

**STATE OF ILLINOIS
SECRETARY OF STATE
SECURITIES DEPARTMENT**

IN THE MATTER OF:)	
)	
Paul R. Quinn (CRD# 2909821),)	
)	File No. 0900220
Paul R. Quinn and Associates, and its)	
Partners, members, officers, directors,)	
Agents, employees, affiliates, successors and)	
Assigns.)	
)	

CONSENT ORDER

TO THE RESPONDENTS: Paul R. Quinn (CRD #2909821)
c/o his Attorneys
Martin Q. Ryan
Baugh, Dalton, Carlson & Ryan, LLC
55 West Monroe Street, Suite 600
Chicago, IL 60603

Paul R. Quinn and Associates
c/o their Attorneys
Martin Q. Ryan
Baugh, Dalton, Carlson & Ryan, LLC
55 West Monroe Street, Suite 600
Chicago, IL 60603

WHEREAS, Paul R. Quinn (“Quinn”), personally and as Principal of Paul R. Quinn and Associates, on the 18th day of June, 2010 executed a certain Stipulation to Enter Consent Order (“the Stipulation”), which hereby is incorporated by reference herein.

WHEREAS, by means of the Stipulation, Quinn has admitted to the jurisdiction of the Secretary of State and service of the Temporary Order of Prohibition & Suspension of the Secretary of State, Securities Department, dated August 18, 2009, (the “Temporary Order”) and the Notice of Hearing of the Secretary of State, Securities Department, dated October 26, 2009, in this proceeding (the “Notice”) and has consented to the entry of this Consent Order (“Consent Order”).

WHEREAS, by means of the Stipulation, Quinn acknowledges and agrees that the following shall be adopted as the Secretary of State’s Findings of Fact:

1. Paul R. Quinn (“Quinn”) is an individual with last known address of 352 Highland Drive, Rantoul, IL 61866.

Consent Order

-2-

2. At all relevant times, Quinn was registered with the Secretary of State of the State of Illinois as an investment adviser representative and securities salesperson with Berthel Fisher and Company Financial Services, Inc. ("Berthel Fisher").
3. Investor A is a 23-year-old college student at the University of Illinois at Urbana-Champaign.
4. On January 23, 2009, Investor A's father met with Quinn to discuss Investor A's financial circumstances, various investment options available to Investor A and the allocation of Investor A's investment portfolio.
5. On January 29, 2009, Investor A and Investor A's father met with Quinn to discuss Investor A's financial circumstances, investment options and the allocation of Investor A's investment portfolio.
6. During the meeting on January 29, 2009, representations were made regarding Investor A's investment objectives, investment experience, investment portfolio, income, risk tolerance, and net worth.
7. On February 2, 2009, Investor A and Investor A's father met with Quinn to discuss certain investment options and the allocation of Investor A's investment portfolio.
8. Investor A, Investor A's father and Quinn discussed the allocation of Investor A's investment portfolio across various types of investments.
9. Investor A opened a managed account with Berthel Fisher.
10. In connection with the opening of Investor A's managed account with Berthel Fisher, Investor A executed certain documents which memorialized her investment objectives, investment experience, income, risk tolerance, and net worth and which granted discretionary authority over Investor A's managed account.
11. By accepting discretionary authority over a managed account, an investment adviser representative is required to manage the managed account as a reasonably prudent investment adviser representative.
12. In February 2009 and March 2009, certain discretionary options purchases were made in Investor A's managed account.
13. Investor A incurred investment losses in March 2009 when she exited her positions and closed her managed account.
14. Berthel Fisher's policies require that discretionary options transactions be reviewed by a Registered Options Principal before execution. In this case, the options transactions either were not reviewed by a Registered Options Principal before execution or the documents which would confirm that certain options transactions in Investor A's account were reviewed by a Registered Options Principal of Berthel Fisher were not maintained in an easily accessible place within two years after those transactions occurred.

Consent Order

-3-

15. Section 130.825(h) of the Rules and Regulations under the Illinois Securities Law of 1953 provides, *inter alia*, that the records (or a copy thereof) required by this Section must be maintained in each office in this State, if any, from which the transaction with respect to those records occurred.
16. Section 8.F(2) of the Act provides, *inter alia*, that the Secretary of State may temporarily prohibit or suspend, for a maximum period of 90 days, by an order effective immediately, the offer or sale or registration of securities, the registration of a dealer, salesperson, investment adviser, or investment adviser representative, or the offer or sale of securities by any person, or the business of rendering investment advice, without the notice and prior hearing in this subsection prescribed, if the Secretary of State shall in his or her opinion, based on credible evidence, deem it necessary to prevent an imminent violation of this Act or to prevent losses to investors which the Secretary of State reasonably believes will occur as a result of a prior violation of this Act.

WHEREAS, by means of the Stipulation and in order to resolve the administrative action, Quinn acknowledges and agrees that the following shall be adopted as the Secretary of State's Conclusions of Law:

1. Illinois has jurisdiction over this matter pursuant to the Illinois Securities Law of 1953 [815 ILCS 5] (the "Act").
2. The Illinois Securities Department finds that the above conduct subjected Quinn to temporary suspension under Section 8.F(2) of the Act.
3. The Illinois Securities Department finds the following relief was appropriate and in the public interest.

WHEREAS, by means of the Stipulation, Quinn acknowledges and agrees that, upon the entry of this Consent Order, Quinn's registration as an investment adviser representative and securities salesperson temporarily was suspended for ninety days beginning on August 18, 2009 and ending on November 16, 2009 in accordance with Section 8.F(2) of the Act.

WHEREAS, the Secretary of State, by and through his duly authorized representative, has determined that the formal hearing as it relates to Paul R. Quinn and Paul R. Quinn and Associates may be dismissed without further proceedings.

NOW THEREFORE, IT IS HEREBY ORDERED THAT:


1. Paul R. Quinn's registration as an investment adviser representative and securities salesperson in the State of Illinois temporarily was suspended for ninety days beginning on August 18, 2009 and ending November 16, 2009 in accordance with Section 8.F(2) of the Act.

Consent Order

-4-

2. The Notice of Hearing dated October 26, 2009 is dismissed without further proceedings.

Entered on this 28th day of June, 2010.



JESSE WHITE
Secretary of State
State of Illinois

NOTICE: Failure to comply with the terms of this Order shall be a violation of Section 12.D of the Act. Any person or entity who fails to comply with the terms of this Order of the Secretary of State, having knowledge of the existence of the Order shall be guilty of a Class 4 Felony.

Attorney for the Secretary of State:
James Gleffe
Office of the Secretary of State
Illinois Securities Department
69 West Washington Street, Suite 1220
Chicago, Illinois 60602
Telephone: (312) 793-3593