

**UNITED STATES OF AMERICA**  
**Before the**  
**SECURITIES AND EXCHANGE COMMISSION**

**INVESTMENT ADVISERS ACT OF 1940**  
**Release No. 2975 / January 11, 2010**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-13741**

**In the Matter of**

**JULIE M. JARVIS, and**  
**CROSSROADS FINANCIAL**  
**PLANNING, INC.,**

**Respondents.**

**ORDER INSTITUTING**  
**ADMINISTRATIVE PROCEEDINGS**  
**PURSUANT TO SECTIONS 203(e) and**  
**203(f) OF THE INVESTMENT**  
**ADVISERS ACT OF 1940, MAKING**  
**FINDINGS AND IMPOSING REMEDIAL**  
**SANCTIONS**

**I.**

The Securities and Exchange Commission (“Commission”) deems it appropriate and in the public interest that public administrative proceedings be, and hereby are, instituted pursuant to Sections 203(e) and 203(f) of the Investment Advisers Act of 1940 (“Advisers Act”) against Julie M. Jarvis (“Jarvis”) and Crossroads Financial Planning, Inc. (“CFP”).

**II.**

In anticipation of the institution of these proceedings, Respondents have submitted Offers of Settlement (the “Offers”) which the Commission has determined to accept. Solely for the purpose of these proceedings and any other proceedings brought by or on behalf of the Commission, or to which the Commission is a party, and with admitting the findings herein, Respondents consent to the entry of this Order Instituting Administrative Proceedings Pursuant to Sections 203(e) and 203(f) of the Investment Advisers Act of 1940 (“Advisers Act”), Making Findings, and Imposing Remedial Sanctions (“Order”), as set forth below.

### III.

On the basis of this Order and Respondents' Offers, the Commission finds that:

1. Julie M. Jarvis, age 50, was an investment adviser and an associated person with a registered investment adviser at the relevant times. Jarvis was the president and chief executive officer of Crossroads Financial Planning, Inc. ("CFP"), 5001 Horizons Dr., Upper Arlington, Ohio, a registered investment adviser and an entity incorporated in the State of Ohio. From approximately 1995 to February 2009, Jarvis, through CFP, acted as an investment adviser to certain individuals and entities.

2. On April 8, 2009, the Commission filed a Complaint alleging that Jarvis and CFP misappropriated at least \$2.3 million from clients in violation of Section 10(b) of the Securities Exchange Act of 1934 ("Exchange Act") and Sections 206(1) and 206(2) of the Advisers Act, before the United States District Court for the Southern District of Ohio, in S.E.C. v. Julie Jarvis and Crossroads Financial Planning, Inc., No. 2:09cv269 (Marbley, J./Able, MJ). The Complaint alleged that Jarvis, through CFP, misappropriated funds from two elderly clients, concealed the nature of the withdrawals and securities transactions and then converted the funds to pay her personal expenses or otherwise use for her benefit. On April 22, 2009, Judge Marbley issued a preliminary injunction, enjoining Jarvis from committing further violations and freezing Jarvis and CFP's assets.

3. On May 13, 2009, Jarvis pled guilty to Count I of an Information alleging mail fraud in connection with a scheme to defraud investors in violation of Section 1341, Title 18, United States Code, before the United States District Court for the Southern District of Ohio, in United States v. Julie M. Jarvis, No. 2:09cr103 (Frost, J.). The count of the Information to which Jarvis pled guilty alleged that Jarvis, while purporting to provide financial advice to her clients, willfully and knowingly devised a scheme and artifice to defraud; defrauded her clients by use of the means and instrumentalities of interstate commerce and of the mails, directly and indirectly; and that she engaged in transactions, practices, and courses of business operating to defraud and deceive those clients.

4. On October 22, 2009, the Commission filed an Amended Complaint restating the allegations against Jarvis and CFP, but adding John Simpson as a Relief Defendant.

5. On November 6, 2009, Defendants Jarvis and CFP executed Consents in this case, admitting the facts alleged in the Amended Complaint, and, on December 28, 2009, the Court entered a permanent injunction against violations of Section 10(b) of the Exchange Act and Rule 10b-5 thereunder and Sections 204, 206(1) and 206(2) of the Advisers Act, and Rule 204-2 thereunder.

#### IV.

In view of the foregoing, the Commission deems it appropriate and in the public interest to impose the sanctions agreed to in Respondents' Offers.

Accordingly, it is hereby ORDERED:

Pursuant to Section 203(e) of the Advisers Act, Respondent CFP's registration is hereby revoked and, pursuant to Section 203(f) of the Advisers Act, Respondent Jarvis is hereby barred from association with any investment adviser.

Any reapplication for association by Respondent Jarvis will be subject to the applicable laws and regulations governing the reentry process, and reentry may be conditioned upon a number of factors, including, but not limited to, the satisfaction of any or all of the following: (a) any disgorgement ordered against the Respondents, whether or not the Commission has fully or partially waived payment of such disgorgement; (b) any arbitration award related to the conduct that served as the basis for the Commission order; (c) any self-regulatory organization arbitration award to a customer, whether or not related to the conduct that served as the basis for the Commission order; and (d) any restitution order by a self-regulatory organization, whether or not related to the conduct that served as the basis for the Commission order.

By the Commission.

Elizabeth M. Murphy  
Secretary