

STATE OF VERMONT
DEPARTMENT OF FINANCIAL REGULATION

IN RE: Michael J. Bombardier)
) DOCKET NO. 15-006-S
)
)

STIPULATION AND CONSENT ORDER

This Stipulation and Consent Order is entered this 7 day of July, 2015 by and among Michael J. Bombardier (“Respondent”), and the State of Vermont Department of Financial Regulation (“Department”).

WHEREAS, the Commissioner of the Department (“Commissioner”) is responsible for administering and enforcing the Vermont Uniform Securities Act (“Securities Act”), Title 9, Chapter 150 of the Vermont Statutes Annotated, pursuant to which the Department has conducted a review of Respondent; and

WHEREAS, as a result of the Department’s review, the Department has concluded that Respondent violated the Securities Act by transacting business in this state as an agent, investment adviser, and/or investment adviser representative without being registered with the Department; and

WHEREAS, the Department has accordingly sought, and Respondent, without the necessity of further formal proceedings, has agreed to take corrective and remedial measures as more specifically described herein; and

WHEREAS, Respondent elects to permanently waive any right to a hearing and appeal under the Vermont Administrative Procedure Act, Title 3, Chapter 25 of the Vermont Statutes Annotated; the rules, regulations, and orders of the Commissioner; and any right it may have to judicial review by any court with respect to this Consent Order.

NOW THEREFORE, the parties so stipulate, and the Commissioner makes findings and conclusions as follows:

FINDINGS OF FACT

Respondent admits and subjects himself to the jurisdiction of the Commissioner and the Department and consents to the entry of this Order by the Commissioner.

1. Respondent Michael J. Bombardier (“Bombardier”) is a Vermont resident with a business address of record at 85 Prim Road, Suite 204, Colchester, Vermont 05446, and an address of record at 106 Reynolds Road, Grand Isle, Vermont 05458.

2. Respondent is not registered as an agent of a broker-dealer in Vermont, or in any other capacity with the Department's Securities Division, and is not employed by or associated with a broker-dealer registered in Vermont.

3. Respondent was previously registered as an agent of a broker-dealer with the Financial Industry Regulatory Authority central registration depository ("CRD") number 1769223 until or about March 12, 2012, when his association and/or employment with Woodbury Financial Services, Inc., CRD 421, ceased because Respondent was discharged.

4. Respondent was previously registered as an agent of a broker-dealer with the CRD 1769223 from or about August 29, 2012 until or about July 14, 2014, when his association and/or employment with Southeast Investments, N.C., Inc., CRD 43035, ceased because Respondent was discharged.

5. Between his periods of employment or affiliation with Woodbury Financial Services, Inc. and Southeast Investments, N.C., Inc., or between March 12, 2012 and August 29, 2012, Respondent engaged in unregistered activity by advising numerous clients to liquidate securities in order to purchase insurance products while having no active registration with the Securities Division.

6. Respondent has engaged in unregistered activity by advising numerous clients to liquidate securities in order to purchase insurance products while having no active registration with the Securities Division following his discharge from Southeast Investments, N.C., Inc. on or about July 14, 2014.

CONCLUSIONS OF LAW

7. Under 9 V.S.A. § 5402, the Securities Act provides that it is unlawful for a person to transact business in this state as an agent unless the person is registered with the Securities Division as an agent or is exempt from registration. Under 9 V.S.A. § 5403, the Securities Act provides that it is unlawful for a person to transact business in this state as an investment adviser unless the person is registered with the Securities Division as an investment adviser representative or is exempt from registration. Under 9 V.S.A. § 5404, the Securities Act provides that it is unlawful for a person to transact business in this state as an investment adviser representative unless the person is registered with the Securities Division as an investment adviser representative or is exempt from registration.

8. Providing advice to purchase or sell a security constitutes investment advice and requires registration with the Securities Division.

9. Respondent, by providing investment advice to numerous clients while domiciled but unregistered in Vermont as set forth in the foregoing Findings of Fact, has violated 9 V.S.A. § 5402, § 5403, and/or § 5404.

10. Under 9 V.S.A. § 5604, after determining that a person has engaged in an act that constitutes a violation of the Securities Act, the Commissioner may, among other things, issue a

final order directing the person to cease and desist from engaging in the act, and pay a civil penalty.

11. Pursuant to 9 V.S.A. §§ 5412(c) and 5604, the Commissioner has the authority to bar a person from registration.

12. Pursuant to 9 V.S.A. § 5604, the Commissioner issues the following Consent Order.

CONSENT ORDER

NOW, THEREFORE, based on Respondent's stipulation, and on the basis of the Findings of Fact and Conclusions of Law, the Commissioner issues the following Order, to be fully complied with following receipt by the Commissioner of the duly executed Consent to Entry of Administrative Order:

1. Respondent Michael J. Bombardier is permanently barred from registration as an agent, investment adviser, or investment adviser representative in Vermont.
2. Respondent Michael J. Bombardier shall not apply to be registered as an agent, investment adviser, or investment adviser representative in Vermont.
3. Respondent shall pay an administrative penalty in the amount of \$5,000.00 to the Department within 10 days of the execution of this Stipulation and Consent Order.
4. If Respondent fails or neglects to comply with any of the terms, conditions or undertakings set forth in this Stipulation and Consent Order, the Department may, upon written notice to Respondent, institute any legal or administrative proceedings it deems appropriate to enforce same and to seek such other appropriate sanctions, and Respondent shall consent to the entry of judgment for any unpaid balance.
5. Upon receipt by the Department of the full \$5,000.00 amount paid by Respondents in accordance with the terms of this Consent Order, this Stipulation and Consent Order will be deemed to have documented the resolution of this matter and will not be a basis for action against Respondent by the Department arising out of these same events in regards to the business of securities except in determining any action or penalty that may be imposed by the Department for any future violations of law by Respondent.

This ORDER shall become effective immediately upon the date set forth below.

BY ORDER OF THE COMMISSIONER

Entered at Montpelier, Vermont, this 7 day of July, 2015.

Susan L. Donegan
SUSAN L. DONEGAN, Commissioner
Vermont Department of Financial Regulation

Cynthia L. Stuart, Acting Commissioner

**CONSENT BY MICHAEL J. BOMBARDIER TO THE ENTRY OF AN ORDER BY THE
COMMISSIONER IMPOSING TERMS, CONDITIONS AND UNDERTAKINGS UNDER
THE VERMONT UNIFORM SECURITIES ACT**

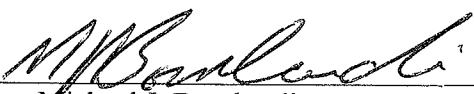
1. Michael J. Bombardier ("Respondent"), hereby admits the jurisdiction of the Commissioner over the subject matter of this proceeding, and solely with respect to this matter, knowingly and voluntarily waives any and all rights to a hearing before the Commissioner or her designee and all other procedures otherwise available under the Vermont Uniform Securities Act ("Securities Act"), Title 9, Chapter 150 of the Vermont Statutes Annotated, and any successor act, or the rules, regulations, and orders of the Commissioner. Respondent also waives compliance with the provisions of 3 V.S.A., Chapter 25 regarding contested cases. Respondent acknowledges that this Consent Order constitutes a valid order duly rendered by the Commissioner, and agrees to be fully bound by it.

2. Respondent voluntarily and knowingly waives any rights he may have to judicial review by any court by way of suit, appeal, or extraordinary remedy resulting from the issuance of the Consent Order.


3. Respondent acknowledges and agrees that the Consent Order is entered into freely and voluntarily and that no promise was made, nor was any coercion used, to induce the Respondent to enter into the Consent Order.

4. Respondent acknowledges its understanding of all terms, conditions, and obligations contained in the Consent Order and further acknowledges that should it fail to comply with any and all provisions of the Consent Order, the Commissioner may impose additional sanctions and seek other appropriate relief subject to the Respondent's right to a hearing pursuant to the Securities Act and any successor act.

Dated this 23 day of JUNE, 2015.

By: 
Michael J. Bombardier

BEFORE ME this 23 day of JUNE, 2015, personally appeared Michael J. Bombardier who acknowledged that he executed the foregoing for the purposes therein contained, and that such act of execution is his free act and deed.


Notary Public

My Commission Expires

MY COMMISSION EXPIRES
FEBRUARY 10, 2019
NOTARY PUBLIC