

STATE OF MAINE
SECURITIES DIVISION
121 STATE HOUSE STATION
AUGUSTA, MAINE 04333

IN THE MATTER OF:

Christopher Street Financial
80 Wall St., Suite 515
New York, New York 10005-3601

CONSENT AGREEMENT
No. 01-020

This Agreement is entered into between the State of Maine Securities Division ("Securities Division") and Christopher Street Financial, Inc. ("Christopher Street Financial") a broker-dealer located in New York, New York.

WHEREAS, the parties agree as follows:

1. At all relevant times, it has been unlawful in Maine for a person to act as a broker-dealer unless licensed or exempt from licensing under the Revised Maine Securities Act, Title 32 Maine Revised Statutes Annotated §10101 et seq.
2. At all relevant times it has been unlawful in Maine for a broker-dealer to employ or contract with a person as a sales representative unless the sales representative is licensed or exempt from licensing under the Revised Maine Securities Act, Title 32 §10301.
3. Christopher Street Financial has been licensed as a broker-dealer with the Securities Division since February 13, 1998.
4. As a result of a complaint filed by a Maine resident with the Securities Division, it came to the attention of the Maine Securities Division that Christopher Street Financial has effected (10) transactions for (1) customer using an unlicensed sales representative.
5. It is the Securities Division's position that Christopher Street Financial employed an unlicensed sales representative to effect transactions in violation of 32 M.R.S.A. § 10301.
6. Christopher Street Financial has represented to the Securities Division that the violations were inadvertent and were caused by a compliance oversight. The Maine Securities Division has no reason to doubt these representations.
7. Both parties desire an expeditious resolution of this matter.

NOW THEREFORE, without trial or adjudication of any issue of fact or law, and without Christopher Street Financial admitting or denying that its conduct violated the Revised Maine Securities Act, it is agreed that:

1. Christopher Street Financial will comply with all licensing and other legal requirements governing persons acting as securities broker-dealers in the State of Maine at all times from the date hereof;
2. In lieu of the Securities Division seeking the imposition of a penalty for the allegations contained herein, Christopher Street Financial will pay the sum of \$6,049.16 to Warren Doe of Vienna, Maine upon Christopher Street Financial's execution of this Agreement; and
3. The Securities Division will not take further action against Christopher Street Financial, based upon its employment of unlicensed sales representatives during the period preceding and including the date of execution of this Agreement, **PROVIDED**, however, that this paragraph applies only to those transactions previously disclosed to the Securities Division by Christopher Street Financial.

February 13, 2001
Date

/s/ Christine A. Bruenn
Christine A. Bruenn
Securities Administrator

February 6, 2001
Date

/s/ Kermit Johns
Kermit Johns
President, GSP & Director
Christopher Street Financial, Inc.