BEFORE THE DIRECTOR OF THE DEPARTMENT OF FINANCE

OF THE STATE OF IDAHO

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STATE OF IDAHO, Department of Finance, Securities Bureau, Complainant, vs. SISBRO PORTFOLIO CONSULTANTS, LLC, Respondent.

Docket No. 2000-7-36

AGREEMENT AND ORDER

The Director of the Department of Finance has investigated the conduct of Sisbro Portfolio Consultants, LLC ("Respondent") in the securities business. Pursuant to said investigation, it appears to the Director that violations of the Idaho Securities Act, Idaho Code §30-1401, *et seq.*, have occurred. The Director and Respondent have agreed to resolve this matter without a public hearing. Therefore, the Director deems it appropriate and in the public interest that this Agreement and Order be entered. Respondent consents to the entry of this Agreement and Order.

FINDINGS

 Sisbro Portfolio Consultants, LLC ("Respondent") conducts business at 960
Broadway Ave, Suite 250 Boise, Idaho and falls within the definition of an investment adviser as defined in Idaho Code §30-1402(6).

2. Respondent had been registered with the Securities and Exchange Commission ("SEC") as an investment advisor, but effective January 31, 2000, the registration of Respondent was cancelled by the SEC. 3. Respondent has transacted business in Idaho as an investment advisor from February 1, 2000 to date without being registered with the Idaho Department of Finance as required by Idaho Code §30-1406.

4. Respondent has violated Idaho Code §30-1406.

REMEDIES

5. Respondent admits to the allegations contained in this Agreement and Order and agrees to inform all clients in writing of this admission.

6. Respondent agrees to repay all consideration that has been received from Idaho clients in connection with the investment advisory services rendered from February 1, 2000 to the date in which the Respondent's registration with the SEC is deemed effective.

7. Respondent agrees to pay a civil penalty in the amount of two thousand five hundred dollars (\$2,500) to the Idaho Department of Finance.

8. Respondent agrees to comply with the provisions of the Idaho Securities Act ("Act") in future securities transactions. Respondent further agrees that, should the Director find within twelve months from the date of this Agreement and Order that Respondents have committed any additional violations of the Act, the Department may use all allegations contained in this Agreement and Order, and any other allegations concerning violations of the Act by Respondent, in any subsequent proceeding. DATED this III day of April, 2000.

SISBRO PORTFOLIO CONSULTANTS, LLC BY: NAME:

MARILYN T. SÇANLAN Bureau Chief, Securities Bureau Department of Finance State of Idaho

IT IS SO ORDERED this _____ day of April, 2000.

GAVIN M. GEE Director Department of Finance

