

BEFORE THE
STATE OF WISCONSIN
DEPARTMENT OF FINANCIAL INSTITUTIONS
DIVISION OF SECURITIES

In the Matter of,

ANTHONY B. LIDDLE and

PROSPER WEALTH MANAGEMENT, LLC,

Respondents.

FINAL ORDER BY CONSENT TO
CEASE AND DESIST, REVOKING
EXEMPTIONS, BARRING
REGISTRATION AND IMPOSING
RESTITUTION AND PENALTIES

DFI Case No. S-244949 (LX)

I.

The Administrator of the State of Wisconsin, Department of Financial Institutions, Division of Securities (“Division”), having legal authority and jurisdiction to administer and enforce the Wisconsin Uniform Securities Law, Wis. Stats. Ch. 551 (“Ch. 551”) and rules and orders promulgated thereunder, and having determined that this action is necessary and appropriate in the public interest and for the protection of investors, hereby enters this Order as follows:

II.

Division staff have presented evidence sufficient for the Administrator to make the following findings of fact and conclusions of law:

A. Findings of Fact

Respondents

1. ANTHONY B. LIDDLE (“Liddle”) (CRD# 5478479) is an adult male Wisconsin resident with a last known address of 535 68th Avenue, Apt 6, Wausau WI 54401.
2. PROSPER WEALTH MANAGEMENT, LLC (CRD# 166152) is a Wisconsin limited liability company organized May 5, 2016, with a last known business address of 500 N. 3rd Street, Suite 202, Wausau, Wisconsin 54403. At all material times, Liddle was the managing member and controlling person of Prosper Wealth Management, LLC, as well as its registered agent. Prosper Wealth Management was registered with the Division until May 27, 2022.

Conduct

3. Liddle was registered with the Division as a registered representative of Landolt Securities, Inc. (CRD# 28352) from April 27, 2020 to May 23, 2022. Liddle was suspended by Landolt Securities on May 9, 2022. Prior to that, Liddle was registered with the Division as a registered representative of Western International Securities, Inc. (CRD# 39262 (2012-2020), Sarkauskas & Associates, Inc. (CRD#106374) (2011-2013) and Eliason Financial Group, LLC (CRD# 130144) (2008-2010).
4. Since November 11, 2013, Liddle has held a Wisconsin resident intermediary license (#17112747) authorizing him to sell life insurance, annuities, variable life insurance and variable annuities.
5. Liddle has offered wealth management services, including investment management, through Prosper Wealth Management, LLC since December 19, 2016. Before that time, Liddle provided those services through Prosper Wealth Management's predecessor, Sark Investments, LLC.
6. From June 2019 through May 2022, Liddle solicited \$1.9 million from 11 Wisconsin investors and two Michigan investors. The funds were to be used for investments including, but not limited to, the purchase of L Bonds issued by GWG Holdings, Inc. Liddle informed investors that the L Bonds would pay a fixed percentage of 5.5% or more annually.
7. Landolt Securities did not authorize Liddle to sell the L Bonds issued by GWG Holdings. Furthermore, GWG Holdings had suspended L Bond sales during the time period that Liddle was offering the securities to investors.
8. The 13 investors did not authorize Liddle to use their investment funds for any purposes other than investments on their behalf.
9. Pursuant to Liddle's instructions, the 13 investors made checks payable or sent wire transfers to Prosper Wealth Management, which Liddle deposited into a business bank account he controlled. Liddle did not invest any of the funds which were deposited into the business account. Instead, he used the investors' funds for personal and business expenses and to pay down debt.
10. Liddle also used investor funds to make monthly payments to certain investors even though those monthly payments were not generated from any investments made on their behalf. These monthly payments lulled investors into believing that Liddle had invested their money as he had promised.
11. Table 1 below summarizes the investments and monthly payments attributable to the 13 investors:

Investor	Total Invested	Date of Initial Investment	Payments Received By Investor	Restitution Owed to Investor
SA	\$71,000	3/15/19	\$57,080	\$13,920
DH	\$140,000	6/13/19	\$36,933.32	\$103,066.68
JH	\$270,000	3/4/21	\$0	\$270,000
HL	\$110,000	12/8/21	\$3,060	\$106,940
LM	\$325,000	8/28/20	\$43,500	\$281,500
NO	\$521,816.92	2/18/20	\$69,276.32	\$452,540.60
MR	\$40,000	6/29/21	\$41,860	\$0
CR	\$185,000	8/9/21	\$0	\$185,000
DS	\$125,000	5/21/21	\$0	\$125,000
MW	\$15,000	9/9/21	\$0	\$15,000
NW	\$10,000	10/28/21	\$0	\$10,000
CW	\$100,000	7/30/21	\$3,208.28	\$96,791.72
DW	\$25,000	7/30/21	\$1,031.22	\$23,968.78
Total:	\$1,937,817.92		\$255,949.14	\$1,683,727.78

12. Of the 13 investors identified in Table 1, 10 investors were at least 65 years of age at the time of their initial investment.
13. During the Division's investigation, Liddle provided examiners with copies of promissory notes which he alleged were for "loans" he received from the investors. The promissory notes were signed by Liddle and purportedly signed by the investors. Liddle admitted to the Division that he did not provide copies of the promissory notes to the investors.
14. All of the investors interviewed by the Division denied making loans to Liddle or Prosper Wealth Management and either denied or could not recall signing the notes.

15. On June 8, 2022, the Division issued a Final Order By Consent to Cease and Desist, Revoking Exemptions and Barring Registration against Liddle and Prosper Wealth Management, LLC. The Final Order by Consent noted the investigation in this matter was ongoing and further orders may be issued.
16. On June 14, 2022, FINRA issued a letter of acceptance, waiver, and consent sanctioning Liddle with a permanent bar from FINRA membership for refusing to produce information and documents and to appear for on-the-record testimony requested by FINRA in connection with its investigation.

B. Conclusions of Law

Legal Authority and Jurisdiction

17. The Administrator has legal authority and jurisdiction over the conduct described above pursuant to Wis. Stats. Ch. 551 and the rules and orders promulgated thereunder.
18. Liddle was registered as an agent of a broker-dealer as defined under Wis. Stat. § 551.102(2) at all relevant times.
19. Liddle was registered as an investment adviser representative as defined under Wis. Stat. § 551.102(16) at all relevant times.
20. Pursuant to Wis. Stat. § 551.412(4)(m), a person may be disciplined under Wis. Stat. § 551.412(3) if the person engaged in dishonest or unethical practices in the securities, commodities, investment, franchise, banking, finance or insurance business within the previous 10 years.
21. Pursuant to Wis. Stat. § 551.505, it is unlawful for a person, to make or cause to be made in a record that is used in an action or proceeding or filed under this chapter, a statement that, at the time and in the light of the circumstances under which it is made, is false or misleading in a material respect, or, in connection with the statement, to omit to state a material fact necessary to make the statement made, in the light of the circumstances under which it was made, not false or misleading.
22. Pursuant to Wis. Stat. § 551.501(2), it is unlawful for a person, in connection with the offer, sale or purchase of a security, directly or indirectly, to make an untrue statement of a material fact or to omit to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading.
23. Pursuant to Wis. Stat. § 551.501(3), it is unlawful for a person, in connection with the offer, sale or purchase of a security, directly or indirectly, to engage in an act, practice or course of business that operates or would operate as a fraud or deceit upon another person.

24. Pursuant to Wis. Stat. § 551.502(1), it is unlawful for a person that advises others for compensation, either directly or indirectly or through publications or writings, as to the value of securities or the advisability of investing in, purchasing, or selling securities or that, for compensation and as part of a regular business, issues or promulgates analyses or reports relating to securities, to do any of the following:
 - a. To employ a device, scheme, or artifice to defraud another person.
 - b. To engage in an act, practice, or course of business that operates or would operate as a fraud or deceit upon another person.

Violations

25. Through the conduct described above, the Respondents are subject to discipline for engaging in dishonest or unethical practices in the securities business in violation of Wis. Stat. §§ 551.412(4)(m).
26. As described above, Liddle violated Wis. Stat. § 551.505 when he made or caused to be made in a record that is used in an action or proceeding or filed under this chapter, one or more statements that, at the time and in the light of the circumstances under which they were made, were false or misleading in a material respect, or, in connection with the statements, omitted to state a material fact necessary to make the statements made, in the light of the circumstances under which they were made, not false or misleading.
27. Through the conduct described above, the Respondents violated Wis. Stat. § 551.501(2), when they, in connection with the offer, sale or purchase of a security, directly or indirectly, omitted to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading
28. Through the conduct described above, the Respondents violated Wis. Stat. § 551.501(3), when, in connection with the offer, sale or purchase of a security, they engaged in an act, practice or course of business that operated as a fraud or deceit upon another person.
29. Through the conduct described above, the Respondents employed a device, scheme, or artifice to defraud, and engaged in an act, practice, or course of business that operates or would operate as a fraud or deceit upon the investors identified in Table 1 in violation of Wis. Stat. §§ 551.502(1)(a) and 551.502(1)(b) by using investors' money in a manner contrary to what they had represented, and for Liddle's personal benefit.

III.

In view of the above findings of fact and conclusions of law, the Administrator deems it necessary and appropriate in the public interest and for the protection of investors, and

pursuant to its legal authority and jurisdiction under Ch. 551, to wit Wis. Stat. §§ 551.604 and 551.412, to issue the following orders and notices:

A. Consent Orders issued pursuant to Wis. Stat. §§ 551.604(2) and 551.412(6)

- (a) IT IS ORDERED that Respondents, their agents, servants, officers, employees, successors, affiliates, and every entity and person directly or indirectly controlled or organized by or on behalf of any Respondent, shall cease and desist from making or causing to be made in or from Wisconsin to any person or entity any further offers or sales of securities unless and until such securities qualify as federal covered securities, federal exempt securities or are registered under Ch. 551 or successor statute, pursuant to Wis. Stats. §§ 551.604(1)(a) and (2).
- (b) IT IS FURTHER ORDERED that all exemptions from registration set forth at Ch. 551 or successor statute that might otherwise apply to any offer or sale of any security of or by any of the Respondents, their agents, servants, officers, employees, successors, affiliates, and every entity and person directly or indirectly controlled or organized by or on behalf of any Respondent, are hereby revoked, pursuant to Wis. Stats. §§ 551.604(1)(b) and (2).
- (c) IT IS FURTHER ORDERED that all exemptions from registration set forth in Wis. Stat. §§ 551.201 and 551.202 that may otherwise apply to a specific security, transaction or offer of or by the Respondents, their agents, servants, officers, employees, successors, affiliates, and every entity and person directly or indirectly controlled or organized by or on behalf of any Respondent, are hereby revoked, pursuant to Wis. Stats. §§ 551.604(1)(c) and (2).
- (d) IT IS FURTHER ORDERED that Respondents, their successors, affiliates, controlling persons, officers, agents, servants, employees and every entity and person directly or indirectly controlled or hereafter organized by or on behalf of any Respondent, are prohibited from violating Wis. Stat. § 551.501 or successor statute.
- (e) IT IS FURTHER ORDERED that Respondents, their successors, affiliates, controlling persons, officers, agents, servants, employees, and every entity and person directly or indirectly controlled or hereafter organized by or on behalf of either Respondent, are prohibited from violating Ch. 551 or successor statute that might otherwise apply to any offer or sale of a security of or by Respondents.
- (f) IT IS FURTHER ORDERED that Respondents are permanently barred from future registration with the Division in any capacity pursuant to Wis. Stat. § 551.412(3).
- (g) IT IS FURTHER ORDERED that Respondents pay restitution, to the investors identified in Table 1 in the aggregate amount of **\$1,683,727.78** with interest on such amount at the legal rate under Wis. Stat. § 138.04, starting from the effective date of

this order through the date of satisfaction, pursuant to Wis. Stat. § 551.604(4m). Respondents shall provide the Division with proof of the restitution payments by no later than 30 days after restitution has been paid.

- (h) IT IS FURTHER ORDERED that pursuant to Wis. Stat. § 551.604(4) a civil penalty be imposed upon the Respondents in the form of an administrative assessment totaling \$25,000 for the violations committed against the investors, many of whom were over the age of 65 at the time the violations occurred. The parties may renegotiate the payment and amount of the penalties if Respondents pay full restitution to the investors in compliance with this order.
- (i) PLEASE TAKE NOTICE that the orders of the Administrator are effective as of the issuance of this order, pursuant to Wis. Stat. §§ 551.604(2) and 551.412(6). You are advised that any willful violation of an order issued by the Division under Ch. 551 is a criminal offense punishable under the provisions of Wis. Stat. § 551.508.

B. Service of Order

- (j) IT IS FURTHER ORDERED that this order shall be sent promptly by certified mail to each party named in the order at the party's last known address or to the party's attorney of record, or shall be personally served upon the party or the party's attorney of record, pursuant to Wis. Admin. Code § DFI-Sec. 8.06. This order shall also be served upon the office of the administrator pursuant to Wis. Stat. § 551.611.
- (k) PLEASE TAKE NOTICE that if service is by certified mail, the date of the service of this order is the date it is placed in the mail. If service is by personal service, the date of the service of this order is the date personal service is completed.

C. Notifications

- (l) PLEASE TAKE NOTICE that this Final Order consented to by Respondents prohibit Respondents from transacting business in the State of Wisconsin per the terms of the consent orders issued pursuant to Wis. Stat. § 551.604(2), is effective upon the date issued, and shall have the same effect on the Respondents as a permanent injunction entered by a circuit court pursuant to Wis. Stat. § 551.603(2)(a):
- (m) PLEASE TAKE FURTHER NOTICE that violations of this Final Order may be enforced by any investor, or by the Division, whether acting in its own right or on behalf of the investor, by petitioning any court of competent jurisdiction to enforce the terms of the order. Respondents agree to venue in Dane County if the Division or its representatives choose to enforce the Final Order in the Circuit Court of Dane County.
- (n) PLEASE TAKE FURTHER NOTICE that pursuant to Wis. Stat. §§ 551.604(2) and 551.412(6) the orders of the Administrator are effective as of the issuance of this order.

(o) PLEASE TAKE FURTHER NOTICE that any willful violation of an Order issued by the Division under Ch. 551 is a criminal offense punishable under the provisions of Wis. Stat. § 551.508.

EXECUTED at Madison, Wisconsin, and effective on this 4th day of August, 2022.



Leslie M. Van Buskirk

Leslie Van Buskirk
Administrator
Department of Financial Institutions

State of Wisconsin
Department of Financial Institutions
4822 Madison Yards Way
North Tower, 4th Floor
Madison, Wisconsin 53705

BEFORE THE
STATE OF WISCONSIN
DEPARTMENT OF FINANCIAL INSTITUTIONS
DIVISION OF SECURITIES

In the Matter of

ANTHONY B. LIDDLE, and
PROSPER WEALTH MANAGEMENT, LLC

Respondents.

WAIVER AND CONSENT
TO ORDER

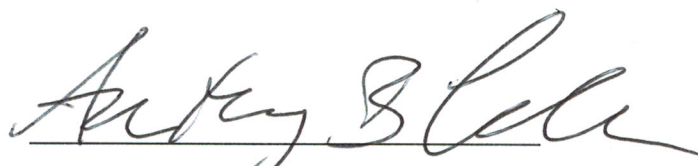
DFI Case No. S-244949 (LX)

The undersigned Respondent, ANTHONY B. LIDDLE, on his own behalf and on behalf of PROSPER WEALTH MANAGEMENT, LLC, having decided not to contest the issuance of the attached Order, hereby waives his right to a hearing with respect to this matter, including waiving findings of fact and conclusions of law as may otherwise be required for the Order, and hereby consents to the issuance of the Order. Respondents reserve all defenses for any proceeding not covered by this consent order.

Respondents hereby acknowledge that, in exchange for Respondents' voluntary consent and agreement to cease and desist from further violations of Ch. 551, the revocation of certain exemptions, bar from the industry, restitution, penalties and other conditions as described in the attached Order, the Division agrees to resolve this matter by issuance of the attached Order. Subject to Respondents' compliance with the attached Order, the Division agrees to forgo further legal action, including injunction proceedings in a circuit court pursuant to Wis. Stat. § 551.603. If Respondents fail to comply with any condition or term of the consent order, the Division reserves all rights under the law to enforce the Order against the Respondents.

The undersigned Respondents understand and agree that the attached Order shall prohibit Respondents from transacting any securities business in the State of Wisconsin, effective on the date the Order is issued. The undersigned Respondents understand the Order, when signed by the Administrator of the Division of Securities, is effective on the date issued and that a willful

violation of an Order signed by the Administrator is a criminal offense pursuant to Wis. Stat. § 551.508.

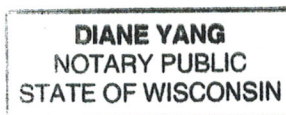


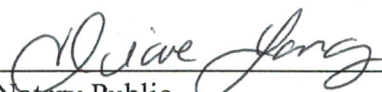
ANTHONY B. LITTLE, on his own behalf
and on behalf of PROSPER WEALTH
MANAGEMENT, LLC

State of _____)

County of _____)

Subscribed before me this
3rd of August, 2022.





Notary Public

My commission is permanent/expires 12/8/2025



State of Wisconsin
Department of Financial Institutions

Tony Evers, Governor

Cheryll Olson-Collins, Secretary

AFFIDAVIT OF SERVICE
AND COMPLIANCE WITH WIS. STAT. § 551.611

STATE OF WISCONSIN)
) ss.
COUNTY OF DANE)

I, KATHERINE CLEMENTI, first being duly sworn, depose and state:

- 1. I am employed with the State of Wisconsin, Department of Financial Institutions, Division of Securities.
2. On the date of this Affidavit and in the course of regularly conducted activity, I have caused to be served by certified mail upon Attorney James C. Yong on behalf of Anthony B. Liddle & Prosper Wealth Management, LLC at his last known business address of One E Wacker Dr., Suite 3400, Chicago, IL 60601:
i. A copy of the Final Order by Consent to Cease and Desist, Revoking Exemptions, Barring Registration and Imposing Restitution and Penalties, Waiver and Consent to Order; DFI Case No. S-244949 (LX); and
ii. A copy of this Affidavit of Service.
3. In compliance with Wis. Stat. §§ 227.48, 551.611, and 891.46; and Wis. Admin. Code. §§ DFI-Sec 8.06 and 8.07, I have also caused to be served copies of those same documents upon the Administrator for the Division of Securities.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Katherine Clementi (handwritten signature)

KATHERINE CLEMENTI

State of Wisconsin
Department of Financial Institutions
Division of Securities

Subscribed and sworn to before me

This 5 day of August, 2022.

Bonnie J. Kusek (handwritten signature)

(Notary Seal)

Notary Public, State of Wisconsin
My commission expires 2/12/2024

