

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

In the matter of:

DANIEL EARLEY
Unregistered,

ENF-22-020121

Respondent.

Issued and entered
this 20th day of March, 2023

STIPULATION AND CONSENT ORDER
RESOLVING 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.*:

1. On October 19, 2022, the State of Michigan, Department of Licensing and Regulatory Affairs, Corporations, Securities, and Commercial Licensing Bureau (“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 ORDER”) to Respondent Daniel Earley (“Respondent”).

2. Respondent is an individual who holds no registrations under the Act and has not registered any securities offerings under the Act.

3. The C&D ORDER was immediately effective under MCL 451.2604(2) and ordered Respondent to immediately cease and desist from alleged violations of MCL 451.2301 and MCL 451.2501; however, Respondent timely requested an

administrative hearing on the C&D ORDER under MCL 451.2604(2) and (3) (the “Hearing Request”).

4. Following issuance of the C&D ORDER, the Bureau and Respondent (collectively, “the Parties”) engaged in settlement negotiations through this Stipulation and Consent Order Resolving Notice and Order to Cease and Desist (“Consent Order”).

5. Respondent consulted with or had an opportunity to consult with legal counsel of his choosing before executing the following Stipulation.

B. STIPULATION

The Parties agree to resolve the C&D ORDER based on the following terms:

1. Respondent neither admits nor denies the allegations in the C&D ORDER or any wrongdoing in connection with this matter, and consents to entry of this Consent Order only for the purpose of resolving the C&D ORDER in an expeditious fashion that avoids the time and expense associated with an administrative proceeding and any related appeals.

2. Respondent agrees that he will not conduct any business and will not act as a principal or consultant on behalf of any business subject to the Act beginning on the issued and entered date of this Consent Order.

3. For the purposes of this Consent Order and any proceedings brought by or on behalf of the Bureau to enforce this Consent Order, Respondent acknowledges the Bureau’s jurisdiction over him and the subject matter of these proceedings and

consents to the entry of this Consent Order for the purpose of resolving the C&D ORDER.

4. Respondent agrees to pay an administrative assessment in the amount of Ten Thousand and 00/100 Dollars (\$10,000.00) within 60 calendar days after the issued and entered date of this Consent Order. It may be paid by check, money order, or debit or credit card. If Respondent is paying the administrative assessment by check or money order, Respondent must make the check payable to the “State of Michigan,” write “ENF-22-020121” on the check or money order, enclose the “Payment Processing Stub” attached to the Payment Instructions form received with the Stipulation and Consent Order, and mail it to:

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

Please consider mail processing delays when determining how and when to make payment. Information about how to open an online account to submit payments by debit or credit card or how to use an existing online account to make a payment to the Bureau may be found by visiting www.mi.gov/miclear. All other communications and documentation may be directed to the Bureau at the address above, or by email to LARA-CSCL-Order-Monitoring@michigan.gov.

5. If any portion of the administrative assessment is overdue, the Administrator may refer it to the Michigan Department of Treasury for collection action against Respondent or take other available legal action to collect the

administrative assessment. Respondent is responsible for all costs and expenses incurred in complying with the terms of this Consent Order and must do so within the timeframe specified. The Administrator retains the right to pursue any action or proceeding permitted by law to enforce the Consent Order's provisions.

6. Respondent's Hearing Request is withdrawn without further action by the Parties.

7. This matter is a public record required to be published and made available to the public, under section 11 of the Michigan Freedom of Information Act, MCL 15.241. The Bureau publishes copies of orders issued under the Act to its website and includes a summary of order content in monthly disciplinary action reports separately published there.

8. Respondent must comply with any reasonable investigative demands made by the Bureau in the future for purposes of ensuring compliance with this Consent Order or the Act.

9. Respondent waives any right to a hearing or appeal of this Consent Order and the C&D ORDER under the Act, the rules promulgated under the Act, the Administrative Procedures Act of 1969, 1969 PA 306, MCL 24.201 *et seq.*, or other applicable law.

10. This Consent Order is fully effective and binding on its issued and entered date. The Administrator may accept or reject it. If the Administrator rejects it, the Bureau will submit the Hearing Request for adjudication through a formal administrative proceeding.

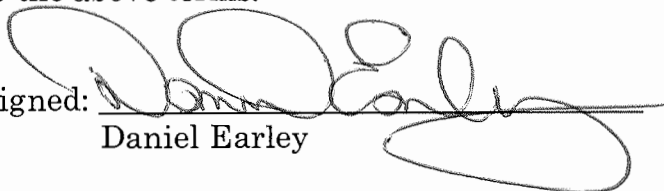
11. This Consent Order contains the entire understanding of the Parties and supersedes and forever terminates all prior and contemporaneous representations, promises, agreements, understandings, and negotiations, whether oral or written, with respect to its subject matter.

12. This Consent Order resolves only Respondent's activities, conduct, and statutory violations alleged in the C&D ORDER, but it does not address or resolve any other conduct or potential statutory violations engaged in by Respondent not expressly alleged in the C&D ORDER or occurring after the date this Consent Order is entered. The Consent Order does not preclude the Bureau or its staff from fully cooperating with any state or federal agency or official that may investigate or pursue its own civil or criminal enforcement against Respondent.

13. This Consent Order may only be modified in writing signed by each Party and approved by a subsequent order of the Administrator.


14. 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.

Through his signature, Respondent confirms that he read, understands, and agrees to the above terms.

Signed: 
Daniel Earley

Dated: March 14, 2023

Reviewed and Acknowledged by:

Signed: 
Paul V. McCord (P61138)
Fraser Trebilcock Davis & Dunlap P.C.
Attorney for Respondent

Dated: March 14, 2023

Approved by:

Signed: /s/ Lindsay DeRosia
Lindsay DeRosia
Securities & Audit Division Director
Corporations, Securities & Commercial Licensing Bureau

Dated: March 15, 2023

Reviewed and Drafted by:

Signed: 
Jonathan Comish (P86211)
Assistant Attorney General
Attorney for the Bureau

Dated: March 15, 2023

C. ORDER

The Administrator NOW, THEREFORE, ORDERS:

THE TERMS AND CONDITIONS IN THE ABOVE FULLY EXECUTED
STIPULATION ARE INCORPORATED IN THIS CONSENT ORDER.

By: /s/ Linda Clegg

Linda Clegg

Administrator and Director

Corporations, Securities & Commercial Licensing Bureau