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BETH ANN BLACKWOOD
MEMBER

WILLIAM R. SMITH
MEMBER

IN THE MATTER OF THE
INVESTMENT ADVISER
REGISTRATION OF
SENIORS ONLY FINANCIAL, INC.

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Order No. IC06-SUS-38

TO: Dale L. Stringer, President
Seniors Only Financial, Inc. (IARD No. 132671)
165 Meadow Heath Drive
Gun Barrel City, TX 75156

DISCIPLINARY ORDER

Be it remembered that Seniors Only Financial, Inc. ("Respondent"), by and through, Dale L. Stringer, its President, appeared before the Securities Commissioner of the State of Texas ("Securities Commissioner") and consented to the entry of this order ("Order") and the Findings of Fact and Conclusions of Law contained herein.

FINDINGS OF FACT

- 1 Respondent has waived (a) Respondent's right to notice and hearing in this matter; (b) Respondent's right to appear and present evidence in this matter; (c) Respondent's right to appeal this Order; and (d) all other procedural rights granted to the Respondent by The Securities Act, TEX. REV. CIV. STAT. ANN. art. 581-1 et seq. (Vernon 1964 & Supp. 2006)("Texas Securities Act"), and the Administrative Procedure Act, TEX. GOV'T CODE ANN. § 2001.001 et seq. (Vernon 2000 & Supp. 2006)("Administrative Procedure Act").
2. On or about November 16, 2004, Respondent registered with the Securities Commissioner as an investment adviser, which is currently effective.
3. On or about February 10, 2006, the staff of the Texas State Securities Board (the "Staff") conducted a routine inspection (the "Inspection") of Respondent's place of business.
4. At the time of the Inspection, Respondent had not established, and was not maintaining, a written privacy policy. However, multiple agreements between Respondent and Respondent's investment advisory clients contained the following language: "Client also acknowledges receipt of the Advisors Privacy Policy".

5. On or about August 22, 2005 and on or about October 12, 2005, Respondent withdrew funds from the brokerage accounts of several of Respondent's clients (collectively "Clients"). Respondent has represented that the funds withdrawn constituted payments for consultation services provided by Respondent to each of the clients.
6. Respondent had authority to withdraw funds from each of these brokerage accounts for the fees due to the Respondent from the respective client.
7. The type(s) of fees that each client agreed to pay Respondent were determined by the written agreement between Respondent and each client. According to the relevant agreements, none of the Clients had agreed to pay a consultation service fee to the Respondent.
8. The agreements between Respondent and the Clients state that the consultation services "will be invoiced, as charges are incurred". However, Respondent did not provide the Clients with invoices detailing the consultation services rendered by Respondent.

CONCLUSIONS OF LAW

1. Respondent's inclusion of language stating "Client also acknowledges receipt of the Advisors Privacy Policy" in agreements with clients at a time when Respondent had not established, and was not maintaining, a written privacy policy constitutes an inequitable practice in the rendering of investment advisory services.
2. Respondent's withdrawals of consultation service fees from the Clients' respective accounts when none of the Clients had agreed to pay for consultation services constitute inequitable practices in the rendering of investment advisory services.
3. Respondent's failures to provide invoices regarding consulting services billed to each of the Clients as required by Respondent's agreement with the Clients constitute inequitable practices in the rendering of investment advisory services.
4. Pursuant to Section 14.A(3) of the Texas Securities Act, the foregoing inequitable practices in the rendering of investment advisory services constitute bases for the issuance of an order suspending a registered investment adviser.

ORDER

It is therefore ORDERED that the registration of Seniors Only Financial, Inc. with the Securities Commissioner is hereby SUSPENDED for a period of fifty (50) days from the date that this Order is entered.

SIGNED AND ENTERED BY THE SECURITIES COMMISSIONER this 23RD
day of August, 2006. [^]
Deputy

DENISE VOIGT CRAWFORD
Securities Commissioner

Don A. Raebler
Deputy Securities Commissioner

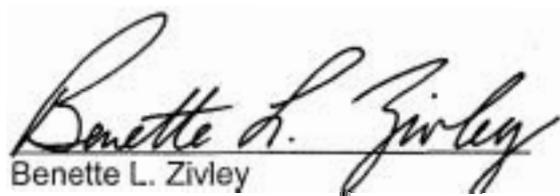
Respondent:

Seniors Only Financial, Inc.



By: Dale L. Stringer, President

Approved as to Form:

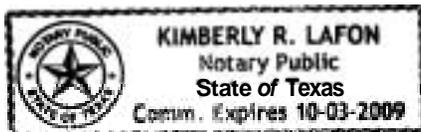


Benette L. Zivley
Director
Inspections and Compliance Division

ACKNOWLEDGMENT

On the 14th day of AUGUST, 2006, Seniors Only Financial, Inc. ("Respondent"), by and through, Dale L. Stringer, its President, personally appeared before me, executed the foregoing Order, and acknowledged that:

1. Dale L. Stringer is duly authorized to enter into the foregoing Order on behalf of Respondent;
2. Dale L. Stringer has read the foregoing Order;
3. Respondent has been fully advised of its rights under the Texas Securities Act and the Administrative Procedure Act;
4. Respondent knowingly and voluntarily consents to the entry of the foregoing Order and the Findings of Fact and Conclusions of Law contained therein; and,
5. Respondent, by consenting to the entry of the foregoing Order, has knowingly and voluntarily waived its rights as set forth therein.



[affix notary seal here]

Kimberly R. Lafon
Notary Public in and for
the State of Texas

My commission expires on: 10-3-09