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**STATE OF OREGON
DEPARTMENT OF CONSUMER AND BUSINESS SERVICES
DIVISION OF FINANCE AND CORPORATE SECURITIES**

In the Matter of:

Case No. S-14-0057

Todd M. Thorne, individually, and d/b/a
Thorne Trading & Investment Management,

Respondent.

**ORDER TO CEASE AND DESIST,
ORDER ASSESSING CIVIL PENALTY,
AND CONSENT TO ENTRY OF ORDER**

WHEREAS the Director of the Department of Consumer and Business Services (“the Director”) has conducted an investigation of certain business activities conducted by Todd M. Thorne d/b/a Thorne Trading & Investment Management (“Respondent”), and the Director has determined that provisions of the Oregon Securities Law, Oregon Revised Statutes Chapter 59, were violated; and

WHEREAS the Respondent wishes to resolve and settle this matter with the Director;

NOW THEREFORE, as evidenced by the authorized signature subscribed on this Order, the Respondent hereby CONSENTS to entry of this Order to Cease and Desist, Order Assessing Civil Penalty, and Consent to Entry of Order upon the Director’s Findings of Fact and Conclusions of Law as stated hereinafter.

FINDINGS OF FACT

The Director FINDS that:

1. During 2012 and early 2013, Thorne Trading & Investment Management (“Thorne Trading”) was an Oregon limited liability company with a principal place of

Division of Finance and Corporate Securities
Labor and Industries Building
350 Winter Street NE, Suite 410
Salem, OR 97301-3881
Telephone: (503) 378-4387





1 business at 146 South Main Street, Suite 211, Pendleton, Oregon 97801.

2 2. Todd M. Thorne (“Mr. Thorne”) was the owner, manager, and principal of
3 Thorne Trading.

4 3. Thorne Trading was registered as an Oregon limited liability company with
5 the Oregon Secretary of State, Corporation Division, from January 11, 2012 to March 15,
6 2013. Thorne Trading did not renew its registration with the Oregon Secretary of State,
7 Corporation Division, in 2013. Thorne Trading was administratively dissolved on March
8 15, 2013.

9 4. Thorne Trading was a state investment adviser licensed with the Oregon
10 Division of Finance and Corporate Securities (“DFCS”) from August 27, 2013 to
11 December 31, 2013. The Investment Adviser Registration Depository number for Thorne
12 Trading is #133309. The state investment adviser license number for Thorne Trading is
13 #IA-2367. Thorne Trading’s state investment license ended December 31, 2013, due to
14 failure to renew.

15 5. Mr. Thorne was licensed with DFCS as an investment adviser representative
16 to work for Thorne Trading from August 27, 2013, to December 31, 2013. Mr. Thorne’s
17 investment adviser representative license ended December 31, 2013, due to failure to
18 renew.

19 6. During 2014, Mr. Thorne has continued doing business in Oregon as Thorne
20 Trading & Investment Management, even though Thorne Trading is no longer registered
21 with the Oregon Secretary of State, Corporation Division, Thorne Trading is no longer
22 licensed with DFCS as a state investment adviser, and Mr. Thorne is no longer licensed
23 with DFCS as an investment adviser representative.

24 7. During 2014, the Respondent, has, for compensation, engaged in the business
25 of managing an investment or trading account in securities for other persons, and has
26 engaged in the business of advising others as to the value of securities or as to

1 advisability of investing in, purchasing or selling securities.

2 8. During 2014, while doing business as Thorne Trading & Investment
3 Management, Mr. Thorne has made recommendations or otherwise rendered advice
4 regarding securities and has managed accounts or portfolios of clients.

5 9. DFCS has no record of consumer complaints concerning the Respondent.
6 DFCS has no record of prior enforcement history concerning the Respondent.

7
8 **CONCLUSIONS OF LAW**

9 The Director CONCLUDES that:

10 10. During 2014, the Respondent has transacted business in Oregon as a state
11 investment adviser, as defined by ORS 59.015(20)(a).

12 11. During 2014, Mr. Thorne has transacted business in Oregon as an investment
13 adviser representative, as defined by ORS 59.015(8)(a).

14 12. During 2014, Mr. Thorne has been an officer, director, managing member or
15 control person of a state investment adviser required to be licensed with DFCS.

16 13. During 2014, the Respondent has transacted business in Oregon without being
17 licensed with DFCS as a state investment adviser, in violation of ORS 59.165(6).

18 14. During 2014, Mr. Thorne has transacted business in Oregon as an investment
19 adviser representative without being licensed with DFCS as an investment adviser
20 representative, in violation of ORS 59.165(4)(c).

21 15. During 2014, the Respondent has employed an unlicensed investment adviser
22 representative, Mr. Thorne, in violation of ORS 59.165(4)(a).

23
24 **ORDER**

25 Now, therefore, the Director issues the following ORDER:

26 16. Pursuant to the authority of ORS 59.245, the Director hereby ORDERS the





1 Respondent to CEASE AND DESIST from violating any of the provisions of ORS
2 Chapter 59 or Oregon Administrative Rules Chapter 441.

3 17. Pursuant to the authority of ORS 59.995, the DIRECTOR hereby ASSESSES
4 a CIVIL PENALTY in the amount of \$5,000 (five thousand dollars) against the
5 Respondent, for the violations of ORS 59.165 described above.

6 18. Respondent must pay \$2,500 the civil penalty at signing, prior to the entry of
7 this Order, and must pay the remaining balance of \$2,500 no later than December 22,
8 2014.

9 19. This Order is a "Final Order" under ORS 183.310(6)(b). Subject to that
10 provision, the entry of this Order does not limit other remedies that are available to the
11 Director under Oregon law.

12 IT IS SO ORDERED.

13 Dated this 19th day of November, 2014, at Salem, Oregon.

14 PATRICK M. ALLEN, Director
15 Department of Consumer and Business Services

16
17 /s/ David Tatman
18 David C. Tatman, Administrator
19 Division of Finance and Corporate Securities

20 CONSENT TO ENTRY OF ORDER BY TODD M. THORNE, INDIVIDUALLY,
21 AND D/B/A THORNE TRADING & INVESTMENT MANAGEMENT

22 I, Todd M. Thorne, individually, and d/b/a Thorne Trading & Investment

23 Management, state that I am a resident of the State of Oregon, that I have read the
24 foregoing Order and that I know and fully understand the contents hereof; that I have
25 been advised of the right to a hearing and the right to be represented by counsel in this
26 matter; that I voluntarily consent to the entry of this Order, without any force or duress,

1 expressly waiving any right to a hearing in this matter; that I understand that the Director
2 reserves the right to take further actions to enforce this Order or to take appropriate action
3 upon discovery of other violations of the Oregon Securities Law; and that I will fully
4 comply with the terms and conditions stated herein.

5 I understand that this Order is a public document.

6
7 By: /s/ Todd M. Thorne
8 Todd M. Thorne

9 State of: Oregon

10 County of: Umatilla

11 Signed or attested before me on November 12 2014, by Todd M. Thorne.

12
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14
15 /s/ Tina M. Richardson
16 Signature of Notary Public

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