

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

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**IN THE MATTER OF:**

**COKER & PALMER**

**RESPONDENT.**  
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) **FILE NO. 1700274**  
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**CONSENT ORDER OF CENSURE**

**TO RESPONDENT:** Coker & Palmer  
J. David Coker, President  
1667 Lelia Drive  
Jackson, MS 39216

WHEREAS, Coker & Palmer (CRD No. 29163) ("Respondent") on the 19th day of June 2018, executed a certain Stipulation to Enter Consent Order Of Censure ("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 Notice of Hearing of the Secretary of State, Securities Department, dated June 13, 2018, (the "Notice") in this matter and Respondent has consented to the entry of this Consent Order of Censure ("Consent Order").

WHEREAS, by means of the Stipulation, Respondent has acknowledged that the following allegations shall be adopted as the Secretary of State's Findings of Fact and Conclusions of Law and has admitted to the truth thereof:

1. On March 13, 2017, Respondent filed an application for registration as a securities dealer in the State of Illinois.
2. Respondent is a firm which engages in the business of acting as a dealer in the offer and sale of securities to the general public.
3. Between February 2015 and January 2016, Respondent effected at least forty-one (41) securities transactions on behalf of at least three (3) Illinois residents.

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4. At the time Respondent effected the forty-one (41) securities transactions on behalf of the three (3) Illinois residents, Respondent was not registered as a dealer in the State of Illinois pursuant to Section 2.7 of the Illinois Securities Law of 1953 [815 ILCS 5/1 *et seq.*] ("Act").
5. Section 8.A of the Act provides, in pertinent part, except as otherwise provided, every dealer shall be registered as such with the Illinois Secretary of State.
6. The activity described in paragraph three (3) above constitutes the activity of a dealer as defined in Section 2.7 of the Act.
7. Section 12.A of the Act provides, *inter alia*, that it shall be a violation of the provisions of the Act for any person to offer or sell any security except in accordance with the provisions of the Act.
8. 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 advisor, or investment adviser representative, unless registered as such, where registration is required, under the provisions of the Act.
9. By virtue of the foregoing, Respondent has violated Sections 12.A and 12.C of the Act.

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

10. Respondent has violated Sections 12.A and 12.C of the Act.

WHEREAS, by means of the Stipulation Respondent has acknowledged and agreed that:

11. It shall be censured;
12. The Department shall grant Respondent's request to withdraw its application for registration as a securities dealer in the State of Illinois; and
13. Respondent shall not file an application for registration as a securities dealer in the State of Illinois within four (4) years from the date of the Consent Order of Censure.

NOW THEREFORE IT SHALL BE AND IS HEREBY ORDERED:

14. The allegations contained in the Stipulation shall be and are hereby adopted as the Secretary of State's Findings of Fact and Conclusions of Law.

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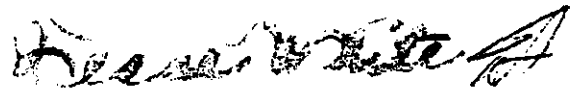
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15. Respondent Coker & Palmer (CRD No. 29163) shall be **CENSURED**.
16. Respondent's request to withdraw its application for registration as a securities dealer in the State of Illinois is granted.
17. Respondent shall not file an application for registration as a securities dealer in the State of Illinois within four (4) years from the date of the Consent Order of Censure.
18. The formal hearing scheduled in this matter is hereby dismissed without further proceedings.

NOTICE: Failure to comply with the terms of this Order shall be a violation of Section 12.D of the Illinois Securities Law of 1953, as amended, 815 ILCS 5/1 *et seq.* 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 this Order, shall be guilty of a Class 4 felony.

This is a Final Order subject to judicial review pursuant to the Administrative Review Law, 735 ILCS 5/3-101 *et seq.* and the Rules and Regulations of the Act (14 Ill. Admin. Code, Ch. I, Sec. 130.1123. 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. Mailing of this Order to the Respondent or representative of record constitutes service of the Order.

ENTERED: This 13<sup>th</sup> day of June 2018.



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JESSE WHITE  
Secretary of State  
State of Illinois

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