

BEFORE THE DIRECTOR OF THE DEPARTMENT OF FINANCE
OF THE STATE OF IDAHO

In the Matter of:

STATE OF IDAHO,
DEPARTMENT OF FINANCE,
SECURITIES BUREAU,

Complainant,

vs.

GORDON BOLSTER
ADVISORS LLC AND
GORDON LEE BOLSTER

Respondents.

Docket No.: 2017-7-18

AGREEMENT AND ORDER

The Director of the Department of Finance (“Department”), has conducted an investigation into the conduct of GORDON BOLSTER ADVISORS LLC and GORDON LEE BOLSTER (collectively “Respondents”). Pursuant to the investigation, it appears to the Director that violations of Idaho’s Uniform Securities Act (2004), Idaho Code Sections 30-14-101, *et. seq.* (the “IUSA”), have occurred. The Director and Respondents have agreed to resolve this matter without a public hearing or other adjudication. Therefore, the Director deems it appropriate and in the public interest to enter into this Agreement and Order (“Order”). Respondents voluntarily consent to the entry of this Order.

RESPONDENTS

1. Respondent Gordon Bolster Advisors LLC (“GBA”) is a Washington limited liability company registered as an investment advisor in Washington on August 15, 2013.

2. Respondent Gordon Lee Bolster (“Bolster”) is the sole owner and qualifying officer for GBA. Bolster was registered as a broker dealer agent and/or an investment advisor representative almost continually from April of 2000 until December 31, 2017.

BACKGROUND

3. Respondents moved their residence and place of business from Liberty Lake, Washington to Coeur D’Alene, Idaho in or about August of 2017.

4. After moving to Idaho Respondents continued to transact business in Idaho as an investment advisor and investment advisor representative. Respondents’ investment advisor business included communicating with clients to provide investment advice about securities, and charging and receiving investment advisor fees.

5. Respondents did not apply for registration as an investment advisor or investment advisor representative in Idaho prior to transacting investment advisory business in Idaho.

VIOLATIONS

Unregistered Investment Advisor and Investment Advisor Representative

6. Pursuant to Idaho Code § 30-14-403, it is unlawful to transact business in this state as an investment advisor unless the person is registered. GBA violated Idaho Code § 30-14-403 by providing investment advice about securities to clients for a fee without registering with the Department.

7. Pursuant to Idaho Code § 30-14-404, it is unlawful to transact business in this state as an investment advisor representative unless the individual is registered. Bolster violated Idaho Code § 30-14-404 by providing investment advice about securities to clients, while employed by GBA, without registering with the Department.

AGREEMENT, ACKNOWLEDGEMENT & REMEDIES

The Department and Respondents agree as follows:

8. Respondents consent to the entry of this Agreement and Order.

9. Respondents represent that neither is currently registered as an investment advisor or investment advisor representative and will not provide investment advice regarding securities to any person until they have properly registered as such.

10. Respondents agree to pay an administrative penalty in the amount of one thousand five hundred dollars (\$1,500). Payment of the penalty is suspended until Respondents apply for any registration with the Department in the future.

11. Respondents agree to comply with all provisions of the IUSA and the rules promulgated thereunder in the future.

12. Respondents agree that failure to comply with the terms of this Agreement and Order may result in the Director bringing further legal proceedings or an administrative action.

AGREED TO and ACKNOWLEDGED this 28 day of January, 2018



GORDON BOLSTER ADVISORS, LLC
By: GORDON BOLSTER, Owner and Managing Member

GORDON BOLSTER

IT IS SO ORDERED

DATED this 21st day of FEBRUARY, 2018.

STATE OF IDAHO
DEPARTMENT OF FINANCE



GAVIN GEE, Director



9. Respondents represent that neither is currently registered as an investment advisor or investment advisor representative and will not provide investment advice regarding securities to any person until they have properly registered as such.

10. Respondents agree to pay an administrative penalty in the amount of one thousand five hundred dollars (\$1,500). Payment of the penalty is suspended until Respondents apply for any registration with the Department in the future.

11. Respondents agree to comply with all provisions of the IUSA and the rules promulgated thereunder in the future.

12. Respondents agree that failure to comply with the terms of this Agreement and Order may result in the Director bringing further legal proceedings or an administrative action.

AGREED TO and ACKNOWLEDGED this _____ day of _____, 2018

GORDON BOLSTER ADVISORS, LLC

By: GORDON BOLSTER, Owner and Managing Member



GORDON BOLSTER

IT IS SO ORDERED

DATED this 21ST day of FEBRUARY, 2018.

STATE OF IDAHO
DEPARTMENT OF FINANCE



GAVIN GEE, Director




CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 21st day of February, 2018, I caused a true and correct fully-executed copy of the foregoing AGREEMENT AND ORDER to be served on the following by the designated means:

Gordon Lee Bolster
Gordon Bolster Advisors LLC
819 W Boyd
Coeur d'Alene, Idaho 83814-4311

U.S. mail, postage prepaid
 Certified mail
 Facsimile:
 Email:



Mary Harper, Program Information Coordinator
Idaho Department of Finance