

**BEFORE THE SECURITIES COMMISSIONER
OF THE STATE OF KANSAS**

In the Matter of:

JAMES E. OTTO, and
JOTTO, INC.,

Docket No. 11 E 012
KSC No. 2010-5671

Respondents.

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Pursuant to K.S.A. 17-12a604

CONSENT ORDER

COMES NOW the above-entitled action before the Securities Commissioner of Kansas for further consideration. Upon due deliberation, the Commissioner finds as follows:

1. Respondents James E. Otto and JOTTO, Inc., and staff for the Office of the Kansas Securities Commissioner have entered into a Stipulation for Consent Order in this matter.
2. In the above-referenced Stipulation, Respondents Otto and JOTTO have waived their right to a hearing to contest the allegations contained in the Stipulation. Therefore, this Order may be issued without further proceedings.
3. Respondents Otto and JOTTO, Inc., neither admit nor denies the allegations contained in the Stipulation.
4. It is in the public interest and consistent with the purposes of the Kansas Securities Act that this Order be issued.

WHEREFORE, the Commissioner adopts the Allegations of Fact set forth in the Stipulation as true and correct Findings of Fact, and the Allegations of Law contained in the Stipulation as true and correct Conclusions of Law.

IT IS THEREFORE ORDERED by the Securities Commissioner that Respondents Otto and JOTTO Permanently Cease & Desist from (1) transacting business in the State of Kansas as a broker-dealer, investment adviser or investment adviser representative; (2) associating with any broker-dealer or investment adviser transacting business in the State of Kansas unless registered under the Kansas Uniform Securities Act; and (5) engaging in other acts or practices which constitute violation of the Kansas Uniform Securities Act.

IT IS FURTHER ORDERED by the Securities Commissioner that Respondent Otto pays \$1,000, as the cost of the investigation, in the form of a cashier's check or money order made payable to the Office of the Kansas Securities Commissioner, and delivered to the Office of the Kansas Securities Commissioner with the signed Stipulation for Consent Order.

IT IS SO ORDERED BY THE COMMISSIONER.

Entered at Topeka, Kansas, this 17th day of August, 2011.

/s/ Aaron Jack
Aaron Jack
Securities Commissioner
State of Kansas

NOTICE:

This decision may constitute final agency action that is subject to judicial review. The agency officer to receive service of a petition for judicial review on behalf of the Office of the Securities Commissioner is Aaron Jack, Securities Commissioner, at 109 SW 9th St., Suite 600, Topeka, Kansas, 66612.