

JOHN MORGAN
SECURITIES COMMISSIONER

RONAK V. PATEL
DEPUTY SECURITIES COMMISSIONER

Mail: P.O. BOX 13187
AUSTIN, TEXAS 78711-3187

Phone: (512) 305-8300
Facsimile: (512) 305-8310



Texas State Securities Board

208 E. 10th Street, 5th Floor
Austin, Texas 78701-2407
www.ssb.state.tx.us

BETH ANN BLACKWOOD
CHAIR

DERRICK MITCHELL
MEMBER

E. WALLY KINNEY
MEMBER

DAVID A. APPLEBY
MEMBER

ALAN WALDROP
MEMBER

IN THE MATTER OF THE §
INVESTMENT ADVISER REGISTRATION §
OF DENNIS TATE BROCK D/B/A §
B&F INVESTMENT STRATEGIES §

Order No. IC12-SUS-19

TO: Dennis Tate Brock (CRD No. 114777)
d/b/a B&F Investment Strategies
102 S. Broad, Suite 2D
Cedar Hill, TX 75104

DISCIPLINARY ORDER

Be it remembered that Dennis Tate Brock d/b/a B&F Investment Strategies ("Respondent"), appeared before the Securities Commissioner of the State of Texas ("Securities Commissioner") and consented to the entry of this Order and Undertaking 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 Respondent by The Securities Act, Tex. Rev. Civ. Stat. Ann. art. 581-1 et seq. (West 2010 & Supp. 2011) ("Texas Securities Act"), and the Administrative Procedure Act, Tex. Gov't Code Ann. § 2001.001 et seq. (West 2010 & Supp. 2011) ("Administrative Procedure Act").
2. On or about June 4, 1999, Respondent registered with the Securities Commissioner as an investment adviser. This registration is currently effective.
3. On January 6, 2012, in Order No. IC12-SUS-05 ("January Order"), the Securities Commissioner entered findings that Respondent violated an undertaking with the

Securities Commissioner, failed to maintain accurate records, failed to update registration forms, failed to distribute and offer a disclosure document, and failed to establish written policies and procedures reasonably designed to prevent the misuse of material nonpublic information.

4. In connection with the January Order, Respondent was suspended and assessed an administrative fine. Additionally, Respondent was ordered to comply with the terms of an undertaking contained in the January Order ("Undertaking").
5. In the Undertaking, Respondent undertook and agreed to:
 - a. Retain an independent outside consultant ("Consultant") that was not unacceptable to the Staff, within thirty (30) days of the date the January Order was entered by the Securities Commissioner;
 - b. Submit, at least ten (10) days prior to retaining the Consultant, a letter to the Director of the Inspections and Compliance Division of the Texas State Securities Board ("Director") identifying: the Consultant, the Consultant's experience in the securities industry, and all preexisting personal and business relationships between the Consultant and Respondent;
 - c. Retain the Consultant to perform a review ("Review"), within sixty (60) days of the date the January Order was entered by the Securities Commissioner, and at least annually thereafter for a period of two (2) years, of Respondent's business activities to monitor for compliance with applicable securities laws;
 - d. Require the Consultant to deliver to Respondent, within thirty (30) days of each Review, a report ("Report") describing the areas the Consultant reviewed and its findings and recommendations; and
 - e. Submit to the Director within fifteen (15) days of receiving each Report: (1) the Report; and (2) a statement identifying all corrective measures taken by Respondent in response to the Report, and stating the reason(s) for not following any of the Consultant's recommendations.
6. As of July 2012, Respondent had not retained a Consultant as required by the Undertaking.
7. On July 25, 2012, the staff of the Inspections and Compliance Division of the Texas State Securities Board filed a Notice of Hearing initiating an administrative action against Respondent for failing to comply with the Undertaking.
8. After the Notice of Hearing was filed, Respondent represented that he had retained a Consultant.

CONCLUSIONS OF LAW

1. Respondent's failure to timely retain the Consultant as required by the Undertaking is a violation of the Undertaking.
2. Respondent's failure to comply with the Undertaking is a violation of the January Order.
3. Pursuant to Section 14.A(11) of the Texas Securities Act, Respondent's violation of Respondent's Undertaking with the Securities Commissioner is a basis for the issuance of an Order suspending Respondent's registration with the Securities Commissioner.
4. Pursuant to Section 14.A(11) of the Texas Securities Act, Respondent's violation of the January Order is a basis for the issuance of an Order suspending Respondent's registration with the Securities Commissioner.

UNDERTAKING

1. Respondent undertakes and agrees to ensure that the Consultant performs a review ("Review"), within sixty (60) days of the date this Order is entered by the Securities Commissioner, and at least annually thereafter for a period of two (2) years, of Respondent's business activities to monitor for compliance with applicable securities laws.
2. Respondent further undertakes and agrees to ensure that the Consultant delivers to Respondent, within thirty (30) days of each Review, a report ("Report") describing the areas the Consultant reviewed and its findings and recommendations.
3. Respondent further undertakes and agrees to submit to the Director within fifteen (15) days of receiving each Report: (1) the Report; and (2) a statement identifying all corrective measures taken by Respondent in response to the Report, and stating the reason(s) for not following any of the Consultant's recommendations.

ORDER

1. It is therefore ORDERED that the investment adviser registration of Dennis Tate Brock with the Securities Commissioner is hereby SUSPENDED for a period of sixty (60) days from the date this Order is entered by the Securities Commissioner.

2. Dennis Tate Brock is further ORDERED TO COMPLY with the terms of the Undertaking contained herein.

SIGNED AND ENTERED BY THE SECURITIES COMMISSIONER this 26th
day of September, 2012.



JOHN MORGAN
Securities Commissioner

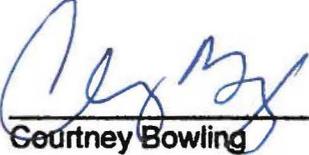
Respondent:

Dennis T. Brock
Dennis Tate Brock

Approved as to Form:



Ronak V. Patel
Deputy Securities Commissioner

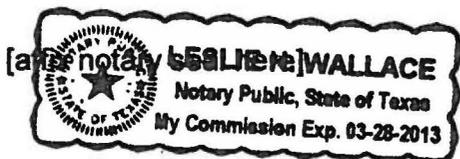


Courtney Bowling
Attorney
Inspections & Compliance Division

ACKNOWLEDGMENT

On the 24 day of September, 2012, Dennis Tate Brock ("Respondent") personally appeared before me, executed the foregoing Order and Undertaking, and acknowledged that:

1. Respondent has read the foregoing Order and Undertaking;
2. Respondent has been fully advised of his rights under the Texas Securities Act and the Administrative Procedure Act;
3. Respondent knowingly and voluntarily consents to the entry of the foregoing Order and Undertaking and the Findings of Fact and Conclusions of Law contained therein; and
4. Respondent, by consenting to the entry of the foregoing Order, has knowingly and voluntarily waived his rights as set forth therein.



[Signature]
Notary Public in and for
the State of Texas

My commission expires on: 3/28/13