

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

IN THE MATTER OF DETERMINING ) Order No.: S-14-1603-16-CO12  
whether there has been a violation of the )  
Securities Act of Washington by: )  
Life Partners, Inc.; Life Partners Holdings, Inc.; ) CONSENT ORDER  
Brian Pardo; R. Scott Peden; David Barr; James ) AS TO TIM WATTERS  
Billington; Kim Butler; Gary Cassill; Michael )  
Chapman; Tomas Delos Santos; Neal Inscoe; John )  
Ley; William Meyer; Steven Minnich; Tim )  
Watters; Don Wells; Alliance of Professionals for )  
Business, Inc.; NW Retirement Solutions LLC; )  
NW Safe Retirement LLC; Partners Portfolio )  
Solutions, Inc.; Strategic Insurance Services, LLC )  
Respondents. )

**INTRODUCTION**

On March 7, 2016 the Securities Administrator of the Securities Division of the Department of Financial Institutions ("Securities Division") issued a Statement of Charges and Notice of Intent to Enter Order to Cease and Desist, to Impose Fines, and to Charge Costs ("Statement of Charges") Order Number S-14-1603-16-SC01, against Respondents Life Partners, Inc.; Life Partners Holdings, Inc.; Brian Pardo; R. Scott Peden; David Barr; James Billington; Kim Butler; Gary Cassill; Michael Chapman; Tomas Delos Santos; Neal Inscoe; John Ley; William Meyer; Steven Minnich; Tim Watters; Don Wells; Alliance of Professionals for Business, Inc.; NW Retirement Solutions LLC; NW Safe Retirement LLC; Partners Portfolio Solutions, Inc.; and Strategic Insurance Services, LLC.

Pursuant to the Securities Act of Washington, RCW 21.20, the Securities Division and Respondent Tim Watters do hereby enter into this Consent Order in settlement of the matters set forth in the Statement of Charges. Respondent Tim Watters neither admits nor denies the Findings of Fact and Conclusions of Law as set forth in the Statement of Charges, which are hereby incorporated by reference into this Consent Order.

**CONSENT ORDER**

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

IT IS AGREED AND ORDERED that Respondent Tim Watters shall cease and desist from violating RCW 21.20.140, the securities registration section of the Securities Act of Washington.

IT IS FURTHER AGREED AND ORDERED that Respondent Tim Watters shall cease and desist from violating RCW 21.20.040, the securities salesperson registration section of the Securities Act of Washington.

CONSENT ORDER  
AS TO TIM WATTERS

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IT IS FURTHER AGREED AND ORDERED that Respondent Tim Watters shall cease and desist from violating RCW 21.20.010, the anti-fraud section of the Securities Act of Washington.

IT IS FURTHER AGREED AND ORDERED that Respondent Tim Watters shall pay a fine of \$3,600.

IT IS FURTHER AGREED AND ORDERED that Respondent Tim Watters shall pay costs of \$250 prior to the entry of this Consent Order.

IT IS FURTHER AGREED AND ORDERED that the payment of the fine and costs described above shall be made as follows: Respondent Tim Watters shall pay \$100 towards the fine and \$250 toward the investigative costs on or before the entry of this Consent Order. Respondent Tim Watters shall then pay the remaining fine in monthly payments of \$100 from August to December of 2016, and a final payment of \$3,000 in January of 2017. Each payment shall be due on the first business day following the first day of the month.

IT IS FURTHER AGREED AND ORDERED that if Respondent Tim Watters fails to make any monthly payment, the remainder of the fine 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 Securities Division has jurisdiction to enter this Consent Order.

IT IS FURTHER AGREED that Respondent Tim Watters enters into this Consent Order freely and voluntarily and with a full understanding of its terms and significance.

IT IS FURTHER AGREED that in consideration of the foregoing, Respondent Tim Watters waives his rights to a hearing and to judicial review of this matter pursuant to RCW 21.20.440 and Chapter 34.05 RCW.

WILLFUL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE.

1 Signed this 12th day of July 2016.

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3 Signed by:

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5 /s  
Tim Watters

6 Reviewed as to form by:

7 /s  
Jason Anderson, Carney Badley Spellman  
8 WSBA #30152

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10 SIGNED and ENTERED this 18th day of July 2016.

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14 William M. Beatty  
15 Securities Administrator

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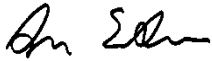
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Approved by:

Presented by:

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22 Suzanne Sarason  
23 Chief of Enforcement

24 Adam N. Yeaton  
25 Financial Legal Examiner

26 Reviewed by:

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29 Jack McClellan  
30 Financial Legal Examiner Supervisor

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