* *

IN THE MATTER OF:	*	
	*	**CONSENT ORDER**
JAYME FRANCES LEMAIRE	*	
CRD NO. 4336052	*	**MATTER NO. CO-26-20269-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"), as amended, and Sections 36b-31-2 to 36b-31-33, inclusive, of the Regulations of Connecticut State Agencies ("Regulations") promulgated under the Act;

WHEREAS, Jayme Frances Lemaire ("Lemaire") is an individual who resides at 25 Jolin Lane, Colchester, Connecticut, 06415. Lemaire was registered at various times and with various firms as a broker-dealer agent and investment adviser agent from July 11, 2001 to July 15, 2025;

II. REGISTRATION HISTORY

WHEREAS, relevant to this matter, Lemaire was registered as an investment adviser agent with Raymond James Financial Services Advisors, Inc. (IARD #149018) from April 20, 2021 through July 15, 2025, and registered as a broker-dealer agent of Raymond James Financial Services, Inc. (CRD #6694) from April 20, 2021 through July 15, 2025 (hereinafter, Raymond James Financial Services Advisors, Inc. and Raymond James Financial Services, Inc. are referred to collectively as "Raymond James"). Lemaire was discharged by Raymond James on July 2, 2025, and on July 15, 2025, Raymond James filed a Form U5 "Uniform Termination Notice for Securities Industry Registration", ("Form U5") requesting a full termination of her investment adviser agent and broker-dealer agent registrations and discharging Lemaire for "conduct inconsistent with firm policies on borrowing from clients."

WHEREAS, on July 11, 2025, Lemaire was hired by Lincoln Investment ("Lincoln") (CRD #519), and filed a Form U4 "Uniform Application for Securities Industry Registration or Transfer" and applied for broker-dealer agent registration and investment adviser agent registration with the Division. On July 22, 2025, Lincoln filed a Form U5 for Lemaire, requesting termination of her pending applications for investment adviser agent and broker-dealer agent registration and discharging her for "provid[ing] inaccurate and/or incomplete information at the time of onboarding regarding her termination from Raymond James." Specifically, Lincoln reported that Lemaire failed to disclose to Lincoln that she was discharged from Raymond James for borrowing money from clients.

WHEREAS, on July 24, 2025, Lemaire applied for registration as an investment adviser agent of International Assets Investment Management, LLC (IARD #144426) and as a broker-dealer agent of International Assets Advisory, LLC (CRD #10645). On October 20, 2025, International Assets Advisory, LLC filed a Form U5 for Lemaire, requesting termination of her application for broker-dealer agent registration. On December 1, 2025, International Assets Investment Management, LLC filed a Form U5 for Lemaire, requesting termination of her application for investment adviser agent registration.

WHEREAS, the Commissioner, through the Securities and Business Investments Division ("Division") of the Department of Banking ("Department"), conducted an investigation pursuant to Section 36b-26 of the Act into the activities of Lemaire to determine if she had violated, was violating or was about to violate any provisions of the Act or any regulation or order under the Act ("Investigation");

WHEREAS, as a result of the Investigation, the Division ascertained that Lemaire engaged in dishonest or unethical business practices in violation of Section 36b-31-15b(c) of the Regulations and FINRA Rule 3240 by borrowing approximately $140,000 from a brokerage client;

WHEREAS, as a result of the Investigation, the Division ascertained that Lemaire engaged in dishonest or unethical business practices in violation of 36b-31-15b(c) of the Regulations and FINRA Rule 3220 by accepting cash gifts in the amount of $947,000 from two brokerage clients;

WHEREAS, as a result of the Investigation, the Division ascertained that Lemaire violated Section 36b-23 by making a false or misleading statement to the Commissioner when she filed a Form U4 on July 11, 2025, in connection with her employment with Lincoln. When Lemaire filed her Form U4 on July 11, 2025, Lemaire answered "No" to Question 14J (1): "Have you ever voluntarily *resigned*, been discharged or permitted to *resign* after allegations were made that accused you of: (1) violating *investment-related* statutes, regulations, rules or industry standards of conduct?" (emphasis in original Form U4). Lemaire was discharged from Raymond James on July 2, 2025, and the Division contends that Ms. Lemaire had sufficient knowledge of the reason for her termination to answer "Yes" to Question 14J (1);

WHEREAS, the Commissioner, as a result of the Investigation, has reason to believe that the foregoing conduct violates certain provisions of the Act and would support administrative proceedings against Lemaire under Sections 36b-15 and 36b-27 of the Act; including conduct which, if proven, would constitute a basis for: 1) revocation of Lemaire's investment adviser agent and broker dealer agent registrations with Raymond James, respectively; 2) denial of Lemaire's pending investment adviser agent and broker dealer agent applications with Lincoln, International Assets Investment Management, LLC and International Assets Advisory, LLC, respectively; and a 3) bar of Lemaire's securities and investment advisory activities, under Section 36b-15(a) of the 2026 Supplement to the General Statutes;

WHEREAS, an administrative proceeding initiated under 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, 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, 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 Lemaire have reached an agreement, the terms of which are reflected in this Consent Order, in full and final resolution of the matters described herein;

WHEREAS, Lemaire expressly consents to the Commissioner's jurisdiction under the Act and to the terms of this Consent Order as set forth below;

WHEREAS, the Commissioner finds that the issuance 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, the Commissioner has not received any client complaints about Lemaire's above described activity;

WHEREAS, Lemaire's counsel has provided the Commissioner with written documentation that Lemaire extended written offers of full repayment to both the client she borrowed money from and the two clients who gifted her money. Lemaire's counsel has provided the Division with a written response from each client declining Lemaire's offers of repayment.

WHEREAS, Lemaire acknowledges that she has had the opportunity to consult with and be represented by independent counsel in negotiating and reviewing this Consent Order and that she executes this Consent Order freely;

AND WHEREAS, Lemaire, through her execution of this Consent Order, specifically assures the Commissioner that none of the violations alleged in this Consent Order shall occur in the future.

III. CONSENT TO WAIVER OF PROCEDURAL RIGHTS

WHEREAS, Lemaire, through her execution of this Consent Order, voluntarily waives 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 herself 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 her position in a hearing in which she is 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.

IV. ACKNOWLEDGEMENT OF THE COMMISSIONER'S ALLEGATIONS

WHEREAS, Lemaire, through her execution of this Consent Order, acknowledges the following allegations of the Commissioner:

1. Lemaire engaged in dishonest and unethical business practices within the meaning of Section 36b-31-15b(c) of the Regulations and FINRA Rule 3240 by borrowing money from a brokerage client;

2. Lemaire engaged in dishonest and unethical business practices within the meaning of Section 36b-31-15b(c) of the Regulations and FINRA Rule 3220 by accepting cash gifts from two clients in excess of the FINRA permissible limit of $300.00 on gifts and gratuities;

3. Lemaire violated Section 36b-23 of the Act by making a false or misleading statement to the Commissioner through her inaccurate answer to disclosure question 14J on the Form U4 filed with the Commissioner on July 11, 2025.

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

AND WHEREAS, Lemaire acknowledges the possible consequences of an administrative hearing and voluntarily agrees to consent to the entry of the sanctions described below.

V. CONSENT TO ENTRY OF SANCTIONS

WHEREAS, Lemaire, through her execution of this Consent Order, consents to the Commissioner's entry of an order imposing on her the following sanctions:

1. Lemaire 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 or other device, including without limitation, violation of Section 36b-23 of the Act; and from engaging in dishonest or unethical business practices within the meaning of Sections 36b-31-15b(c) of the Regulations and FINRA Rules 3240 and 3220;

2. Effective upon the entry of this Consent Order by the Commissioner, Lemaire's investment adviser agent and broker-dealer agent registrations with Raymond James shall be **REVOKED**;

3. Effective upon the entry of this Consent Order by the Commissioner, Lemaire's applications for investment adviser agent registration and broker-dealer agent registration with Lincoln shall be **DENIED**;

4. Effective upon the entry of this Consent Order by the Commissioner, Lemaire's application for broker-dealer agent registration with International Assets Advisory, LLC shall be **DENIED**;

5. Effective upon the entry of this Consent Order by the Commissioner, Lemaire's application for investment adviser agent registration with International Assets Investment Management, LLC shall be **DENIED**;

6. Effective upon the entry of this Consent Order by the Commissioner, Lemaire shall be **BARRED** from directly or indirectly, through any person, organization, entity or other device, (i) transacting business in or from Connecticut as a broker-dealer, agent, investment adviser or investment adviser agent, as such terms are defined in the Act and notwithstanding any definitional exclusion that might otherwise be available under the Act; and (ii) acting in any other capacity which requires a license or registration from the Commissioner; and

7. No later than the date this Consent Order is entered by the Commissioner, Lemaire shall remit to the department by cashier's check, certified check or money order made payable to "Treasurer, State of Connecticut" the sum of thirty thousand dollars ($30,000), which shall constitute an administrative fine.

VI. 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 Lemaire based upon a violation of this Consent Order or the matters underlying its entry if the Commissioner determines that Lemaire has failed to comply with the terms herein;
3. Nothing in this Consent Order shall be construed as limiting the Commissioner's ability to take enforcement action against Lemaire 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 Lemaire withheld material information from, or made any material misstatement or omission to, the Commissioner in connection with this matter;
4. Lemaire 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. However, nothing in this Consent Order affects Lemaire's (i) testimonial obligations; or (ii) right to take any legal or factual position in litigation, arbitration, or other legal proceedings in which the Commissioner is not a party; and
5. This Consent Order shall become final when entered.

So ordered at Hartford, Connecticut,
this _7th_ day of August 2026.

____/s/____________________________________
Jorge L. Perez
Banking Commissioner

CONSENT TO ENTRY OF ORDER

I, Jayme Frances Lemaire, 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/___________________________________
Jayme Frances Lemaire

State of: Pennsylvania

County of: Lehigh

On this the _4th_ day of July 2026, before me, the undersigned officer, personally appeared Jayme Frances Lemaire, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that she executed the same for the purposes therein contained.

In witness whereof I hereunto set my hand.

____/s/______________________________________
Tara L. Golden
Notary Public
Date Commission Expires: 09/16/2026