IN THE MATTER OF:  

J. RANDALL GLADDEN  

Respondent.  

ORDER NO. 17-204-S  

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 settle 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


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

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

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

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

7. On July 20, 2017, the Administrator called the phone numbers on the literature distributed at the New Jerusalem Church. When called, a receptionist answered: "Lord & 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. Respondent agrees not to act as an investment adviser representative, agent, or a supervised person, or to otherwise solicit on behalf of a broker-dealer or investment adviser, under the Alaska Securities Act.

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

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

This Order is a publicly disclosable document.

**IT IS SO ORDERED.**

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

DATED: October 10, 2017  
/s/ Kevin Anselm

BY: Kevin Anselm, Director  
Division of Banking and Securities

**CONSENT TO ENTRY OF ORDER**

I, J. Randall Gladden, state that I have read the foregoing Consent Order and that I know and fully understand the Consent Order contents; that I admit the jurisdiction of the Administrator; that I admit violation of the Alaska Securities Act; that I have been advised of the right to a hearing and expressly waive any right to a hearing in this matter; that I have been represented by counsel in this matter; that I voluntarily and without any force or duress consent to the entry of this Consent Order; that I understand that the Administrator reserves the right to 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.

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

DATED: 10/10/17  
/s/ J. Randall Gladden

J. Randall Gladden

Consent Order
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