

STATE OF NORTH DAKOTA

SECURITIES DEPARTMENT

In the Matter of Susan L. Welo,  
doing business under the trade name,  
Welo Wealth Management,  
  
Respondent.

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**CEASE AND DESIST ORDER  
AND  
NOTICE OF RIGHT TO  
REQUEST A HEARING**

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**THE SECURITIES COMMISSIONER OF THE STATE OF NORTH DAKOTA TO  
THE ABOVE-NAMED RESPONDENT:**

The North Dakota Securities Commissioner has a reasonable basis to believe that the Respondent has engaged in, is engaging in, or is about to engage in, acts, practices or transactions, as more fully described below, which are prohibited under Chapter 10-04 of the North Dakota Century Code (N.D.C.C.). It is necessary and appropriate in the public interest and for the protection of investors to restrain these acts, practices, or transactions of the Respondent.

1. Respondent, Susan L. Welo, CRD #1884407, is a resident of West Fargo, North Dakota. Respondent Welo has been registered as a securities agent in North Dakota with various broker-dealer firms since 1999, most recently with Cetera Advisor Networks LLC, CRD #13572, (Cetera) until her discharge on or about October 3, 2016.
2. While registered with Cetera, Respondent Welo engaged in the sale of securities and insurance products to the public under the registered trade name, Welo Wealth Management, in offices in banks located in Arthur, Buffalo, Casselton, Enderlin, Hatton, Hillsboro, Lamoure, Lisbon, Marion, Oakes, and Mayville, North Dakota.
3. Since October 4, 2016, and through July 2017, Respondent Welo has communicated with her former Cetera customers in written correspondence and

verbally that she will continue to service their accounts, provide investment advice and work with them from a primary office in Fargo, North Dakota. Her principal office as registered with the Secretary of State is 1823 Queensbury St., West Fargo, North Dakota 58078, which is her personal residence. Welo has taken custody of client funds for transfer to Cetera's clearing firm while not registered to do so. Welo has recommended the liquidation of client securities for investment in other investments and the transfer of securities accounts from Cetera to other broker-dealer firms.

4. Respondent Welo, in effecting or attempting to effect purchases or sales of securities in this state, while not registered with a registered broker-dealer or exempt from registration, acted as an unregistered agent in violation of N.D.C.C. § 10-04-10(2).

5. Respondent Welo, in recommending the liquidation and reinvestment of client securities, acted as an unregistered investment adviser in violation of N.D.C.C. § 10-04-10(3). Respondent Welo is not now and has never been registered as an investment adviser or investment adviser representative in North Dakota.

6. Since October 4, 2016, and through July 2017, Respondent Welo has by representation or material omission failed to disclose to her North Dakota clients that she is not registered to transact business in this state as an agent or investment adviser and that it is unlawful for her to do so.

7. Pursuant to N.D.C.C. § 10-04-16(1), the Securities Commissioner has the authority to Order that a person Cease and Desist from violations of the Securities Act, to rescind transactions made in violation of the Securities Act, and to assess civil penalties in an amount not to exceed \$10,000 for each violation of the Securities Act.

8. This Order is issued in the public interest and for the protection of investors.

**NOW, THEREFORE, IT IS ORDERED**, pursuant to N.D.C.C. § 10-04-16, that the Respondent, Susan L. Welo, shall immediately **CEASE AND DESIST** from any further violations of the Securities Act or rules in connection with the offer and/or sales of securities in this state or the providing of investment advice, individually or through Welo Wealth Management.

This Order shall be effective upon signature of the Commissioner.

**NOTICE OF RIGHT TO REQUEST A HEARING**

**YOU ARE NOTIFIED** that pursuant to N.D.C.C. § 10-04-12 you may request a hearing before the Securities Commissioner if such a request is made in writing WITHIN FIFTEEN (15) DAYS AFTER THE RECEIPT OF THIS ORDER. The Respondent has the right to be represented by legal counsel at the hearing.

**IN TESTIMONY WHEREOF**, witness my hand and seal this 21<sup>st</sup> day of July, 2017.



  
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Karen J. Tyler, Securities Commissioner  
North Dakota Securities Department  
600 East Boulevard Ave.  
State Capitol – Fifth Floor  
Bismarck, ND 58505-0510  
(701) 328-2910

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**AFFIDAVIT OF SERVICE BY MAIL**

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I, Jacqui Ferderer, being first duly sworn, state that I am a citizen of the United States over the age of twenty-one years and not a party to or interested in the above-entitled proceeding.

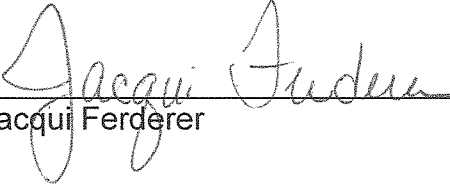
On July 21<sup>st</sup>, 2017, I deposited in the Central Mailing Bureau of the United States Post Office Department in the State Capitol in Bismarck, North Dakota, true and correct copies of each of the following documents:

**CEASE AND DESIST ORDER AND NOTICE OF RIGHT TO REQUEST A HEARING**

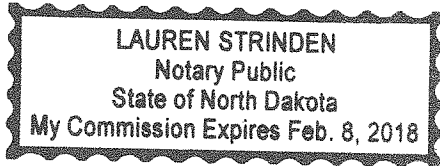
A copy of the above documents was securely enclosed in an envelope with postage prepaid, sent via Certified U. S. mail, return receipt requested, and addressed to each of the following:

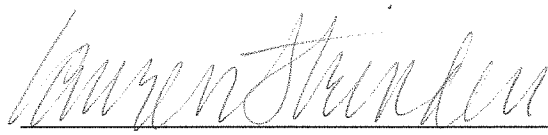
Susan L. Welo  
1823 Queensbury St.  
West Fargo, ND 58078

To the best of my knowledge, information, and belief, the address given above is the last known address of the party intended to be served.

  
Jacqui Ferderer

Subscribed and sworn to before me on this 21<sup>st</sup> day of July, 2017.



  
Notary Public  
Burleigh County, North Dakota  
My commission expires: