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

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

MICHAEL PALOMA; PINE CANYON
ENTERPRISES, INC.; KEITH ROBERTSON,

Respondents.

Order Number S-05-008-07-CO01

CONSENT ORDER AS TO KEITH
ROBERTSON

INTRODUCTION

On June 29, 2007, the Securities Administrator of the State of Washington issued Statement of Charges and Notice of Intent to Enter Order to Cease and Desist and Notice of Intent to Impose Fines and Recover Costs, Order Number S-05-008-07-SC01, hereinafter referred to as "Statement of Charges," against Respondents Michael Paloma, Pine Canyon Enterprises, Inc., and Keith Robertson. The Securities Division and Respondent Keith Robertson do hereby enter into this Consent Order in settlement of the above-captioned matter. The Securities Division made certain allegations and conclusions in the Statement of Charges, set forth under the headings "Tentative Findings of Fact" and "Conclusions of Law." Respondent Keith Robertson neither admits nor denies the Findings of Fact and Conclusions of Law, which are hereby incorporated by reference into this Consent Order.

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1 **CONSENT ORDER**

2 Based upon the foregoing and finding it in the public interest:

3 IT IS AGREED AND ORDERED that Respondent Keith Robertson and his agents and employees
4 each shall cease and desist from violating RCW 21.20.040, the section of the Securities Act of
5 Washington requiring registration of securities salespersons, broker-dealers, investment advisers, and
6 investment adviser representatives.

7 IT IS FURTHER AGREED AND ORDERED that Respondent Keith Robertson and his agents and
8 employees each shall cease and desist from violating RCW 21.20.010, the anti-fraud section of the
9 Securities Act of Washington.

10 IT IS FURTHER AGREED AND ORDERED that Respondent Keith Robertson and his agents and
11 employees each shall cease and desist from violating RCW 21.20.020, the investment adviser anti-fraud
12 section of the Securities Act of Washington.

13 IT IS FURTHER AGREED AND ORDERED, pursuant to RCW 21.20.110(1), that Respondent
14 Keith Robertson shall not make application for nor be granted a broker-dealer, securities salesperson,
15 investment adviser and/or investment adviser representative license for a period of two (2) years from the
16 date of entry of this Consent Order.

17 IT IS FURTHER AGREED AND ORDERED that Respondent Keith Robertson shall be liable for
18 and pay a fine of \$5,000. The Respondent shall pay \$2,500 on or before the date of entry of this consent
19 order. The Respondent shall then make then payments of \$300 per month for eight consecutive months
20 with a final payment in the ninth month of \$100. Each payment shall be due by the 15th day of the
21 month. The first payment shall be due on January 15, 2008.

22 IT IS FURTHER AGREED that the Securities Division has jurisdiction to enter this Order.

1 IT IS FURTHER AGREED that Respondent Keith Robertson enters into this Consent Order freely
2 and voluntarily and with full understanding of its terms and significance.

3 IT IS FURTHER AGREED that in consideration of the foregoing Respondent Keith Robertson
4 waives his right to a hearing in this matter and judicial review of this matter pursuant to RCW 21.20.440
5 and RCW 34.05.

6 **WILLFUL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE.**

7 SIGNED this 26th day of December, 2007.

8 Signed by:

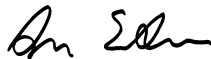
9
10 /s/ _____
11 KEITH ROBERTSON, individually

12 -----
13 SIGNED and ENTERED this 10th day of January, 2008.

14 

15 _____
16 MICHAEL E. STEVENSON
17 Securities Administrator

17 Approved by:

18 

19 _____
20 SUZANNE SARASON
21 Chief of Compliance and Examinations

17 Presented by:

18 

19 _____
20 JILL M. VALLELY
21 Enforcement Attorney