



STATE OF MISSOURI
OFFICE OF SECRETARY OF STATE

IN THE MATTER OF:)
)
ROBERT PATTON STANSBERRY,)
CRD # 712525; and) Case No. AP-20-14
V WEALTH ADVISERS LLC,)
CRD # 153278,)
)
Respondents.)

CONSENT ORDER

1. On July 16, 2020, the Financial Industry Regulatory Authority (“**FINRA**”) issued an Acceptance, Waiver, and Consent (“**AWC**”) against Robert Patton Stansberry (“**Stansberry**”), a Missouri-registered investment adviser representative, for using a personal email account to conduct securities business, in violation of FINRA Rules 4511 and 2010, and altering customer account documents in violation of FINRA Rule 2010.¹ Pursuant to the AWC, Stansberry consented to a six-month suspension from association with any FINRA member in any capacity and a \$10,000 fine. The Enforcement Section of the Missouri Securities Division of the Office of Secretary of State (“**Enforcement Section**”), through Director of Enforcement, Douglas M. Jacoby, alleges that these actions constitute sufficient grounds to suspend Stansberry’s Missouri registration as an investment adviser representative in accordance with Sections 409.4-412(b) and 409.4-412(d)(5)(C).² The Enforcement Section further alleges that Stansberry’s current employer, V Wealth Advisors LLC (“**VWA**”), a federal covered investment adviser³, failed to promptly notify the Securities Division of the aforementioned AWC as required pursuant to a plan of heightened supervision of Stansberry that had been executed on November, 18, 2019, between the Securities Division and VWA, in violation of 15 CSR 30-51.173(1)(A) and (C).
2. Respondents and the Securities Division desire to settle the allegations and the matters raised by the Securities Division relating to alleged violations of: with respect to Stansberry, Sections 409.4-412(b) and 409.4-412(d)(5)(C); and, with respect to VWA, 15 CSR 30-51.173(1)(A) and (C).

¹ See FINRA AWC issued in Matter No. 2018059500901.
² Unless otherwise noted, all statutory references are to the 2016 Revised Statutes of Missouri.
³ “Federal covered investment adviser” means a person registered under the Investment Advisers Act of 1940.

CONSENT TO JURISDICTION

3. Respondents and the Securities Division stipulate and agree that the Missouri Commissioner of Securities (“**the Commissioner**”) has jurisdiction over Respondents and these matters pursuant to the Missouri Securities Act of 2003, Chapter 409, *et seq.*
4. Respondents and the Securities Division stipulate and agree that the Commissioner has authority to enter this Order pursuant to Section 409.6-604(h), which provides:

“The commissioner is authorized to issue administrative consent orders in the settlement of any proceeding in the public interest under this act.”

WAIVER AND EXCEPTION

5. Respondents waive any rights to a hearing with respect to this matter.
6. Respondents waive any rights that they may have to seek judicial review or otherwise challenge or contest the terms and conditions of this Order. Respondents specifically forever release and holds harmless the Missouri Office of the Secretary of State, Secretary of State, Commissioner, and their respective representatives and agents from any and all liability and claims arising out of, pertaining to, or relating to this matter.
7. Respondents stipulate and agree with the Securities Division that, should the facts contained herein prove to be false or incomplete, the Securities Division reserves the right to pursue any and all legal or administrative remedies at its disposal.

CONSENT TO COMMISSIONER’S ORDER

8. Respondents and the Securities Division stipulate and agree to the issuance of this Consent Order without further proceedings in this matter, agreeing to be fully bound by the terms and conditions specified herein.
9. Respondents agree not to take any action or to make or permit to be made any public statement creating the impression that this Order is without factual basis. Nothing in this paragraph affects Respondents’ (a) testimonial obligations; (b) right to take legal or factual positions in defense of litigation or in defense of other legal proceedings in which the Commissioner is not a party; or (c) right to make public statements that are factual.
10. Respondents agree that they are not the prevailing party in this action since the parties have reached a good faith settlement.
11. Respondents neither admit nor deny the allegations made by the Securities Division or the Findings of the Commissioner, but consent to the Commissioner’s Findings of Fact, Conclusions of Law, and Order as set forth below solely for the purposes of resolving this

proceeding and any proceeding that may be brought to enforce the terms of this Consent Order.

THE COMMISSIONER'S FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER

I. FINDINGS OF FACT

12. Stansberry is a Columbia, Missouri, resident and has been associated with several Missouri-registered broker-dealers and investment advisers since 1980. Stansberry is registered in the Central Registration Depository (“**CRD**”) with number 712525. Most recently, since November 14, 2019, Stansberry has been associated with VWA as an investment adviser representative. Stansberry conducts investment adviser business for VWA at a non-registered branch location of 108 E. Green Meadows, Suite 2, Columbia, MO 65203.
13. VWA is a Kansas-based investment adviser with an address of 6800 College Blvd., Suite 630, Overland Park, KS 66211. VWA is registered in CRD with number 153278. VWA is a federal covered investment adviser and has notice filed in the State of Missouri continuously since April 6, 2010.
14. On November 14, 2019, upon voluntarily terminating his employment with another Missouri-registered investment adviser⁴ and joining VWA, Stansberry, as is required upon switching firms, applied to re-register as an investment adviser representative for VWA with the State of Missouri.
15. As a precondition for approving Stansberry’s application, the Securities Division, as a result of the conduct and activity Stansberry allegedly engaged in while employed at Wells Fargo, which formed the basis of FINRA’s investigation in Matter No. 2018059500901, required VWA to implement certain enhanced supervisory measures with respect to Stansberry (the “Enhanced Supervisory Measures”). The terms of the Enhanced Supervisory Measures were agreed and affirmed in separate written affidavits by both Stansberry and VWA on November 18, 2019.
16. The Enhanced Supervisory Measures required, among other things, that VWA promptly send to the Missouri Securities Commissioner any documentation of regulatory investigations, action and/or proceedings regarding Stansberry.
17. The Securities Division subsequently approved Stansberry’s application on November 20, 2019.
18. On July 16, 2020, FINRA issued an AWC in Matter No. 2018059500901. According to the AWC, Stansberry consented to a six-month suspension from association with any

⁴ Prior to joining VWA, Stansberry was employed as a broker-dealer agent and investment adviser representative from May 2017 to August 2018, at Wells Fargo Advisors Financial Network, LLC (CRD #11025)(“**Wells Fargo**”), a Missouri-registered broker-dealer and investment adviser, and as a broker-dealer agent and investment adviser representative from August 2018 to November 2019, at Cutter & Company, Inc. (CRD #22449), a Missouri-registered broker-dealer and investment adviser.

FINRA member in any capacity and a \$10,000 fine for using a personal email account to conduct securities business, in violation of FINRA Rules 4511 and 2010, and altering customer account documents in violation of FINRA Rule 2010.

19. On September 15, 2020, without having received any prior notice from VWA, as required under the Enhanced Supervisory Measures, the Securities Division discovered the AWC in Matter No. 2018059500901 while conducting a routine periodic review of Missouri-related disciplinary matters.
20. The Enforcement Section alleges that the regulatory action taken by FINRA against Stansberry in Matter No. 2018059500901 constitutes sufficient grounds to suspend Stansberry's Missouri registration as an investment adviser representative in accordance with Sections 409.4-412(b) and 409.4-412(d)(5)(C).
21. Further, the Enforcement Section alleges that VWA's breach of its obligation and responsibility to provide such notice pursuant to the Enhanced Supervisory Measures represents a failure to implement reasonable supervision by VWA under 15 CSR 30-51.173(1)(A) and (C).

II. CONCLUSIONS OF LAW

22. **THE COMMISSIONER CONCLUDES** that an order is in the public interest to suspend the registrations of Respondent Stansberry as an investment adviser representative pursuant to Sections 409.4-412(b) and 409.4-412(d)(5)(C).
23. **THE COMMISSIONER CONCLUDES** that Respondent VWA failed to comply with its obligations with respect to the Enhanced Supervisory Measures, when it failed to promptly notify the Securities Division of the FINRA AWC in Matter No. 2018059500901, in violation of 15 CSR 30- 51.173(1)(A) and (C).
24. **THE COMMISSIONER CONCLUDES** that the violations above are sufficient to issue an order in accordance with Section 409.6-604.
25. The Commissioner, after consideration of the stipulations set forth above and on consent of the Respondents and the Enforcement Section, finds and concludes that the Commissioner has jurisdiction over Respondents in this matter and that the following order is in the public interest, necessary for the protection of public investors, and consistent with the purposes intended by Chapter 409.

III. ORDER

NOW, THEREFORE, it is hereby Ordered that:

1. Respondent Stansberry is **SUSPENDED** from operating as a broker-dealer agent and investment adviser representative in the State of Missouri for a period of six months from the date of issuance of this Order, during which Respondent Stansberry is prohibited from receiving remuneration or compensation, either directly or indirectly, of any kind or in any form from Respondent VWA or any officer, director, employee or agent of Respondent VWA (or enter into any pre-arranged agreement with Respondent VWA or any officer, director or employee for the same), including, but not limited to, any compensation for the sale of Respondent Stansberry's book of clients to Respondent VWA;
2. Respondent VWA shall pay \$7,500 to the Missouri Secretary of State's Investor Education and Protection Fund for violations of 15 CSR 30- 51.173(1)(A) and (C). This amount shall be made payable to the Missouri Secretary of State's Investor Education and Protection Fund and sent to the Securities Division at 600 W. Main Street, Jefferson City, Missouri 65101 within thirty days of this Order;
3. Respondents, their agents and employees, and all other persons participating in the above-described alleged violations with knowledge of this Order, are permanently enjoined and restrained from engaging in violations of: as to Respondent Stansberry, Section 409.4-412(b) and 409.4-412(d)(5)(C), by engaging in conduct and/or activities subject to discipline under Section 409.4-412; and, as to Respondent VWA, 15 CSR 30-51.173(1)(A) and (C), by failing to appropriately notify the Division under the terms of the Enhanced Supervisory Measures; and
4. Respondents shall pay their own costs and attorneys' fees with respect to this matter.

SO ORDERED:

WITNESS MY HAND AND OFFICIAL SEAL OF MY OFFICE AT JEFFERSON CITY,
MISSOURI THIS 1st DAY OF OCTOBER, 2020.

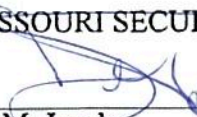


JOHN R. ASHCROFT
SECRETARY OF STATE


DAVID M. MINNICK
COMMISSIONER OF SECURITIES

Consented to by:

THE MISSOURI SECURITIES DIVISION



Douglas M. Jacoby
Director of Enforcement


RESPONDENT



Robert Patton Stansberry, CRD#712525

RESPONDENT

V WEALTH ADVISERS LLC



Thomas Blumer, Managing Partner