

STATE OF RHODE ISLAND
DEPARTMENT OF BUSINESS REGULATION, DIVISION OF SECURITIES
1511 PONTIAC AVENUE, BUILDING 69-1
CRANSTON, RI 02920

IN THE MATTER OF	:
	: CONSENT AGREEMENT
STRATEGIC FINANCIAL LLC	:
	: 2025-SC-003
RESPONDENT	:

I.

The Securities Division (the “Division”) of the Rhode Island Department of Business Regulation (the “Department”) enters into this Consent Agreement (“Agreement”) to resolve concerns that R.I. Gen. Laws §§ 7-11-203 and 7-11-204(1)(ii) of the Rhode Island Uniform Securities Act of 1990 (the “RIUSA” or the “Act”), R.I. Gen. Laws § 7-11-101 *et seq.* of the Rhode Island General Laws, may have been violated by Strategic Financial, LLC (“Respondent”). The Division and the Respondent have determined to resolve this matter, after investigation, but without instituting formal administrative proceedings, by entering into this Consent Agreement.

II.

It is hereby agreed by and between the Division and Strategic Financial, LLC that:

1. Respondent is a limited liability company organized under the laws of the State of Connecticut, has a principal place of business at 1695 Ellington Road, Suite 202, South Windsor, CT 06074.
2. Respondent is registered as an Investment Adviser Firm since November 14, 2002 as CRD #122437.
3. At all times relevant to this Agreement, it has been unlawful to transact

business in this State as an investment adviser or investment adviser representative unless licensed or exempt from licensing under R.I. Gen. Laws § 7-11-203 .

4. On April 28, 2025, during the Respondent's initial registration examination by the Division the Division discovered that:

a.) Beginning in 2018, Respondent had conducted business and exceeded the de minimis exemption threshold by having more than five (5) Rhode Island clients within a twelve-month period while not being registered as an investment adviser in Rhode Island. This constitutes a violation of R.I. Gen. Laws § 7-11-204(1)(ii).

b.) An investment adviser representative associated with Respondent was conducting advisory business in Rhode Island while not being properly registered with Rhode Island. This constitutes a violation of R.I. Gen. Laws § 7-11-203(b).

c.) Both the Respondent and the investment adviser representative engaged in unregistered activity and such conduct is subject to administrative penalties under R.I. Gen. Laws § 7-11-602

III

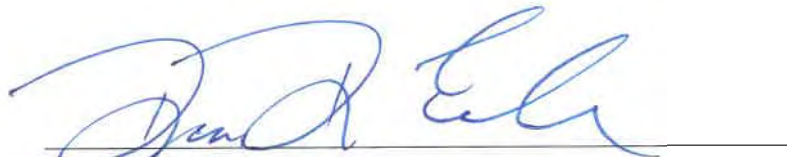
Based on the foregoing, the Division finds that the following is in the public interest, appropriate for the protection of investors, and consistent with the purposes intended by the policy and provisions of RIUSA.

Accordingly, it is hereby further agreed that:

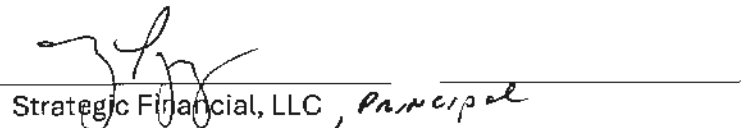
1. Respondent has taken all steps necessary to ensure full compliance with R.I. Gen. Laws § 7-11-203 and all related rules and regulations.
2. Upon execution of this Agreement, Respondent shall pay an administrative penalty of Three Thousand Dollars (\$3,000.00) to the Department for violations of R.I. Gen. Laws § 7-11-203. Payment instructions to follow under separate cover

Respondent is hereby notified that any additional violations of the R.I. Gen. Laws may be grounds for significant and substantial penalties

Dated as of 30th day of October, 2025.



Don DeFedele
Associate Director Securities, Commercial Licensing



Strategic Financial, LLC, Principal