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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF BANKING AND SECURITIES

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COMMONWEALTH OF PENNSYLVANIA	:	
DEPARTMENT OF BANKING AND	:	
SECURITIES, BUREAU OF SECURITIES	:	
COMPLIANCE AND EXAMINATIONS	:	Docket No. : 190047 (SEC-OSC)
	:	
v.	:	
	:	
DANIEL A CISTONE LLC	:	

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 role of Daniel A Cistone LLC ("Cistone") in connection with the sale of notes offered and sold by Complete Business Solutions Group, Inc. d/b/a PAR Funding ("CBSG"). Based on the results of its investigation, the Bureau has concluded that Cistone has operated in violation of the Pennsylvania Securities Act of 1972, 70 P.S. § 1-101 *et seq.* ("1972 Act"). Cistone, in lieu of litigation, and without admitting or denying the allegations contained 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. The Bureau operates from the Department's main office located at 17 North Second Street, Suite 1300, Harrisburg, Pennsylvania 17101.

4. Cistone was, at all times material herein, a Pennsylvania limited liability company with an address at Redacted .

5. From in or about June 2016 through December 2017, Cistone effected the sale of Non-Negotiable Term Promissory Notes ("Notes") issued by CBSG to at least two Pennsylvania residents.

6. Cistone received compensation from CBSG for the sale of the Notes issued by CBSG.

7. Cistone was neither registered pursuant to Section 301(a) of the 1972 Act, 70 P.S. § 1-301(a), nor exempt from registration.

VIOLATION

8. By engaging in the acts and conduct set forth in paragraphs 5 through 7 above, Cistone effected transactions in securities in Pennsylvania while neither registered nor exempt from registration in willful violation of Section 301(a) of the 1972 Act, 70 P.S. § 1-301(a).

RELIEF

9. Cistone shall pay the Department an administrative assessment in the amount of \$30,000.00. 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 Securities Compliance and Examinations located at 17 North Second Street, Suite 1300, Harrisburg, PA 17101.

10. The administrative assessment shall be paid as follows:

- a. \$7,500.00 within 30 days of the Effective Date of this Order, as defined in paragraph 18;
- b. \$7,500.00 on or before October 4, 2019;
- c. \$7,500.00 on or before February 7, 2020; and
- d. \$7,500.00 on or before June 5, 2020.

11. Cistone 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.

12. Should Cistone fail to pay the assessment as set forth in paragraphs 9 through 10 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 Cistone the option of either paying the assessment or being indefinitely subject to the sanctions.

13. Should Cistone 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 Cistone's rights to a hearing pursuant to the 1972 Act.

FURTHER PROVISIONS

14. Consent. Cistone 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 he understands all of the terms and conditions contained herein. Cistone, 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.

15. Entire Agreement. This Order contains the entire agreement between the Department and Cistone. 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 mutual agreement by the Department and Cistone.

16. Binding Nature. The Department, Cistone, and all officers, owners, directors, employees, heirs and assigns of Cistone intend to be and are legally bound by the terms of this Order.

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

18. Effectiveness. Cistone hereby stipulates and agrees that the Order shall become effective on the date the Bureau executes the Order (“Effective Date”).

19. 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 Cistone in the future regarding all matters not resolved by this Order.

b. Cistone 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.

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

21. Counterparts. This Order may be executed in separate counterparts, by facsimile and/or by PDF.

22. 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.

23. 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 Daniel A Cistone LLC, intending to be legally bound, do hereby execute this Consent Agreement and Order.

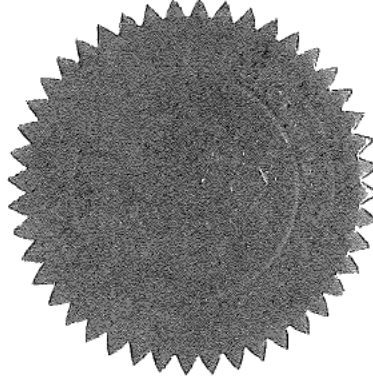
**FOR THE COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF BANKING AND SECURITIES
BUREAU OF SECURITIES COMPLIANCE AND EXAMINATIONS**

Redacted

Joseph J. Mirisi, Deputy Secretary for Securities

Date:

6/11/19



FOR DANIEL A CISTONE LLC

Redacted

(Signature)

Date:

6-10-19