

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 71734 / March 18, 2014

INVESTMENT ADVISERS ACT OF 1940
Release No. 3797 / March 18, 2014

ADMINISTRATIVE PROCEEDING
File No. 3-15797

In the Matter of

MICHAEL AARON BRADY,

Respondent.

**ORDER INSTITUTING
ADMINISTRATIVE PROCEEDINGS
PURSUANT TO SECTION 15(b) OF THE
SECURITIES EXCHANGE ACT OF 1934
AND SECTION 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 Section 15(b) of the Securities Exchange Act of 1934 (“Exchange Act”) and Section 203(f) of the Investment Advisers Act of 1940 (“Advisers Act”) against Michael Aaron Brady (“Brady” or “Respondent”).

II.

In anticipation of the institution of these proceedings, Respondent has submitted an Offer of Settlement (the “Offer”) 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, Respondent consents to the Commission’s jurisdiction over him and the subject matter of these proceedings and to the entry of this Order Instituting Administrative Proceedings Pursuant to Section 15(b) of the Securities Exchange Act of

1934 and Section 203(f) of the Investment Advisers Act of 1940, Making Findings, and Imposing Remedial Sanctions (“Order”), as set forth below.

III.

On the basis of this Order and Respondent’s Offer, the Commission finds that:

1. Brady was the founder and sole member of A+ Financial Services, LLC (“A+ Financial”), a financial services entity and unregistered investment adviser. From March 1999 through March 2010, Brady was also a registered representative associated with broker-dealers registered with the Commission. Brady, 39 years old, is a resident of Newington, Connecticut.

2. On December 15, 2011, Brady pled guilty to one count of mail fraud in violation of Title 18 United States Code, Section 1341, before the United States District Court for the District of Connecticut in *United States of America v. Michael Brady*, Crim. Information No. 3:11-CR-00246-JBA. On May 24, 2012, a judgment in the criminal case was entered against Brady. He was sentenced to a prison term of 36 months, followed by three years of supervised release, and ordered to make restitution in the amount of \$136,374.90.

3. The count of the criminal information to which Brady pled guilty alleged, *inter alia*, that between approximately January 2008 and approximately March 2010, Brady defrauded investors by soliciting client funds for investment and then converting the funds for his own personal use.

4. In connection with that plea, Respondent admitted that:

- a) On or about January 24, 2008, Brady faxed blank forms to a client in order for the client to open an investment account with Brady, who purported to act as the investment adviser on the client’s account;
- b) On or about March 4, 2008, at Brady's direction, the client obtained a cashier's check in the amount of \$56,625.39 payable to A+ Financial and mailed that check to Brady to invest. Instead of investing the money, Brady converted the proceeds of that check to his own personal use;
- c) In or around January 2010, Brady mailed a fictitious retirement account statement to the client purporting to show the status of the client's investment account. In fact, there was no such account because Brady had used the client's money for his own benefit; and
- d) The total loss for the client and other victims of the mail fraud scheme that forms the basis of the Information is \$195,424.81.

IV.

In view of the foregoing, the Commission deems it appropriate and in the public interest to impose the sanctions agreed to in Respondent Brady's Offer.

Accordingly, it is hereby ORDERED pursuant to Section 15(b)(6) of the Exchange Act and Section 203(f) of the Advisers Act that Respondent Brady be, and hereby is:

barred from association with any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization and barred from participating in any offering of a penny stock, including: acting as a promoter, finder, consultant, agent or other person who engages in activities with a broker, dealer or issuer for purposes of the issuance or trading in any penny stock, or inducing or attempting to induce the purchase or sale of any penny stock.

Any reapplication for association by the Respondent 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 Respondent, 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.

Jill M. Peterson
Assistant Secretary