



COMMONWEALTH OF KENTUCKY
PUBLIC PROTECTION CABINET
DEPARTMENT OF FINANCIAL INSTITUTIONS
AGENCY CASE NO. 2025-DFI-0013

DEPARTMENT OF FINANCIAL INSTITUTIONS

COMPLAINANT

vs.

AGREED ORDER

ITRUST ASSET MANAGEMENT, LLC

RESPONDENT

FACTUAL BACKGROUND

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

2. iTrust Asset Management, LLC (“iTrust” or “Respondent”) is a Kentucky Limited Liability Company, with a principal address of 3320 Tates Creek Road, Suite 100, Lexington, KY 40502.

3. Due to a clerical error, iTrust failed to pay the renewal fees for its 2023 notice filing and its investment adviser representative registrations prior to December 31, 2022, resulting in the lapse of the notice filing and representative registrations. iTrust reinstated its notice filing on January 13, 2023.

4. iTrust and its representatives conducted investment advisory activity during the period in which it was not notice filed in Kentucky (January 1, 2023, and January 12, 2023).

ACTIONS FOR COMPLIANCE AND SETTLEMENT

DFI and Respondent, collectively, in the interest of economically and efficiently resolving

this matter, agree as follows:

5. Respondent waives its right to a hearing at which it would be entitled to legal representation, to confront and cross-examine witnesses, and to present evidence on its behalf, or to otherwise appeal or set aside this Agreed Order.

6. Respondent consents to and acknowledges the jurisdiction of DFI over this matter. This Order is a matter of public record and may be disseminated as such.

7. Respondent neither admits nor denies violating any provision of KRS 292.

8. In consideration of the execution of this Agreed Order, Respondent, for itself, and for its successors and assigns, hereby release and forever discharge 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 Respondents 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 settlement.

9. Respondent agrees to pay to DFI the amount of One Thousand dollars (\$1,000.00) as full settlement of this matter.

10. Respondent agrees to pay the above-referenced amount in the form of an ACH payment or a certified check or money order made payable to the "Kentucky State Treasurer" and mailed to the "Department of Financial Institutions, Securities Division, 500 Mero Street, 2SW19, Frankfort, KY 40601 re: iTrust Asset Management, LLC Agreed Order". The payment shall be due within 30 days after entry of the Agreed Order.

11. Respondent agrees to continue to take measures to ensure compliance with all securities statutes and regulations.

12. 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.

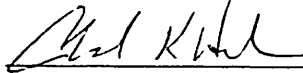
AGREED on this the 16th day of April, 2025.

Marni Rock Gibson

MARNI R. GIBSON
COMMISSIONER

Consented to:

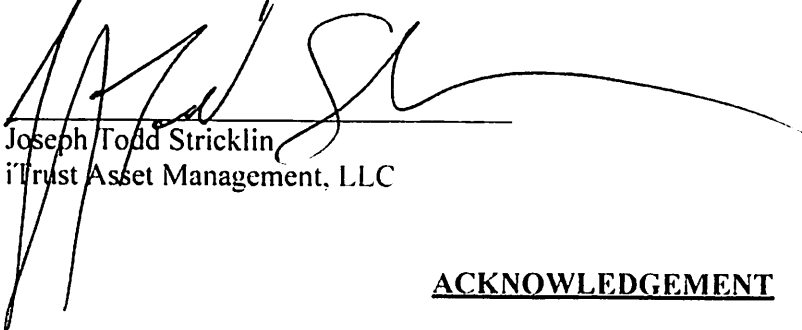
This 14th day of April, 2025



Chad K. Harlan, Director
Division of Securities
Department of Financial Institutions

AND

This 7th day of April, 2025



Joseph Todd Stricklin
iTrust Asset Management, LLC

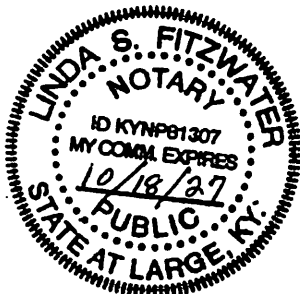
ACKNOWLEDGEMENT

STATE OF Kentucky)
)
COUNTY OF Fayette)

On this the 7th day of April, 2025, before me Linda S. Fitzwater
the undersigned, Joseph Todd Stricklin, did personally appear and acknowledge
himself/herself to be the authorized representative of iTrust Asset Management, LLC and that
being authorized to do so did enter into and execute the foregoing instrument, for himself and for
iTrust Asset Management, LLC, for the purposes therein contained.

In witness whereof I hereunto set my hand.

My Commission Expires: October 18, 2027




Notary Public

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **Agreed Order** was sent on this the 17 of April, 2025, by certified mail, return receipt requested, or hand-delivery, to the following:

Joseph Todd Stricklin
iTrust Asset Management, LLC
3320 Tates Creek Road, Suite 100
Lexington, KY 40502

Gary A. Stephens
Department of Financial Institutions
500 Mero Street 2SW19
Frankfort, KY 40601

Department of Financial Institutions

Name: Allison Reed by Victoria Ward-Bishop

Title: Executive Staff Advisor