

**STATE OF NEW HAMPSHIRE  
DEPARTMENT OF STATE  
BUREAU OF SECURITIES REGULATION  
CONCORD, NEW HAMPSHIRE**

IN THE MATTER OF: )

Greene & Company Financial Services, LLC )  
CRD #126875 )

Respondent )

I-2020000016

**CONSENT ORDER**

- I. For purpose of settling the above-referenced matter and in lieu of further administrative proceedings, Greene & Company Financial Services, LLC (hereinafter referred to as "Greene & Company" or "Respondent"), has submitted an offer of settlement, which the Bureau of Securities Regulation, Department of State, State of New Hampshire (hereinafter referred to as the "Bureau") has determined to accept. Accordingly, and without admitting or denying the allegations and findings herein, the Respondent does hereby consent to the entry of the Consent Order (this "Consent") and the following:

**Facts**

1. Greene & Company is an investment advisor (CRD #126875), and in May 2019, it relocated to New Hampshire from Connecticut. It maintains its principal office located at 240 Ossipee Mountain Rd., Moultonborough, NH 03254. Greene & Company did not file its application for registration as an investment advisor with the Bureau until March 2020.
2. Greene & Company has three clients in New Hampshire, all of which are family members of its sole owner/investment advisor representative. The remainder of its clients are located primarily in Connecticut, with a small portion located in several other states. In May 2019, Greene & Company

informed its clients of its relocation, but also continued to hold office hours in Connecticut for its Connecticut clients. Nonetheless, Greene & Company conducts investment advisory business at its New Hampshire address.

3. Last year, had Greene & Company timely applied for registration as an investment advisor with the Bureau, then, Greene & Company would have been required to pay a renewal fee this year.

#### Law

4. Greene & Company is an investment adviser within the meaning of RSA 421-B:1-102(26) and is a person within the meaning of RSA 421-B:1-102(39).
5. Pursuant to RSA 421-B:4-403(a), it is unlawful for a person to transact business in this state as an investment advisor unless the person is registered or exempt. Greene & Company is in violation of this provision.
6. Pursuant to RSA 421-B:4-410(d), an investment advisor shall pay a fee of \$200 when filing a renewal of registration as an investment adviser. Greene & Company is subject to this provision.
7. Pursuant to RSA 421-B:6-604(a)(1), if the New Hampshire secretary of state determines that a person has engaged, is engaging, or is about to engage, in an act, practice, or course of business constituting a violation of RSA 421-B, the secretary of state may take action necessary or appropriate to comply with this chapter. Greene & Company is subject to this provision.
8. Pursuant to RSA 421-B:6-604(a)(1), whenever it appears to the New Hampshire secretary of state that any person has engaged or is about to engage in any act or practice constituting a violation of this chapter or any rule under this chapter, he shall have the power to issue and cause to be served upon such person an order requiring the person to cease and desist from violations of this chapter, including RSA 421-B:4-403. Greene & Company is subject to this provision.
9. Pursuant to RSA 421-B:6-604(d) in a final order, the Secretary of State may impose a civil penalty up to a maximum of \$2,500 for a single violation. Greene & Company is subject to this provision.

II. In view of the foregoing, the Respondent agrees to the following:


1. Respondent voluntarily consents to the entry of this Order and represents and avers that no employee or representative of the Bureau has made any promise, representation, or threat to induce its execution.
2. Respondent waives its right to an administrative hearing and any appeal therein under this chapter.
3. Respondent shall pay an administrative fine in the amount of Two Thousand Five Hundred Dollars (\$2,500) and a renewal fee of Two Hundred Dollars (\$200), with a total amount of Two Thousand Seven Hundred Dollars (\$2,700) to the State of New Hampshire. Upon execution of this Order, payment shall be made by 1) United States postal money order, certified check, bank cashier's check, business check, or bank money order; 2) made payable to the State of New Hampshire; and 3) hand-delivered or mailed to the Bureau of Securities Regulation, Department of State, State House, Room 204, Concord, New Hampshire, 03301.
4. Respondent has entered into this Consent for purpose of resolving only the matter and issues as described herein and no other issues pending before the State of New Hampshire. This Consent shall have no collateral estoppel, res judicata, evidentiary, or other legal effect in any other lawsuit, proceeding, or action, not described herein. Likewise, this Consent shall not be construed to restrict the Bureau's right to initiate an administrative investigation or proceeding relative to conduct that the Bureau was unaware of at the time this Consent was executed. If the Respondent fails to comply with any provision herein, this Consent may be vacated by the Bureau and the Bureau may institute any proceedings permitted by RSA 421-B.
5. The Respondent may not take any action or make or permit to be made any public statement, including in regulatory filings or otherwise, denying, directly or indirectly, any allegation in this Consent or create the impression that the Consent is without factual basis. Nothing in this provision affects the Respondent's testimonial obligations or right to take legal positions in litigation in which the State of New Hampshire is not a party.

III. Based on the foregoing, the Bureau deems it appropriate and in the public interest to accept and enter into this Order. **THEREFORE, IT IS HEREBY ORDERED THAT:**

1. Respondent pays an administrative fine in the amount of Two Thousand Five Hundred Dollars (\$2,500) as outlined above.
2. Respondent pays the required renewal fee in the amount of Two Hundred Dollars (\$200).
3. Respondent ceases and desists from any violations of RSA 421-B:4-403(a).
4. Respondent complies with the above-referenced undertakings.

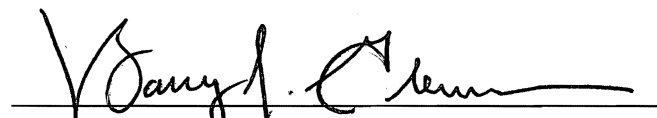
Executed this 15<sup>th</sup> day of May 2020

**GREENE & COMPANY FINANCIAL SERVICES, LLC**

  
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Douglas H. Greene, duly authorized

Entered this 22<sup>nd</sup> day of May 2020

**NEW HAMPSHIRE BUREAU OF SECURITIES REGULATION**

  
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Barry Glennon, Director