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MIGUEL ROMANO, JR.
MEMBER

IN THE MATTER OF THE
AGENT REGISTRATON
OF MICHAEL DELAO

§
§
§

Order No. REG16-CAF-04

TO: Michael Delao (CRD No. 2406749)
St. Bernard Financial Services, Inc.
4000 Fountainwood Circle
Georgetown, TX 78624

Robert Keenan, CEO
St. Bernard Financial Services, Inc.
1609 West Main St.
Russellville, AR 72801

DISCIPLINARY ORDER

Be it remembered that Michael Delao ("Respondent"), 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 rights to notice and hearing in this matter; (b) Respondent's rights to appear and present evidence in this matter; (c) Respondent's rights to appeal this Order; and (d) all other procedural rights granted to the Respondent by The Securities Act, Tex. Rev. Civ. Stat. Ann. arts. 581-1 to 581-44 (West 2010 & Supp. 2016)("Texas Securities Act"), and the Administrative Procedure Act, Tex. Gov't Code Ann. §§ 2001.001 to 2001.902 (West 2008 & Supp. 2016)("Administrative Procedure Act").
2. From July 31, 2009 through September 10, 2015, Respondent was registered as an agent and investment adviser representative of Century Securities Associates, Inc. ("Century").
3. On September 23, 2015, Respondent applied for registration as an agent of IFS Securities, Inc. ("IFS Securities"), and on September 24, 2015, Respondent applied for registration as an investment adviser representative of IFS Advisory, LLC ("IFS Advisory"). Both applications were withdrawn on November 20, 2015.

4. Respondent re-submitted an application to register as an agent of IFS Securities on May 13, 2016 and an application to register as an investment adviser representative of IFS Advisory on July 1, 2016. Both applications were withdrawn on August 18, 2016.
5. On October 31, 2016, Respondent applied for registration as an agent of St. Bernard Financial Services, Inc. ("St. Bernard"). This application is currently pending.

Failures to Report Criminal Charges

6. While registered with Century, Respondent was arrested in connection with two felony charges for which Respondent was also indicted.
7. During the relevant time period, Century's written supervisory procedures required Respondent to promptly notify the Registration Department of Century in the event Respondent was arrested, indicted or convicted of any felony.
8. Although these felony charges were later dismissed in the interest of justice, Respondent did not report these events to Century following either the arrest or the indictments.
9. Further, Respondent did not report the felony charges to the Securities Commissioner within thirty (30) days of the indictments, as required by §115.9(a)(2) and §116.9(a)(2) of the Rules and Regulations of the Texas State Securities Board ("Board Rules").
10. Shortly after Century discovered the aforementioned felony charges and Respondent's lack of disclosure thereof, Respondent voluntarily resigned from Century as an agent and investment adviser representative and such registrations with the Securities Commissioner were withdrawn.

Failures to Update Form U4

11. In connection with Respondent's applications to register with the Securities Commissioner, Respondent had submitted the Uniform Application for Securities Industry Registration or Transfer ("Form U4").
12. Item 14 of the Form U4 requires applicants to make disclosures of certain reportable events in response to specific questions listed in the Form U4.
13. Sections 115.9(a)(6) and 116.9(a)(6) of the Board Rules require that any change in any information previously disclosed to the Securities Commissioner on any application form be reported to the Securities Commissioner within thirty (30) days after its occurrence.

14. The Form U4 submitted to the Securities Commissioner in connection with Respondent's applications to register with IFS Securities and IFS Advisory reflected that Respondent had not updated the Form U4 to report within thirty (30) days multiple reportable events that Item 14 of the Form U4 required be disclosed.
15. Notably, Respondent had failed to timely report on the Form U4 the felony charges and that Respondent had voluntarily resigned from Century after being notified that he had violated Century's supervisory procedures.

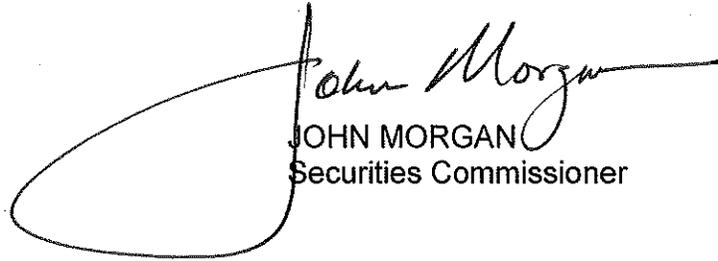
CONCLUSIONS OF LAW

1. Respondent's failures to report to the Securities Commissioner the two felony charges within thirty (30) days of the indictments are violations of §115.9(a)(2) and §116.9(a)(2) of the Board Rules.
2. Respondent's failures to report to the Securities Commissioner the changes in information reported in Item 14 of the Form U4 within thirty (30) days of the event dates are violations of §115.9(a)(6) and §116.9(a)(6) of the Board Rules.
3. Pursuant to Section 14.A(6) of the Texas Securities Act, Respondent's violations of the Board Rules constitute bases for the issuance of an order reprimanding Respondent.
4. Pursuant to Section 23-1 of the Texas Securities Act, Respondent's violations of the Board Rules constitute bases for the assessment of an administrative fine against Respondent.

ORDER

1. It is therefore ORDERED that the registration of Michael Delao as an agent of St. Bernard Financial Services, Inc. is hereby GRANTED.
2. It is further ORDERED that Michael Delao is hereby REPRIMANDED.
3. It is further ORDERED that Michael Delao COMPLY with the terms of the Undertaking dated December 5, 2016 and filed with the Securities Commissioner.
4. It is further ORDERED that Michael Delao is hereby ASSESSED AN ADMINISTRATIVE FINE in the amount of Seven Thousand and Five Hundred Dollars (\$7,500.00). Payment shall be made by delivery of a cashier's check to the Securities Commissioner in the amount of Seven Thousand and Five Hundred Dollars (\$7,500.00), payable to the State of Texas, contemporaneously with the delivery of this Order.

SIGNED AND ENTERED BY THE SECURITIES COMMISSIONER this 6th day of December, 2016.



JOHN MORGAN
Securities Commissioner

Respondent:



Michael Delao

Approved as to Form:



Clinton T. Edgar
Director
Registration Division

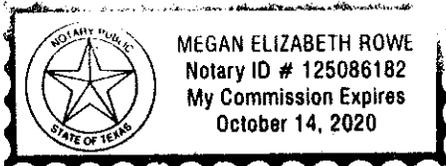


John Courtade
Attorney at Law

ACKNOWLEDGMENT

On the 30th day of November, 2016, Michael Delao ("Respondent") personally appeared before me, executed the foregoing Order and acknowledged that:

1. Respondent has read the foregoing Order;
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 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.



[affix notary seal here]

Megan Rowe
Notary Public in and for
the State of Texas

My commission expires on: October 14, 2020

