

STATE OF ILLINOIS
SECRETARY OF STATE
SECURITIES DEPARTMENT

IN THE MATTER OF: SENIOR FINANCIAL STRATEGIES, INC.)
D/B/A PINNACLE INVESTMENT ADVISERS)
THOMAS N. COOPER AND)
SUSAN B. COOPER)

) File No. 0800064
)
)

Amended Notice of Hearing

TO THE RESPONDENTS: Senior Financial Strategies, Inc.
D/B/A Pinnacle Investment Advisors
Thomas N. Cooper
Susan B. Cooper

c/o Tom Kelty
Kelty Law Office
P.O. Box 2243
Springfield, Ill 62705

You are hereby notified that the Notice of Hearing issued against you on October 21, 2009 is hereby amended by adding the following Count as follows:

Count II

1. That on October 21, 2009 the Illinois Securities Department (the "Department") issued a Notice of Hearing alleging violations of the Illinois Securities Act against the above named Respondents.
2. Senior Financial Strategies, Inc. Thomas N. Cooper and Susan B. Cooper are registered with the Department as investment adviser and investment adviser representatives respectively.

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3. As part of the registration process, the Respondent, Senior Financial Strategies is required, pursuant to Rule 840 of the Rules and Regulation of the Illinois Securities Department (14 Admin Code 130.100 et seq.), to prepare and file a Revised Uniform Application for the Investment Adviser Registration (Form ADV).
4. The Respondents prior to their registration and as a requirement of registration prepared, completed and filed a Form ADV on their behalf with the Department via the Investment Adviser Registration Database (IARD).
5. Form ADV is a document used by both the SEC and State securities administrators as part of the registration, audit and enforcement process. Additionally, the Form ADV is made available to clients and prospective clients via the internet and upon request and Part II of Form ADV must be delivered to clients and prospective clients of an investment adviser.
6. Form ADV contains information about the business background, number and type of clients, services provided, fees charged and disciplinary history of the investment adviser and its representatives.
7. Item 11 of Part I of the Form ADV asks the investment adviser to answer questions regarding the disciplinary history of the firm and its investment adviser representatives.
8. Question G of Item 11 requests the following: "Are you or any advisory affiliate now the subject of any regulatory proceeding that could result in a 'yes' answer to any part of Item 11.C., 11.D., or 11.E.?"
9. Items 11.C., 11.D., and 11.E. request information about disciplinary actions by the SEC or CFTC, any federal regulatory agency, any state agency or any foreign financial regulatory authority, or any self-regulatory organization or commodities exchange, respectively.
10. Before October 21, 2009, The Respondent's Form ADV answered Items 11.C-G in the negative.
11. Section 8.D.13 of the Illinois Securities Act and Rule 840 require an investment adviser to amend its Form ADV whenever any material change occurs that renders information in the Form ADV no longer accurate. Such amendment must be made within 10 days of the occurrence. Rule 840 defines material

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change to also include any disciplinary action concerning the investment adviser or its investment adviser representatives.

12. On April 8, 2010 and July 14, 2010, The Department sent letters to the Respondents advising them that they were in violation of the Illinois Securities Act and must amend their Form ADV to include a 'yes' answer to Item 11.G due to the issuance of an administrative complaint by the Department against them.
13. As of the date of this Amended Notice of Hearing, the Form ADV has not been amended by the Respondents to reflect the issuance of an administrative action against them.
14. That by virtue of the foregoing the Respondents have violated sections 12.D, E and J of the Illinois Securities Law of 1953 815 ILCS 5/1 ("the Act").
15. That by virtue of the foregoing the Respondents' registrations are subject to suspensions or revocations pursuant to Section 8.E.1(g) of the Act.
16. That Section 11.E(4) of the Act provides, inter alia, that if the Secretary of State, after finding that any provision of the Act has been violated, may impose a fine as provided by rule, regulation or order not to exceed \$10,000.00 for each violation of the Act.
17. That by virtue of the foregoing, the Respondents are subject to a fine of up to \$10,000.00 per violation, an order of censure and an order that suspends or revokes their investment adviser and investment adviser representative registrations in the State of Illinois.

You are further notified that you are required pursuant to Section 130.1104 of the Rules and Regulations (14 Ill. Adm. Code 130) (the "Rules"), to file an answer to the allegations outlined above within ten days from the date of the Amended Notice of Hearing. Your failure to do so within the prescribed time shall be deemed an admission of the allegations contained in the Notice of Hearing and Amended Notice of Hearing and waives your right to a hearing.


Furthermore, you may be represented by legal counsel; may present evidence; may cross-examine witnesses and otherwise participate. A failure to so appear shall constitute default.

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Delivery of notice to the designated representative of any Respondent constitutes service upon such Respondents.

Dated this 30th day of July, 2010.


Jesse White
Jesse White
Secretary of State
State of Illinois

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