

1  
2 STATE OF OREGON  
3 DEPARTMENT OF CONSUMER AND BUSINESS SERVICES  
4 DIVISION OF FINANCIAL REGULATION

5 In the Matter of:

Case No. S-23-0041

6 SOVEREIGN LEGACY  
7 SECURITIES, INC. (CRD #1783),

Respondent.

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

8 The Director of the Department of Consumer and Business Services for the State  
9 of Oregon (“the Director”), acting in accordance with the Oregon Securities Law, Oregon  
10 Revised Statutes (“ORS”) 59.005 to 59.451, 59.991 and 59.995, and Oregon  
11 Administrative Rules (“OAR”) chapter 441, has investigated the securities business  
12 activities of Sovereign Legacy Securities, Inc. (“Respondent”).

13 Respondent wishes to resolve this matter with the Director.

14 Now therefore, as evidenced by the signatures subscribed herein, Respondent  
15 hereby CONSENTS to the entry of this Order.

16 FINDINGS OF FACT

17 The Director FINDS that:

- 18 1. Respondent is a broker-dealer with a principal place of business in North  
19 Carolina. The Central Registration Depository (“CRD”) number for Respondent is #1783.
- 20 2. “FP” is a securities salesperson for Respondent.
- 21 3. From April 2, 2021 until April 2, 2022 (“the relevant time period”),  
22 Respondent transacted business in Oregon as a broker-dealer by effecting transactions in  
23 securities for the account of an investor (“CA”) residing in Grants Pass, Oregon.
- 24 4. During the relevant time period, FP represented a broker-dealer, Respondent,  
25 in effecting transactions in securities for the account of CA.
- 26 5. During the relevant time period, Respondent was not licensed in Oregon as a

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



1 broker-dealer. Respondent became licensed in Oregon as a broker-dealer on July 5, 2022.

2 6. During the relevant time period, FP was not licensed in Oregon as a securities  
3 salesperson to work for Respondent. FP became licensed in Oregon as a salesperson to  
4 work for Respondent on July 5, 2022.

5 7. Respondent applied to the Oregon Division of Financial Regulation (“the  
6 Division”) for a license as a broker-dealer on or about June 17, 2021.

7 8. FP applied to the Division for a license as a securities salesperson in Oregon on  
8 June 17, 2021.

9 9. On July 5, 2022, the Division approved Respondent for a broker-dealer  
10 license in Oregon and approved FP for a salesperson license to work for Respondent in  
11 Oregon.

12 10. A search of the Division’s records shows no history of prior enforcement  
13 action taken by the Division against Respondent or FP, and no investor complaint was  
14 filed with the Division in this case.

#### 15 CONCLUSIONS OF LAW

16 The Director CONCLUDES that:

17 11. During the relevant time period, Respondent transacted business in Oregon as  
18 a “broker-dealer” as defined by ORS 59.015(1), by effecting transactions in securities for  
19 the account of an Oregon resident.

20 12. During the relevant time period, FP acted as an “salesperson” of Respondent  
21 in Oregon, as defined by ORS 59.015(18)(a).

22 13. During the relevant time period, Respondent transacted business in Oregon as  
23 a broker-dealer without a license under the Oregon Securities Law, in violation of ORS  
24 59.165(1).

25 14. During the relevant time period, Respondent employed an unlicensed  
26 salesperson, FP, to act in Oregon, in violation of ORS 59.165(3).



1 ORDERS

2 The Director issues the following ORDERS:

3 15. In accordance with ORS 59.245(4), Respondent, and any and all agents,  
4 authorized representatives, and entities owned or controlled by Respondent, their  
5 successors and assigns, are hereby ORDERED to CEASE AND DESIST from employing  
6 an unlicensed salesperson to act in Oregon, in violation of ORS 59.165(3), and  
7 transacting business in Oregon as a broker-dealer without the required license, in  
8 violation of ORS 59.165(1), unless exempt from the licensing requirements.

9 16. In accordance with ORS 59.995, the Director may assess CIVIL PENALTIES  
10 in an amount not to exceed \$20,000 per violation against any person who violates or who  
11 procures, aids or abets in a violation of the Oregon Securities Law. The maximum civil  
12 penalty for any continuing violation shall not exceed \$100,000.

13 17. In accordance with ORS 59.995(1), the Director hereby ORDERS Respondent  
14 to pay a CIVIL PENALTY of \$5,000 for violations of ORS 59.165(1) and (3).

15 18. Respondent must pay the \$5,000 civil penalty at the time of signing and  
16 returning this Order to the Division.

17 19. This Order is a "Final Order" under ORS 183.310(6)(b). Subject to that  
18 provision, the entry of this Order does not limit other remedies that are available to the  
19 Director under Oregon law to enforce this Order or to take action for violations of this  
20 Order or of the Oregon Securities Law.

21 SO ORDERED this 1<sup>st</sup> day of February, 2024.

22 Andrew R. Stolfi, Director  
23 Department of Consumer and Business Services

24 /s/ Dorothy Bean  
25 Dorothy Bean, Chief of Enforcement  
26 Division of Financial Regulation

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



1 CONSENT TO ENTRY OF ORDER BY SOVEREIGN LEGACY SECURITIES, INC.

2

3 Sovereign Legacy Securities, Inc. (“Respondent”) states that one or more of its  
4 employees and/or officers with appropriate authority has read this Consent Order, fully  
5 understands its contents, and the factual allegations stated herein are true and correct.  
6 Respondent consents to the entry of this Consent Order, and will take any necessary steps  
7 to ensure that Respondent and any and all agents, authorized representatives, and entities  
8 owned or controlled by Respondent, their successors and assigns, fully comply with the  
9 terms of the Order.

7 Respondent further states that it has been advised of its right to be represented by  
8 counsel in this matter, has been advised of its right to a hearing, and voluntarily and  
9 without any force or duress expressly waives any right to a hearing in this matter.  
10 Respondent understands that the Director reserves the right to take further actions against  
11 Respondent to enforce this Order or to take appropriate action upon discovery of other  
12 violations of the Oregon Securities Law by Respondent.

10 Respondent understands that this Consent Order is a public document.

11 Jacqueline M. Westbrook is president of Respondent and is authorized to execute  
12 this Consent to Entry of Order on behalf of Respondent

13 Sovereign Legacy Securities, Inc.

14  
15 By: /s/ Jacqueline M. Westbrook

16  
17 Jacqueline M. Westbrook  
18 President

17 State of North Carolina

18 County of Moore

19  
20 Subscribed and affirmed before me by Jacqueline M. Westbrook this 17<sup>th</sup> day of  
21 January , 2024.

22  
23  
24  
25 /s/Heather Bevan-Sweed  
26 Notary Public

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

