



4. On March 9, 2004, a letter was dispatched to BROAD STREET which enumerated certain documentation and information that must be provided as part of the application for registration, among which was a requirement to furnish a statement concerning any prior sales activity that had occurred in the state of Alabama.

5. By letter, dated May 18, 2004, MADA advised the Commission that BROAD STREET had not had any prior activity in Alabama.

6. On August 2, 2004, a visitation letter was dispatched to BROAD STREET's clearing firm, Western Securities Clearing Corp ("WESTERN") for a listing of Alabama clients of Broad Street, and documents, including transaction reports detailing transactions and date of transactions, if any.

7. On September 24, 2004, the Commission received transaction information from WESTERN reflecting BROAD STREET has 3 open accounts with Alabama residents reflecting 12 securities trades.

8. On December 20, 2004, and again on February 23, 2006, a letter was dispatched to BROAD STREET advising that the Commission intended to deny BROAD Street's application for registration.

9. Written responses from BROAD STREET to both telephonic and written communication with Commission staff failed to provide adequate information relating to the prior sales.

10. Review of the files of the Commission, disclosed no record of registration or exemption from registration of BROAD STREET as a dealer in the state of Alabama.

#### CONCLUSIONS OF LAW

11. BROAD STREET is not registered nor exempt from registration as a

dealer in the state of Alabama, and has effected securities transactions with a resident of the state of Alabama.

12. Transacting business in the state of Alabama as a dealer, without benefit of registration or exemption from registration, is a violation of Section 8-6-3(a), Code of Alabama 1975.

13. BROAD STREET has filed an application for registration which, as of its effective date, or as of any date after filing, was incomplete or contained a false statement.

14. The filing of an application for registration, containing a false statement, is a violation of Section 8-6-3(j)(1), Code of Alabama 1975.

This Order does not prevent the Commission from seeking such other civil or criminal remedies that are available to it under the Act.

This Order is appropriate in the public interest for the protection of investors and is consistent with the purposes of the Act.

**ACCORDINGLY, IT IS HEREBY ORDERED** that RESPONDENTS immediately **CEASE AND DESIST** from further offers or sales of any security into, within or from the state of Alabama.

Entered at Montgomery, Alabama, this 21<sup>st</sup> day of December, 2006.



ALABAMA SECURITIES COMMISSION  
770 Washington Avenue, Suite 570  
Montgomery, AL 36130-4700  
(334) 242-2984  
BY:

A handwritten signature in black ink, appearing to read "Joseph P. Borg", is written over a set of horizontal lines.

JOSEPH P. BORG  
Director

3