STATE OF NEVADA OFFICE OF THE SECRETARY OF STATE SECURITIES DIVISION

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

In the Matter of:

STERN BROTHERS ASSET

MANAGEMENT, LLC a/k/a

SIGNALWISE LLC, CRD No. 152735; and
WILLIAM PAUL STERN, CRD No.

2735897, an individual.

ADMINISTRATIVE CONSENT ORDER

File No. CIC19-009

SECURITIES DIVISION

/ DATE FILED

Respondent.

TO: STERN BROTHERS ASSET MANAGEMENT, LLC

WILLIAM PAUL STERN 13391 N. 7th Avenue Boise, ID 83714

WHEREAS, STERN BROTHERS ASSET MANAGEMENT, LLC (STERN), CRD No. 152735, is a registered investment advisory firm located at 13391 N. 7TH Avenue, Boise, ID 83714;

WHEREAS, William Paul Stern, CRD No. 2735897, is a registered investment adviser representative of Stern, employed at Stern's offices at 13391 N. 7TH Avenue, Boise, ID 83714;

WHEREAS, on January 14, 2019, Compliance/Audit Investigators with the Nevada Securities Division, Office of the Secretary of State (Division), pursuant to the Administrator's authority under NRS § 90.410, conducted an inspection of Respondents to verify compliance with Nevada's Uniform Securities Act (Act);

WHEREAS, based on the facts and circumstances revealed during the course of this inspection, Respondents failed to file the required annual updating amendments to the Form ADV as required by NAC 90.380(3);

WHEREAS, it is a violation of NAC § 90.380(3) to fail to file required annual updating amendments to the Form ADV;

WHEREAS, Respondents have advised the Division of their desire to resolve the above failures to comply with the requirements of the Act, on the terms specified within this Administrative Consent Order;

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

NOW THEREFORE, the Administrator, pursuant to the Act, hereby enters the following:

ORDER

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

IT IS HEREBY ORDERED:

- 1. Respondents will cease from violating the Act and will comply with said Act.
- 2. Respondents will pay the Nevada Secretary of State a civil penalty in the cumulative amount of Two Thousand Five Hundred Dollars and No Cents (\$2,500.00), due upon the signing of Respondent's consent to entry of this Administrative Order.
- Respondents shall submit a check made payable to the Secretary of State in the amount of
 One Thousand Dollars and No Cents (\$1,000.00) for its fee for the inspection of
 Respondent's records performed under NRS § 90.410.
- 4. All fees submitted under this section shall be remitted to:

Nevada Secretary of State c/o Stacey Roter 2250 Las Vegas Blvd. North, Suite 400 North Las Vegas, NV 89030

5. In consideration, the Division will take no further enforcement action based upon the circumstances covered by this inspection and this Order, and close its administrative investigation of the Respondents in connection with the aforementioned activities.

- 6. Nothing in this Order shall be construed as a waiver of the Division's right to investigate and pursue any violations by Respondents in connection with other activity not set forth herein.
- 7. Nothing in this Order is intended to limit or create for third parties any private remedies against Respondent.
- 8. This Order shall be effective as of the date on which it is signed by the Administrator, as set forth below.

Dated this 13th day of June, 2020.

BY ORDER OF THE ADMINISTRATOR
Nevada Securities Division, Office of the Secretary of State

Deputy Secretary for Securities Securities Administrator

CONSENT TO ENTRY OF ADMINISTRATIVE ORDER

Stern Brothers Asset Management, LLC, a/k/a Signalwise LLC (Respondent), by and through its authorized representative, William Paul Stern, and William Paul Stern, as an individual, hereby acknowledge that they have been served with a copy of this Administrative Consent Order (ACO), have waived the same.

Respondents admit the jurisdiction of the Securities Division, of the Office of the Secretary of State, State of Nevada and consent to entry of this ACO by the Administrator of the Division as settlement of the issues contained in this ACO.

Respondents aver that no promise of any kind or nature, other than the consideration set forth in this ACO, was made to Respondents to induce them to enter into this ACO, and that they have entered into this ACO voluntarily.

Dated this \(\frac{\lambda \lambda \lambda}{\lambda} \) day of June, 2020.

STERN BROTHERS ASSET MANAGEMENT, LLC

Authorized Representative, and in his individual

capacity