

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

In the matter of:

Agency No. 339869

DANIEL CADEZ, JR.
CRD# 3001507

and

THE CADEZ GROUP, LTD
D/B/A ADVANCED FINANCIAL PLANNING, INC.
CRD/IARD# 116896
Respondents.

Agency No. 338687

Issued and entered
this 24th day of October, 2019

CONSENT ORDER RESOLVING:

- **Notice of Intent to Revoke Investment Adviser Representative Registration of Daniel Cadez, Jr.;**
- **Notice of Intent to Revoke Investment Adviser Registration of The Cadez Group, Ltd, D/B/A Advanced Financial Planning, Inc.; and**
- **Notice and Order to Cease and Desist.**

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

1. Daniel Cadez, Jr. (CRD# 3001507, "Cadez") is an individual who resides in the State of Michigan and is registered in Michigan as an investment adviser representative of the Cadez Group, LTD, d/b/a Advanced Financial Planning, Inc. (CRD/IARD# 116896 ("The Cadez Group"), a Michigan-registered adviser.
2. The Cadez Group is a Michigan corporation that is registered as an investment adviser pursuant to the Securities Act. The Cadez Group is owned and operated by Cadez.
3. On July 31, 2019, the State of Michigan, Department of Licensing and Regulatory Affairs, Corporations, Securities & Commercial Licensing Bureau

(the "Bureau") and the Director of the Bureau who serves as the Administrator of the Act (the "Administrator") issued a Notice and Order to Cease and Desist ("C&D") to Cadez under MCL 451.2411(6) and MCL 451.2501(b). The C&D Order asserted that:

- a. Cadez violated the Securities Act by taking and maintaining custody of client funds without obtaining annual audits for the years 2015, 2016, 2017, 2018, or to date in 2019 as required by 17 CFR 275.206(4)-2, contrary to Order No. 2011-009-M, the Sixth Transition Order Administering the Securities Act, Rule 451.4.13, and MCL 451.2411(6).
 - b. Cadez, through the private placement memorandum he distributed to investors on behalf of Pishon Partners, LP, represented that investors would receive annual audited financial statements from the limited partnership; this representation was untrue, as no audited financial statements were prepared and distributed for the years 2015, 2016, 2017, 2018, or to date in 2019. The statement regarding provision of annual audited financial statements was in connection with the offer or sale of a security, material, and untrue, contrary to section 501(b) of the Securities Act, MCL 451.2501(b).
4. On July 31, 2019, the Bureau and the Administrator also issued a Notice of Intent to Revoke Investment Adviser Representative Registration and Order of Summary Suspension to Cadez (Agency No. 339869) and a separate Notice of Intent to Revoke Investment Adviser Registration and Order of Summary Suspension to The Cadez Group (Agency No. 338687).
 5. The July 31, 2019 Notice of Intent (NOI) issued to The Cadez Group was based on The Cadez Group's alleged custody of client funds or securities as a result of its associated person Cadez's role in a private fund called Pishon, Ltd., in violation of the Securities Act. As of July 31, 2019, The Cadez Group's Investment Adviser registration was summarily suspended pending outcome of revocation proceedings instituted by the NOI in accordance with section 412(6) of the Securities Act, MCL 451.2412(6).
 6. The July 31, 2019 NOI issued to Cadez was based on Cadez's alleged unlawful custody of The Cadez Group client funds or securities in violation of the Securities Act as well as Cadez's alleged untrue statements of fact in
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connection with the offer or sale of a security. As of July 31, 2019, Cadez's Investment Adviser Representative registration was summarily suspended pending the outcome of revocation proceedings instituted by the NOI in accordance with section 412(6) of the Securities Act, MCL 451.2412(6).

7. Cadez and The Cadez Group timely requested an opportunity to meet with the Bureau in an attempt to negotiate a resolution of the above-captioned matters, including both NOIs and the C&D Order. Thereafter, Cadez, on behalf of himself and The Cadez Group, along with legal counsel for Cadez and The Cadez Group, met with representatives of the Bureau on September 3, 2019 and, as a result of that meeting and further negotiations, the Bureau, Cadez, and The Cadez Group agree to and recommend that the Administrator order a settlement of these matters under the terms and conditions set forth in this Stipulated Consent Order. The Cadez Group and Cadez were represented by, and had the advice of, legal counsel throughout the process of resolving the C&D Order and the July 31, 2019 NOIs. At the meeting, Cadez and the Cadez Group represented that Pishon Partners, LP ceased all trading activities in 2016 and filed a final partnership tax return for 2016, and that approximately \$9,000 of funds were still held at its brokerage firm, which the brokerage firm refused to release because Pishon Partners, LP no longer had a bank account.

B. STIPULATION

The Cadez Group and Cadez ("Respondents"), and the Administrator (collectively, "the Parties") agree that the C&D Order and NOIs will be resolved and the Summary Suspensions lifted based upon the following conditions:

1. Respondents agree to comply with the Securities Act in connection with all future conduct and activities.
2. Respondents neither admit nor deny the allegations in the C&D Order or the NOIs, and neither admit nor deny any wrongdoing in connection with these matters. Respondents consent to entry of this Consent Order only for the purpose of resolving the C&D Order and the NOIs in an expeditious fashion that avoids the time and expense associated with an administrative proceeding and any appeals therefrom. The Parties agree that this Consent Order is automatically admissible in a proceeding to enforce its provisions or in any administrative proceeding under the Securities Act.

3. The Parties agree that this Consent Order resolves only Respondents' activities, conduct, and alleged Securities Act violations contained in the C&D Order and the NOIs, but it does not address or resolve any other activities, conduct, or potential Securities Act violations engaged in by Respondents not expressly contained in the C&D Order or NOIs or occurring after the date of this Consent Order.
 4. Respondents agree that, effective upon entry of this Consent Order, any request for an administrative hearing related to the C&D Order and/or the NOIs is automatically revoked without further action of the Parties.
 5. The Cadez Group agrees to the revocation of its Michigan Investment Adviser Registration, CRD/IARD# 116896 and Cadez agrees to the revocation of his Michigan Investment Adviser Representative Registration, CRD# 3001507, which shall be effective no later than ninety (90) days after the effective date of this Consent Order and as set forth in Paragraphs B.6. and B.7.
 6. The Parties represent that The Cadez Group currently supervises an Investment Adviser Representative, John W. Ellison ("Ellison"), who is located in Wisconsin. The Cadez Group shall be permitted to continue to supervise Ellison as Ellison's Investment Adviser for no more than ninety (90) days after the effective date of this Consent Order, at which time The Cadez Group's Michigan Investment Adviser registration shall be revoked. If, however, Ellison affiliates with another Investment Adviser at any time prior to ninety (90) days after the effective date of this Consent Order, then The Cadez Group shall so inform the Bureau and the Bureau shall, at that time, update The Cadez Group's registration status on CRD to "Revoked", and file. Until such time as The Cadez Group's Michigan Investment Adviser registration is revoked, The Cadez Group shall not supervise any other Investment Adviser Representatives, other than Ellison, and shall not accept any new clients.
 7. Cadez agrees that the Bureau shall revoke his Michigan Investment Adviser Representative registration. To the extent Cadez is required to maintain his Investment Adviser Representative registration as a condition of maintaining Cadez Group's Investment Adviser registration, then Cadez shall be permitted to continue to maintain his Investment Adviser Representative registration for no more than ninety (90) days after the effective date of this Consent Order as set forth in paragraph B.6. Until such time as Cadez's Michigan Investment Adviser Representative registration is revoked, Cadez
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shall not accept any new clients or provide investment advice to any clients. The Bureau shall update Cadez's registration status on CRD to "Approved-Restricted" until Cadez notifies the Bureau that he is no longer required to supervise Ellison, or until ninety (90) days after the effective date of this Consent Order, whichever is sooner, at which time the Bureau will update Cadez's registration status on CRD to "Revoked".

8. Respondents agree that to the extent they currently have custody over any client funds, they shall take immediate steps to distribute such funds to the owner(s) of such funds. The Parties represent that Respondent's attorney, Robert J. Mottern ("Mottern"), has received Respondents' client funds in his attorney trust account for the sole purpose of distributing the funds to the owner(s) of such funds. Upon distribution of Respondents' client funds through Mottern's attorney trust account, Mottern shall provide the Bureau with an affidavit describing the distribution of the funds, including the amount of funds distributed, to whom the funds were distributed, and the date of distribution. The account distribution and Mottern's affidavit to the Bureau describing the fund distribution shall be completed as soon as possible but no later than ninety (90) days after the effective date of this Consent Order.
9. The Administrator agrees to reduce the total fines in the C&D Order, and Respondents agree to pay, jointly and severally, a civil fine of \$1,000.00 to the Bureau within 120 days after the mailing date of this Consent Order. The fine must be paid by check or money order payable to the "State of Michigan," contain The Cadez Group and Cadez's identifying information (name and Agency Nos. 338687 and 339869), and be mailed to:


Corporations, Securities & Commercial Licensing Bureau
Final Order Monitoring – Securities & Audit Division
P.O. Box 30018
Lansing, MI 48909
10. If any portion of the fine is overdue for at least six months, the Administrator may refer it to the Michigan Department of Treasury for collection action against The Cadez Group and/or Cadez. In addition, the Administrator reserves the right to pursue any other action or proceeding permitted by law to enforce payment of the fine.
11. The Parties acknowledge and agree that the Administrator retains the right to pursue any action or proceeding permitted by law to enforce compliance


with the provisions of this Consent Order, and that failure to comply with this Consent Order may result in the reinstatement of the C&D Order, pending any other action the Administrator chooses to take as a result of Respondents' failure to comply.

12. Respondents agree to cooperate with the Bureau and comply with any reasonable investigative demands made by the Bureau in the future for purposes of ensuring compliance with this Consent Order or the Securities Act.
 13. Respondents acknowledge and agree that: (a) the Administrator has jurisdiction and authority to enter this Consent Order; (b) the Administrator may enter this Consent Order without any further notice to Respondents; and (c) upon entry of this Consent Order, it is final and binding, and Respondents waive any right to a hearing or an appeal of this Consent Order and the C&D Order or NOIs under the Securities Act, the rules promulgated under the Securities Act or the predecessor Securities Act, the Administrative Procedures Act of 1969, 1969 PA 306, MCL 24.201 *et seq.*, or other applicable law.
 14. The Parties understand and agree that this Consent Order will be presented to the Administrator for her final approval as evidence by its entry, and that the Administrator may, in her sole discretion, decide to accept or reject this Consent Order. If the Administrator accepts this Consent Order by entering it, this Consent Order becomes fully effective and binding in accordance with Paragraph B.13. above. If the Administrator rejects this Consent Order by refusing to enter it, the Parties waive any objection to submitting a hearing request for adjudication through a formal administrative proceeding and the Administrator remaining the final decisionmaker at the conclusion of that proceeding.
 15. Following entry of the attached Order, the Bureau will file a Form U6 reflecting the Parties' resolution of the NOI and C&D under this Consent Order. This Consent 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 Bureau currently publishes copies of orders issued under the Act to the Bureau's website.
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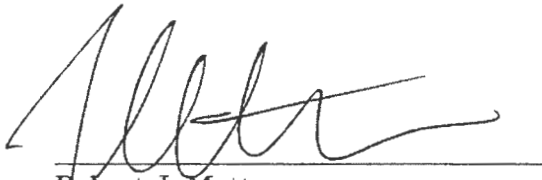
16. The Parties acknowledge and agree that this Consent Order contains the entire understanding of the Parties and supersedes and forever terminates all prior and contemporaneous representations, promises, understandings, and negotiations, whether oral or written, with respect to its subject matter. The Parties further agree that this Consent Order may only be amended, modified, or supplemented by a duly executed writing signed by each Party and approved by Order of the Administrator.
 17. The Parties acknowledge and represent that: (a) each Party has read this Consent 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 Consent 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 Consent Order; (d) each Party has freely and voluntarily signed this Consent Order; and (e) the consideration received by each Party as described in this Consent Order is adequate.
 18. Respondents understand and intend that by signing this Consent Order, they are waiving the right, pursuant to the Act, the rules promulgated under that Act and the Uniform Securities Act (Predecessor Act), 1964 PA 265, MCL 451.501 *et seq.*, and the Administrative Procedures Act, 1969 PA 306, MCL 24.201 *et seq.*, to prior notice and a hearing before an administrative law judge, at which the Bureau would be required to defend any disciplinary action taken under Section 604 (6) of the Act, MCL 451.2604, by presentation of evidence and legal authority and at which Respondents would be entitled to appear with or without an attorney to cross-examine all witnesses presented by the Bureau and to present such testimony or other evidence or legal authority deemed appropriate.
 19. The Parties agree that facsimile or electronically transmitted signatures may be submitted in connection with this Consent Order and are binding on that Party to the same extent as an original signature.
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Through their signatures, the Parties agree to the above terms and conditions:

Dated: 10/15/19 Signed: 
The Cadez Group
By: Daniel Cadez, Jr.

Dated: 10/19/19 Signed: 
Daniel Cadez, Jr., on his own behalf

Acknowledged and Review by:

Dated: 10/18/19 Signed: 
Robert J. Mottern
Attorney for Respondents

Approved by:

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

Through their signatures, the Parties agree to the above terms and conditions.

Dated: _____

Signed: _____

The Cadez Group
By: Daniel Cadez, Jr.

Dated: _____

Signed: _____

Daniel Cadez, Jr., on his own behalf

Acknowledged and Review by:

Dated: _____


Signed: _____

Robert J. Mottern
Attorney for Respondents

Approved by:

Dated: 10-21-19

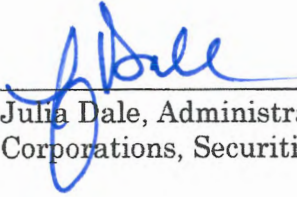
Signed: _____


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

C. ORDER

The Administrator NOW, THEREFORE, ORDERS:

THE TERMS AND CONDITIONS IN THIS CONSENT ORDER ARE BINDING AND EFFECTIVE, IN ACCORD WITH THE FULLY EXECUTED STIPULATION CONTAINED HEREIN.



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. 338687

THE CADEZ GROUP, LTD
D/B/A ADVANCED FINANCIAL PLANNING, INC.
CRD/IARD#: 116896

Respondent.

This 31st day of July, 2019

Issued and entered

**NOTICE OF INTENT TO REVOKE
INVESTMENT ADVISER REGISTRATION
AND ORDER OF SUMMARY SUSPENSION**

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. The Cadez Group, LTD, d/b/a Advanced Financial Planning, Inc. (CRD/IARD# 116896, "Respondent") is a Michigan corporation which is registered as an investment adviser pursuant to the Securities Act. Respondent is owned and operated by Daniel Cadez, Jr., (CRD#3001507, "Cadez"), who is registered as an investment adviser representative of Respondent.
2. The Corporations, Securities & Commercial Licensing Bureau ("the Bureau") within the State of Michigan Department of Licensing and Regulatory Affairs notified Respondent and Cadez in or around October of 2018 that Bureau staff was beginning an examination of Cadez Group's books and records pursuant to MCL 451.2411(4).
3. On or around April 24, 2019, Respondent and Cadez were suspended for failing to cooperate with the Bureau's examination of Respondent. (Exhibit 1, "the April Order"). Since the issuance of the April Order, Respondent and Cadez have cooperated with the examination and provided relevant documents to Bureau examiners.
4. Documents provided by Respondent demonstrated that it has custody of client funds or securities as a result of its associated person Cadez's role in a private fund called Pishon, Ltd., in violation of the Securities Act. (See Exhibit 2 for details regarding the custody arrangement – Cadez Cease and Desist Order).

5. The Director of the Bureau (“Administrator”) has reviewed materials regarding Respondent’s actions as a registrant under the Securities Act. The Administrator has determined that it is authorized, appropriate, and in the public interest to withdraw the April Order, and to institute new administrative proceedings under the Securities Act to revoke Respondent’s investment adviser representative registration based upon its willful failure to comply with the Securities Act.

6. Section 412(2) of the Securities Act, MCL 451.2412(2), states in relevant part:

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 the registration of a registrant and if the registrant is a broker-dealer or investment adviser, of a partner, officer, 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...

7. 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:

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

8. Section 412(6) of the Securities Act, MCL 451.2412(6), states:

(6) The administrator may suspend or deny an application summarily, restrict, condition, limit, or suspend a registration, or censure, bar, or impose a civil fine on a registrant pending final determination of an administrative proceeding. On the issuance of the order, the administrator shall promptly notify each person subject to the order that the order has been issued, the reasons for the action, and that, within 15 days after the receipt of a request in a record from the person, the matter will be scheduled for a hearing. If a hearing is not requested by a person subject to the order or is not ordered by the administrator within 30 days after the date of service of the order, the order is final. If a hearing is requested or ordered, the administrator, after notice of and opportunity for hearing to each person subject to the order, may modify or vacate the order or extend the order until final determination.

9. 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.

10. The Administrator may revoke Respondent's investment adviser registration pursuant to section 412(2) of the Securities Act, MCL 451.2412(2), because it is in the public interest, and because:

- A. Respondent willfully violated or failed to comply with the Securities Act by taking custody of client funds or securities, giving the Administrator cause to issue an order under sections 412(2) and 412(4)(b) of the Securities Act, MCL 451.2412(2) and MCL 451.2412(4)(b).

11. The Administrator may summarily suspend Respondent's investment adviser representative registration pursuant to section 412(6) of the Securities Act, MCL 451.2412(6), pending the outcome of the administrative proceedings initiated by this Notice.

II. ORDER.

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

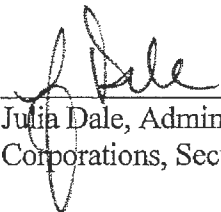
IT IS ORDERED as follows:

1. The April 24, 2019 Notice of Intent to Revoke Investment Adviser Registration and Order of Summary Suspension issued against Respondent is withdrawn as a result of Respondent's cooperation with the Bureau's examination, and replaced by this Notice and Order.
2. The Administrator intends TO REVOKE THE INVESTMENT ADVISER REGISTRATION OF THE CADEZ GROUP, LTD, d/b/a ADVANCED FINANCIAL PLANNING, INC., under section 412(2) of the Securities Act, MCL 451.2412(2), because it willfully violated or failed to comply with the Securities Act, which supports the revocation of its investment adviser registration under the above-cited provisions of the Michigan Uniform Securities Act (2002), 2008 PA 551, MCL 451.2101 *et seq.*
3. Respondent's investment adviser registration is SUMMARILY SUSPENDED pending the outcome of revocation proceedings instituted by this NOTICE in accordance with section 412(6) of the Securities Act, MCL 451.2412(6).
4. 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 revoke Respondent's investment adviser 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 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
CORPORATIONS, SECURITIES & COMMERCIAL LICENSING BUREAU

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

7/31/19
Date

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

In the matter of:

Agency No. 338687

THE CADEZ GROUP, LTD
D/B/A ADVANCED FINANCIAL PLANNING, INC.
CRD/IARD#: 116896

Respondent.

This 24th day of April, 2019

Issued and entered

**NOTICE OF INTENT TO REVOKE
INVESTMENT ADVISER REGISTRATION
AND ORDER OF SUMMARY SUSPENSION**

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. The Cadez Group, LTD, d/b/a Advanced Financial Planning, Inc. (CRD/IARD# 116896, "Respondent") is a Michigan corporation which is registered as an investment adviser pursuant to the Securities Act. Respondent is owned and operated by Daniel Cadez, Jr., (CRD#3001507, "Cadez"), who is registered as an investment adviser representative of Respondent.
2. The Corporations, Securities & Commercial Licensing Bureau ("the Bureau") within the State of Michigan Department of Licensing and Regulatory Affairs notified Respondent and Cadez in or around October of 2018 that Bureau staff was beginning an examination of Respondent's books and records pursuant to MCL 451.2411(4).
3. The onsite portion of the examination began on or around December 11, 2018. Thereafter, on January 23, 2019, Bureau staff submitted a written request for further information from Respondent and Cadez. Respondent and Cadez failed to respond to the request, and to follow-up requests on or around February 21, 2019; March 7, 2019; and March 15, 2019.
4. Bureau staff requested production of documents for inspection in connection with the examination through numerous methods of communication, including in person, through multiple email requests and reminders, and through U.S. Mail.

5. Respondent and Cadez have failed to provide the records necessary for Bureau staff to complete its examination of Respondent, thereby impeding an examination being conducted pursuant to MCL 451.2411(4).
6. The Director of the Bureau ("Administrator") has reviewed materials regarding Respondent's actions to impede the Bureau's lawful examination under the Securities Act. The Administrator has determined that it is authorized, appropriate, and in the public interest to revoke Respondent's investment adviser registration and to suspend its registration pending the outcome of revocation proceedings.
7. Section 412(2) of the Securities Act, MCL 451.2412(2), states in relevant part:

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 the registration of a registrant and if the registrant is a broker-dealer or investment adviser, of a partner, officer, 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...

8. 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:

(h) The person refuses to allow or otherwise impedes the administrator from conducting an audit or inspection under section 411(4) or refuses access to a registrant's office to conduct an audit or inspection under section 411(4)...

9. Section 412(6) of the Securities Act, MCL 451.2412(6), states:

(6) The administrator may suspend or deny an application summarily, restrict, condition, limit, or suspend a registration, or censure, bar, or impose a civil fine on a registrant pending final determination of an administrative proceeding. On the issuance of the order, the administrator shall promptly notify each person subject to the order that the order has been issued, the reasons for the action, and that, within 15 days after the receipt of a request in a record from the person, the matter will be scheduled for a hearing. If a hearing is not requested by a person subject to the order or is not ordered by the administrator within 30 days after the date of service of the order, the order is final. If a hearing is requested or ordered, the administrator, after notice of and opportunity for hearing to each person subject to the order, may modify or vacate the order or extend the order until final determination.

10. 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.

11. The Administrator may revoke Respondent's investment adviser registration pursuant to section 412(2) of the Securities Act, MCL 451.2412(2), because it is in the public interest, and because:

- A. Respondent has impeded the Bureau's examination under MCL 451.2411(4), giving the Administrator cause to issue an order under sections 412(2) and 412(4)(h) of the Securities Act, MCL 451.2412(2) and MCL 451.2412(4)(h).

12. The Administrator may summarily suspend Respondent's investment adviser registration pursuant to section 412(6) of the Securities Act, MCL 451.2412(6), pending the outcome of the administrative proceedings initiated by this Notice.

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 THE INVESTMENT ADVISER REGISTRATION OF THE CADEZ GROUP, INC., D/B/A ADVANCED FINANCIAL PLANNING, INC. under section 412(2) of the Securities Act, MCL 451.2412(2), because it has impeded the inspection of its records of pursuant to section 411(4) of the Securities Act, MCL 451.2411(4), which supports the revocation of its investment adviser registration under the above-cited provisions of the Michigan Uniform Securities Act (2002), 2008 PA 551, MCL 451.2101 *et seq.*

2. Respondent's investment adviser registration is SUMMARILY SUSPENDED pending the outcome of revocation proceedings instituted by this NOTICE in accordance with section 412(6) of the Securities Act, MCL 451.2412(6).

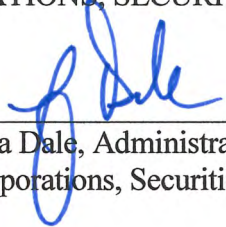
3. In accordance with sections 412(2) and 412(7) of the Securities Act, MCL 451.2412(2) and MCL 451.2412(7): This is NOTICE that the Administrator intends to revoke Respondent's investment adviser registration, and that Respondent has thirty (30) days after the date that this

Order is served on Respondent to respond in writing to the enclosed Notice of Opportunity 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
CORPORATIONS, SECURITIES & COMMERCIAL LICENSING BUREAU

By:



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



Date