

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OKLAHOMA 73102



In the Matter of:

Leah Anne Brooks (CRD No. 5587158),

Respondent.

ODS File 17-071

AGREEMENT

THIS AGREEMENT is entered into between Leah Anne Brooks ("**Respondent**") and the Administrator of the Oklahoma Department of Securities (the "**Administrator**" and the "**Department**") (collectively, the "**Parties**"), as of the Effective Date set forth below.

Respondent is a resident of Oklahoma. Respondent was registered under the Oklahoma Uniform Securities Act of 2004 ("**Act**"), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (2011 and Supp. 2016), as an agent of Raymond James Financial Services, Inc. ("**Raymond James**") from October 14, 2015, until March 29, 2017.

The Department maintains that while Respondent was associated with Raymond James, Respondent failed to comply with the standards of ethical practices set forth in 660:11-5-42 of the Rules of the Oklahoma Securities Commission and the Administrator of the Department of Securities ("**Rules**") (effective August 1, 2013, and November 1, 2016). Specifically, Respondent (a) changed the investment profiles of certain customers without prior authorization from the customers, (b) engaged in an outside business activity without providing prior written notice to Raymond James, and (c) shared customer information with a third party without the customer's authorization.

On April 10, 2017, Respondent applied for registration under the Act as an agent and investment adviser representative of Securities America, Inc., and Securities America Advisors, Inc., respectfully. Respondent's applications for registration are pending.

Respondent voluntarily enters into this Agreement. Respondent waives the initiation of an individual proceeding and adjudication of any issue of law or fact.

The Parties hereto agree as follows:

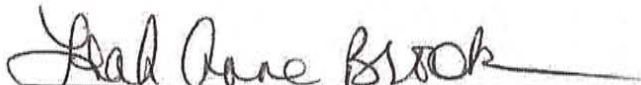
1. **Jurisdiction.** The Administrator has jurisdiction over Respondent and the subject matter of this Agreement.

2. **Conditional Registration.** Respondent's pending applications for registration under the Act will be approved as of the Effective Date of this Agreement. However, for a period of one (1) year from the Effective Date of this Agreement, any registration of Respondent under the Act will be conditioned upon Respondent being subject to a heightened supervision plan approved by the firm with which she is associated and the Administrator.
3. **Civil Penalty.** Within 90 days of the Effective Date of this Agreement, Respondent will pay a civil penalty in the amount of \$2,500 to the Department's Investor Education Revolving Fund.
4. **No Coercion.** Respondent enters into this Agreement voluntarily and without any duress, undue influence, or coercion by the Administrator, any employee of the Department, or any member of the Oklahoma Securities Commission.
5. **Public Record.** This Agreement is a public record and will be available for public examination, pursuant to Section 1-607 of the Act.
6. **Consideration.** In consideration for this Agreement, the Administrator will not take further action against Respondent in connection with the conduct alleged herein, except as provided for in paragraphs 7 and 8 below.
7. **Failure to Comply.** If Respondent fails to comply with this Agreement, this Agreement shall be treated as an Order issued under the Act, and the Administrator may take any action authorized by law.
8. **Limitation on Agreement.** Nothing in this Agreement shall prohibit the Administrator from furnishing information to any other properly constituted agency or authority. In the event any other agency or authority commences an action against Respondent based upon information obtained from the Administrator, the Administrator may assist in such action as authorized by law.
9. **Entire Agreement.** This writing constitutes the entire agreement of the Parties with respect to the subject matter hereof and supersedes any and all prior and contemporaneous agreements, representations and understandings of the Parties. No supplement, modification or amendment to this Agreement shall be binding unless executed in writing by each of the Parties hereto.
10. **Applicability.** This Agreement applies only to the activities of Respondent, and to no others. It is further agreed that the execution of this Agreement does not mean that the Administrator has approved,

condoned or passed in any way upon the merits or qualifications of, or recommended, the transactions to which it relates or any future securities transactions.

11. **Effective Date.** This Agreement shall be effective as of the date on which it is signed by the Administrator as set forth below his signature hereto.

The Parties have executed this Agreement as of the date and year set forth below their signatures hereto.


LEAH ANNE BROOKS (CRD NO. 5587158)

Date: 5/10/17

OKLAHOMA DEPARTMENT OF SECURITIES

By: 
Irving L. Faught, Administrator

Date: 5/12/17