
*
IN THE MATTER OF: *
*
TYR PARTNERS LP D/B/A GOODSTEAD*
IARD NO. 308769 *
*
ROBERT ELBERT SWIGERT *
CRD NO. 5846103 *

CONSENT ORDER
MATTER NO. CO-25-2025-32-S

I. PRELIMINARY STATEMENT

WHEREAS, the Banking Commissioner (“Commissioner”) is charged with the administration of Chapter 672a of the General Statutes of Connecticut, the Connecticut Uniform Securities Act (“Act”), and Sections 36b-31-2 to 36b-31-33, inclusive, of the Regulations of Connecticut State Agencies (“Regulations”) promulgated under the Act;

WHEREAS, Tyr Partners LP d/b/a Goodstead (“Goodstead”) is a Delaware limited partnership formed on August 10, 2016, and having its principal place of business at 113 Woodbury Road, Washington, Connecticut 06793;

WHEREAS, Robert Elbert Swigert (“Swigert”) is an individual whose address last known to the Commissioner is 543 4th Street, Apartment 4L, Brooklyn, New York 11215. Swigert is the sole general partner and sole representative of Goodstead;

WHEREAS, Goodstead was initially registered as an investment adviser under the Act from January 4, 2021, to December 31, 2023, at which time it failed to timely renew such registration. Goodstead was re-registered as an investment adviser under the Act from January 24, 2024, to December 31, 2024, at which time it again failed to timely renew the registration. On July 22, 2025,

Goodstead filed an application to register as an investment adviser under the Act for the year 2025 and paid the associated fee, which application is currently pending;

WHEREAS, Swigert was registered as an investment adviser agent of Goodstead under the Act from January 4, 2021, to December 31, 2023, at which time he failed to timely renew such registration. Swigert was re-registered as an investment adviser agent under the Act from January 24, 2024 to December 31, 2024, at which time he again failed to timely renew the registration. On July 22, 2025, Swigert filed an application to register as an investment advisor agent under the Act for the year 2025 and paid the associated fee, which application is currently pending;

WHEREAS, the Commissioner, through the Securities and Business Investments Division (“Division”) of the Department of Banking (“Department”), conducted an investigation of Goodstead and Swigert (collectively, the “Respondents”) pursuant to Sections 36b-8 and 36b-26(a) of the Act to determine if Respondents had violated, were violating or were about to violate provisions of the Act or Regulations or any order thereunder, and if a basis existed to deny Goodstead’s pending application for investment adviser registration or Swigert’s pending application for investment adviser agent registration (“Investigation”);

WHEREAS, as a result of the Investigation, the Commissioner has reason to believe that Goodstead’s continued transaction of investment advisory business in Connecticut when its investment adviser registration was no longer in effect violated Section 36b-6(c)(1) of the Act, as amended by Public Act 25-85, and that Goodstead’s engagement of an unregistered investment adviser agent in Connecticut when the investment adviser agent’s registration was no longer in effect violated Section 36b-6(c)(3) of the Act, as amended by Public Act 25-85;

WHEREAS, as a result of the Investigation, the Commissioner has reason to believe that Swigert’s continued transaction of investment advisory business in Connecticut when his investment adviser agent registration was no longer in effect violated Section 36b-6(c)(2) of the Act, as amended by Public Act 25-85;

WHEREAS, as a result of the Investigation, the Commissioner has reason to believe that the foregoing conduct by Goodstead violates Sections 36b-6(c)(1) and 36b-6(c)(3) of the Act, as amended, and by Swigert violates Section 36b-6(c)(2) of the Act, as amended, and would support administrative proceedings against Respondents under Section 36b-15 of the Act, as amended by Public Act 25-85, and Section 36b-27 of the Act;

WHEREAS, Section 36b-31(a) of the Act provides, in relevant part, that “[t]he commissioner may from time to time make . . . such . . . orders as are necessary to carry out the provisions of sections 36b-2 to 36b-34, inclusive”;

WHEREAS, Section 36b-31(b) of the Act provides, in relevant part, that “[n]o . . . order may be made . . . unless the commissioner finds that the action is necessary or appropriate in the public interest or for the protection of investors and consistent with the purposes fairly intended by the policy and provisions of sections 36b-2 to 36b-34, inclusive”;

WHEREAS, an administrative proceeding initiated under Section 36b-15 of the Act, as amended, and Section 36b-27 of the Act would constitute a “contested case” within the meaning of Section 4-166(4) of the General Statutes of Connecticut;

WHEREAS, Section 4-177(c) of the General Statutes of Connecticut and Section 36a-1-55(a) of the Regulations provide that a contested case may be resolved by consent order, unless precluded by law;

WHEREAS, without holding a hearing and without trial or adjudication of any issue of fact or law, and prior to the initiation of any formal proceeding, the Commissioner and Respondents reached an agreement, the terms of which are reflected in this Consent Order, in full and final resolution of the matters described herein;

WHEREAS, Respondents expressly consent to the Commissioner’s jurisdiction under the Act and to the terms of this Consent Order;

WHEREAS, the Commissioner finds that the entry of this Consent Order is necessary or appropriate in the public interest or for the protection of investors and consistent with the purposes fairly intended by the policy and provisions of the Act;

WHEREAS, Respondents acknowledge that they have had the opportunity to consult with and be represented by independent counsel in negotiating and reviewing this Consent Order and execute this Consent Order freely;

WHEREAS, Goodstead has seven clients who are all long-time friends of Swigert, none of whom reside in Connecticut and Respondents have been cooperative with the Division during the Investigation;

WHEREAS, Goodstead represents that it will undertake a thorough review of its compliance and supervisory policies and procedures (“Policies”) relating to firm and investment adviser agent registrations to ensure that the Policies clearly state registration deadlines and are up to date. Such Policies will be distributed, at least annually, to all firm personnel in an effort to ensure that all registration applications are timely made;

AND WHEREAS, Respondents, through their execution of this Consent Order, specifically represent and agree that none of the violations alleged in this Consent Order shall occur in the future.

II. CONSENT TO WAIVER OF PROCEDURAL RIGHTS

WHEREAS, Respondents, through their execution of this Consent Order, voluntarily waive the following rights:

1. To be afforded notice and an opportunity for a hearing within the meaning of Sections 36b-15(f) and 36b-27 of the Act and Section 4-177(a) of the General Statutes of Connecticut;
2. To present evidence and argument and to otherwise avail themselves of Sections 36b-15(f) and 36b-27 of the Act and Section 4-177c(a) of the General Statutes of Connecticut;
3. To present their position in a hearing in which they are represented by counsel;
4. To have a written record of the hearing made and a written decision issued by a hearing officer; and
5. To seek judicial review of, or otherwise challenge or contest, the matters described herein, including the validity of this Consent Order.

III. ACKNOWLEDGEMENT OF THE COMMISSIONER’S ALLEGATIONS

WHEREAS, Respondents, through their execution of this Consent Order, acknowledge, without admitting or denying, the following allegations of the Commissioner:

1. Goodstead violated Section 36b-6(c)(1) of the Act, as amended, by transacting business as an investment adviser in Connecticut without registering as an investment adviser under the Act;
2. Goodstead violated Section 36b-6(c)(3) of the Act, as amended, by engaging one or more unregistered investment adviser agents; and
3. Swigert violated Section 36b-6(c)(2) of the Act, as amended, by transacting business as an investment adviser agent in Connecticut without registering as an investment adviser agent under the Act;

WHEREAS, the Commissioner would have the authority to enter findings of fact and conclusions of law after granting Respondents an opportunity for a hearing;

AND WHEREAS, Respondents acknowledge the possible consequences of an administrative hearing and voluntarily agree to consent to the entry of the sanctions described below.

IV. CONSENT TO ENTRY OF SANCTIONS

WHEREAS, Respondents, through their execution of this Consent Order, consent to the Commissioner's entry of a Consent Order imposing on them the following sanctions:

1. Goodstead shall cease and desist from engaging in conduct constituting or which would constitute a violation of the Act, or any regulation, rule or order adopted or issued under the Act, either directly or through any person, organization, entity, or other device, including, without limitation, violating Sections 36b-6(c)(1) and 36b-6(c)(3) of the Act, as amended;
2. Swigert shall cease and desist from engaging in conduct constituting or which would constitute a violation of the Act, or any regulation, rule or order adopted or issued under the Act, either directly or through any person, organization, entity, or other device, including, without limitation, violating Section 36b-6(c)(2) of the Act, as amended;
3. No later than the date this Consent Order is entered by the Commissioner, Respondents shall jointly and severally remit to the Department by cashier's check, certified check or money order made payable to "Treasurer, State of Connecticut" the sum of two thousand five hundred dollars (\$2,500), which shall constitute an administrative fine;
4. Effective on the date this Consent Order is entered by the Commissioner, the name of "Tyr Partners LP d/b/a Goodstead" shall be entered on the Register of Investment Advisers pursuant to Section 36b-8 of the Act; and
5. Effective on the date this Consent Order is entered by the Commissioner, the name of Robert Elbert Swigert shall be entered on the Register of Investment Adviser Agents pursuant to Section 36b-8 of the Act

V. CONSENT ORDER

NOW THEREFORE, the Commissioner enters the following:

1. The Sanctions set forth above be and are hereby entered;
2. Entry of this Consent Order by the Commissioner is without prejudice to the right of the Commissioner to take enforcement action against Respondent based upon a violation of this Consent Order or the matters underlying its entry if the Commissioner determines that compliance with the terms herein is not being observed;
3. Nothing in this Consent Order shall be construed as limiting the Commissioner's ability to take enforcement action against Respondents based upon: (i) evidence of which the Division was unaware on the date hereof relating to a violation of the Act or any regulation or order under the Act; or (ii) evidence indicating that Respondents withheld material information from, or made any material misstatement or omission to, the Commissioner in connection with this matter;
4. Respondents shall not take any action or make or permit to be made any public statement, including in regulatory filings, any proceeding in any forum or otherwise, denying, directly or indirectly, any allegation referenced in this Consent Order or create the impression that this Consent Order is without factual basis;
5. Respondents shall not take any position in any proceeding brought by or on behalf of the Commissioner, or to which the Commissioner is a party, that is inconsistent with any part of this Consent Order. Nothing in this provision affects Respondents' (i) testimonial obligations or (ii) right to take a legal or factual position in litigation, arbitration, or other legal proceeding in which the Commissioner is not a party; and
6. This Consent Order shall become final when entered.

So ordered at Hartford, Connecticut,
this 28th day of November 2025.

_____/s/_____
Jorge L. Perez
Banking Commissioner

CONSENT TO ENTRY OF ORDER

I, Robert Elbert Swigert, state on behalf of Tyr Partners LP d/b/a Goodstead (“Goodstead”), that I have read the foregoing Consent Order; that I know and fully understand its contents; that I am authorized to execute this Consent Order on behalf of Goodstead; that Goodstead agrees freely and without threat or coercion of any kind to comply with the terms and conditions stated herein; and that Goodstead consents to the entry of this Consent Order.

Tyr Partners LP, d/b/a Goodstead

By: _____/s/_____
Robert Elbert Swigert
General Partner

State of: Florida

County of: Broward

On this the 5th day of November 2025, before me, the undersigned officer, personally appeared Robert Elbert Swigert, who acknowledged himself to be the General Partner of Tyr Partners LP d/b/a Goodstead, a limited partnership, and that he, as such General Partner, being authorized so to do, executed the foregoing instrument for the purposes therein contained, by signing the name of the limited partnership by himself as General Partner.

In witness whereof I hereunto set my hand.

_____/s/_____
Notary Public / Commissioner of the Superior Court
Date Commission Expires: 02/28/2027

CONSENT TO ENTRY OF ORDER

I, Robert Elbert Swigert, state that I have read the foregoing Consent Order; that I know and fully understand its contents; that I agree freely and without threat or coercion of any kind to comply with the terms and conditions stated herein; and that I consent to the entry of this Consent Order.

_____/s/_____
Robert Elbert Swigert

State of: _____

County of: _____

On this the 5th day of November 2025, before me, the undersigned officer, personally appeared Robert Elbert Swigert, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that he executed the same for the purposes therein.

In witness whereof I hereunto set my hand.

_____/s/_____
Notary Public / Commissioner of the Superior Court
Date Commission Expires: 02/28/2027