

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

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IN THE MATTER OF: DEBORAH ELLEN ROMARY )  
\_\_\_\_\_)

File No: C0200269

**CONSENT ORDER OF WITHDRAWAL**

TO THE RESPONDENT:                   Deborah Ellen Romary  
  2109 Lake Ridge Drive  
  Fort Wayne, Indiana 46804  
  CRD#1112258

111 East Ludwig Road Suite 109  
Fort Wayne, Indiana 46825

WHEREAS, Respondent on the 25th day of March 2003 executed a certain Stipulation to Enter Consent Order of Withdrawal (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 February 18, 2003 in this proceeding (the "Notice") and Respondent has consented to the entry of this Consent Order of Withdrawal ("Consent Order").

WHEREAS, by means of the Stipulation, Respondent has acknowledged, while neither admitting nor 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. 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.
2. That on March 4, 2002 NASD Regulation, Inc (NASDR) entered a Letter of Acceptance, Waiver and Consent (AWC) submitted by the Respondent regarding FILE NO. C8A020013 which sanctioned the Respondent as follows:
  - A. Ten business day suspension from association with any NASD member firm in any capacity; and
  - B. \$2,500 fine.

3. The AWC found that in December 2000 the Respondent knowingly recommended, to one customer, that he transfer money from the Lincoln Choice Plus variable annuity to the First Variable Life variable annuity. Respondent did not have a reasonable basis for this recommendation. The customer followed Respondent's recommendation. As a result, the customer incurred a surrender charge in the amount of \$12,479.00. Respondent's conduct was a violation of NASD Conduct Rule 2110 and 2310.
4. That Section 8.E(1)(j) of the Act provides, *inter alia*, that the registration of a salesperson may be revoked 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 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.
5. That NASDR 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:

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 and agreed that:

1. She shall cause to have her application for registration as a salesperson in the State of Illinois withdrawn within three (3) days from the entry of this Consent Order and will not re-apply for registration for a period of two (2) years from the entry of this Consent Order;
2. Respondent shall pay the sum of One Thousand Dollars (\$1,000.00) to the Secretary of State, Investors Education Fund, as reimbursement to cover the costs of investigation of this matter. Said sum shall be payable by means of a certified or cashier's check and made to the order of the Secretary of State, Investors Education Fund, and shall be due within thirty (30) days from the entry of the Consent Order.

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. Deborah Ellen Romary shall cause to have her application for registration as a salesperson in the State of Illinois withdrawn within three (3) days from the entry of this Consent Order and will not re-apply for registration for a period of two (2) years from the entry of this Consent Order;
2. Respondent shall pay the sum of One Thousand Dollars (\$1,000.00) to the Secretary of State, Investors Education Fund, as reimbursement to cover the costs of investigation of this matter. Said sum shall be payable by means of a certified or cashier's check and made to the order of the Secretary of State, Investors Education Fund, and shall be due within thirty (30) days from the entry of the Consent Order.
3. The formal hearing scheduled on this matter is hereby dismissed without further proceedings.

Entered this 2nd day of April, 2003.



JESSE WHITE  
Secretary of State  
State of Illinois