



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
LANSING

SHELLY EDGERTON
DIRECTOR

Agency No. 331056

**JOHN JAGGER
CRD No. 256868**

FINE PAYMENT INSTRUCTIONS

The FINE must be received by the Department on or before AUGUST 14, 2017. The FINE must be paid by cashier's check or money order, with the Complaint No. clearly indicated on the check or money order, made payable to the State of Michigan, and sent to the address indicated below. Payment cannot be made by credit card.

Once the FINE has been overdue for at least six months, it will be referred to the Michigan Department of Treasury for collection. Questions may be directed to Final Order Monitoring staff at (517) 241-9180.

To ensure the proper posting of the payment to your account, please mail the Fine Payment Processing Stub with your payment to:

Michigan Department of Licensing and Regulatory Affairs
CORPORATIONS, SECURITIES & COMMERCIAL LICENSING BUREAU
Final Order Monitoring – Securities & Audit Division
P.O. Box 30018 – Lansing, MI 48909

FINE PAYMENT PROCESSING STUB

Please return this with your payment.

Make your check or money order drawn from a U.S. financial institution payable to the STATE OF MICHIGAN.
Do not send cash. Payment cannot be made by credit card.

Agency C3 ACCOUNT Code 10117

Complaint No.: 331056 _____	Due: AUGUST 14, 2017 Total Amount Due: \$2,000.00
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**STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
CORPORATIONS, SECURITIES & COMMERCIAL LICENSING BUREAU**

In the matter of:

Agency No. 331056

JOHN P. JAGGER
CRD No. 256868

Respondent.

Issued and entered
This 14th day of June, 2017

**STIPULATION AND ORDER APPROVING
INVESTMENT ADVISER REPRESENTATIVE CONDITIONAL REGISTRATION**

A. RELEVANT INFORMATION AND STATUTORY PROVISIONS, under the Michigan Uniform Securities Act (2002) (the “Act”), 2008 PA 551, MCL 451.2101 *et seq.*:

1. John P. Jagger (“Respondent”) has been registered as an investment adviser representative or as a securities agent in Michigan at various times between 1999 until March 2017, and is employed by and/or associated with investment adviser Prather Investment Management, LLC (“PIM”). Respondent is also one of two managing members of investment adviser Northern Star Capital Management, LLC (“Northern Star”). On April 4, 2017, Respondent submitted an application with the Department of Licensing and Regulatory Affairs, Corporations, Securities & Commercial Licensing Bureau (the “Department”) to register as an investment adviser representative associated with Northern Star.
2. PIM has been registered as an investment adviser in Michigan since in or around April 2004. Northern Star has been registered as an investment adviser in Michigan since in or around January 2015, but had no associated investment adviser representatives before the issuance of this Stipulation and Order.
3. The Director of the Department, as Administrator of the Act (“Administrator”), summarily suspended Respondent’s investment adviser representative registration by order dated March 3, 2017 (the “Summary Suspension Order”), based upon multiple regulatory deficiencies identified during the Department’s examinations of Northern Star and PIM in or around April 2016 and October 2016, respectively.
4. Respondent is employed by and/or associated with Northern Star, and would begin working with Northern Star as a registered investment adviser representative of the firm (and resume acting as one of Northern Star’s managing members) upon the lifting of his summary suspension and conditional approval of his registration. According to its Form ADV Part 2, Northern Star assumed all of PIM’s assets under management, existing infrastructure, and business portfolio combined with the investment advisory practices of Respondent and

of investment adviser representative Kenneth E. Prather, Jr., whose registration was also suspended on March 3, 2017 and is addressed in a separate Stipulation and Order.

5. On March 3, 2017, the Administrator also issued and entered a notice of intent to revoke, suspend, condition, or limit Respondent's investment adviser representative registration (the "Notice of Intent") based on Respondent's failure to correct the multiple deficiencies identified during the Department's examinations of PIM and Northern Star. Collectively, the Summary Suspension Order and Notice of Intent are referred to hereafter as the "Disciplinary Order & Notice." Respondent requested a compliance conference regarding the Notice of Intent, which led to discussions about resolution through this Stipulation and Order.
6. Northern Star's principal office and place of business is located at, and Respondent will be working at, the following address:

Northern Star Capital Management, LLC
377 Fisher Road, Suite H
Grosse Pointe, Michigan 48230
Telephone: (313) 884-5961
7. Respondent's compliance reporting (detailed below) must be reviewed and certified, at his sole cost and expense, by an independent, third-party: (a) licensed certified public accountant with a securities background; (b) licensed attorney with a securities background; or (c) securities compliance consulting firm (the "Compliance Professional").
8. Respondent and the Department (collectively, the "Parties") acknowledge and agree that under Section 412 of the Act, MCL 451.2412, Respondent's disciplinary history provides grounds for the Administrator to take disciplinary action against his registration as provided in the Disciplinary Order & Notice.
9. Notwithstanding that bases exist for disciplinary action against Respondent's registration, the Department and Administrator determined that: (a) protection of the investing public does not require further disciplinary action if Respondent agrees to registration subject to the terms and conditions specified in this Stipulation and Order, including engaging the services of the required Compliance Professional; and (b) the conditional registration of Respondent under this Stipulation and Order is authorized by law and otherwise reasonable, appropriate, and in the public interest.

B. STIPULATION

In consideration of the foregoing facts and the following mutually agreed upon promises and covenants and other good and valuable consideration, the adequacy and sufficiency of which the Parties hereby expressly acknowledge, the Parties agree to this Stipulation enabling the Administrator to conditionally register Respondent as an investment adviser representative,

subject to his compliance with the following conditions and additional terms agreed to by the Parties below:

**Reduced Civil Fine under Disciplinary Order & Notice, Updating the CRD, and
Termination of Respondent's Association with PIM**

1. Respondent agrees to pay the Department a reduced civil fine from the fine imposed in the Disciplinary Order & Notice, in the settlement amount of Two Thousand and 00/100 Dollars (\$2,000.00) (the "Reduced Civil Fine"). The Reduced Civil Fine is payable separate and apart from any additional civil fines required under another Stipulation and Order. Respondent agrees to pay the Reduced Civil Fine within sixty (60) calendar days after the mailing date of the attached Order. The Reduced Civil Fine must be paid by cashier's check or money order made payable to the "State of Michigan," contain identifying information (name and "Agency No. 331056"), and be mailed to the Department at the following address:

Corporations, Securities & Commercial Licensing Bureau
Securities & Audit Division – Final Order Monitoring
P.O. Box 30018
Lansing, MI 48909

2. Following entry of the attached Order, the Department will file a Form U6 reflecting the Parties' resolution of the Disciplinary Order & Notice under this Stipulation and Order. In addition, the Department will update the CRD to reflect Respondent's registration as an investment adviser representative with Northern Star as "APPROVED-RES [RESTRICTED]." This Stipulation and Order is a public record required to be published and made available to the public, consistent with section 11 of the Michigan Freedom of Information Act, MCL 15.241. The Department currently publishes copies of orders issued under the Act to the Department's website.
3. PIM has agreed in a separate Stipulation and Order to submit within a specified time period a Form U5 terminating Respondent's association with it as an investment adviser representative in Michigan.

Compliance Review and Reporting and Conditional Registration Term

4. As described further below, Respondent agrees to prepare and submit quarterly compliance reports to the Compliance Professional, which the Compliance Professional will then review, certify, and maintain in the form attached as Exhibit A, together with all additional information required by this Stipulation and Order.
5. Respondent's investment adviser representative registration will remain conditional and subject to this Stipulation and Order, and Respondent is responsible for ensuring that the Compliance Professional supervises him, for a minimum period of one (1) year following the date Respondent becomes conditionally registered in accordance with the terms of this

Stipulation and Order (the "Conditional Registration Term"). After the expiration of the Conditional Registration Term, the Compliance Professional may submit a written request to the Department that the conditions be lifted from Respondent's registration and providing a reasonable basis for the request. The Compliance Professional's written request to lift the conditional registration must include: (a) originals of all quarterly compliance reports required by Paragraphs B.4, B.15, B.16, and described throughout Section B of this Stipulation and Order; and (b) any additional information specifically required by this Stipulation and Order. Respondent's registration will remain conditional until the Administrator issues an order lifting the conditions imposed by this Stipulation and Order after consideration of the Compliance Professional's written request contemplated by this paragraph.

6. The Compliance Professional's written request under Paragraph B.5 to lift Respondent's conditional registration must provide a copy of any agreements entered into between Respondent and the Compliance Professional, including any replacement Compliance Professional(s) if Respondent has changed the identity of the Compliance Professional during the Conditional Registration Term.
7. Any changes to Paragraph A.6 of this Stipulation and Order must be reported in writing to the Department within fifteen (15) days, at the address indicated in Paragraph B.1.
8. Respondent must separately report to the Department any: (a) customer complaints (written or verbal); (b) disciplinary actions; (c) judgments or liens entered or filed against Respondent; and (d) other changes to Respondent's answers to the Disclosure Questions on the Form U4 (a "Reportable Event") that arise during the Conditional Registration Term, regardless of whether Respondent is required to report this information on the Form U4, within ten (10) days after receipt of the information. Reporting this information on the CRD/IARD system alone will not satisfy this requirement. Respondent must also supply the Department a copy of his revised Form(s) U4 upon its filing through the CRD/IARD. The foregoing items must be reported to the Department in writing directly to the address indicated in Paragraph B.1 of this Stipulation and Order, and include the following information regarding each customer complaint or Reportable Event:
 - a. Client name, address, telephone number and e-mail address, if any.
 - b. A copy of any written complaint.
 - c. A written summary of any verbal complaint or other Reportable Event.
 - d. Current status of the complaint or other Reportable Event, including the resolution, if any.
9. Respondent acknowledges that a customer complaint or other Reportable Event arising during the Conditional Registration Term may result in, among other actions, an extension of the Conditional Registration Term.
10. Respondent agrees that he will not exercise general discretionary authority (or limited power of attorney) over accounts of any Michigan customers during the Conditional

Registration Term. However, Respondent may exercise specific discretionary authority and/or limited power of attorney over accounts of Michigan customers if the investment activities, transactions, etc. engaged in by Respondent: (a) are authorized by and within the scope of an investment advisory agreement that the Michigan customer previously approved in writing (a "Customer-Approved Investment Advisory Agreement"); and (b) implement the investment strategies and goals included in a Customer-Approved Investment Advisory Agreement. As part of the agreement between Respondent and the Compliance Professional, the Compliance Professional must be required, in conjunction with reviewing and certifying Respondent's quarterly compliance reports, to review and discuss with Respondent any exercise of discretionary authority and/or limited power of attorney for compliance with this paragraph.

11. As part of the agreement between Respondent and the Compliance Professional, the Compliance Professional must perform periodic, random reviews of any correspondence (including, without limitation, account statements, invoices, advertising, sales literature, other solicitation materials, etc. sent via electronic communication, U.S. mail, or facsimile, both incoming and outgoing) between Respondent and Michigan customers or potential customers during the Conditional Registration Term. Respondent agrees to promptly provide any such correspondence upon the Compliance Professional's request.
12. As part of the agreement between Respondent and the Compliance Professional, the Compliance Professional must be required, in conjunction with reviewing and certifying Respondent's quarterly compliance reports, to review and discuss with Respondent his activities and the status of any current disciplinary actions during the Conditional Registration Term.
13. As part of the agreement between Respondent and the Compliance Professional, the Compliance Professional must be required, in conjunction with reviewing and certifying Respondent's quarterly compliance reports, to review, assess, and discuss with Respondent his customer accounts for compliance with this Stipulation and Order.
14. Respondent agrees to meet with the Compliance Professional quarterly to review and discuss the matters required under Paragraphs B.10, B.12, and B.13. "Quarter" or "quarterly," for purposes of this paragraph and as used throughout this Stipulation and Order, means the periods from January 1 to March 31; April 1 to June 30; July 1 to September 30; and October 1 to December 31. The quarterly review meeting requirement under this paragraph begins immediately on the date that the attached Order is entered and the meetings must be completed within fourteen (14) calendar days after the final day of each quarter.
15. Within fourteen (14) calendar days after each quarterly review meeting is completed, Respondent agrees to prepare and submit to the Compliance Professional a quarterly compliance report in the form attached as Exhibit A. Respondent further agrees to ensure that within ten (10) days after receipt, the Compliance Professional reviews each quarterly compliance report and completes the cover page, on the Compliance Professional's

letterhead, certifying whether Respondent was in compliance with this Stipulation and Order during the applicable quarterly reporting period. The reporting period for the first quarterly compliance report begins immediately on the date that the attached Order is entered and ends on the final day of that quarter. The reporting period for subsequent quarterly compliance reports begins on the first day and ends on the final day of the next applicable quarter.

16. The Compliance Professional is not required to submit the quarterly compliance reports to the Department on a periodic basis. However, Respondent must ensure that the Compliance Professional maintains all quarterly compliance reports and provides them to the Department: (a) to support a request to lift the conditional registration as provided in Paragraph B.5 of this Stipulation and Order; (b) immediately upon the Department's request for any reason; and (c) in connection with any submission of information to the Department as required under Paragraph B.8 of this Stipulation and Order. If any quarterly review meeting or compliance report reveals that Respondent is not in compliance with this Stipulation and Order or the Act, then Respondent must immediately notify the Department in writing at the address indicated in Paragraph B.1.

Correction of Examination Deficiencies

17. Respondent has worked with the Department to address and correct all examination deficiencies identified in the Disciplinary Order & Notice. If the Department identifies and communicates to Respondent that these or additional deficiencies remain outstanding and require correction, Respondent will cooperate with the Department to promptly address such deficiencies. Unless specifically required by this Stipulation and Order or Exhibit A, the Compliance Professional is not responsible for assessing, monitoring, or certifying Respondent's timely correction of any deficiencies that the Department identifies and directly communicates under this paragraph.

Additional Provisions


18. Respondent agrees to fully cooperate with the Department in any investigation, audit, or examination relating to his activities.
19. Respondent acknowledges and agrees that upon his failure to comply with any terms of this Stipulation and Order within the time frames specified, and until such compliance is made, the Administrator is entitled to and may automatically and summarily: (a) suspend all registrations held by Respondent under the Act; (b) deny any renewal registrations submitted by him; and (c) deny any future applications for registration submitted by him, which shall be effective upon notice given by the Administrator or her designee with no opportunity for hearing. Respondent further acknowledges and agrees that the Administrator may pursue any other available contractual, administrative, or judicial remedies to enforce this Stipulation and Order. Respondent may voluntarily surrender or withdraw a registration under the Act; however, such surrender or withdrawal will not negate the aforementioned actions against the relevant registration or additional

disciplinary proceedings if a violation of this Stipulation and Order or the Act have occurred.

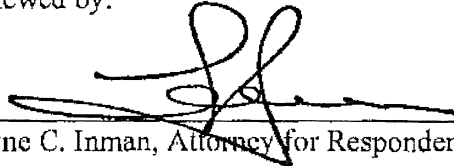
20. Respondent further acknowledges and agrees that: (a) the Administrator has jurisdiction and authority to enter the attached Order; (b) the attached Order may be entered without any further notice to him; and (c) upon entry of the attached Order, it is final and binding, and Respondent waives any right to a hearing and/or appeal of the attached Order and the Disciplinary Order & Notice that exists under the Act, the rules promulgated under the Act or the predecessor Act, the Administrative Procedures Act of 1969, 1969 PA 306, MCL 24.201 *et seq.*, or other applicable law.
21. The Parties acknowledge and agree that this Stipulation and Order contains the entire understanding of the Parties and supersedes and forever terminates all prior and contemporaneous representations, promises, agreements, understandings, and negotiations, whether oral or written, with respect to its subject matter. The Parties further agree that this Stipulation and Order may only be amended, modified, or supplemented by a duly executed writing signed by each party and approved by Order of the Administrator.
22. The Parties acknowledge and represent that: (a) each party has read this Stipulation and Order in its entirety and fully understands all of its terms, conditions, ramifications, and consequences; (b) each party unconditionally consents to the terms of this Stipulation and Order; (c) each party has consulted with or had ample opportunity to consult with legal counsel of his, her, or its choosing prior to executing this Stipulation; (d) each party has freely and voluntarily signed this Stipulation; and (e) the consideration received by each party as described in this Stipulation and Order is adequate.
23. The Parties agree that they may execute this Stipulation in any number of counterparts, each of which shall be deemed an original hereof, but which together shall constitute one and the same instrument and agreement, and that facsimile or electronically-transmitted signatures may be attached to this Stipulation and shall be binding on such party as an original signature.
24. The signatories to this Stipulation below represent and warrant that they have the legal capacity and authority to enter into this Stipulation on behalf of the named Parties and to bind the named Parties to the terms and conditions contained herein.

[This space left intentionally blank; Signature Page and Order follow]

Through his signature, Respondent agrees to comply with the above terms and conditions.

Dated: 05-31-17 Signed: 
John P. Jagger ("Respondent")

Reviewed by:

Dated: 06-01-2017 Signed: 
Wayne C. Inman, Attorney for Respondent

Approved by:

Dated: _____ Signed: _____
Timothy L. Teague
Securities & Audit Division Director
Corporations, Securities & Commercial Licensing
Bureau

Through his signature, Respondent agrees to comply with the above terms and conditions.

Dated: _____

Signed: _____

John P. Jagger ("Respondent")

Reviewed by:

Dated: _____

Signed: _____

Wayne C. Inman, Attorney for Respondent

Approved by:

Dated: 6-9-17

Signed: _____

Timothy L. Teague

Timothy L. Teague
Securities & Audit Division Director
Corporations, Securities & Commercial Licensing
Bureau

C. ORDER

NOW, THEREFORE, the Administrator ORDERS:

IN ACCORDANCE WITH THE FOREGOING FULLY EXECUTED STIPULATION, THE SUMMARY SUSPENSION OF JOHN P. JAGGER'S INVESTMENT ADVISER REPRESENTATIVE REGISTRATION IS LIFTED, AND HIS INVESTMENT ADVISER REPRESENTATIVE REGISTRATION ASSOCIATED WITH NORTHERN STAR CAPITAL MANAGEMENT, LLC IS CONDITIONALLY APPROVED.



Julia Dale
Administrator and Director
Corporations, Securities & Commercial Licensing Bureau

**STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
CORPORATIONS, SECURITIES & COMMERCIAL LICENSING BUREAU**

In the matter of:

Agency No. 331056

JOHN JAGGER
CRD#256868

Respondent.
_____ /

Issued and entered
This 3rd day of March, 2017

**ORDER SUMMARILY SUSPENDING
INVESTMENT ADVISER REPRESENTATIVE REGISTRATION**

I. RELEVANT FACTS AND APPLICABLE LAW.

Relevant information and statutory provisions, under the Michigan Uniform Securities Act (2002) (the "Securities Act"), 2008 PA 551, as amended, MCL 451.2101 *et seq.*:

1. John Jagger ("Respondent") has been registered as an investment adviser representative of Prather Investment Management, LLC (CRD#130947) since in or around October of 2014. Respondent is also a co-owner and control person of Northern Star Capital Management, LLC (CRD#173649).
2. The Corporations, Securities & Commercial Licensing Bureau ("the Bureau") within the State of Michigan Department of Licensing and Regulatory Affairs, concurrent with the issuance of this Order Summarily Suspending Investment Adviser Representative Registration, has initiated administrative proceedings against Respondent pursuant to section 412 of the Securities Act, MCL 451.2412 (Exhibit 1 – Notice of Intent to Revoke Investment Adviser Representative Registration).
3. Section 412(6) of the Securities Act, MCL 451.2412(6), authorizes the Administrator of the Securities Act ("Administrator") to summarily suspend a registration pending final determination of an administrative proceeding.
4. Based on Respondent's conduct discussed above and hereafter, the Administrator determined that the summary suspension of Respondent's investment adviser representative registration is authorized, appropriate, and in the public interest.

II. ORDER.

The Administrator finds that this ORDER is authorized, appropriate, and in the public interest based on the above-cited facts and law, and orders as follows:

1. In accordance with section 412(6) of the Securities Act, MCL 451.2412(6), the INVESTMENT ADVISER REPRESENTATIVE REGISTRATION OF JOHN JAGGER IS SUMMARILY SUSPENDED pending the final determination of the administrative proceedings referenced in Exhibit 1, attached hereto.
2. In accordance with section 412(2) and (6) of the Securities Act, MCL 451.2412(2) and (6): This is NOTICE that the Administrator has summarily suspended Respondent's registrations, and that Respondent has thirty (30) calendar days after the date that this Order is served on Respondent to submit a written request to the Administrator that this matter be scheduled for a hearing. If the Administrator timely receives a written request, the Administrator shall schedule a hearing within 15 days after receipt of the written request. If a hearing is not requested by Respondent or is not ordered by the Administrator within 30 days after the date of service of this Order, then the Order becomes FINAL. If a hearing is requested or ordered, the Administrator, after notice of and an opportunity for hearing to Respondent, may modify or vacate this Order or extend the Order until final determination.

If Respondent requests a hearing, THE REQUEST MUST BE IN WRITING and filed with the Department of Licensing and Regulatory Affairs, Corporations, Securities & Commercial Licensing Bureau, Regulatory Compliance Division, P.O. Box 30018, Lansing, MI 48909.

DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS

By: 
Julia Dale, Administrator and Director
Corporations, Securities & Commercial Licensing Bureau

**STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
CORPORATIONS, SECURITIES & COMMERCIAL LICENSING BUREAU**

In the matter of:

Agency No. 331056

JOHN JAGGER
CRD# 256868

Respondent.

/
This ^{Issued} 3rd day of March, 2017

**NOTICE OF INTENT TO REVOKE, SUSPEND, CONDITION, OR LIMIT
INVESTMENT ADVISER REPRESENTATIVE REGISTRATION**

I. RELEVANT FACTS AND APPLICABLE LAW.

Relevant information and statutory provisions, under the Michigan Uniform Securities Act (2002), 2008 PA 551, as amended, MCL 451.2101 *et seq* (the "Securities Act"):

1. John Jagger ("Respondent") (CRD#256868) is an individual who is registered as an investment adviser representative of Prather Investment Management, LLC ("PIM") (CRD#130947), a registered investment adviser firm. Respondent is also identified as one of two owners and managing members of another investment adviser firm, Northern Star Capital Management, LLC ("Northern Star").¹ Respondent, as a member of the LLC, controls Northern Star directly or indirectly.
2. The Corporations, Securities & Commercial Licensing Bureau ("the Bureau") within the Department of Licensing and Regulatory Affairs began a routine examination of Northern Star in or around April of 2016.
3. The examination of Northern Star identified multiple regulatory deficiencies which were identified to Northern Star by a letter of advisement dated June 27, 2016 (Exhibit 1 – Letter of Advisement). Northern Star and Respondent's failure to correct the deficiencies led to the issuance of a Notice of Intent to Revoke, Suspend, Condition, or Limit Investment Adviser Registration to Northern Star (Exhibit 2 – Northern Star Notice of Intent).
4. Section 412(2) of the Securities Act, MCL 451.2412(2), states:

If the administrator finds that the order is in the public interest and subsection (4) authorizes the action, an order under this act may revoke, suspend, condition, or limit

¹ Mr. Kenneth Prather is identified as the other owner and managing member of Northern Star in Northern Star's registration documents.

the registration of a registrant and *if the registrant is a broker-dealer or investment adviser, of a partner, officer, or director, or a person having a similar status or performing similar functions, or a person directly or indirectly in control of the broker-dealer or investment adviser...* [Emphasis added.]

5. Section 412(3) of the Securities Act, MCL 451.2412(3), states:

If the administrator finds that the order is in the public interest and subsection (4)(a) to (f), (i) to (j), or (l) to (n) authorizes the action, an order under this act may censure, impose a bar, or impose a civil fine in an amount not to exceed a maximum of \$10,000.00 for a single violation or \$500,000.00 for more than 1 violation on a registrant and, if the registrant is a broker-dealer or investment adviser, on a partner, officer, or director, a person having a similar status or performing similar functions, or a person directly or indirectly in control of the broker-dealer or investment adviser.

6. Section 412(4) of the Securities Act, MCL 451.2412(4) states in relevant part:

(4) A person may be disciplined under subsections (1) to (3) if any of the following apply to the person:

(a) The person filed an application for registration in this state under this act or the predecessor act within the previous 10 years, which as of the effective date of registration or as of any date after filing in the case of an order denying effectiveness, was incomplete in any material respect or contained a statement that, in light of the circumstances under which it was made, was false or misleading with respect to a material fact.

(b) The person willfully violated or willfully failed to comply with this act or act or a rule adopted or order issued under this act or the predecessor act within the previous 10 years...

7. Section 412(7) of the Securities Act, MCL 451.2412(7), states:

(7) Except under subsection (6), an order shall not be issued under this section unless all of the following have occurred:

- (a) Appropriate notice has been given to the applicant or registrant.
- (b) Opportunity for hearing has been given to the applicant or registrant.
- (c) Findings of fact and conclusions of law have been made on the record pursuant to the administrative procedures act of 1969, 1969 PA 306, MCL 24.201 to 24.328.

8. Section 412(8) of the Securities Act, MCL 451.2412(8), states:

(8) A person who controls, directly or indirectly, a person not in compliance with this section may be disciplined by order of the administrator under subsections (1) to (3) to the same extent as the noncomplying person, unless the controlling person did not know, and in the exercise of reasonable care could not have known, of the existence of conduct that is a basis for discipline under this section. [Emphasis added.]

9. The Administrator may revoke, suspend, condition or limit Respondent's investment adviser representative registration pursuant to sections 412(2) and 412(8) of the Securities Act, MCL 451.2412(2) and MCL 451.2412(8), because it is in the public interest, and because:

A. Northern Star Capital Management, LLC is the subject of a Notice of Intent to Revoke, Suspend, Condition, or Limit Investment Adviser Registration pursuant to sections 412(2) and 412(4)(a)-(b) of the Securities Act, MCL 451.2412(2) and MCL 451.2412(4)(a)-(b); Respondent controls, directly or indirectly, Northern Star Capital Management, LLC, justifying the issuance of an order against Respondent pursuant to sections 412(2) and 412(8) of the Securities Act, MCL 451.2412(2) and MCL 451.2412(8).

II. ORDER.

The Administrator finds that this ORDER is authorized, appropriate, and in the public interest based on the above-cited facts and law.

IT IS ORDERED as follows:

1. The Administrator intends TO REVOKE, SUSPEND, CONDITION, OR LIMIT THE INVESTMENT ADVISER REPRESENTATIVE REGISTRATION OF JOHN JAGGER under sections 412(2) and 412(8) of the Securities Act, MCL 451.2412(2) and MCL 451.2412(8), because the investment adviser over which John Jagger exercises direct or indirect control is subject to an order issued under the Securities Act, supporting the revocation, suspension, conditioning, or limitation of Respondent's investment adviser representative registration under the above-cited provisions of the Michigan Uniform Securities Act (2002), 2008 PA 551, MCL 451.2101 *et seq.*

2. In her final order, the Administrator intends to impose a civil fine of \$10,000.00 against Respondent under section 412(3) of the Securities Act, MCL 451.2412(3).

3. In accordance with sections 412(2) and 412(7) of the Securities Act, MCL 451.2412(2) and MCL 451.2412(7): This is NOTICE that the Administrator intends to commence administrative proceedings to revoke, suspend, condition, or limit Respondent's investment adviser representative registration, and that Respondent has thirty (30) days after the date that this Order is served on Respondent to respond in writing to the enclosed Notice of Opportunity

John Jagger (CRD#256868)

NOI to Revoke, Suspend, Condition, or Limit Investment Adviser Representative Registration

File No. 331056

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to Show Compliance. If the Administrator timely receives a written request, depending upon the election, the Administrator shall either promptly schedule a compliance conference, or schedule a hearing within fifteen (15) days after receipt of the written request. If you fail to respond to this Notice and Order within the time frame specified, the Administrator shall schedule a hearing. If a hearing is requested or ordered, the Administrator, after notice of and an opportunity for hearing to Respondent, may modify or vacate this Order or extend the Order until final determination.

If Respondent requests a hearing, the request must be in writing and filed with the Department of Licensing and Regulatory Affairs, Corporations, Securities & Commercial Licensing Bureau, Regulatory Compliance Division, P.O. Box 30018, Lansing, MI 48909.

DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS

By:



Julia Dale, Administrator and Director
Corporations, Securities & Commercial Licensing Bureau