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

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IN THE MATTER OF DETERMINING
Whether there has been a violation
of the Securities Act of Washington by:

Order Number S-02-343-05-CO01

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FAMILY FIRST ADVANCED ESTATE
PLANNING and FAMILY FIRST INSURANCE
SERVICES

CONSENT ORDER

Respondents

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INTRODUCTION

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On October 29, 2004, the Securities Division of the State of Washington Department of Financial Institutions (“Securities Division”) issued a Statement of Charges, Order No. S-02-343-03-SC01, against Family First Advanced Estate Planning and Family First Insurance Services, Respondents, and others. Pursuant to the Securities Act of Washington, ch. 21.20 RCW, the Securities Division and Respondents do hereby enter into this Consent Order in settlement of the matters alleged herein.

In the Statement of Charges, the Securities Division made certain allegations and conclusions, set forth under the headings “Tentative Findings of Fact” and “Conclusions of Law.” Respondents, Family First Advanced Estate Planning and Family First Insurance Services, neither admit nor deny those Tentative Findings of Fact and Conclusions of Law, which are incorporated by reference into this Consent Order.

CONSENT ORDER

Based upon the foregoing, and in consideration of resolving this matter:

CONSENT ORDER

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

1 IT IS AGREED AND ORDERED that Respondents, Family First Advanced Estate Planning and
2 Family First Insurance Services, shall each cease and desist from any violation of RCW 21.20.010, the
3 anti-fraud section of the Securities Act of Washington.

4 IT IS FURTHER AGREED AND ORDERED that Respondents, Family First Advanced Estate
5 Planning and Family First Insurance Services, and their successors and affiliates, shall not offer or sell a
6 living trust in violation of RCW 21.20.010, the anti-fraud section of the Securities Act of Washington.
7 This prohibition shall apply if such successor or affiliate had knowledge of the offer or sale of the living
8 trust in violation of RCW 21.20.010 or if such successor or affiliate in the exercise of reasonable care
9 could have known of the offer or sale of the living trust in violation of RCW 21.20.010.

10 “Affiliate” shall mean any person who, directly or indirectly, controls, or is controlled by, or is
11 under common control with the Respondents, Family First Advanced Estate Planning or Family First
12 Insurance Services. “Control” shall mean the ownership of fifty (50) percent or more of the voting
13 power of an entity.

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15 IT IS FURTHER AGREED that Respondents, Family First Advanced Estate Planning and Family
16 First Insurance Services, have each discontinued doing business in the State of Washington and shall not
17 offer, sell or purchase securities for at least three years from the date of entry of this Consent Order.

18 IT IS FURTHER AGREED that Respondents, Family First Advanced Estate Planning and Family
19 First Insurance Services, and their successors and affiliates, shall not, for at least three years from the
20 date of entry of this Consent Order, enter into an insurance agency contract with, or any contract that
21 would involve the offer, purchase or sale of securities by, John Owen, Nick Michaels, Thomas Harman
22 or Robert Mikhail; nor shall John Owen, Nick Michaels, Thomas Harman or Robert Mikhail be
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Signed:

FAMILY FIRST ADVANCED ESTATE PLANNING

By: /s/ Dale Brueggeman
President, Family First Advanced Estate Planning

Signed:

FAMILY FIRST INSURANCE SERVICES

By: /s/ Dale Brueggeman
President, Family First Insurance Services

SIGNED and ENTERED this 21st day of April , 2006

Michael E. Stevenson

MICHAEL E. STEVENSON
Securities Administrator

Approved by:

Martin Cordell

Martin Cordell
Chief of Enforcement

Presented by:

Janet So

Janet So
Financial Legal Examiner

CONSENT ORDER

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Securities Division
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Olympia, WA 98507-9033
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