

BEFORE THE SECURITIES COMMISSIONER
STATE OF COLORADO

Case No. 2024-CDS-028

CONSENT ORDER

IN THE MATTER OF JEKADA FINANCIAL GROUP, LLC AND KEVIN
BRADY,

Respondents.

THIS MATTER is before Tung Chan, Securities Commissioner for the State of Colorado (“Commissioner”), on the Stipulation for Consent Order (“Stipulation”) between the Staff of the Colorado Division of Securities (the division, “Division” and the staff, “Staff”) and Jekada Financial Group, LLC (IARD# 134101) and Kevin Michael Brady (CRD# 3024203), (collectively, “Respondents”). After reviewing the Stipulation and grounds therein, the Commissioner makes the following Findings and enters the order as follows:

FINDINGS

1. The Commissioner has jurisdiction over the Respondents and this matter pursuant to the provisions of the Colorado Securities Act, §§ 11-51-101 through 803, C.R.S.
2. By entering into the Stipulation, Respondents waive the following rights: (1) to have a formal hearing pursuant to §§ 11-51-606(1), 24-4-104 and 24-4-105, C.R.S.; (2) to be represented by counsel in that action; (3) to present a defense through oral or documentary evidence; (4) to cross-examine witnesses at such hearing; and (5) to seek judicial review of the Consent Order as provided in §§ 11-51-607 and 24-4-106, C.R.S.
3. Respondents further waive the findings required by § 11-51-410(1), C.R.S. and do not contest that pursuant to § 11-51-704(2), C.R.S. entry of this Consent Order is necessary and appropriate in the public interest and is consistent with the purposes of the Colorado Securities Act.

ORDER

NOW, THEREFORE, based on the foregoing, it is ORDERED as follows:

1. The terms of the attached Stipulation are incorporated and made a part of this Consent Order.

2. Respondents shall comply with all agreements, undertakings, and directives contained in the Stipulation, to the extent any such agreements, undertakings, or directives remain unsatisfied on the date of this Consent Order.
3. Respondents Jekada Financial Group, LLC and Kevin Michael Brady hereby have a restriction placed on their license pursuant to § 11-51-410(1), C.R.S.
4. Respondents Jekada Financial Group, LLC and Kevin Michael Brady shall retain a compliance consultant, approved by the Division, within thirty (30) days from the entry of the Consent Order to ensure compliance with the September 25, 2015, and the July 31, 2024, deficiency letters (adjusted for any rule changes), timely file and update disclosure documents, and review and develop all required policies and procedures to ensure compliance with the Colorado Securities Act and rules thereunder. The compliance consultant shall be retained for a period of two (2) years.
5. The Commissioner shall retain jurisdiction over this action to ensure Respondents' compliance with this Consent Order and reserves the power to enter additional orders as needed to ensure the compliance by the Respondents with this Consent Order.
6. In the event Respondents fail to comply with any of the terms or conditions for this Consent Order or the Stipulation, the Commissioner or the Staff, in their sole discretion, may initiate formal enforcement proceedings against Respondents for such noncompliance.
7. This Consent Order, and the terms and conditions herein, shall be binding on all successors and assigns.

DATE: October 15, 2024



Tung Chan
Securities Commissioner

BEFORE the SECURITIES COMMISSIONER
STATE OF COLORADO

Case No. 2024-CDS-028

STIPULATION FOR CONSENT ORDER

IN THE MATTER OF JEKADA FINANCIAL GROUP, LLC AND KEVIN
BRADY,

Respondents.

The Staff of the Colorado Division of Securities (the staff, "Staff" and the division, the "Division") and Respondents Jekada Financial Group, LLC and Kevin Michael Brady, (collectively, "Respondents"), hereby enter into this Stipulation for Consent Order (the "Stipulation") in this matter as follows:

I. Background

1. The Staff conducted an examination of Respondents pursuant to § 11-51-409, C.R.S.
2. As a result of its examination, the Staff alleges that Respondents engaged in the following conduct:
 - a. Jekada Financial Group, LLC (IARD# 134101) (the "Firm") is a Colorado LLC with its principal place of business located at 1800 W. Littleton Boulevard, Littleton, CO 80120.
 - b. Jekada Financial Group, LLC has been licensed in Colorado as an investment adviser since September 14th, 2006.
 - c. Kevin Michael Brady ("Brady") (CRD# 3024203) has been licensed in Colorado as an investment adviser representative with Jekada Financial Group, LLC since 2006 and is currently the owner of Jekada Financial Group, LLC.
 - d. In or around June of 2024, Staff initiated an examination of Respondents pursuant to § 11-51-409, C.R.S.
 - e. As part of the examination in 2024 (the "2024 Exam"), a review of the deficiency letter issued during the Firm's last examination in **2015** (the "2015 Exam") was conducted.
 - f. The 2024 Exam revealed that the Firm failed to correct certain of the deficiencies identified in the 2015 Exam and also identified

additional deficiencies. A deficiency exists when the staff has determined that the Firm has failed to comply with a provision or rule under the Colorado Securities Act.

- g. The Firm conceded during the 2024 Exam that the Firm did not make some of the required changes that were identified in the 2015 Exam. Specific examples that were not corrected from the 2015 Exam include but are not limited to:
 - a. Respondents failed to provide sufficient advisory fee billing information to each client in violation of Rule 51-4.10(IA)(B)(2).
 - b. Respondents failed to maintain a complete set of trial balances, financial statements (prepared in accordance with generally accepted accounting principles) and internal audit working papers relating to the investment adviser's business as an investment adviser in violation of Rule 51-4.6(IA)(A)(6).
 - c. Respondents failed disclose on client agreements how the account values are determined for the billing period in violation of Rule 51-4.8 (IA)(P).
 - d. Respondents failed to keep true and accurate books and records as required by Rule 51-4.6(IA). Examples of continued violations include:
 - 1. Failing to remove the Firm's inactive website www.jekadafmancial.com in the ADV Part 1 filings with the Commissioner.
 - u. Failing to retire inactive ADV Part 2A brochure filings in CRD.
 - 1u. Failing to update the Form ADV Part 2A to include the required disclosure language on the Cover Page, identify an accurate custodian of customer securities and funds, and disclose the use of ETFs.

Based on this alleged conduct, Staff determined that Respondents have willfully violated or willfully failed to comply with provisions of the Colorado Securities Act and rules thereunder and pursuant to § 11-51-410(1)(b), C.R.S., the following licensing conditions are warranted.

II. Stipulation

The Staff and Respondents, in order to resolve this matter without a formal hearing, hereby enter into this Stipulation for Consent Order in this matter and Respondents hereby stipulate as follows:

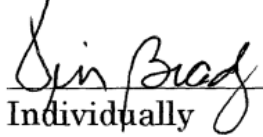
1. The Securities Commissioner for the State of Colorado has jurisdiction over the Respondents and the subject matter of this action.
2. Respondents agree to the entry of a Consent Order in the form attached (the "Consent Order") and incorporated by reference.
3. Respondents agree to the following:
 - a. Respondents agree to fully comply with all action-requested items in the Division deficiency letter issued September 25, 2015, and the deficiency letter dated July 31, 2024, and respond to the Division in writing of all corrective actions taken to correct the deficiencies within sixty (60) days from the entry of the Consent Order. The compliance consultant retained pursuant to paragraph 3.b. below shall review and sign the response attesting to its accuracy.
 - b. Respondents shall retain a compliance consultant, approved by the Division, within thirty (30) days from the entry of the Consent Order for a period of two (2) years. The consultant shall ensure compliance with the September 25, 2015, and the July 31, 2024, deficiency letters (adjusted for any rule changes), review the Respondent's response letter to the Division dated August 22, 2024, timely file and update disclosure documents including verifying all documents to reflect the Firm's use of discretionary trading authority, and review and develop all required policies and procedures to ensure compliance with the Colorado Securities Act and rules thereunder.
 - c. In the event that the compliance services agreement is terminated for any reason during the supervision period, Respondents shall notify the Division in writing within five (5) days of the termination. Respondents shall enter into another agreement within fifteen (15) days of the termination with a replacement compliance service agreement which provides similar supervisory functions as the original compliance service agreement, subject to review and acceptance of the Division.
 - d. Respondents shall supervise the compliance consultant during the engagement to verify that all required tasks have been completed by the consultant and that the Firm is in compliance with the September 25, 2015, and the July 31, 2024, deficiency letters (adjusted for any rule changes), the Colorado Securities Act and rules, and with this Stipulation and Consent Order.
 - e. In the event Respondents fail to comply with any of the terms or conditions for this Consent Order or the Stipulation, the

Commissioner or the Staff, in their sole discretion, may initiate formal enforcement proceedings against Respondents for such noncompliance.

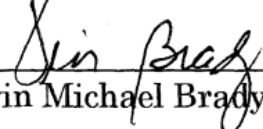
- f. Respondents shall submit all communications to the Division by email at DORA_SecuritiesWebsite@state.co.us (Attn: Chief Examiner) and retain documentation of all communications with and documents submitted to the Division.
4. Respondents understand that they have the following rights: (1) to have a formal hearing pursuant to § 11-51-606(1), C.R.S.; (2) to be represented by counsel in that action; (3) to present a defense through oral or documentary evidence; (4) to cross-examine witnesses at such hearing; and (5) to seek judicial review of the Consent Order as provided in §§ 11-51-607 and 24-4-106, C.R.S. By entering into this Stipulation, Respondents expressly waive the rights set forth in this paragraph.
5. Respondents acknowledge that they have entered into this Stipulation voluntarily, after the opportunity to consult with counsel, and with the understanding of the legal consequences of this Stipulation and Consent Order.
6. Respondents hereby waive the findings required by § 11-51-410(1), C.R.S.; and pursuant to § 11-51-704(2), C.R.S., Respondents do not contest that the entry of a Consent Order is necessary and appropriate in the public interest and is consistent with the purposes and provisions of the Colorado Securities Act.
7. Respondents agree that the entry of this Consent Order is a disciplinary event that is material to a client's or prospective client's evaluation of their advisory business or the integrity of its management and must disclose the event in appropriate filings and disclosure documents.
8. By consenting to the entry of the Consent Order, Respondents agree not to take any action or to make, or permit to be made, any public statement denying, directly or indirectly, any Finding or Conclusion in the Consent Order or creating the impression that said Consent Order lacks a factual basis.
9. Respondents further acknowledge that any violation of the Consent Order, when issued, may constitute grounds for further sanctions and formal proceedings against them for such violations.
10. This Stipulation is subject to approval by the Securities Commissioner and shall become binding upon the parties hereto upon such approval.

BY RESPONDENTS:

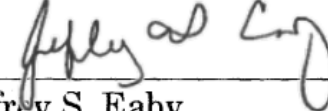
Kevin Michael Brady:


Individually

Jekada Financial Group, LLC:

BY :
Kevin Michael Brady, Owner

BY THE STAFF OF THE DIVISION OF SECURITIES:


Jeffrey S. Eaby
Deputy Commissioner

October 14, 2024
Date