

**OFFICE OF THE MISSISSIPPI SECRETARY OF STATE
BUSINESS REGULATION AND ENFORCEMENT DIVISION**

In The Matter Of:)
)
ADAM BYRD HILLMAN individually and)
doing business as INSURANCE SOLUTIONS) **Administrative Proceeding**
) **Number: S-06-0396**
)
Respondent)

AMENDED CONSENT ORDER

I. JURISDICTION

The Business Regulation and Enforcement Division of the Mississippi Secretary of State's Office (hereinafter "Division") having the authority to administer and to provide for the enforcement of all provisions of the Mississippi Securities Act (hereinafter "Act") and Mississippi Securities Act Rules (hereinafter "Rules"), and ADAM BYRD HILLMAN (hereinafter "Hillman") doing business as INSURANCE SOLUTIONS, Respondent, do hereby enter into this Amended Consent Order in resolution of the following allegations by the Division of violations of certain provisions of the Act and Rules. This Amended Consent Order replaces that certain Consent Order issued by the Division on the 24th day of May, 2007.

II. ALLEGATIONS

A. REGISTERED AND REGULATED PARTIES

1. Adam Byrd Hillman (CRD #2569652) is an agent/representative of Sunset Financial Services, Inc. (CRD #290651) (hereinafter "Sunset"). Hillman was at

all times relevant herein a registered representative of Sunset and registered with the Division.

B. EXAMINATION HISTORY

On the morning of September 28, 2006, the Division performed an examination of Hillman's office.

Mississippi Securities Act Rule 521 requires all broker/dealers to establish and keep current a set of written supervisory procedures. It further requires that a complete set of such procedures **shall** be kept in all offices located in this state. Hillman had difficulty accessing Sunset's on-line version of its Compliance and Supervisory Procedures Manual. If the supervisory procedures cannot be easily accessed, they cannot be considered "to be kept in all offices located in this state."

III. APPLICABLE LAW

Mississippi Securities Act and Securities Act Rules -

1. Power to Impose Penalty -

Miss. Code Ann. § 75-71-715 provides in pertinent part as follows:

Whenever it appears to the Secretary of State that any person has engaged or is about to engage in any act or practice constituting a violation of any provision of this chapter or any rule or order hereunder, he may, in his discretion, seek any or all of the following remedies:

* * *

(2) (a) Issue an order in the case of an issuer of registered securities, broker-dealer, investment advisor, agent, investment adviser representative, or other person

who violated this chapter, imposing an administrative penalty up to a maximum of Twenty-five Thousand Dollars (\$25,000.00) for each offense and each violation shall be considered as a separate offense in a single proceeding or a series of related proceedings; to be paid to the Secretary

of State and requiring reimbursement to the Secretary of State for all costs and expenses incurred in the investigation of the violation(s) and in the institution of administrative proceedings, if any, as a result thereof;

* * *

2. Mississippi Securities Rule 521 provides in pertinent part:

Supervision: All broker/dealers shall establish and keep current a set of written supervisory procedures and a system for implementing such procedures which may be reasonably expected to prevent and detect any violations of the Act and rules promulgated thereunder. The procedures shall include the designation by name or title of those persons delegated supervisory responsibility in at least the areas of sales, financial operations, and compliance. A complete set of such procedures and systems shall be kept in all offices located in this state.

III. STIPULATIONS

Respondent, under the terms of this Consent Order and solely for the purpose of resolving the foregoing allegations, stipulates without a hearing to the matters set forth above in Paragraph II and hereby consents to the issuance of this Consent Order and further consents to and agrees to the undertakings contained herein, with no formal administrative hearing and determination of wrongdoing.

Respondent stipulates to the jurisdiction of the Division as to all matters contained herein under the authority of the Act and acknowledges that the issuance of this Consent Order is solely for the purpose of resolving the matters set forth herein.

Further, Respondent consents to and agrees to the undertakings contained herein.

THEREFORE, in consideration of a final resolution of the matters set forth herein, the Division and Respondent hereby agree and stipulate as follows:

1. The Division has imposed a penalty upon the Respondent Hillman in the amount of Five Hundred Dollars (\$500.00).
2. Respondent agrees that he will comply with the provisions of the Mississippi Securities Act as currently in effect or as may be subsequently amended.
3. This Consent Order is in resolution of the matters contained herein. As a result of this Consent Order, the matters contained herein cannot be used as a basis for action by the Division except in determining any penalty as may be imposed by the Division for any future violations of the Act committed by the Respondent.

In the event Respondent fails or neglects to comply with any of the terms, stipulations or undertakings set forth in this Consent Order, the Division may, without notice to the Respondent, unilaterally rescind this Order and institute any legal or administrative proceedings it deems appropriate including, but not limited to, proceedings to address the matters set forth herein.

IV. ACKNOWLEDGEMENT

Respondent hereby acknowledges that he has read this Order in its entirety and fully understands the terms, and his rights and obligations contained herein.

ISSUED, this the 4th day of July, 2007.

ERIC CLARK
Secretary of State

BY: Patricia Melvin
PATRICIA MELVIN
Senior Attorney
Business Regulation and Enforcement

**ADAM BYRD HILLMAN, Individually and doing
Business as INSURANCE SOLUTIONS**

Adam Byrd Hillman III

Date: 7/6/07

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