

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

IN THE MATTER OF: RICHARD N. BELEUTZ

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FILE NO. 0800051

CONSENT ORDER OF DISMISSAL

TO THE RESPONDENT: Richard N. Beleutz
(CRD#: 2403229)
Brewer Financial Services, LLC
200 South Michigan Ave
21st Floor
Chicago, Illinois 60604

Richard N. Beleutz
1730 North Clark
#3501
Chicago, Illinois 60614

WHEREAS, Respondent on the 27th day of February, 2009 executed a certain Stipulation to Enter Consent Order of Dismissal (the "Stipulation"), which hereby is incorporated by reference herein.

WHEREAS, by means of the Stipulation, Respondent has 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 26, 2009 in the proceeding (the "Notice") and Respondent has consented to the entry of the Consent Order of Dismissal ("Consent Order").

WHEREAS, by means of the Stipulation, the Respondent acknowledged, without admitting or denying the truth thereof, that the following allegations contained in the Notice of Hearing shall be adopted as the Secretary of State's Findings of Fact:

1. That at all relevant times, the Respondent was registered with the Secretary of State as a salesperson in the State of Illinois pursuant to Section 8 of the Act.

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2. That on January 24, 2008 FINRA entered a Letter Of Acceptance, Waiver And Consent (AWC) submitted by the Respondent regarding File No. E8A20040321-01 which sanctioned the Respondent as follows:
 - a. A 45 days calendar days Suspension in all capacities with any member firm in any capacity for sixty (60) calendar days; and
 - b. A fine of \$15,000.

3. That the AWC found:
 - a. On May 28, 2002, Ameriprise informed Beleutz that market timing had been detected in some of the accounts of one of his hedge fund clients. Ameriprise advised Beleutz that further market timing in these accounts would not be tolerated and that Ameriprise would close the accounts if further market timing was detected. Instead of stopping the market timing activity, Beleutz's hedge fund client simply moved funds to its different Ameriprise accounts and continued the market timing transactions. From June 2002 through August 2003, Beleutz facilitated 73 market timing roundtrips by this hedge fund client in its multiple Ameriprise accounts. Though this conduct, Beleutz violated the high standards of commercial honor and just and equitable principles of trade required by NASD Conduct Rule 2110.

 - b. On July 10, 2002, Ameriprise informed Beleutz that market timing had also been detected in some of the accounts of another one of his hedge fund clients. Ameriprise advised Beleutz that further market timing in these account would not be tolerated and that Ameriprise would close the accounts if further market timing was detected. Instead of stopping the market timing activity, Beleutz's hedge fund client simply moved funds to its different Ameriprise accounts and continued the market timing transactions. From July through November 2002, Beleutz facilitated 63 market timing roundtrips by this hedge fund client in its multiple Ameriprise accounts. Though this conduct Beleutz violated the high standards of commercial honor and just and equitable principles of trade required by NASD) Conduct Rule 2110.

4. That Section 8.E(1)(j) of the Act provides, inter alia, that the registration of a salesperson may be denied if the Secretary of State finds that such salesperson has been suspended by any self-regulatory organization registered under the Federal 1934 Act or the Federal 1974 Act suspended, revoked, refused expelled, cancelled, barred, limited in and capacity, or otherwise adversely affected in a similar manner arising from any fraudulent or deceptive act or a practice in violation of any rule, regulation or standard duly promulgated by the self-regulatory organization.

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5. That FINRA is a self-regulatory organization as specified in Section 8.E(1)(j) of the Act.
6. That by virtue of the foregoing, the Respondent's registration as a salesperson in the State of Illinois is subject to revocation pursuant to Section 8.E(1)(j) of the Act.

WHEREAS, by means of the Stipulation Respondent has acknowledged, without admitting or denying the averments, that the following shall be adopted as the Secretary of State's Conclusion of Law:

The Respondent's registrations as a salesperson in the State of Illinois is subject to revocation pursuant to Section 8.E(1)(j) of the Act.

WHEREAS, by means of the Stipulation Respondent has acknowledged and agreed that he has submitted a "Heightened Supervision Memorandum", which contains certain undertakings that he and Brewer Financial Services, LLC, entered into and shall continue to adhere to for at least six months after the entry of this Consent Order. Said undertakings are incorporated by reference herein and made a part hereof.

WHEREAS, by means of the Stipulation Respondent has acknowledged and agreed that he is not an Illinois Designated Principal; and that his activities regarding marketing and sales to Illinois residents and investors will be supervised by Andrew Carava, who is a duly authorized Illinois Designated Principal. Said undertakings are incorporated by reference herein and made a part hereof.

WHEREAS, by means of the Stipulation Respondent has acknowledged and agreed that he shall be levied costs incurred during the investigation of this matter in the amount of One Thousand Dollars (\$1,000.00). Said amount is to be paid by certified or cashier's check, made payable to the Office of the Secretary of State, Securities Audit and Enforcement Fund.

WHEREAS, by means of the Stipulation Respondent has acknowledged and agreed that he has submitted with the Stipulation a certified or cashier's check in the amount of One Thousand Dollars (\$1,000.00) to cover costs incurred during the investigation of this matter. Said check has been made payable to the Office of the Secretary of State, Securities Audit and Enforcement Fund.

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

NOW THEREFORE IT SHALL BE AND IS HEREBY ORDERED THAT:

1. The Notice of Hearing dated January 26, 2009 is dismissed.
2. The Respondent is levied costs of investigation in this matter in the amount of One Thousand Dollars (\$1,000.00), payable to the Office of the Secretary of State, Securities Audit and Enforcement Fund, and on March 3, 2009 has submitted One Thousand Dollars (\$1,000.00) in payment thereof.
3. The formal hearing scheduled on this matter is hereby dismissed without further proceedings.

Entered: This 3rd day of March, 2009


JESSE WHITE
Secretary of State
State of Illinois

NOTICE: Failure to comply with the terms of this Order shall be a violation of the 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.

This is final order subject to administrative review pursuant to the Administrative Review Law, {735 ILCS 5/3-101 et seq.} and the Rules and Regulations of the Illinois Securities Act, {14 Ill. Admin. Code Ch. I, Section 1360.1123}. Any action for Judicial Review must be commenced within thirty-five (35) days from the date a copy of this Order is served upon the party seeking review.

Attorney for the Secretary of State:
Mary A. Lopez
Office of the Secretary of State
Illinois Securities Department
69 W. Washington Street, Suite 1220
Chicago, Illinois 60602
Telephone: (312) 793-3023