

**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

**CONSENT AGREEMENT AND  
FINAL ORDER**

This Consent Agreement (Agreement) and Final Order (Order) are entered into by the Commissioner of Securities and Insurance, Office of the Montana State Auditor (CSI or Commissioner), acting pursuant to the authority of the Montana Living Trust Act, Mont. Code Ann. Title 30, Chapter 10, part 9 (the Act), and Anderson Business Advisors, LLC, and Anderson Global Business Group, LLC (Respondents).

**RECITALS**

WHEREAS, Respondent Anderson Business Advisors, LLC, doing business as Anderson Business Advisors, is a limited liability company organized under the laws of the state of Nevada;

WHEREAS, Respondent Anderson Global Business Group, LLC, formerly Anderson Law Group PLLC, is a limited liability company organized under the laws of the state of Washington;

WHEREAS, on November 7, 2023, Montana residents S.B. and K.B. contacted CSI regarding their purchase of a living trust from Respondents;

WHEREAS, CSI conducted an investigation into Respondents offering and selling living trusts to persons who reside in Montana;

WHEREAS, on April 4, 2024, CSI filed a Notice of Proposed Agency Action, Temporary

Order to Cease and Desist, and Opportunity for Hearing (Notice) that alleged Respondents violated the licensure, or exemption from licensure, provision of § 30-10-904(1), MCA;

WHEREAS, on October 21, 2024, Respondents identified its Montana Licensed Attorney to CSI, thereby demonstrating compliance with the exemption from licensure provision of § 30-10-904(1), MCA;

WHEREAS, CSI and Respondents agree that the best interests of the parties and the public is served by entering into the Agreement;

NOW, THEREFORE, in consideration of the mutual undertakings and agreements contained in this Agreement, CSI and Respondents hereby agree to settle this matter pursuant to the following terms and conditions:

#### **STIPULATIONS AND CONSENTS**

1. Respondents stipulates and consents to the following:
  - a. Respondents neither admits nor denies any of CSI's allegations contained in the Notice.
  - b. Respondents shall pay a fine of \$15,000.00 to the State of Montana within sixty (60) days from the entry of the Final Order on this Agreement. Payment shall be made by check or money order payable to "The State of Montana" sent to the Commissioner of Securities and Insurance, Office of the Montana State Auditor, Attn: Brandy Morrison, Paralegal, 840 Helena Avenue, Helena, MT 59601.
  - c. On October 21, 2024, Respondents identified an attorney employed by Respondents and who is licensed to practice law in Montana in satisfaction of the requirement of § 30-10-904(2)(1)(a), MCA.
  - d. Respondents shall deliver to CSI the names and mailing address of Respondents' clients who reside in Montana within thirty (30) days from the entry of the Final Order on this Agreement.
  - e. Respondents shall comply with all provisions of the Act and all rules under the Act.
  - f. Respondents specifically and affirmatively waives a contested case hearing and its

right to appeal under the Montana Administrative Procedure Act (MAPA), including Title 2, chapter 4, part 7, of the Montana Code Annotated; and elects to resolve this matter on the terms and conditions set forth herein.

- g. Respondents fully and forever releases and discharges CSI from any and all actions, claims, causes of action, demands, or expenses for damages or injuries, whether asserted or not asserted, known or unknown, foreseen or unforeseen, arising out of or related to the Recitals or this Agreement.

2. CSI stipulates and consents to the following:

- a. CSI will send a letter to Respondents' clients residing in Montana after Respondents complete performance of paragraph 1.d. of this Agreement. The letter CSI will send is attached to this Agreement as "Exhibit 1."
- b. CSI fully and forever releases and discharges Respondents from any and all actions, claims, causes of action, demands, or expenses for damages or injuries, whether asserted or not asserted, known or unknown, foreseen or unforeseen, arising out of or related to the Recitals or this Agreement

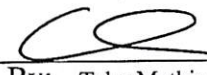
3. All parties to this Agreement stipulate and consent as follows:

- a. The Commissioner has jurisdiction over Respondents and the subject matter of this matter pursuant to § 30-10-901 *et seq.*, MCA.
- b. This Agreement rescinds the Temporary Cease and Desist Order issued on April 4, 2024.
- c. This Agreement is entered into without adjudication of any issue, law, or fact and is therefore not an admission of liability. It is entered into solely for the purpose of resolving CSI's allegations and is not intended to be used for any other purpose. For any person or entity not a party to this Agreement, this Agreement does not limit or create any private rights or remedies against the Respondents, limit or create liability of Respondents, or limit or create defenses of Respondents to any claims.

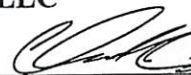
- d. The applicable statute of limitations, set forth in § 30-10-913, MCA, is tolled with regard to the allegations asserted in this matter. In the event Respondents fail to comply with the terms of this Agreement at any time after entering this Agreement, CSI may pursue additional administrative action against Respondents.
- e. This Agreement constitutes the entire agreement between the Commissioner and Respondents, and no other promises or agreements, either express or implied, have been made by the Commissioner or by any member, officer, agent or representative of CSI to induce Respondents to enter into this Agreement.
- f. This Agreement may not be modified orally, and any subsequent modifications to this Agreement must be mutually agreed upon in writing to be effective.
- g. This Agreement shall be incorporated into and made a part of the attached Final Order issued by the Commissioner herein.
- h. This Agreement shall be effective upon signing of the Final Order.
- i. This Agreement is a public record under Montana law and, as such, may not be sealed or otherwise withheld from the public.

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

**ANDERSON GLOBAL BUSINESS  
GROUP, LLC**

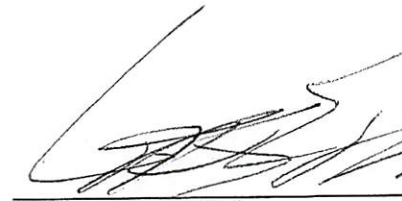
  
By: Toby Mathis  
Title: Director

**ANDERSON BUSINESS ADVISORS,  
LLC**

  
By: Clint Coons  
Title: Director

*Approved as to form and content:*

  
KEVIN BRATCHER  
*Legal Counsel for CSI*

  
LARS EVENSEN  
*Legal Counsel for Respondents*

**FINAL ORDER**

Pursuant to the authority vested by Mont. Code Ann. § 2-4-603, and § 30-10-901 *et seq.*, and upon review of the foregoing Consent Agreement, and good cause appearing,

IT IS HEREBY ORDERED that the foregoing Consent Agreement between the Commissioner and Respondents is adopted as if set forth fully herein.

DATED this 7<sup>th</sup> day of November 2024.



**TROY DOWNING**

Commissioner of Securities and Insurance,  
Montana State Auditor

EXHIBIT 1 (page 1 of 2)

Commissioner of Securities and Insurance

Troy Downing  
Commissioner



Office of the  
Montana State Auditor

---

Date

Customer Name

Address Line 1

Address Line 2

*Via U.S. Mail*

RE: Anderson Business Advisors Settlement

To whom it may concern,

The Montana Commissioner of Securities and Insurance, Office of the Montana State Auditor (“CSI”), initiated an administrative action alleging Anderson Business Advisors, LLC (“Anderson”), violated the licensure requirement of Mont. Code Ann. § 30-10-904, of the Montana Living Trust Act. On October 21, 2024, Anderson identified to CSI an attorney associated with Anderson who is licensed to practice law in Montana, thereby satisfying Mont. Code Ann. § 30-10-904(2)(a). CSI and Anderson entered into a Consent Agreement resolving the administrative action.

If you have any questions or concerns, please feel free to contact the Securities Division of CSI at (406) 444-3815 or [csi.securities@mt.gov](mailto:csi.securities@mt.gov).

## EXHIBIT 1 (page 2 of 2)

Sincerely,

Troy Downing  
Montana State Auditor,  
Commissioner of Securities and Insurance

840 Helena Avenue, Helena, Montana 59601  
(main fax) 406.444.3413 | (securities fax) 406.444.5558  
(policyholder services fax) 406.444.1980 | (legal fax) 406.444.3499  
(phone) 800.332.6148 or 406.444.2040 | (email) [csi@mt.gov](mailto:csi@mt.gov) | (web) [www.csimt.gov](http://www.csimt.gov)

33353032\_v1