

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

_____))
IN THE MATTER OF:)
)
Drake Asset Management, Inc.)
(CRD #118687) and) CONSENT AGREEMENT
David R. Lidstone)
(CRD #1325528)) No. 04-087-CAG
)
_____))

This Agreement is entered into by the State of Maine Office of Securities ("Securities"), Drake Asset Management, Inc. (CRD # 118687), an investment adviser company with a principal place of business at 232 Center Street, Unit D, Auburn, Maine 04210, and David R. Lidstone (CRD # 1325528), an investment adviser representative affiliated with Drake Asset Management, Inc.

WHEREAS, the parties agree as follows:

1. Pursuant to 32 M.R.S.A. § 10303(1), a person may not act in Maine as an investment adviser representative unless licensed or exempt from licensing under the Revised Maine Securities Act;
2. Pursuant to 32 M.R.S.A. § 10303(3) it is unlawful for an investment adviser licensed or required to be licensed under the Revised Maine Securities Act to employ or contract with an individual as a representative of the investment adviser in Maine unless the individual is licensed;
3. Securities has reviewed David R. Lidstone's licensing record and has found that he has never held an investment adviser representative's license in Maine;
4. It is Securities' position that David R. Lidstone has acted as an investment adviser representative in Maine without being licensed or exempt from licensing; and
5. All parties desire an expeditious resolution of this matter.

NOW THEREFORE, without trial or adjudication of any issue of fact or law, and without Drake Asset Management, Inc. or David R. Lidstone admitting or denying that their conduct violated the Revised Maine Securities Act, it is agreed that:

Drake Asset Management, Inc. and David R. Lidstone will comply with all licensing and other legal requirements governing persons acting as investment advisers and investment adviser representatives in the State of Maine at all times from the date hereof;

In lieu of Securities seeking the imposition of a penalty for the allegations contained herein, Drake Asset Management, Inc. and David R. Lidstone will pay the sum of \$1,500.00 to Securities upon Drake Asset Management, Inc.'s and David R. Lidstone's execution of this Agreement; and

Securities will not take further action against Drake Asset Management, Inc. or David R. Lidstone based upon the unlicensed status of David R. Lidstone during the period preceding and including the date of execution of the Agreement.

Drake Asset Management, Inc.

By:

April 5, 2004
Date

/s/ David R. Lidstone
Signature

David R. Lidstone
(printed name)

Its President

April 5, 2004
Date

/s/ David R. Lidstone
David R. Lidstone

April 5, 2004
Date

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

Reviewed by:

April 7, 2004

Date

/s/ Christina V. Breen

Christina V. Breen

Assistant Securities Administrator

Submitted by:

April 6, 2004

Date

/s/ Christian D. Van Dyck

Christian D. Van Dyck

Investigator/Examiner