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*Counsel for the Commissioner of Securities and Insurance*

**BEFORE THE COMMISSIONER OF SECURITIES AND INSURANCE,  
OFFICE OF THE MONTANA STATE AUDITOR**

IN THE MATTER OF

ANDERSON BUSINESS ADVISORS,  
LLC; ANDERSON GLOBAL BUSINESS  
GROUP, LLC,

Respondents.

Case No. SEC-2024-00022

**NOTICE OF PROPOSED AGENCY  
ACTION, TEMPORARY ORDER TO  
CEASE AND DESIST, AND  
OPPORTUNITY FOR HEARING**

TO: Anderson Business Advisors, LLC  
c/o Anderson Registered Agents  
3225 Mcleod Drive #110  
Las Vegas, NV, 89121

Anderson Global Business Group, LLC  
c/o Registered Agent Clint Coons  
732 Broadway Ste 201  
Tacoma, WA 98402

The Commissioner of Securities and Insurance, Office of the Montana State Auditor (Commissioner), has cause to believe that Anderson Business Advisors, LLC and Anderson Global Business Group, LLC (Respondents) have violated the Montana Living Trust Act, § 30-10-901, *et seq.*, MCA. The Commissioner proposes to impose a fine of \$50,000 and order Respondents to cease and desist from offering and selling living trusts in the state of Montana without licensure or a valid exemption. A temporary cease-and-

desist order has been issued concurrently with this Notice. The Commissioner has the authority to undertake this action pursuant to the Montana Living Trust Act, § 30-10-901 *et seq.*

Acceptance of the cease-and-desist order will resolve this matter and it will be deemed a Final Agency Action based on the facts and law set out below. If Respondents choose not to accept the order, an administrative hearing may be demanded; that demand must be in writing and received by the Commissioner within 21 days of the date this Notice, as described in the Statement of Rights below.

The Commissioner also concurrently issues a Temporary Order to Respondents to immediately cease and desist their unlawful actions in Montana as laid out in the allegations below. Failure to request a hearing on the Temporary Order within 21 days will result in entry of a permanent cease and desist order by default, as described below.

### **FACTUAL ALLEGATIONS**

There is reasonable cause to believe that the following facts, if true, justify and support administrative action against Respondents.

1. Respondent Anderson Business Advisors, LLC, doing business as Anderson Business Advisors (hereafter ABA), is a limited liability company organized under the laws of the state of Nevada.

2. Respondent Anderson Global Business Group LLC, formerly Anderson Law Group PLLC (hereafter AGBG), is a limited liability company organized under the laws of the state of Washington.

3. Respondents maintain a website at <https://andersonadvisors.com/>, which advertises a variety of Asset Protection, Tax Planning, and Estate Planning services.

4. The “Legal” section of Respondents’ website describes Anderson Law Group PLLC as the entity doing business as Anderson Business Advisors.

5. According to the Washington Secretary of State’s corporation search tool, AGBG’s registered Governors are Andrew Mathis, Michael Bowman, and Clinton Coons.

6. One of the services Respondents’ website offers is a Revocable Living Trust. The website touts the advantages of living trusts and invites visitors to “schedule your

complementary living trust strategy session” by submitting personal contact information and other survey answers through an online form.

7. Respondents’ webpage also informs prospective customers that:

Once you decide that a living trust is the right option for you, we ask that you complete a questionnaire to tell us a little about yourself and your situation. After we receive your completed questionnaire, the attorney’s paralegal will contact you to schedule a teleconference to discuss your estate plan.

During the teleconference, your attorney will ask questions regarding how your estate will be distributed to your heirs, who will control this distribution, if you want to compensate your successor trustee, etc.

8. Montana residents S.B. and K.B. contacted CSI investigator Jennifer Adkins on November 7, 2023. S.B. and K.B informed Adkins that they had paid Respondents to form a living trust for them in June 2023. They were concerned because the proposed Trust was formed under Nevada law, even though they were Montana residents.

9. S.B. and K.B. provided copies of a Letter of Agreement they signed with Respondents on June 30, 2023. The Agreement purported to be with Respondent Anderson Business Advisors LLC.

10. The Agreement quoted S.B. and K.B. \$10,174.00 in services, including a Living Trust Estate Plan, Personal Residence Trust, and LLC Formation for Montana and Wyoming companies. This quoted price was discounted from a purported retail value of \$23,619.00. The Agreement also included several recurring fees, including a “Platinum Enrollment” membership of \$35 annually and a “Company Assistance Program” charge of \$795 annually.

11. The Agreement included a letter from Al Caiazza, Sr. Strategist, Anderson Business Advisors, LLC. His photo and a short bio are included, which reflect that he is a former police officer who changed careers to start his own business working with real estate investors and business owners. It does not identify any professional licenses or qualifications, including licensure or registration as an investment advisor, investment advisor representative, or attorney.

12. S.B. and K.B. also provided copies of a receipt reflecting that the services quoted in the Agreement were paid for in full on June 30, 2023.

13. Both the receipt and the Agreement were addressed to S.B. and K.B. and listed their contact information as their home in Bozeman, Montana.

14. S.B. and K.B. received a binder from Respondents with the proposed living trust and associated documents. It was shipped to their home in Bozeman, Montana. The living trust instrument itself included execution instructions and a signature block for S.B. and K.B. to sign it in front of a Montana notary public.

15. Adkins contacted Respondents and requested a list of all of Respondents' living trust clients who are Montana residents. On December 13, 2023, Respondents, through Managing Partner Clint Coons, provided a list of 36 Montana residents who had purchased living trust services from Respondents since 2013, including the dollar amount of the payment received.

16. Respondents did not provide names or contact information for these individuals but only identified them by client numbers.

17. Since 2019, Respondents have sold living trusts to 23 Montana residents for a total of \$68,995.00.

18. Respondents' website also lists the "Anderson Advisors Partners" as Clint Coons, Esq., Toby Mathis, Esq., and Michael Bowman, Esq. These individuals all hold themselves out as attorneys in promotional materials.

19. Adkins performed a search of the State Bar of Montana Member Directory and found that none of the individuals listed in paragraph 18 are licensed to practice law in Montana.

20. S.B. and K.B. stated that during the process of preparing the living trust, they only spoke to Respondents' staff, including Raquel Carmona, Al Caiazza, Ramon Montoya Escobar, and Samantha Kinney. They spoke to these individuals by phone or email.

21. Adkins performed a search of the State Bar of Montana Member Directory and found that none of the individuals listed in paragraph 20 are licensed to practice law in Montana.

22. S.B. and K.B. never spoke directly to Bowman, Coons, or Mathis before receiving the living trust documents for signature.

23. Adkins performed a search of CSI records and found that neither Respondents nor any of the individuals listed above in paragraphs 18 and 20 have ever applied for or received a license to sell living trusts in Montana pursuant to § 30-10-904, MCA.

24. Adkins performed a search of the FINRA CRD database and found that none of the individuals listed above in paragraphs 18 and 20 have ever been registered as an investment advisor or investment advisor representative.

25. Adkins performed a search of the FINRA CRD database and found that Respondents have never been registered as an investment advisor or investment advisor representative.

#### **ASSERTIONS OF LAW**

26. The Commissioner has jurisdiction over this matter pursuant to § 30-10-901 *et seq.*, MCA.

27. It is unlawful for a person to offer or sell a living trust in the state of Montana unless the person is (a) a registered investment adviser or investment adviser representative under § 30-10-201, MCA, and (b) has applied for and been granted a license under § 30-10-904, MCA.

28. A “person” includes, among other things, an individual, corporation, partnership, or association. § 30-10-103(17), MCA.

29. Certain exemptions from registration and licensure are provided for an attorney licensed to practice law in Montana. § 30-10-904(2)(a), MCA.

30. Respondents offered and sold living trusts in the state of Montana without registering and obtaining a license in accordance with § 30-10-904, MCA.

31. Respondents’ attorney members are not licensed in Montana and therefore are not entitled to the exception at § 30-10-904(2)(a), MCA.

32. None of the individuals working for Respondents were registered or licensed under § 30-10-904, MCA at the time they offered and sold living trust plans to Montana residents.

33. If it appears to the Commissioner that any person has engaged or is about to engage in a practice that violates § 30-10-904, MCA, the Commissioner may issue an order directing the person to cease and desist their unlawful acts or practices after notice and an opportunity for hearing. § 30-10-913, MCA. The Commissioner may also issue a temporary cease and desist order that takes immediate effect pending the hearing referenced above. *Id.*

34. The Commissioner may also impose a fine not to exceed \$10,000 per violation on a person found to have violated § 30-10-904, MCA. § 30-10-913, MCA.

35. Since 2019, Respondent violated § 30-10-904, MCA, in 23 separate instances. The maximum aggregated fine for these offenses is \$230,000.

36. In considering the number, severity, and individual nature of Respondents' offenses, the Commissioner proposes to order Respondents to cease and desist their unlawful activity and to issue a fine of \$50,000 for past offenses.

### **PROPOSED AGENCY ACTION**

WHEREFORE, the Commissioner proposes to order the following:

1. Pursuant to § 30-10-913, MCA, a permanent order prohibiting Respondents from offering or selling living trusts in violation of Montana law.
2. Pursuant to § 30-10-913, MCA, an order fining Respondents \$50,000 total, for which the respective entities would be jointly and severally liable.

### **STATEMENT OF RIGHTS**

Respondents are entitled to contest the Commissioner's proposed action by requesting an administrative hearing. To do so, within 21 days of the date this Notice, Respondents must submit a hearing request in writing to Andrew Cziok, 840 Helena Avenue, Helena, MT 59601 or [acziok@mt.gov](mailto:acziok@mt.gov). A hearing request may also include a response to the allegations set forth above. If a hearing is requested, Respondents will be provided notice of the time, place, and nature of the hearing. Respondents will be entitled

to attend this hearing and respond and present evidence and arguments on all issues in this action.

Administrative hearings are conducted by an impartial hearing examiner appointed by the Commissioner under the provisions of the Montana Administrative Procedures Act. Formal proceedings may be waived pursuant to § 2-4-603, MCA. Respondents have the right to be represented by an attorney at any and all stages of this proceeding.

**CONTACT WITH COMMISSIONER'S OFFICE**

Please contact Andrew Cziok at 406-444-3467 or [acziok@mt.gov](mailto:acziok@mt.gov) with any questions or concerns. If represented by an attorney, please ensure this contact is made by the attorney. A non-human entity such as a corporation or partnership must be represented by an attorney in all administrative proceedings. *See Weaver v. Law Firm of Graybill, Ostrem, Warner & Crotty*, 246 Mont. 175, 178, 803 P.2d 1089 (1990).

**POSSIBILITY OF DEFAULT**

Failure to timely provide a written hearing request shall result in the entry of a default order imposing the Commissioner's proposed action, without additional notice, pursuant to Admin. R. Mont. 1.3.214.

DATED this 4<sup>th</sup> day of April 2024.



ANDREW CZIOK

*Counsel for the Commissioner of Securities & Insurance*

### **TEMPORARY CEASE AND DESIST ORDER**

Pursuant to § 30-10-913, MCA, and in light of the factual allegations and assertions of law above, it appears to the Commissioner that Respondents have engaged, are engaged, and may in the future engage in acts or practices constituting a violation of the Montana Living Trust Act.

Therefore, it is hereby ORDERED that Respondents immediately cease and desist offering or selling living trusts to Montana residents without licensure and registration to do so.

### **PENALTIES**

Pursuant to § 30-10-913, a violation of this Order is a separate violation for which the CSI may impose a fine not to exceed \$10,000 per violation in addition to any other penalties imposed by law.

### **NOTICE OF RIGHT TO HEARING**


You are entitled to a hearing to respond to this Notice of Proposed Agency Action, Temporary Order to Cease and Desist, and Opportunity for Hearing (Notice), and to present evidence and arguments on all issues involved in this case. If you wish to contest these allegations, you must make a written request for a hearing within 21 days of receipt of this Notice to: The Office of the Montana State Auditor, Commissioner of Securities and Insurance, c/o Andrew J. Cziok, 840 Helena Avenue, Helena, MT 59601 or [acziok@mt.gov](mailto:acziok@mt.gov).

Should you request a hearing, you have the right to be accompanied, represented, and advised by an attorney. If the attorney you choose has not been admitted to the practice of law in the state of Montana, she or he must comply with the Montana State Bar for appearing pro hac vice and the requirements of *Application of American Smelting and Refining Co.* (1973), 164 Mont. 139, 520 P.2d 103 and *Montana Supreme Court Commission on the Unauthorized Practice of Law v. O'Neil*, 2006 MT 284, 334 Mont. 311, 147 P.3d 200. If you request a hearing, you will be given notice of the date, time, and place of the hearing.

**POSSIBILITY OF DEFAULT**

Failure to request a hearing on this cease and desist order within 21 days will result in the entry of a default order entering a permanent cease and desist order against you without further notice, pursuant to Mont. Admin. R. 6.2.101, and Mont. Admin. R. 1.3.214.

DATED this 4th day of April 2024.



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**TROY DOWNING**  
Commissioner of Securities and Insurance,  
Montana State Auditor

# AFFIDAVIT OF SERVICE

Job # 28376

**Client Info:**

Commissioner of Securities and Insurance, Office of the Montana  
State Auditor  
Brandy Morrison  
840 Helena Ave  
Helena, MT 59601

**Case Info:**

**Plaintiff:**  
Commissioner of Securities and Insurance  
-versus-

Commissioner of Securities and Insurance  
County of Lewis And Clark, Montana

**Defendant:**  
Anderson Business Advisors LLC; Anderson Global Business Group,  
LLC

Issuance Date: 4/5/2024 Court Case # **SEC-2024-00022**

**Service Info:**

**Date Received: 4/5/2024 at 10:06 AM**  
**Service: I Served Anderson Business Advisors, LLC**  
**With: Notice of Proposed Agency Action, Temporary Order to Cease and Desist, and Opportunity for Hearing**  
**by leaving with Marisa Yurk, RECEPTIONIST - AUTHORIZED TO ACCEPT**

**At Business 3225 MCLEOD DRIVE #110, LAS VEGAS, NV 89121**  
Latitude: **36.131165**, Longitude: **-115.110712**

On **4/5/2024 at 02:09 PM**

**Manner of Service: BUSINESS**

**SERVICE:** was performed by delivering a true copy of this **Notice of Proposed Agency Action, Temporary Order to Cease and Desist, and Opportunity for Hearing to: Marisa Yurk, RECEPTIONIST - AUTHORIZED TO ACCEPT** at the address of: **3225 Mcleod Drive #110, Las Vegas, NV 89121** with an agent lawfully designated by statute to accept service of process, pursuant to NRS 14.020, a person of suitable age and discretion at the address, which address is the address of the resident agent as shown on the current certificate of designation filed with the Secretary of State or entities usual place of business.

**Served Description: (Approx)**

Age: **25**, Sex: **Female**, Race: **White-Caucasian**, Height: **5' 7"**, Weight: **150**, Hair: **Brown** Glasses: **Yes**

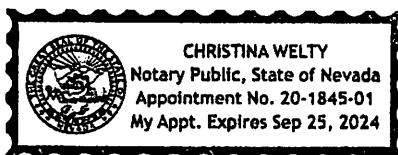
I **Alyssa Douberley**, acknowledge that I am authorized to serve process, in good standing in the jurisdiction wherein the process was served and I have no interest in the above, action. Under penalties of perjury, I declare that I have read the foregoing document and that the facts stated in it are true.

Signature of Server: \_\_\_\_\_

**Alyssa Douberley**  
Lic # **R-2021-09365**  
**LV Process and Investigations, LLC**  
License #2039  
7181 N. Hualapai Way Suite 130-9  
Las Vegas, NV 89166  
Phone: (702) 592-3283

Our Job # **28376** Client Ref # **SEC-2024-00022**

SUBSCRIBED AND SWORN to before me this 5 day of April, 2024 by Alyssa Douberley  
Proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.



\_\_\_\_\_  
NOTARY PUBLIC for the state of Nevada

