STATE OF OKLAHOMA
OKLAHOMA DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OKLAHOMA 73102

In the Matter of:

Kenneth Feyers,

Respondent.

ODS File 16-001

NOTICE OF SERVICE ON THE ADMINISTRATOR
AND
AFFIDAVIT OF COMPLIANCE

STATE OF OKLAHOMA)
) ss.
COUNTY OF OKLAHOMA)

The undersigned affiant, of lawful age, being first duly sworn upon oath deposes and states:

1. That he is the Administrator of the Oklahoma Department of Securities ("Administrator").

2. That a copy of the Order to Cease and Desist and Notice of Opportunity for Hearing ("Order and Notice") was delivered to Affiant in the office of the Administrator pursuant to Section 1-611 of the Oklahoma Uniform Securities Act ("Act"), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (2011).

3. That the Administrator has received service of process on behalf of Respondent, pursuant to Section 1-611 of the Act.

4. That a copy of the Order and Notice, and a copy of this Notice of Service on the Administrator and Affidavit of Compliance are being sent this 25th day of October, 2016, by certified mail, return receipt requested, delivery restricted, to the last known address of Respondent, in compliance with Section 1-611 of the Act.

5. That this Affidavit of Compliance is declared filed of record as of the date set forth below in compliance with Section 1-611 of the Act.

FURTHER AFFIANT SAYETH NOT.

Dated this 25th day of October, 2016.

(SEAL)

IRVING L. FAUGHT, ADMINISTRATOR OF THE
OKLAHOMA DEPARTMENT OF SECURITIES

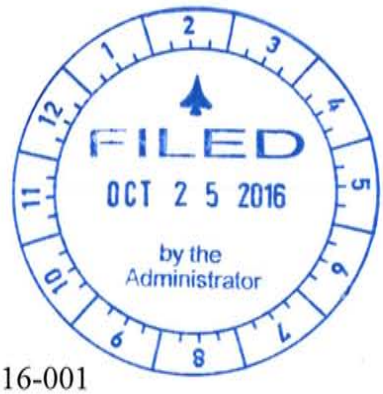
Subscribed and sworn to before me this 25th day of October, 2016.

(SEAL)

BRENDA LONDON
Notary Public
State of Oklahoma
Commission # 05009046 Expires 09/28/17

Notary Public

STATE OF OKLAHOMA
OKLAHOMA DEPARTMENT OF SECURITIES
204 NORTH ROBINSON, SUITE 400
OKLAHOMA CITY, OKLAHOMA 73102



In the Matter of:

Kenneth Feyers,

Respondent. ODS File 16-001

ORDER TO CEASE AND DESIST
AND
NOTICE OF OPPORTUNITY FOR HEARING

Order to Cease and Desist

Pursuant to the Oklahoma Uniform Securities Act of 2004 (Act), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (2011), an investigation was conducted by the Oklahoma Department of Securities (Department) into the activities of Kenneth Feyers ("Respondent"), in connection with the offer, sale and/or purchase of securities in and/or from Oklahoma. Based thereon, the following Findings of Fact, Authorities, and Conclusions of Law are presented in support of sanction(s) against Respondent.

Findings of Fact

1. Respondent, an individual, at all times material hereto, represented Conestoga Trust, formerly known as Conestoga Settlement Trust ("Conestoga Trust"), and Conestoga International, LLC ("Conestoga International") in effecting or attempting to effect purchases or sales of securities in Oklahoma in the nature of "beneficial fixed fractional interests in the benefits payable under life insurance policies" of Conestoga Trust and Conestoga International (the "Interests"). Respondent had no preexisting business relationship with the Oklahoma resident(s).

2. At least one Oklahoma resident purchased an Interest as a result of the efforts of Respondent.

3. At all times material hereto, Respondent was not registered as an agent under the Act.

To the extent any of these Findings of Fact are more properly characterized as Conclusions of Law, they should be so considered.

Authorities

1. Section 1-402 of the Act provides in pertinent part:

A. It is unlawful for an individual to transact business in this state as an agent unless the individual is registered under this act as an agent or is exempt from registration as an agent under subsection B of this section.

4. Section 1-604 of the Act provides in pertinent part:

A. If the Administrator determines that a person has engaged, is engaging, or is about to engage in an act, practice, or course of business constituting a violation of this act or a rule adopted or order issued under this act or constituting a dishonest or unethical practice or that a person has materially aided, is materially aiding, or is about to materially aid an act, practice, or course of business constituting a violation of this act or a rule adopted or order issued under this act or constituting a dishonest or unethical practice, the Administrator may:

> 1. Issue an order directing the person to cease and desist from engaging in the act, practice, or course of business or to take other action necessary or appropriate to comply with this act[.]
>
> * * *

B. An order under subsection A of this section is effective on the date of issuance. Upon issuance of the order, the Administrator shall promptly serve each person subject to the order with a copy of the order and a notice that the order has been entered. The order must include a statement whether the Administrator will seek a civil penalty or costs of the investigation, a statement of the reasons for the order, and notice that, within fifteen (15) days after receipt of a request in a record from the person, the matter will be scheduled for a hearing and the hearing shall be commenced within fifteen (15) days of the matter being set for hearing. If a person subject to the order does not request a hearing and none is ordered by the Administrator, within thirty (30) days after the date of service of the order, the order, that may include a civil penalty or costs of the investigation if a civil penalty or costs were sought in the statement accompanying the order, becomes final as to that person by operation of law. 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 it until final determination.

C. If a hearing is requested or ordered pursuant to subsection B of this section, a hearing must be held pursuant to the Administrative Procedures Act. A final order may not be issued unless the Administrator makes findings of fact and conclusions of law in a record in accordance with the Administrative Procedures Act. The final order may make final, vacate, or modify the order issued under subsection A of this section.

D. In a final order under subsection C of this section, the Administrator may impose a civil penalty up to a maximum of Five Thousand Dollars ($5,000.00) for

a single violation or up to Two Hundred Fifty Thousand Dollars ($250,000.00) for multiple violations in a single proceeding or a series of related proceedings.

E. In a final order, the Administrator may charge the actual cost of an investigation or proceeding for a violation of this act or a rule adopted or order issued under this act.

Conclusions of Law

1. The Interests are securities as defined by Section 1-102 of the Act.

2. Respondent effected or attempted to effect purchases or sales of securities in and/or from Oklahoma.

3. Respondent was an agent within the meaning of Section 1-102(2) of the Act.

4. Respondent violated Section 1-402(A) of the Act by effecting or attempting to effect purchases or sales of securities, in Oklahoma, without registration as an agent.

5. Pursuant to Section 1-604 of the Act, the Administrator has the authority to order Respondent to cease and desist from effecting or attempting to effect purchases or sales of securities, in Oklahoma, without registration as an agent.

6. It is in the public interest to order Respondent to cease and desist from violating the Act.

To the extent any of these Conclusions of Law are more properly characterized as Findings of Fact, they should be so considered.

Order

Based on Section 1-604 of the Act and the Findings of Fact, Authorities, and Conclusions of Law set forth above, IT IS HEREBY ORDERED that Respondent cease and desist from effecting or attempting to effect purchases or sales of securities in and/or from Oklahoma without registration as an agent.

Witness my Hand and the Official Seal of the Oklahoma Department of Securities this 25th of October, 2016.

(SEAL)

IRVING L. FAUGHT, ADMINISTRATOR OF THE
OKLAHOMA DEPARTMENT OF SECURITIES

Notice of Opportunity for Hearing

Pursuant to Section 1-604 of the Act, the Administrator hereby gives notice to Respondent of his right to request a hearing. The request for hearing must be received by the Administrator within thirty (30) days after service of the Order to Cease and Desist (Order). The request for hearing must be in writing and Respondent shall specifically admit or deny each allegation that is contained in the Order.

Within fifteen (15) days after receipt of a request for hearing from Respondent, this matter will be scheduled for hearing. The hearing shall commence within fifteen (15) days of the matter being set for hearing. Notice of the date, time and location of the hearing shall be given to Respondent. If a hearing is requested, the Administrator, after notice of and opportunity for hearing, may modify or vacate the Order or extend it until final determination.

If Respondent does not request a hearing within thirty (30) days after the date of service of the Order and none is ordered by the Administrator, the Order becomes final by operation of law.

Witness my Hand and the Official Seal of the Oklahoma Department of Securities this 25th day of October, 2016.

(SEAL)

IRVING L. FAUGHT, ADMINISTRATOR OF THE
OKLAHOMA DEPARTMENT OF SECURITIES

CERTIFICATE OF MAILING

The undersigned hereby certifies that on the 25th day of October, 2016, a true and correct copy of the above and foregoing *Order to Cease and Desist and Notice of Opportunity for Hearing* was mailed by certified mail, return receipt requested, delivery restricted, with postage prepaid thereon, addressed to:

Kenneth Feyers
11555 Heron Bay Blvd. Suite 200
Coral Springs, FL 33076

Brenda London
Paralegal

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only Notice CD 16-001 PAL

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

7015 0640 0004 8676 8435

Certified Mail Fee
$ 3.30

Extra Services & Fees (check box, add fee as appropriate)
- ☑ Return Receipt (hardcopy) $ 2.70
- ☐ Return Receipt (electronic) $
- ☑ Certified Mail Restricted Delivery $ 4.95
- ☐ Adult Signature Required $
- ☐ Adult Signature Restricted Delivery $

Postage
$ 11.41

10/25/16

Postmark Here

Kenneth Feyers
11555 Heron Bay Blvd Ste 200
Coral Springs FL 33076

for Instructions