

STATE OF MICHIGAN
DEPARTMENT OF ENERGY, LABOR & ECONOMIC GROWTH
OFFICE OF FINANCIAL AND INSURANCE REGULATION

Before the Commissioner of the Office of Financial & Insurance Regulation

In the Matter of:

Anthony Gerald Manaia
CRD #1506665

Enforcement Case No. 10-11088

Respondent.
_____ /

Issued and entered
on March 16, 2011
by Stephen R. Hilker
Chief Deputy Commissioner

CONSENT ORDER AND STIPULATION

FINDINGS OF FACTS AND CONCLUSIONS OF LAW

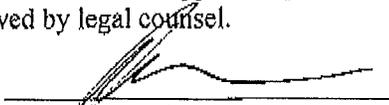
1. Respondent Anthony Gerald Manaia was a registered representative under the Michigan Uniform Securities Act (2002), MCL 451.2101 *et seq.* (MUSA), CRD #1506665.
2. On July 5, 2010, Respondent was separated from his then-current broker-dealer Interwest International Equities Corporation (Interwest).
3. Despite his separation, Respondent attempted to direct security transactions on behalf of clients in August, 2010, while not affiliated with a broker-dealer. Respondent admitted that five of his clients requested funds, and Respondent faxed these trade requests to Pershing, LLC, Interwest's clearing firm, on August 5, 2010.
4. Having worked in the investment management industry for over 20 years, Respondent knew or should have known that Section 401(1) of the MUSA, MCL 451.2401(1), states that "[a] person shall not transact business in this state as a broker-dealer unless the person is registered under this act as a broker-dealer or is exempt from registration"
5. In addition, Respondent knew or should have known that Section 402 of the MUSA, MCL 451.2402, provides in relevant part:
 - (1) An individual shall not transact business in this state as an agent unless the individual is registered under this act or is exempt from registration as an agent under subsection (2).

* * *

- (3) The registration of an agent is effective only while the agent is employed by or associated with a broker-dealer registered under this act or an issuer that is offering, selling, or purchasing its securities in this state.

STIPULATION

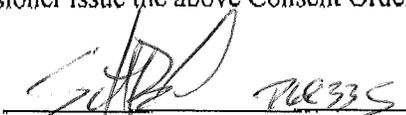
Respondent has read and understands the Consent Order above. Respondent agrees that the Chief Deputy Commissioner has jurisdiction and authority to issue this Consent Order pursuant to the Michigan Uniform Securities Act 2002 (MUSA), MCL 451.2101 *et seq.* Respondent waives the right to a hearing in this matter if this Consent Order is issued. Respondent understands that this Stipulation and Consent Order will be presented to the Chief Deputy Commissioner for approval and the Chief Deputy Commissioner may or may not issue this Consent Order. Respondent waives any objection to the Commissioner deciding this case following a hearing in the event the Consent Order is not approved. Respondent neither admits nor denies the findings of fact and conclusions of law set forth in the above Consent Order and agrees to the entry of this Order. Respondent admits that both parties have complied with the procedural requirements of the Michigan Administrative Procedures Act and the Michigan Uniform Securities Act (2002). Respondent has had an opportunity to review the Stipulation and Consent Order and have the same reviewed by legal counsel.



Anthony Gerald Manala

Dated: 3-3-11

The Office of Financial and Insurance Regulation staff approves this Stipulation and recommends that the Chief Deputy Commissioner issue the above Consent Order.



Scott Basel (P68335)
Attorney

Dated: 3-15-11

6. During August, 2010, Respondent was not registered as a broker-dealer and was not an agent employed by or associated with a registered broker-dealer. As a result, Respondent's trade orders, described above, were made in violation of Section 401(1) and Section 402(1) and (3) of the MUSA.
7. Respondent, while not admitting any of the allegations set forth above, does not contest entry of this Order.

ORDER

Based on the allegations of fact and conclusions of law above, and the Respondent's Stipulation to entry of this Order, it is hereby **ORDERED** that:

1. Respondent shall immediately cease and desist from operating in a manner that violates the Michigan Uniform Securities Act (2002).
2. Respondent shall pay to the State of Michigan, through OFIR, a civil fine of \$2,500.00.
3. Respondent shall be approved for registration as an Investment Advisor Representative, effective January 1, 2011.



Stephen R. Hilker
Chief Deputy Commissioner

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