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**BEFORE THE ARKANSAS SECURITIES COMMISSIONER**

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ARKANSAS SECURITIES DEPT

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**IN THE MATTER OF:  
MILESTONE INSURANCE SERVICES, LLC  
AND PHILLIP A. MCNULTY**

**CASE NO. S-15-0018  
ORDER NO. S-15-0018-16-OR02**

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**CONSENT ORDER**

This Consent Order is entered pursuant to the Arkansas Securities Act ("Act"), codified at Ark. Code Ann. § 23-42-101 through § 23-42-509, the Rules of the Arkansas Securities Commissioner ("Rules") promulgated under the Act, and the Arkansas Administrative Procedures Act, codified at Ark. Code Ann. § 25-15-201 through § 25-15-219, in accordance with an agreement by and between the Staff of the Arkansas Securities Department ("Staff") and Milestone Insurance Services, LLC ("Milestone") and Phillip A. McNulty ("McNulty") in full and final settlement of all claims that could be brought against Milestone and McNulty by the Staff on the basis of the facts set forth herein.

Milestone and McNulty admit the jurisdiction of the Act and the Arkansas Securities Commissioner ("Commissioner"), waive its and his right to a formal hearing, and without admitting or denying the findings of facts made herein, consent to the entry of this order and agree to abide by its terms.

**FINDINGS OF FACT**

1. Milestone is a corporation organized and operating under the laws of the State of Arkansas. Milestone is not registered with the Arkansas Securities Department ("Department") in any capacity.

2. McNulty, CRD no. 5955968, is a resident of Hot Springs, Arkansas. McNulty is an organizer and officer of Milestone. Also, McNulty has been registered with the Department as a representative of Onpointe Advisory and Financial Services, LLC, since April 17, 2015.

3. Home Path Financial, LP ("Home Path") is a Wisconsin limited partnership. Home Path is not registered with the Department in any capacity.

4. On March 23, 2015, McNulty signed a Home Path Broker Profile and a Home Path Broker Agreement. In April 2015 McNulty offered and sold Home Path products to Arkansas residents. McNulty did not update his outside business activity disclosure on IARD to list or disclose his business relationship and outside business activity with Home Path at any time.

#### **CONCLUSIONS OF LAW**

5. Rule 302.02(c) states that the registered representative is under a continuing obligation to update information required by the Form U4 as changes occur. Any amendments to the representative's Form U4 must be filed promptly. McNulty violated Rule 302.02(c), when he failed to provide complete and accurate information and update the information about his outside business activities with Home Path on IARD as detailed in paragraph 4.

#### **UNDERTAKINGS**

In settlement of this matter, but without admitting or denying the findings of fact made above, McNulty agrees to pay a fine in the amount of \$1,500 to the Department. In addition, Milestone and McNulty agree to immediately cease and desist from soliciting, offering or selling Home Path products in Arkansas.


#### **OPINION**

This order is in the public interest. The facts as set out in paragraph 4 support the violation of the Rule as set out in paragraph 5.

**ORDER**

IT IS THEREFORE ORDERED that McNulty pay a fine in the amount of \$1,500 to the Department within 10 days of the entry of this order. In addition, Milestone and McNulty are ordered to immediately cease and desist from soliciting, offering or selling Home Path products in Arkansas

WITNESS MY HAND AND SEAL on this 23 day of February, 2016.



B. Edmond Waters  
Arkansas Securities Commissioner

APPROVED AS TO FORM  
AND CONTENT:

Phillip A. McNulty  
Phillip A. McNulty, Respondent  
Individually and for Milestone

2-10-2016  
Date

Tim Hutchinson  
Tim Hutchinson  
Attorney for the Respondents

2/16/16  
Date

Scott Freydl  
Scott Freydl  
Staff Attorney

2/23/16  
Date