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

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

LAGUNA S.A.; JILL JENSEN AMES;  
KATHERINE SWANBERG; JEFF FINCH,

Respondents.

Order Number S-09-133-10-CO02

CONSENT ORDER AS TO JILL JENSEN AMES

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**INTRODUCTION**

On December 23, 2009, the Securities Administrator of the State of Washington issued Statement of Charges and Notice of Intent to Enter an Order to Cease and Desist, Impose Fines, and Recover Costs, S-09-133-09-SC01, hereinafter referred to as "Statement of Charges," against Respondents Laguna S.A; Jill Jensen Ames; Katherine Swanberg; and Jeff Finch. The Securities Division and Respondent Jill Jensen Ames 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 Jill Jensen Ames neither admits nor denies the 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 AS TO JILL JENSEN AMES

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**DEPARTMENT OF FINANCIAL INSTITUTIONS  
Securities Division  
PO Box 9033  
Olympia, WA 98507-9033  
360-902-8760**

1 IT IS AGREED AND ORDERED that Respondent Jill Jensen Ames and her agents and employees  
2 each shall cease and desist from violating RCW 21.20.140, the provision of the Securities Act of  
3 Washington making it unlawful to sell unregistered securities.

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

8 IT IS FURTHER AGREED AND ORDERED that Respondent Jill Jensen Ames and her agents  
9 and employees each shall cease and desist from violating RCW 21.20.010, the anti-fraud section of the  
10 Securities Act of Washington.

11 IT IS FURTHER AGREED AND ORDERED that Respondent Jill Jensen Ames shall be liable for  
12 and pay a fine of \$5,000. Payment of the fine shall be made as follows. Respondent Jill Jensen Ames  
13 shall pay \$2,500 on or before the date of entry of this Consent Order. Respondent Jill Jensen Ames shall  
14 then make payments of \$250 per month for ten (10) consecutive months. Each payment shall be due by  
15 the last day of the month. If Respondent Jill Jensen Ames fails to make any monthly payment, the  
16 balance of the \$5,000 fine shall become immediately due and payable.

17 IT IS FURTHER AGREED that the Securities Division has jurisdiction to enter this Consent  
18 Order.

19 IT IS FURTHER AGREED that in consideration of the foregoing, Respondent Jill Jensen Ames  
20 waives her right to a hearing in this matter and judicial review of this matter pursuant to RCW 21.20.440  
21 and RCW 34.05.

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

2 SIGNED this 20th day of May, 2010.

3 Approved for entry by:

4  
5 /s/  
6 MATTHEW A. CARVALHO, WSBA #31201  
7 Attorney for Respondent

8 Signed by:

9 /s/  
10 JILL JENSEN AMES, individually

11 -----  
12 SIGNED and ENTERED this 25th day of March, 2014.


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14  
15 WILLIAM M. BEATTY  
16 Securities Administrator

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18 SUZANNE E. SARASON  
19 Chief of Enforcement

20 Presented by:

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22 JILL M. VALLELY  
23 Enforcement Attorney

24 CONSENT ORDER AS TO JILL JENSEN AMES