

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

IN THE MATTER OF: Robert J. Lunn and
 Lunn Partners, LLC

FILE NO: 0400750

CONSENT ORDER

TO THE RESPONDENTS: Robert J. Lunn
CRD# 314549
1420 N. Lake Shore Drive
Chicago, Illinois 60610

Lunn Partners, LLC
CRD#106483
C/o Robert J. Lunn
1420 N. Lake Shore Drive
Chicago, Illinois 60610

WHEREAS, Respondents on the 8th day of April 2009 executed a certain Stipulation to Enter Consent (the "Stipulation"), which hereby is incorporated by reference herein.

WHEREAS, by means of the Stipulation, Respondents have admitted to the jurisdiction of the Secretary of State and service of the Notice of Hearing of the Secretary of State, Securities Department, dated January 7, 2009 in this proceeding (the "Notice") and Respondents have consented to the entry of this Consent Order ("Consent Order").

WHEREAS, by means of the Stipulation, Respondents acknowledge that the following allegations contained in the Notice of Hearing shall be adopted as the Secretary of State's Findings of Fact:

- a. Respondent Robert J. Lunn is an Illinois resident whose last known address is 1420 N. Lake Shore Drive, Chicago, Illinois 60610. At all relevant

Consent Order

2

times, Respondent Lunn was an investment adviser representative of and the managing partner of Respondent Lunn Partners, LLC.

- b. Respondent Lunn Partners, LLC is a Delaware LLC. Illinois Secretary of State records indicate that Respondent Lunn Partners, LLC, was qualified to do business in Illinois, however as of July 14 2006 Respondent Lunn Partners', LLC status of revoked. At all relevant times, Respondent Lunn Partners, LLC was a Federally covered Investment Advisor.
- c. Respondents entered into an Investment Advisor relationship with an Illinois Investor ("Investor A") an Illinois Investor ("Investor A").
- d. Respondent Robert J. Lunn was not registered as an investment adviser representative in Illinois during the pertinent time.
- e. Section 12.C of the Act provides, *inter alia*, that it shall be a violation of the Act for any person "to act as a dealer, salesperson, investment adviser, or investment adviser representative, unless registered as such, where such registration is required, under the provisions of this Act."
- f. Section 8.D-5 of the Act provides, *inter alia*, that "A registered investment adviser or federal covered investment adviser desiring to register an investment adviser representative shall file an application with the Secretary of State, in the form as the Secretary of State may by rule or order prescribe..."
- g. Section 12.D of the Act provides, *inter alia*, that it shall be a violation of the Act for any person "To fail to file with the Secretary of State any application, report or document required to be filed under the provisions of this Act or any rule or regulation made by the Secretary of State pursuant to this Act or to fail to comply with the terms of any order of the Secretary of State issued pursuant to Section 11 hereof."

WHEREAS, by means of the Stipulation Respondents have acknowledged that the following shall be adopted as the Secretary of State's Conclusion of Law:

That Respondent Robert J. Lunn by his conduct described herein violated Sections 12.C and 12.D of the Act of the Illinois Securities Law of 1953 and that Respondent Lunn Partners, LLC by its conduct described herein violated Section 12.D of the Act.

WHEREAS, by means of the Stipulation Respondents have acknowledged and agreed that they desire to resolve this matter absent further administrative action.

WHEREAS, by means of the Stipulation Respondents have acknowledged and agreed shall be prohibited in whatever capacity from offering or selling any

Consent Order

3

securities in the state of Illinois, and that they shall be prohibited from engaging in the business of a registered investment advisor or registered investment advisor representative in the State of Illinois.

WHEREAS, the Secretary of State, by and through his duly authorized representative, has determined that the matter related to the aforesaid formal hearing may be dismissed without further proceedings.

NOW THEREFORE IT SHALL BE AND IS HEREBY ORDERED THAT:

1. Respondents shall be prohibited in whatever capacity from offering or selling any securities in the state of Illinois, and Respondents shall be prohibited from engaging in the business of a registered investment advisor or registered investment advisor representative in the State of Illinois.
2. The formal hearing scheduled on this matter is hereby dismissed without further proceedings.

DATED: This 9th day of April 2009.


JESSE WHITE
Secretary of State
State of Illinois

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