

STATE OF WISCONSIN  
DEPARTMENT OF FINANCIAL INSTITUTIONS  
DIVISION OF SECURITIES

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In the Matter of

CONESTOGA SETTLEMENT SERVICES  
LLC, CONESTOGA INTERNATIONAL  
LLC, CONESTOGA TRUST SERVICES  
LLC, CONESTOGA MEMBER  
SERVICES LLC, MICHAEL C.  
MCDERMOTT, JACE T. MCDONALD,  
PETER P. VIATER, and RICHARD C.  
NETTLETON,

Respondents.

NOTICE OF SUMMARY ORDER TO  
CEASE AND DESIST INCLUDING  
RESTITUTION

File No. S-230672 (EX)

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**YOU ARE NOTIFIED** that pursuant to the legal authority granted to the Administrator of the State of Wisconsin, Department of Financial Institutions, Division of Securities ("Division") under the Wisconsin Uniform Securities Law, Chapter 551, Wis. Stats. ("WUSL"), the Division issues this Summary Order to Cease and Desist to Respondents.

**YOU ARE FURTHER NOTIFIED** that this Summary Order to Cease and Desist is effective on the date it is issued. **You are advised that any willful violation of an Order issued by the Division under Wis. Stats. Ch. 551 is a criminal offense punishable under the provisions of Wis. Stat. § 551.508.**

**THIS ORDER INCLUDES AN ORDER FOR RESTITUTION FOR WISCONSIN RESIDENTS WHO PURCHASED A CONESTOGA LIFE SETTLEMENT INTEREST AFTER SEPTEMBER 26, 2012, WHEN THE FIRST MATERIAL OMISSION TO DISCLOSE OCCURRED.**

**YOU ARE FURTHER NOTIFIED** that you have a right to request a hearing on the matters set forth in the Summary Order to Cease and Desist. Pursuant to Wis. Admin. Code DFI § 8.01, any request for a hearing must be in the form of a written petition filed with the Division within 30 days after the date of service of this Notice and Summary Order to Cease and Desist. A petition for a hearing to review an order shall:

- (1) Plainly admit or deny each specific allegation, finding, or conclusion in the Order and any incorporated papers. However, if the petitioner lacks sufficient knowledge or information to permit an admission or denial, the petition shall so state, and that statement shall have the effect of a denial. Any allegation, finding, or conclusion that is not denied shall be deemed admitted; and
- (2) State all affirmative defenses. Affirmative defenses not raised in the request for hearing may be deemed waived.

**YOU ARE FURTHER NOTIFIED** that, within 15 days after the Division's receipt of a request, the Division will schedule the matter for hearing. If you do not request a hearing within 30 days after the date of service of this Notice and Summary Order to Cease and Desist, the Order, including the imposition of any civil penalties or requirement for payment of restitution, disgorgement, interest, or the costs of investigation sought in a statement in the Order, shall become final by operation of law.

**The failure to file a written petition within the required time shall constitute a waiver of the right to a hearing and the Summary Order to Cease and Desist shall become final by operation of law.**