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PA DEPARTMENT OF BANKING AND SECURITIES

**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF BANKING AND SECURITIES**

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

v.

Docket No. : 210040 (SEC-OSC)

**THE INSIGHT ADVISORY GROUP, LLC,
d/b/a INSIGHT TOTAL STEWARDSHIP
SHAYNA HARVEY**

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 The Insight Advisory Group, LLC, d/b/a, Insight Total Stewardship ("Insight") and Shayna Harvey ("Harvey"). Based on the results of its investigation, the Bureau has concluded that Insight and Harvey operated in violation of the Pennsylvania Securities Act of 1972, 70 P.S. § 1-101 et. seq. ("1972 Act"). Insight and Harvey, in lieu of litigation, and without admitting or denying the allegations herein, and intending to be legally bound, hereby agree 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. Insight, CRD #281229, was, at all times material herein, a Pennsylvania limited liability company with an address at 525 West Chester Pike, Suite 312, Havertown, Pennsylvania 19083.

4. Harvey, CRD #4192481, was, at all times material herein, an individual with an address at 525 West Chester Pike, Suite 312, Havertown, Pennsylvania 19083. Harvey was, at all times material herein, the owner, chief compliance officer, and managing member of Insight.

5. From in or about January 2016 until the present, Insight has been registered pursuant to Section 301(c) of the 1972 Act, 70 P.S. § 1-301(c), as an investment adviser.

6. From in or about January 2016 until the present, Harvey has been registered pursuant to Section 301(c) of the 1972 Act, 70 P.S. § 1-301(c), as an investment adviser representative of Insight.

7. As owner, chief compliance officer, and managing member of Insight, Harvey acted as an "affiliate" of Insight within the meaning of Section 102(b) of the 1972 Act, 70 P.S. § 1-102(b), and, as such, caused Insight to commit the herein stated acts which violated the 1972 Act.

8. Insight, in connection with its advisory services, had authority to make withdrawals from client accounts, maintained by a custodian, to pay its advisory fee and thus had "custody" over client funds or securities as defined in Regulation 102.021, 10 Pa. Code § 102.021.

9. Regulation 304.022(a)(1), 10 Pa. Code § 304.022(a)(1), requires that an investment adviser that has custody of client funds or securities shall file an audited balance sheet as of the end of its fiscal year.

10. Insight's fiscal year ends on December 31.

11. Insight did not file an audited balance sheet with the Department as of the end of its fiscal year.

VIOLATION

12. By engaging in the acts and conduct set forth in paragraphs 5 through 11 above, Insight and Harvey engaged in acts and conduct which formed a basis to deny, suspend, revoke, or condition the registration of Insight and Harvey or censure Insight and Harvey pursuant to Section 305(a)(5) of the 1972 Act, 70 P.S. § 305(a)(5).

RELIEF

13. Insight and Harvey shall pay the Department an administrative assessment in the amount of \$10,000.00. Payment shall be made by certified check or money order 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 N. Second Street, Suite 1300, Harrisburg, PA 17101. The payments shall be made as follows:

- a. \$5,000.00 on or before December 1, 2021;
- b. \$500.00 on or before January 1, 2022;
- c. \$450.00 on or before February 1, 2022;
- d. \$450.00 on or before March 1, 2022;
- e. \$450.00 on or before April 1, 2022;
- f. \$450.00 on or before May 1, 2022;
- g. \$450.00 on or before June 1, 2022;
- h. \$450.00 on or before July 1, 2022;
- i. \$450.00 on or before August 1, 2022;
- j. \$450.00 on or before September 1, 2022;
- k. \$450.00 on or before October 1, 2022; and,

1. \$450.00 on or before November 1, 2022.

14. Insight and Harvey are ordered to comply with the 1972 Act, and Regulations adopted by the Department, and in particular Regulation 304.022(a)(1), 10 Pa. Code § 304.022(a)(1).

15. Should Insight and Harvey fail to pay the assessment as set forth in Paragraph 13, 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 Insight and Harvey the option of either paying the assessment or being indefinitely subjected to sanctions.

16. Should Insight and Harvey 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 Insight and Harvey's right to a hearing pursuant to the 1972 Act.

FURTHER PROVISIONS

17. Consent. Insight and Harvey hereby knowingly, willingly, voluntarily and irrevocably consent to the entry of this Order pursuant to the Bureau's authority under the 1972 Act and agree that they understand all of the terms and conditions contained herein. Insight and Harvey, by voluntarily entering into this Order, waive any right to a hearing or appeal concerning the terms, conditions and/or penalties set forth in this Order.

18. Entire Agreement. This Order contains the entire agreement between the Department, Insight, and Harvey. 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, Insight, and Harvey.

19. Binding Nature. The Department, Insight, and Harvey, and all officers, owners,

directors, employees, heirs and assigns of Insight and Harvey intend to be and are legally bound by the terms of this Order.

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

21. Effectiveness. Insight and Harvey hereby stipulate and agree that the Order shall become effective on the date the Bureau executes the Order (“Effective Date”).

22. 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 Insight and Harvey in the future regarding all matters not resolved by this Order.

(b) Insight and Harvey acknowledge and agree 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.

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

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

25. 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.

26. 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.

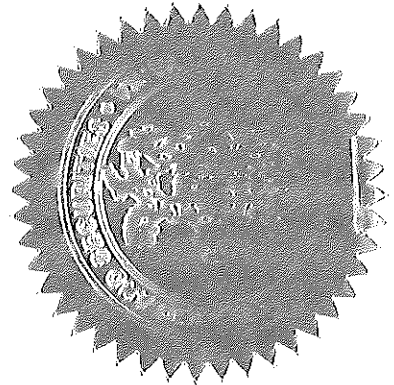
WHEREFORE, in consideration of the foregoing, including the recital paragraphs, the Commonwealth of Pennsylvania, Department of Banking and Securities, Bureau of Securities Compliance and Examinations, The Insight Advisory Group, LLC, d/b/a, Insight Total Stewardship, and Shayna Harvey intending to be 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

Eric R. Pistilli
Acting Deputy Secretary for Securities

Date: 11/29/2021



**FOR THE INSIGHT ADVISORY GROUP, LLC, D/B/A,
INSIGHT TOTAL STEWARDSHIP ("INSIGHT")**

Redacted

(Signature)

Shayna L. Harvey
(Print Name)

Managing Member
(Title)

Date: 11/18/21

FOR SHAYNA HARVEY

Redacted

(Signature)

Shayna L. Harvey
(Print Name)

Managing Member
(Title)

Date: *11/18/21*