

**STATE OF NEVADA**  
**OFFICE OF THE SECRETARY OF STATE**  
**SECURITIES DIVISION**

2250 LAS VEGAS BOULEVARD NORTH, SUITE 400  
NORTH LAS VEGAS, NEVADA 89030

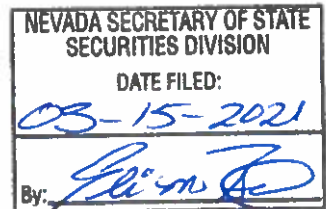
In the Matter of:

CONESTOGA SETTLEMENT SERVICES,  
LLC; CONESTOGA INTERNATIONAL,  
LLC; CONESTOGA TRUST SERVICES,  
LLC; CONESTOGA TRUST; and  
MICHAEL CHARLES MCDERMOTT, an  
individual,

Respondents.

ADMINISTRATIVE CONSENT ORDER

File No. INV19-061



TO: Conestoga Settlement Services, LLC  
c/o Incorp Services, Inc., its Registered Agent  
919 N. Market Street, Suite 950  
Wilmington, DE 19801

Conestoga International, LLC  
c/o Strategic Solutions, Inc., its Registered Agent  
Chartis Building, 250 Munoz Rivera Avenue, Suite 1400  
San Juan, PR 00918

Conestoga Trust Services, LLC/Conestoga Trust  
c/o Incorp Services, Inc., its Registered Agent  
919 N. Market Street, Suite 950  
Wilmington, DE 19801

Michael Charles McDermott  
644 Avenue Fernandez Juncos, Suite 301  
San Juan, PR 00907

WHEREAS, on May 26, 2020, the Nevada Secretary of State, Securities Division (Division) filed a Complaint (incorporated herein), against Conestoga Settlement Services, LLC, Conestoga International, LLC, Conestoga Trust Services LLC, and Michael Charles McDermott (collectively, Respondents).

WHEREAS, on May 26, 2020, the Division Administrator issued a Cease and Desist Order against the Respondents based on the contents of that complaint.

1       **WHEREAS**, Respondents timely requested a hearing on the matters set forth in the Cease and  
2 Desist Order.

3       **WHEREAS**, Respondents have advised the Division of their desire to resolve the issues set  
4 forth in the Cease and Desist Order and to comply with the requirements of Nevada's Uniform  
5 Securities Act (Act), on the terms specified with this Administrative Consent Order;

6       **WHEREAS**, Respondents elect to permanently and expressly waive any right to a hearing and  
7 appeal under the Act and/or to seek judicial review under the Nevada Administrative Procedure Act,  
8 NRS Chapter 233B, with respect to this Order.

9       **WHEREAS**, Respondents neither admit nor deny the allegations recited in the Division's  
10 Complaint of May 26, 2020.

11       Finding the following appropriate and in the public interest, and on the basis of the foregoing,  
12 and Respondents' consent to the entry of this Order,

13       **IT IS HEREBY ORDERED:**

- 14       1. The Cease and Desist Order issued on May 26, 2020 by the Division Administrator against  
15       the Respondents is hereby withdrawn and replaced with this Order.
- 16       2. Respondents will cease from violating the Act and will comply with said Act.
- 17       3. Respondents shall not offer any non-exempt unregistered securities in the state of Nevada.
- 18       4. That any registration exemptions set forth in NRS 90.530(10) and NRS 90.530(11) related  
19       to any securities offered by Respondents are hereby revoked. Moreover, prior to offering  
20       any security in, into, or from Nevada, whether exempt or not, Respondents shall notify the  
21       Division.
- 22       5. In consideration of Respondents' consent to entry of this Order, the Division will not pursue  
23       any further administrative proceedings, including not seeking civil monetary penalties,  
24       against Respondents regarding the actions known to the Division as of the date of this Order.
- 25       6. Nothing in this Order shall be construed as a waiver of the Division's right to investigate  
26       and pursue any criminal violations by Respondents.

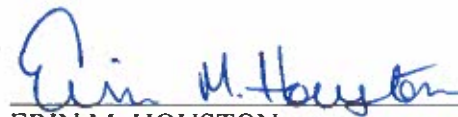
1 7. Nothing in this Order is intended to limit or create for third parties any private remedies  
2 against Respondents. Furthermore, nothing in this Order is intended to, or shall in any say  
3 limit, restrict, or adversely affect Respondents' ability to defend themselves in any civil  
4 proceeding brought by any third party and/or criminal prosecution identified in the  
5 Complaint filed in INV-061.

6 8. This Order shall be effective as of the date on which it is signed by the Administrator as set  
7 forth below.

8  
9 IT IS SO ORDERED.

10  
11 DATED this 15<sup>th</sup> day of March, 2021.

12 **BY ORDER OF THE ADMINISTRATOR**  
13 Office of the Secretary of State, Securities Division

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15 ERIN M. HOUSTON  
16 Deputy Secretary for Securities  
17 Securities Administrator  
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3 **CONSENT TO ENTRY OF ADMINISTRATIVE ORDER**

4 Respondent Conestoga Settlement Services, LLC, Conestoga International, Conestoga Trust  
5 Services, Michael McDermott (collectively, Respondents) hereby acknowledge, through counsel, that  
6 they have been served with a copy of this Order, have read the foregoing Order, are aware of their  
7 rights to a hearing and appeal in this matter, and has waived the same.

8 Respondents specifically acknowledge that a violation of this Order may constitute a felony  
9 pursuant to NRS 90.650.

10 Respondents admit the jurisdiction of the Securities Division of the Nevada Office of the  
11 Secretary of State and consent to entry of this Order by the Administrator of the Division as settlement  
12 of the issues contained within this Order.

13 Respondents state that no promises of any kind or nature, other than the consideration set forth  
14 in the Order, were made to them to induce them to enter into this Order and that they have entered  
15 into this Order voluntarily.

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17   
18 Authorized Representative of  
19 Conestoga Settlement Services, LLC

20   
21 Authorized Representative of  
22 Conestoga International, LLC

23 Authorized Representative of  
24 Conestoga Trust Services, LLC

25   
26 Michael McDermott

27 Reviewed for content:   
28 Jim Orr, Esq.

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Respondents state that no promises of any kind or nature, other than the consideration set forth in the Order, were made to them to induce them to enter into this Order and that they have entered into this Order voluntarily.

**Michael McDermott**

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