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COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF BANKING AND SECURITIES

PA DEPARTMENT OF  
BANKING AND SECURITIES

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF BANKING AND  
SECURITIES, BUREAU OF SECURITIES  
COMPLIANCE AND EXAMINATIONS

17055

DOCKET No. 17055 (SEC-OSC)

v.

ELIZABETH J. HASKELL d/b/a IRON WILL  
ADVISORY GROUP

CONSENT AGREEMENT AND ORDER

The Commonwealth of Pennsylvania, acting through the Department of Banking and Securities ("Department"), Bureau of Securities Compliance and Examinations ("Bureau") has conducted an investigation of the business practices of Elizabeth J. Haskell d/b/a Iron Will Advisory Group ("Haskell"). Based on the results of its investigation, the Bureau has concluded that Haskell has operated in violation of the Pennsylvania Securities Act of 1972, 70 P.S. § 1-101 et. seq. ("1972 Act"). Haskell, in lieu of litigation, and without admitting, or denying the allegations herein, and intending to be legally bound, hereby agrees to the terms of this Consent Agreement and Order ("Order").

**BACKGROUND**

1. The Department is the Commonwealth of Pennsylvania's administrative agency authorized and empowered to administer and enforce the 1972 Act.
2. The Bureau is primarily responsible for administering and enforcing the 1972 Act for the Department.

3. Elizabeth J. Haskell d/b/a Iron Will Advisory Group, CRD#3031891 was, at all material times herein, an individual with an address at Redacted

Redacted

4. Haskell offered and sold securities issued by an affiliate of Woodbridge Structured Funding, LLC ("WSF") to Pennsylvania residents.

5. Haskell received compensation from WSF for sales of securities issued by an affiliate of WSF.

6. Haskell was neither registered pursuant to Section 301 of the 1972 Act, 70 P.S. 1-301, nor exempt from registration.

#### **VIOLATION**

7. By engaging in the acts and conduct set forth in paragraphs 4 through 6 of the Factual Allegations, Respondent Haskell effected transactions in securities in Pennsylvania while neither registered nor exempt from registration in wilfull violation of Section 301 of the 1972 Act, 70 P.S. §1-301.

#### **RELIEF**

8. Haskell shall pay the Department an administrative assessment in the amount of \$10,000.00. Payment shall be made by certified check or money order made payable to the "Department of Banking and Securities" and shall be mailed, or delivered in person to the Bureau of Licensing, Compliance and Examinations located at 17 N. Second Street, Ste., 1300, Harrisburg, PA 17101.

9. The administrative assessment shall be paid as follows:

a. 11 monthly payments of \$833.33 due on or before the 28<sup>th</sup> day of each month, beginning on November 28, 2017 and ending on October 28, 2018;

b. \$833.37 due on or before November 28, 2018.

10. Haskell is ORDERED to comply with the 1972 Act, and Regulations adopted by the Department, and in particular Section 301 of the 1972 Act, 70 P.S. §1-301.

11. Should Haskell fail to pay the costs and the assessment as set forth in paragraph 9 above the sanctions set forth elsewhere in the Order shall continue in full force and effect until full payment is made. However, this provision shall not be construed as affording Haskell the option of either paying the costs and the assessment or being indefinitely subject to the sanctions.

12. Should Haskell fail to comply with any and all provisions of this Order, the Department may impose additional sanctions and costs and seek other appropriate relief subject to Haskell's right to a hearing pursuant to the 1972 Act.

#### FURTHER PROVISIONS

13. Consent. Haskell hereby knowingly, willingly, voluntarily and irrevocably consents to the entry of this Order pursuant to the Bureau's authority under the 1972 Act and agrees that she understands all the terms and conditions contained herein. Haskell, by voluntarily entering into this Order, waives any right to a hearing or appeal concerning the terms, conditions and/or penalties set forth in this Order.

14. Entire Agreement. This Order contains the entire agreement between the Department and Haskell. There are no other terms, obligations, covenants, representations, statements, conditions, or otherwise, of any kind whatsoever concerning this Order. This Order may be amended in writing by agreement by the Department and Haskell.

15. Binding Nature. The Department, Haskell, and all heirs and assigns of Haskell intend to be and are legally bound by the terms of this Order.

16. Counsel. This Order is entered into by the parties upon full opportunity for legal advice from legal counsel.

17. Effectiveness. Haskell hereby stipulates and agrees that the Order shall become effective on the date the Bureau executes the Order ("Effective Date").

18. Other Enforcement Action

(a) The Department reserves all of its rights, duties, and authority to enforce all statutes, rules and regulations under its jurisdiction against Haskell in the future regarding all matters not resolved by this Order.

(b) Haskell acknowledges and agrees that this Order is only binding upon the Department and not any other local, state or federal agency, department or office regarding matters within this Order.

19. Authorization. The parties below are authorized to execute this Order and legally bind their respective parties.

20. Counterparts. This Order may be executed in separate counterparts, by facsimile and by PDF.

21. Titles. The titles used to identify the paragraphs of this document are for the convenience of reference only and do not control the interpretation of this document.

22. Finding. The Department finds that it is necessary and appropriate in the public interest and for the protection of investors, and consistent with the purposes fairly intended by the policy and provisions of the 1972 Act to issue this Order.

WHEREFORE, in consideration of the foregoing, including the recital paragraphs, the Commonwealth of Pennsylvania, Department of Banking and Securities, Bureau of Securities Compliance and Examinations and Elizabeth J. Haskell d/b/a Iron Will Advisory Group intending to be legally bound, do hereby execute this Consent Agreement and Order.

FOR THE COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF BANKING AND SECURITIES,  
BUREAU OF SECURITIES COMPLIANCE AND EXAMINATIONS

Redacted

Joseph J. Minisi/Deputy Secretary for Securities

Date: 11/27/17

FOR ELIZABETH J. HASKELL d/b/a IRON WILL ADVISORY GROUP

Redacted

(Signature)

Elizabeth J Haskell  
(Print Name)

