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:

Strategic I, LLC;
Strategic IV, LLC;
SAAM Realty, LLC;
Edward R. Zumwalt,

Respondents.

CONSENT ORDER

INTRODUCTION

On March 14, 2013, the Securities Administrator of the State of Washington issued

Statement of Charges and Notice of Intent to Issue an Order to Cease and Desist, Impose Fines,
and Recover Costs, S-09-020-12-SC01, hereinafter referred to as the “Statement of Charges,”

against the Respondents Strategic I, LLC; Strategic IV, LLC; SAAM Realty, LLC; and Edward
R. Zumwalt. The Securities Division and the Respondents do hereby agree to this Consent
Order in settlement of the above captioned matter. The Securities Division has, in the

Statement of Charges, made certain allegations and conclusions, set forth under the headings

“Tentative Findings of Fact” and “Conclusions of Law.” The Respondents Strategic I, LLC;
Strategic IV, LLC; SAAM Realty, LLC; and Edward R. Zumwalt neither admit nor deny the
Tentative Findings of Fact and Conclusions of Law, which are hereby incorporated by
reference into this Consent Order.

CONSENT ORDER

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

CONSENT ORDER
IT IS AGREED AND ORDERED that the Respondents Strategic I, LLC; Strategic IV, LLC; SAAM Realty, LLC; and Edward R. Zumwalt shall cease and desist from violation of RCW 21.20.010, the anti-fraud section of the Securities Act of Washington.

IT IS FURTHER AGREED AND ORDERED that the Respondents Strategic I, LLC; Strategic IV, LLC; SAAM Realty, LLC; and Edward R. Zumwalt shall cease and desist from violation of RCW 21.20.140, the securities registration section of the Securities Act of Washington.

IT IS FURTHER AGREED AND ORDERED that the Respondent Edward R. Zumwalt shall cease and desist from violation of RCW 21.20.040, the securities salesperson and broker-dealer registration section of the Securities Act of Washington.

IT IS FURTHER AGREED that the Respondents Strategic I, LLC; Strategic IV, LLC; SAAM Realty, LLC; and Edward R. Zumwalt shall be liable for and shall pay the investigative costs incurred in the investigation of this matter in the amount of $2,500. The Respondents shall pay $100 before the entry of this Consent Order, and shall make payments of $100 per month for twenty-four (24) consecutive months. Each payment shall be due by the last day of the month. The first payment shall be due by July 31, 2013.

IT IS FURTHER AGREED that if the Respondents Strategic I, LLC; Strategic IV, LLC; SAAM Realty, LLC; and Edward R. Zumwalt fail to make any monthly payment, the $2,500 in costs imposed in this Consent Order shall become immediately due and payable, and the Securities Division may seek enforcement of the Consent Order pursuant to RCW 21.20.395.
IT IS FURTHER AGREED that the Respondents Strategic I, LLC; Strategic IV, LLC; SAAM Realty, LLC; and Edward R. Zumwalt enter into this Consent Order freely and voluntarily and with full understanding of its terms and significance.

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

IT IS FURTHER AGREED that in consideration of the foregoing, the Respondents Strategic I, LLC; Strategic IV, LLC; SAAM Realty, LLC; and Edward R. Zumwalt waive their right to a hearing in this matter and judicial review of this order.

WILLFUL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE.

SIGNED this _2nd_ day of _July___, 2013_.

Signed by:
Strategic I, LLC
______________________________ /s/ ____________________________
Edward R. Zumwalt, CEO of Strategic Asset Acquisition & Management LLC, the Manager of Strategic I, LLC

Signed by:
Strategic IV, LLC
______________________________ /s/ ____________________________
Edward R. Zumwalt, CEO of Strategic Asset Acquisition & Management LLC, the Manager of Strategic IV, LLC

Signed by:
SAAM Realty, LLC
______________________________ /s/ ____________________________
Edward R. Zumwalt, Manager
Signed by:

/s/

Edward R. Zumwalt, individually

DATED AND ENTERED this 8th day of July, 2013.

By:

William M. Beatty
Securities Administrator

Approved by: Reviewed by:

Suzanne Sarason Robert Kondrat
Chief of Enforcement Financial Legal Examiner Supervisor

Presented by:

Bridgett Fisher
Enforcement Attorney