STATE OF NEBRASKA
Department of Banking & Finance

In the Matter of	)	
	)	ORDER VACATING
Robert M. McCulley	)	
105 Coronado Court, Building 9-D,	)	ORDER TO SHOW CAUSE
Fort Collins, Colorado	)	

THIS MATTER comes before the Nebraska Department of Banking and Finance ("DEPARTMENT"), by and through its Director, pursuant to its authority under the Securities Act of Nebraska, Neb. Rev. Stat. §§ 8-1101 to 8-1123 (Reissue 2012; LB 205, 2013; LB 214, 2013).

On February 8, 2013, the DEPARTMENT issued Findings of Fact, Conclusions of Law and Order to Show Cause ("Show Cause Order") to Robert M. McCulley ("MCCULLEY"), 105 Coronado Court, Building 9-D, Fort Collins, Colorado. MCCULLEY was ordered to appear before the Director to show cause why he should not be permanently barred from conducting securities business in Nebraska under the Act, and why a fine, not to exceed $25,000.00 per violation, and/or the costs of the investigation incurred by the DEPARTMENT, including a reasonable amount for the time incurred by the DEPARTMENT staff, should not imposed upon MCCULLEY. The Show Cause Order alleged MCCULLEY had engaged in unregistered activity in Nebraska. A hearing on the matter was set for April 9, 2013. The hearing was continued on April 8, 2013.

On October 25, 2013, MCCULLEY and the DEPARTMENT entered into Findings of Fact, Conclusions of Law and Consent Order ("Consent Order") to resolve

the pending Show Cause Order. Pursuant to the Consent Order, MCCULLEY agreed to pay a fine in the amount of two thousand five hundred dollars ($2,500.00) and one half of the costs of the hearing in the amount of three hundred sixty-two dollars and 25 cents ($362.25) within thirty (30) days of the date of the Consent Order. MCCULLEY neither admitted nor denied the allegations in the Consent Order.

MCCULLEY paid the amount of two thousand eight hundred sixty-two dollars and 25 cents ($2,862.25) to the DEPARTMENT on October 28, 2013, in satisfaction of the requirement of the Consent Order.

An order vacating the Show Cause Order is appropriate in this matter and is consistent with the purposes fairly intended by the policy and the provisions of the Act.

IT IS THEREFORE CONSIDERED, ORDERED, AND ADJUDGED that the Findings of Fact, Conclusions of Law and Order to Show Cause issued by the DEPARTMENT on February 8, 2013, to Robert M. McCulley be, and hereby is, vacated, and the hearing on such Order is hereby cancelled.

DATED this 30th day of October, 2013.

STATE OF NEBRASKA
DEPARTMENT OF BANKING AND FINANCE

By: _____
John Munn, Director

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