

**STATE OF NORTH DAKOTA
COUNTY OF BURLEIGH**

**BEFORE THE
SECURITIES COMMISSIONER**

In the Matter of **Raoul Brandt**)
and his Officers, Directors,)
Agents and Employees,)
)
Respondents.)

CONSENT ORDER

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The North Dakota Securities Commissioner has advised the Respondent that he is prepared to commence formal action pursuant to North Dakota Century Code Chapter 10-04 and has determined as follows:

1. Raoul Brandt, in association with Investment Management and Research, Inc. offered investments to residents of North Dakota known as Royal Crown Bonds while said bonds were not registered as securities in North Dakota or exempted under North Dakota law;
2. Pursuant to N.D.C.C. § 10-04-16, the Commissioner issued a Cease and Desist Order against Mr. Brandt and others on November 15, 1996, but Mr. Brandt failed to request a hearing as provided for in the Cease and Desist Order;
3. Pursuant to N.D.C.C. § 10-04-16, whenever it shall appear to the Commissioner that any person has engaged in, or is engaging in, or is about to engage in any act or practice which is declared illegal in Ch. 10-04 N.D.C.C., the Commissioner may, in his discretion issue any order and collect civil penalties against any person found in an administrative action to have violated any provision of the chapter in an amount not to exceed \$10,000 for each violation;
4. The violations described above constitute sufficient grounds for the imposition of civil penalties under Ch. 10-04 N.D.C.C.;
5. Respondent waives his right to a hearing in this matter and to present arguments to the Commissioner;
6. Respondent acknowledges his right to be represented by legal counsel throughout this proceeding, and have agreed to an informal disposition of this matter, without a hearing; and
7. The following Order is necessary and appropriate in the public interest.

NOW, THEREFORE, IT IS ORDERED, THAT:

1. Respondents shall not transact any securities business with any person in North Dakota unless registered as a dealer or properly exempted under Ch. 10-04 N.D.C.C.;
2. Respondents shall not employ any person to represent them as a securities salesman for any securities business with any person in North Dakota unless such person is registered as a salesman or properly exempted under Ch. 10-04 N.D.C.C.;
3. Respondents shall pay a civil penalty of \$500 to the Office of the Securities Commissioner pursuant to N.D.C.C. § 10-04-16;
4. The Cease and Desist Order which was issued by the Commissioner on November 15, 1996 against Raoul Brandt and others is hereby vacated and is no longer in effect; and
5. This Order shall be effective upon signature of the Commissioner.

Dated at Bismarck, North Dakota, on March 31, 1997.



Cal Hoovestol

CAL HOOVESTOL
SECURITIES COMMISSIONER
State Capitol-5th Floor
Bismarck, ND 58505-0510
(701) 328-2910

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CONSENT TO ENTRY
OF ORDER

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The undersigned states that he has read the foregoing Consent Order; that he knows and fully understands its contents and effects; that he is authorized to execute this Consent to Entry of Order on behalf of the Respondents; that Respondents have waived their rights to a hearing with respect to this matter; and that Respondents consent to entry of the Consent Order by the Securities Commissioner without admitting or denying the findings of fact and conclusions of law contained herein. It is further expressly understood that the Consent Order constitutes the entire settlement agreement between the parties hereto, there being no other promises or agreements, either expressed or implied.

Dated this 25th day of March, 1997, 1996.

Raoul Brandt
Brandt Brokerage Services

By: Raoul Brandt
(Type or Print Name)

Signed: Raoul Brandt
Capacity: _____