

**COMMONWEALTH OF KENTUCKY  
PUBLIC PROTECTION CABINET  
DEPARTMENT OF FINANCIAL INSTITUTIONS  
ADMINISTRATIVE ACTION NO. 17-AH-00079**

DEPARTMENT OF FINANCIAL INSTITUTIONS

COMPLAINANT

vs.

**AGREED ORDER**

TODD K. MEADOR  
TKM FINANCIAL SERVICES, LLC

RESPONDENTS

\*\*\*\*\*    \*\*\*\*\*    \*\*\*\*\*    \*\*\*\*\*    \*\*\*\*\*

**FACTUAL BACKGROUND**

1. The Kentucky Department of Financial Institutions, (“DFI”) is responsible for administering the provisions of Kentucky Revised Statutes (KRS) Chapter 292, the Securities Act of Kentucky (“the Act”), as well as any applicable rules and regulations enacted thereunder.

2. Todd K. Meador (“Meador”), CRD# 4692678, was employed by Sterling Financial Group, Ltd (“Sterling”) as an investment adviser representative (“IAR”) from November 15, 2016 to January 20, 2017. On or about January 20, 2017, Meador terminated his relationship with Sterling. Meador’s residence is 3509 River Bluff Road, Prospect, KY 40059.

3. On or about February 1, 2017 Meador established his own company, TKM Financial Services, LLC (“TKM”). TKM’s address is 4965 US Highway 42 #1000, Louisville, KY 40222.

4. Meador and TKM offered fee-based comprehensive financial planning and reviewed clients’ financial status.

5. Under TKM’s business plan, if Meador determined a client needed investment advice and management services, Meador would advise the client to use the client’s preferred Investment Adviser (“IA”) and/or IAR, or be referred to Harry Lopp, an IAR with Jesse Investment

Advisors, Inc., (“Jesse”). Meador and TKM would then provide “relationship management” services to the clients, which included scheduling and attending meetings between the client and IA/IAR.

6. Since TKM’s establishment, it has not been registered as an IA.

7. Since TKM’s establishment, Meador has not been registered as an IAR associated with any Investment Advisor.

8. On July 28, 2017, during a meeting with DFI investigators, Meador confirmed the business plan for TKM and its ongoing close working relationships with clients.

9. TKM submitted an IA registration application to DFI on August 30, 2017. The application is pending with DFI.

10. Meador submitted an IAR registration application to DFI on September 5, 2017. The application is pending with DFI.

11. Based upon the facts set forth in paragraphs two (2) through ten (10), DFI has alleged that Respondent violated the Act.

#### **STATUTORY AUTHORITY**

12. Pursuant to KRS 292.330(8), “[i]t is unlawful for any person to transact business in this state as an investment adviser unless the person is registered under this chapter as an investment adviser ...”

13. Pursuant to KRS 292.330(11), “[i]t is unlawful for an individual to transact business in this state as an investment adviser representative unless the individual is registered under this chapter as an investment adviser representative ...”

14. The Commissioner possesses a range of administrative authority in addressing violations of the Act, including the imposition of fines up to twenty thousand dollars (\$20,000.00) for each violation of the Act. See KRS 292.470 and KRS 292.500.

15. The Commissioner finds that this Agreed Order is in the public interest.

#### **CONCLUSIONS OF LAW**

16. TKM violated KRS 292.330(8).

17. Meador violated KRS 292.330(11).

#### **ORDER**

18. To resolve this matter without litigation or adversarial proceedings, DFI, Meador, and TKM agree to compromise and settle all claims arising from the above referenced factual background in accordance with the terms set forth herein.

19. DFI, Meador, and TKM, in the interest of economically and efficiently resolving this matter, agree as follows:

a. Meador and TKM shall pay a fine in the amount of two-thousand dollars (\$2,000). The fine shall be due no later than the date this Agreed Order is tendered to the DFI. Payment shall be in the form of a certified check or money order made payable to the "Kentucky State Treasurer" and mailed to the Department of Financial Institutions, Securities Division – Order, 1025 Capital Center Drive, Suite 200, Frankfort, KY 40601.

b. Meador and TKM shall cease and desist from any further violations of the Act.

20. Meador and TKM waive their right to demand a hearing at which they would be entitled to legal representation, to confront and cross-examine witnesses, and to present evidence on their own behalf, or to otherwise appeal or set aside this Agreed Order.

21. Meador and TKM consent to and acknowledge the jurisdiction of DFI over this matter and that this Order is a matter of public record and may be disseminated as such.

22. In consideration of execution of this Agreed Order, Meador and TKM, for themselves and for their successors and assigns, hereby releases and forever discharges the Commonwealth of Kentucky, DFI, Office of Legal Services, and each of their members, agents, and employees in their individual capacities, from any and all manner of actions, causes of action, suits, debts, judgments, executions, claims and demands whatsoever, known and unknown, in law or equity, that Respondent, ever had, now have, may have or claim to have against any or all of the persons or entities named in this paragraph arising out of or by reason of this Agreed Order.

23. By signing below, the parties acknowledge they have read the foregoing Agreed Order, know and fully understand its contents, and that they are authorized to enter into and execute this Agreed Order and legally bind their respective parties. This Agreed Order shall constitute the final resolution of this matter.

AGREED on this the 5<sup>th</sup> day of December, 2017.

  
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CHARLES A. VICE  
COMMISSIONER

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**Consented to:**

This 4 day of DECEMBER, 2017.

Shonita Bossier

Shonita Bossier, Director  
Division of Securities  
Department of Financial Institutions

**AND**

This 30<sup>th</sup> day of November, 2017.

Todd K. Meador

Todd K. Meador, CRD# 4692678

**ACKNOWLEDGEMENT**

COMMONWEALTH OF KENTUCKY )  
COUNTY OF Jefferson )

On this 30<sup>th</sup> day of November, 2017, before me  
Alicia Tinsley, Notary Public, **Todd K. Meador**, did appear  
personally, and as the authorized representative of **TKM Financial Services, LLC**, entered into  
and executed the foregoing instrument for the purposes therein contained.

My Commission Expires: 1/9/2021

Alicia Tinsley  
Notary Public



**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this Agreed Order was served as follows:

By Certified Mail Return Receipt Request to:


Todd K. Meador  
3509 River Bluff Road  
Prospect, KY 40059

TKM Financial Services, LLC  
4965 US Highway 42, #1000  
Louisville, KY 40222

By Hand-Delivery to:

Hon. Gary W. Adkins  
Kentucky Department of Financial Institutions  
1025 Capital Center Drive, Suite 200  
Frankfort, KY 40601

On this 5<sup>th</sup> day of December, 2017.



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Allison E. Evans  
Kentucky Department of Financial Institutions  
1025 Capital Center Drive, Suite 200  
Frankfort, KY 40601