

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

**SECURITIES EXCHANGE ACT OF 1934**  
**Release No. 78212 / June 30, 2016**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-17324**

**In the Matter of**

**SPEERS FINANCIAL  
GROUP, LLC,**

**Respondent.**

**ORDER INSTITUTING  
ADMINISTRATIVE PROCEEDINGS  
PURSUANT TO SECTION 15(b) OF THE  
SECURITIES EXCHANGE ACT OF 1934,  
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”) against Speers Financial Group, LLC (“Speers Financial” 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, and without admitting or denying the findings herein, except as to the Commission’s jurisdiction over it and the subject matter of these proceedings and the findings contained in Section III.2. below, which are admitted, Respondent consents to the entry of this Order Instituting Administrative Proceedings Pursuant to Section 15(b) of the Securities Exchange Act of 1934, 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. Respondent, a Nevada limited liability company formed in October 2013 by Brady J. Speers, maintains its principal place of business in Mansfield, Texas. Speers formed Speers Financial to receive commissions on his sales of life settlement interests. Neither Speers Financial nor its securities is registered with the Commission, and Speers Financial has not registered any offering of securities with the Commission. Speers is the sole manager of Speers Financial.

2. On June 6, 2016, a final judgment was entered by consent against Respondent, permanently enjoining it from future violations of Section 15(a) of the Exchange Act, in the civil action entitled *Securities and Exchange Commission v. Christopher A. Novinger, Brady J. Speers, NFS Group, LLC d/b/a Novers Financial a/k/a Safe Retirement Experts, ICAN Investment Group, LLC, and Speers Financial Group, LLC*, Civil Action Number 4:15-CV-358-O, in the United States District Court for the Northern District of Texas, Fort Worth Division.

3. The Commission's complaint alleged, among other things, that Respondent acted as an unregistered broker-dealer in offering and selling – and receiving commissions from sales of – life settlement interests to investors and prospective investors.

### IV.

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

Accordingly, it is hereby ORDERED pursuant to Section 15(b)(6) of the Exchange Act that Respondent 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.

Brent J. Fields  
Secretary