STATE OF MICHIGAN
DEPARTMENT OF LABOR & ECONOMIC GROWTH
OFFICE OF FINANCIAL AND INSURANCE REGULATION

Before the Commissioner of the Office of Financial and Insurance Regulation

In the Matter of:

Optimum Capital Management, LLC
CRD# 135261
_____/

Enforcement Case No.: 07-5326

Issued and entered
This 2 day of February 2009,
By Stephen R. Hilker
Chief Deputy Commissioner

ORDER REVOKING INVESTMENT ADVISER REGISTRATION
AND NOTICE OF OPPORTUNITY FOR HEARING

WHEREAS, Optimum Capital Management, LLC (Respondent) was a registered investment adviser authorized to transact business in the state of Michigan; and

WHEREAS, on or about May 1, 2007, the Office of Financial and Insurance Regulation (formerly the Office of Financial and Insurance Services) sent a Registered Investment Advisers' Annual Questionnaire (Questionnaire) to Respondent requesting information concerning its operation; and

WHEREAS, on or about October 26, 2007, the Office of Financial and Insurance Regulation sent a Notice of Opportunity to Show Compliance to Respondent; and

WHEREAS, the Notice of Opportunity Show Compliance alleged that Respondent violated Section 203(d) of the Michigan Uniform Securities Act (MUSA), MCL 451.603(d), by failing to respond to the Questionnaire; and

WHEREAS, by failing to respond to the Questionnaire, Respondent has prohibited the Office of Financial and Insurance Regulation from conducting an examination under Section 203(d) of MUSA, MCL 451.603(d), and therefore is subject to revocation of its investment adviser registration pursuant to Section 204 of MUSA, MCL 451.604; and

IT IS HEREBY ORDERED that, pursuant to Section 204 of MUSA, Respondent's registration as an investment adviser under MUSA is hereby REVOKED.

IT IS FURTHER ORDERED that, pursuant to Section 204(6)(f) of the Act, MCL 451.604(6)(f), Respondent is afforded an opportunity for a hearing. If a written request for a hearing is filed with the Office within twenty (20) days of your receipt of this Order, then the

office after receiving the request will set the matter down for a hearing. If a written request for a hearing is not received within twenty (20) days from the date of your receipt of this Order, and the Office orders none, this order shall remain in effect until it is modified or vacated by the Office.

Any request for a hearing should be addressed to: the Office of Financial and Insurance Regulation, Attention: Dawn Kobus, Hearing Coordinator, 611 West Ottawa Street, Third Floor, Lansing, MI 48933. Her e-mail address is kobusd@michigan.gov. Her fax number is (517) 335-1727.

ANY COMMUNICATION regarding this Order should be addressed to the Department of Energy, Labor and Economic Growth, Office of Financial and Insurance Regulation, Attention: Marlon Roberts, P.O. Box 30701, Lansing, Michigan 48909-8201.

Stephen R. Hilker
Chief Deputy Commissioner
Office of Financial and Insurance Regulation