

STATE OF ALASKA
DEPARTMENT OF COMMERCE, COMMUNITY, AND ECONOMIC DEVELOPMENT
DIVISION OF BANKING AND SECURITIES

IN THE MATTER OF:)
J. RANDALL GLADDEN) **ORDER NO. 17-204-S**
Respondent.) **CONSENT ORDER**

The Director of the Department of Commerce, Community, and Economic Development, Division of Banking and Securities (“Administrator”), has conducted an investigation into business activities of J. Randall Gladden (“Respondent”) and has determined that Respondent violated certain provisions of the Alaska Securities Act, Alaska Statute (“AS”) 45.55 *et seq.* Respondent agrees that the Administrator has jurisdiction over him and this matter pursuant to the Alaska Securities Act. Respondent wishes to resolve and settle this matter with the Administrator. As evidenced by the authorized signature on this Order, Respondent consents to the entry of this Consent Order based on the Conclusions of Law and Order. Respondent waives his right of appeal under AS 45.55.920(d).

I. BACKGROUND

On August 4, 2017, the Administrator issued a Temporary Cease and Desist Order Effective Immediately, Assessing Civil Penalties, with Notice of Hearing Rights and Notice of Final Cease and Desist Order against Respondent (“Temporary Cease and Desist Order”). On August 8, 2017, Respondent received a copy of the Temporary Cease and Desist Order via certified mail. On August 17, 2017, Respondent requested a hearing.

II. FINDINGS OF FACT

1. Respondent is a former broker-dealer agent. His Central Registration Depository (CRD) number is 1789356. He is a resident of California.

2. Lord & Gladden, Inc. (L&G) (CRD #115679) applied to be a state registered investment adviser in Alaska in 2003. L&G withdrew its application on June 7, 2004 following an agreement with the Administrator.

3. Lord & Gladden Wealth Advisors, LLC (LGWA) (CRD #285493) applied to be a state registered investment adviser in Alaska in 2016. LGWA withdrew its application on

1 May 24, 2017, and is not currently registered in Alaska.

2 4. On March 24, 2017, Respondent gave a presentation at the New Jerusalem Church
3 of God in Christ (“New Jerusalem Church”) in North Pole, Alaska. As part of his
4 presentation, Respondent distributed literature to the audience on L&G letterhead. The
5 literature contained the address and phone number for L&G, which happened to be the same
6 address and phone number for LGWA.

7 5. On March 25, 2017 Respondent gave another presentation at the New Jerusalem
8 Church. Respondent again distributed literature on L&G letterhead to the audience
9 containing the address and phone number for L&G, which again happened to be the same as
10 for LGWA.

11 6. Respondent operates two websites at www.lordgladden.com and
12 www.adventuresinliving.guru (collectively, the “websites”). Respondent operates a blog on
13 these websites which include articles on financial and life topics. At the time of the March
14 2017 presentations, a tab entitled “Bizadventures” on the websites led to a page about L&G,
15 which mentioned LGWA, and its founding by Respondent. Also at that time, a tab entitled
16 “Trusted” on the websites led to a page for Carie Phelps, current president of LGWA,
17 describing Phelps’ experience with LGWA and with phone, fax, email, and mailing contact
18 information for LGWA. On every page of both websites at that time, a section for “Contact
19 Info” was listed; the only contact information provided on the websites was the direct phone
20 and fax number for LGWA. All references to LGWA and its contact information have since
21 been deleted from Respondent’s website.

22 7. On July 20, 2017, the Administrator called the phone numbers on the literature
23 distributed at the New Jerusalem Church. When called, a receptionist answered: “Lord &
24 Gladden, Securities Equity Group.”

III. CONCLUSIONS OF LAW

1. Through distribution of L&G and LGWA materials in person in Alaska, Respondent acted as an “agent” as that term is defined in AS 45.55.990(5).

2. Respondent violated AS 45.55.030(a) by operating as an agent in Alaska without being registered.

IV. AGREEMENT

Pursuant to AS 45.55.920, and on the basis of the Findings of Fact and Conclusions of Law, the parties have agreed as follows:

1 1. Respondent agrees not to act as an investment adviser representative, agent, or a
2 supervised person, or to otherwise solicit on behalf of a broker-dealer or investment adviser,
under the Alaska Securities Act.

3 2. Respondent will not apply for registration as an investment adviser representative,
4 agent, or supervised person under the Alaska Securities Act.

5 3. Respondent will not use the business name Lord & Gladden in the context of any
6 business regulated by the Alaska Securities Act.

This Order is a publicly disclosable document.

7 **IT IS SO ORDERED.**

8 Chris Hladick, Commissioner
9 Department of Commerce, Community and
Economic Development

10 DATED: October 10, 2017

/s/ Kevin Anselm

11 BY: Kevin Anselm, Director
12 Division of Banking and Securities

13 **CONSENT TO ENTRY OF ORDER**

14 I, J. Randall Gladden, state that I have read the foregoing Consent Order and that I
15 know and fully understand the Consent Order contents; that I admit the jurisdiction of the
16 Administrator; that I admit violation of the Alaska Securities Act; that I have been advised of
17 the right to a hearing and expressly waive any right to a hearing in this matter; that I have been
18 represented by counsel in this matter; that I voluntarily and without any force or duress consent
19 to the entry of this Consent Order; that I understand that the Administrator reserves the right to
20 take further actions to enforce this Consent Order or to take appropriate action upon discovery
of other violations of the Alaska Securities Act; and that I will fully comply with the terms and
conditions stated herein.

21 I understand that this Consent Order is a publicly disclosable document.

22 DATED: 10/10/17

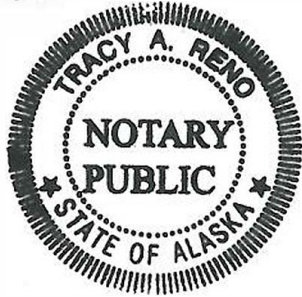
/s/ J. Randall Gladden

23 J. Randall Gladden

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SUBSCRIBED AND SWORN TO before me this 10th day of October, 2017, at Anchorage, Alaska.



/s/ Tracy A. Reno

Notary Public in and for Alaska

Tracy A. Reno

Notary Printed Name

My commission expires 1-14-2018

Approved as to form and content:

10/10/17
Date

/s/ Julius Brecht

Julius Brecht or Renee Sheyko
Attorney for J. Randall Gladden