



STATE OF MISSOURI
OFFICE OF SECRETARY OF STATE

IN THE MATTER OF:)
)
DONOVAN J. BROOKS, CRD #5927442,) Case No.: AP-23-06
)
Respondent.)

CONSENT ORDER

SUMMARY OF ENFORCEMENT SECTION’S ALLEGATIONS

1. The Enforcement Section of the Missouri Securities Division of the Office of Secretary of State (“**Enforcement Section**”), through Enforcement Counsel William F. H. Dunker, alleges that between March 1, 2021 and March 10, 2023 (“**Relevant Period**”), Donovan J. Brooks (“**Respondent**”) transacted business in the State of Missouri as an investment adviser representative on behalf of Origin Financial, CRD #305353 (the “**Firm**”) without being registered or exempt from registration as a representative of the Firm in violation of Section 409.4-404(a). The Enforcement Section alleges that these violations constitute grounds to issue an order in accordance with Section 409.6-604.
2. Respondent and the Securities Division desire to settle the allegations raised by the Enforcement Section regarding Respondent’s alleged violations of Section 409.4-404.

CONSENT TO JURISDICTION

3. Respondent and the Enforcement Section stipulate and agree that the Missouri Commissioner of Securities (the “**Commissioner**”) has jurisdiction over Respondent and these matters pursuant to the Missouri Securities Act of 2003, Chapter 409, *et seq.* (the “**Act**”).¹
4. Respondent and the Enforcement Section stipulate and agree that the Commissioner has authority to enter this Order pursuant to Section 409.6-604(h), which provides:

¹ Unless otherwise specified, all statutory references are to the 2016 Revised Statutes of Missouri, as updated by the 2021 Cumulative Supplement.

“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. Respondent waives any right to a hearing with respect to this matter.
6. Respondent waives any right that he may have to seek judicial review or otherwise challenge or contest the terms and conditions of this Order. Respondent specifically forever releases 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. Respondent stipulates and agrees with the Enforcement Section that, should the facts contained herein prove to be false or incomplete, the Enforcement Section reserves the right to pursue any and all legal or administrative remedies at its disposal.

CONSENT TO COMMISSIONER’S ORDER

8. Respondent and the Enforcement Section 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. Respondent agrees 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 Respondent’s (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. Respondent agrees that he is not the prevailing party in this action since the parties have reached a good faith settlement.
11. Respondent neither admits nor denies the allegations made by the Enforcement Section or the Findings of the Commissioner, but consents to the Commissioner’s Findings of Fact, Conclusions of Law, and Order as set forth below solely for the purpose 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. Origin Financial is a Massachusetts-based investment adviser with an address of 177 Huntington Avenue, Suite 1703 PMB 50966, Boston, Massachusetts, 02115. The Firm is

registered with the U.S. Securities and Exchange Commission (“SEC”), #801-120236 and the Central Registration Depository System (“CRD”), #305353.

13. Respondent is an investment adviser representative with the Firm, with CRD #5927442. Respondent was a registered investment adviser representative in Missouri for another investment adviser, Prosperpurpose Wealth, CRD #281830, throughout the Relevant Period. Respondent remains registered as an investment adviser representative with Prosperpurpose Wealth to the present.
14. On March 10, 2023, David Blaylock, Head of Advice and Planner Compliance at the Firm, emailed the Securities Division to self-report that a routine audit discovered an investment adviser representative, Respondent, conducted investment adviser services on the Firm’s behalf without dual registration in the State of Missouri.
15. Although Respondent began representing the Firm in March 2021, the Firm did not apply for dual registration in Missouri on his behalf until June 16, 2022. The application was marked “deficient” for the lack of a dual registration letter required under 15 CSR 30-51.010(3). The Firm did not complete Respondent’s application, and the system automatically purged the application when it was not timely completed. As a result, Respondent was never properly registered to represent the Firm in the State of Missouri during the Relevant Period.
16. During the Relevant Period, according to the evidence obtained from the Firm by the Missouri Securities Division’s Examination Section, Respondent conducted advisory business and collected fees without being registered as an investment adviser representative of the Firm.
17. On April 27, 2023, the Firm submitted a new application for dual registration on Respondent’s behalf.

II. CONCLUSIONS OF LAW

18. **THE COMMISSIONER CONCLUDES** that Respondent transacted business as an unregistered investment adviser representative in violation of Section 409.4-404(a).
19. **THE COMMISSIONER CONCLUDES** that the violation above is sufficient to issue an order in accordance with Section 409.6-604.
20. The Commissioner, after consideration of the stipulations set forth above and on consent of the Respondent and the Enforcement Section, finds and concludes that the Commissioner has jurisdiction over Respondent 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:

21. Respondent, his agents, employees and servants, and all other persons participating in the above-described violations with knowledge of this order are permanently enjoined and restrained from violating Section 409.4-404(a);
22. Respondent shall pay \$984.64 to the Missouri Secretary of State Investor Education and Protection Fund for violating Section 409.4-404(a). **This amount is due upon execution of this Order and shall be made payable to the Missouri Secretary of State's Investor Education and Protection Fund** and sent via certified check to the Missouri Securities Division at 600 W. Main Street, Jefferson City, Missouri 65101;
23. Respondent, his agents, employees and servants, and all others subject to this order forgo billing and collecting client advisory fees earned during the period in which Respondent was not properly registered; and
24. Respondent shall pay his 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 22nd DAY OF MAY, 2023.



JOHN R. ASHCROFT
SECRETARY OF STATE

A handwritten signature in black ink, appearing to read "Douglas M. Jacoby", written over a horizontal line.

DOUGLAS M. JACOBY
COMMISSIONER OF SECURITIES

Consented to by:

THE MISSOURI SECURITIES DIVISION

A handwritten signature in blue ink, appearing to read "William F. H. Dunker", written over a horizontal line.

William F. H. Dunker
Enforcement Counsel

RESPONDENT

A handwritten signature in black ink, appearing to read "Donovan J. Brooks", written over a horizontal line.
Donovan J. Brooks, CRD No. 5927442