when it transacted business in this state as a broker-dealer without being registered, or exempt from registration under the Securities Act.

Strand violated Section 409.4-402(d) when it employed or associated with agents who transacted business in the State of Missouri on behalf of Strand without being registered or exempt from registration under the Securities Act,

ORDER

WHEREAS, the Commissioner, after consideration of the above and on the consent of Strand and the Securities Division, finds the following Order to be in the public interest, necessary for the protection of public investors and consistent with the provisions of Chapter 409, RSMo Supp. 2006.

NOW, THEREFORE, it is hereby Ordered that:

1. Strand, Atkinson, Williams & York is prohibited from transacting business as a broker-dealer in the State of Missouri in violation of Section 409.4-401(a), RSMo. Supp. 2006.
2. Strand, Atkinson, Williams & York is prohibited from employing or associating with agents who transact business in the State of Missouri on its behalf in violation of Section 409.4-401(a), RSMo. Supp. 2006.
3. Strand, Atkinson, Williams & York will pay five thousand dollars (\$5,000) to the Missouri Secretary of State's Investor Education and Protection Fund. Strand will deliver a check to the Securities Division in the amount of \$5,000 made payable to the Missouri Secretary of State to be deposited into the Missouri Secretary of State's Investor Education and Protection Fund.
4. Strand, Atkinson, Williams & York shall pay its own costs and attorneys fees with respect to this matter.

SO ORDERED:

WITNESS MY HAND AND OFFICIAL SEAL OF MY OFFICE AT JEFFERSON CITY, MISSOURI THIS 10TH DAY OF MAY, 2007.

ROBIN CARNAHAN
SECRETARY OF STATE

(Signed/Sealed)
MATTHEW D. KITZI
COMMISSIONER OF SECURITIES

Consented to by:

Nathan J. Soendker
Chief Registration Counsel
MO Bar #56715
Attorney for Securities Division

Strand, Atkinson, Williams & York