



STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
LANSING

RICK SNYDER  
GOVERNOR

SHELLY EDGERTON  
DIRECTOR

**Complaint Nos. 329668, 329920**

**LAWRENCE ROBERSON  
CRD NO. 1347434**

**FINE PAYMENT INSTRUCTIONS**

The FINE must be received by the Department on or before March 24, 2017. The FINE must be paid by cashier's check or money order, with the Complaint No. clearly indicated on the check or money order, made payable to the State of Michigan, and sent to the address indicated below.

Once the FINE has been overdue for at least six months, it will be referred to the Michigan Department of Treasury for collection. Questions may be directed to Final Order Monitoring staff at (517) 241-9180.

**To ensure the proper posting of the payment to your account, please mail the Fine Payment Processing Stub with your payment to:**

Michigan Department of Licensing and Regulatory Affairs  
**CORPORATIONS, SECURITIES & COMMERCIAL LICENSING BUREAU**  
Final Order Monitoring – Securities & Audit Division  
P.O. Box 30018 – Lansing, MI 48909

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**FINE PAYMENT PROCESSING STUB**  
**Please return this with your payment.**

Make your check or money order drawn from a U.S. financial institution payable to the STATE OF MICHIGAN.  
Do not send cash.

Agency C3 ACCOUNT Code  
10117

Complaint Nos.: 329668, 329920 <hr/>	Due: March 24, 2017 Total Amount Due: \$5,000.00
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LARA is an equal opportunity employer/program.  
Auxiliary aids, services and other reasonable accommodations are available upon request to individuals with disabilities.

**STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
CORPORATIONS, SECURITIES & COMMERCIAL LICENSING BUREAU**

In the matter of:

Complaint Nos. 329668  
329920

LAWRENCE ROBERSON  
CRD# 1347434

Respondent.

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Issued and entered  
This 23<sup>rd</sup> day of January, 2017

**STIPULATION AND ORDER REVOKING INVESTMENT ADVISER  
REPRESENTATIVE REGISTRATION**

A. RELEVANT INFORMATION AND STATUTORY PROVISIONS, under the Michigan Uniform Securities Act (2002) (the "Act"), 2008 PA 551, MCL 451.2101 *et seq.*:

1. Lawrence Roberson (CRD#1347434) ("Respondent") is registered as an investment adviser representative through Wealth Management Group, Inc. (IARD#124527), a Michigan-registered investment adviser firm. Respondent was registered as an investment adviser representative in Michigan through Wealth Management Group, Inc beginning on or around October 14, 2010. Respondent's registration was summarily suspended on March 10, 2016.
2. On October 4, 2016, the Director of the Department of Licensing and Regulatory Affairs, Corporations, Securities & Commercial Licensing Bureau, who is the Administrator of the Act (the "Administrator"), issued a Notice of Intent to Revoke Investment Adviser Representative Registration (the "Notice of Intent to Revoke") to Respondent, providing him with notice and an opportunity to show compliance under the Administrative Procedures Act, 1969 PA 306, as amended, MCL 24.201 *et seq.*, and notice and an opportunity to request a hearing under MCL 451.2412.
3. Also on October 4, 2016, the Administrator issued a Notice and Order to Cease and Desist to Respondent. The Notice and Order to Cease and Desist ("C&D Notice and Order") provided Respondent notice that the Administrator intended to impose a civil fine of \$500,000.00 against Respondent under MCL 451.2604(4). The C&D Notice and Order also provided Respondent notice and an opportunity to request a hearing under MCL 451.2604(2).
4. On November 3, 2016, the Department of Licensing and Regulatory Affairs ("Department"), Corporations, Securities & Commercial Licensing Bureau ("CSCL Bureau") received Respondent's timely request for a hearing on the Notice of Intent to Revoke and the C&D Order and Notice.
5. Respondent and counsel for the CSCL Bureau agreed to hold Respondent's hearing request in abeyance and preserve his hearing rights while the parties discussed possible resolution

of the Notice of Intent to Revoke and C&D Notice and Order at a Compliance Conference held on December 6, 2016. At the Compliance Conference, Respondent indicated that he did not intend to contest the Notice of Intent to Revoke or the C&D Notice and Order.

6. The Respondent and the Department (the "Parties") agree that a basis exists, pursuant to Sections 412 and 604 of the Act, MCL 451.2412 and 451.2604, for the Administrator to take disciplinary action against Respondent's investment adviser representative registration.

## B. STIPULATION

In consideration of the foregoing facts and the following mutually agreed upon promises and covenants and other good and valuable consideration, the adequacy and sufficiency of which the Parties hereby expressly acknowledge, the Parties agree to this Stipulation and Order revoking Respondent's investment adviser representative registration with the following conditions and terms agreed to by the Parties below:

1. Respondent does not contest the Findings of Fact and Conclusions of Law in the C&D Notice and Order.
2. The Administrator agrees to reduce the civil fine imposed against Respondent to Five Thousand Dollars and 00/100 Cents (\$5,000.00).
3. Respondent agrees to pay the Five Thousand Dollars and 00/100 Cents (\$5,000.00) civil fine to the State of Michigan within sixty (60) days from the mailing date of this Stipulation and Order. Complaint Nos. 329668 and 329920 must be clearly indicated on the cashier's check or money order, and the payment sent to the Department of Licensing and Regulatory Affairs, Corporations, Securities & Commercial Licensing Bureau, Final Order Monitoring – Securities & Audit Division, P.O. Box 30018, Lansing, Michigan 48909.
4. Respondent agrees to withdraw his request for hearing in agency numbers 329668 and 329920.
5. The Department will not consider or grant any application for a permit, registration, licensure, relicensure, reinstatement, or renewal submitted by Respondent under the Act until Respondent fully complies with all of the Department's final orders to which Respondent is subject.
6. Respondent acknowledges that failure to comply with this Order may subject him to additional administrative or criminal sanctions, fines, and/or penalties. Under MCL 451.2508, a person that willfully violates the Act, or an order issued under the Act, is guilty of a felony punishable by imprisonment for not more than 10 years or a fine of not more than \$500,000.00 for each violation, or both. An individual convicted of violating a

rule or order under the Act may be fined, but shall not be imprisoned, if the individual did not have knowledge of the rule or order.

7. Both Parties acknowledge that this Stipulation and Order is final and binding upon its entry and waive any right to a hearing and/or appeal of this Stipulation and Order, the Notice of Intent to Revoke, and the C&D Notice and Order under the Act, the rules promulgated under the Act, and the Administrative Procedures Act, MCL 24.201 *et seq.* Both Parties acknowledge and agree that they consulted with or had ample opportunity to consult with legal counsel of their choosing before signing this Stipulation.

~~Through their signatures, the Parties agree to comply with the above terms and conditions.~~

Dated: 1/13/17

Signed:

Lawrence Roberson  
Lawrence Roberson

Dated: 1-18-17

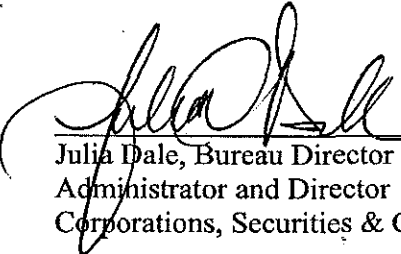
Signed:

Timothy L. Teague  
Timothy L. Teague  
Securities & Audit Division Director  
Corporations, Securities & Commercial Licensing  
Bureau

C. ORDER

NOW, THEREFORE, the Administrator ORDERS:

1. IN ACCORDANCE WITH THE FOREGOING FULLY EXECUTED STIPULATION RESPONDENT LAWRENCE ROBERSON'S INVESTMENT ADVISER REPRESENTATIVE REGISTRATION IS REVOKED, AS AUTHORIZED BY SECTION 412(2) OF THE ACT, MCL 451.2412(2).
2. RESPONDENT MUST CEASE AND DESIST FROM VIOLATING THE ACT IN THE MANNER SET FORTH IN THE NOTICE AND ORDER TO CEASE AND DESIST, ISSUED AND ENTERED ON OCTOBER 4, 2016, IN THIS MATTER.
3. RESPONDENT MUST PAY FIVE THOUSAND DOLLARS AND 00/100 CENTS (\$5,000.00) WITHIN SIXTY DAYS FROM THE MAILING DATE OF THIS FINAL ORDER, AS SPECIFIED IN PARAGRAPH B(3), AS AUTHORIZED BY SECTION 604(4) OF THE ACT, MCL 451.2604(4).



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Julia Dale, Bureau Director  
Administrator and Director  
Corporations, Securities & Commercial Licensing Bureau

**STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
CORPORATIONS, SECURITIES & COMMERCIAL LICENSING BUREAU**

In the matter of:

Agency Nos. 329668 & 329920

LAWRENCE R. ROBERSON  
CRD# 1347434

Respondent.

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Issued and entered  
This 4<sup>th</sup> day of October, 2016

NOTICE AND ORDER TO CEASE AND DESIST

Julia Dale, the Director of the Corporations, Securities & Commercial Licensing Bureau (the "Administrator"), pursuant to her statutory authority and responsibility to administer and enforce the Michigan Uniform Securities Act (2002), 2008 PA 551, as amended, MCL 451.2101 *et seq* ("Securities Act"), hereby orders Lawrence R. Roberson ("Respondent") to cease and desist from offering and selling unregistered, non-exempt securities, unlawfully taking custody of client funds, misstating material facts in the offer and sale of securities, and from engaging in an act, practice, or course of business that would operate as a fraud or deceit upon another person in the provision of investment advice, contrary to the Securities Act. Respondent is notified of the opportunity to request a hearing in this matter.

**I. BACKGROUND**

**A. The Respondent**

1. Lawrence R. Roberson (CRD#1347434) ("Respondent") is registered as an investment adviser representative through Wealth Management Group, Inc. (IARD#124527) ("the Firm"), a Michigan-registered investment adviser firm. Respondent has been registered as an investment adviser representative through the Firm since on or around October 14, 2010. Respondent's investment adviser representative registration has been

suspended since on or around March 10, 2016. (Exhibit 1 – Roberson Summary Suspension Order).

2. Respondent was previously registered as a securities agent through Capital City Securities, LLC (CRD#146001), a Michigan-registered broker-dealer. Respondent became subject to a bar from the Financial Industry Regulatory Authority (“FINRA”) on or around July 19, 2016 as a result of an Acceptance, Waiver, and Consent (“AWC”) entered into by Respondent and FINRA. (Exhibit 2 – FINRA AWC). The bar related to violations of federal antifraud provisions in the offer and sale of a security to a customer, wherein there was no actual security, and Respondent actually used the proceeds of the sale to fund personal expenses.

**C. Findings of Fact**

1. The Bureau conducted an investigation of Respondent’s Activities.
2. The investigation developed evidence that Respondent, in acting as a registered investment adviser, recommended that the Michigan investor, “TT”, buy an “investment” from Respondent, then subsequently accepted \$40,000.00 from that Michigan investor for the “investment”.
3. The FINRA AWC identified the “investment” solicited by Respondent and purchased by TT as a “WMG<sup>[1]</sup> 2015 Bond Debenture”. The security was not registered pursuant to the Securities Act, and Respondent has not identified any exemption from registration applicable to the investment.
4. Respondent subsequently utilized the \$40,000.00 solicited from the Michigan investor to fund personal expenses, and never invested the funds for the investor’s benefit.
5. The funds solicited and accepted by Respondent were withdrawn from an Individual Retirement Account, and resulted in taxable events to TT, the Michigan investor.
6. TT asked respondent during the solicitation if any disclosure documents related to the investment would be provided to TT, and Respondent answered that such documents would be forthcoming in the weeks after the investment. No such documents were ever provided because the investment

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[<sup>1</sup> WMG likely refers to “Wealth Management Group, Inc.”, Mr. Roberson’s solely owned investment adviser firm referred to in paragraph (I)(A)(1).]

was fictitious and no documents related to it ever existed to be provided to TT.

7. Respondent promised TT a return on the investment between \$5,000.00 and \$10,000.00. That statement was false, as Respondent did not intend to and never did invest the funds, but rather put them to personal use.

## **II. RELEVANT STATUTORY PROVISIONS**

1. Section 102c(c) of the Securities Act defines “Security”, in part, as:

a note; stock; treasury stock; security future; bond; debenture; evidence of indebtedness; certificate of interest or participation in a profit-sharing agreement; collateral trust certificate; preorganization certificate or subscription; transferable share; investment contract; voting trust certificate; certificate of deposit for a security; fractional undivided interest in oil, gas, or other mineral rights; put, call, straddle, option, or privilege on a security, certificate of deposit, or group or index of securities, including an interest in or based on the value of that put, call, straddle, option, or privilege on that security, certificate of deposit, or group or index of securities, put, call, straddle, option, or privilege entered into on a national securities exchange relating to foreign currency, an investment in a viatical or life settlement agreement; or, in general, an interest or instrument commonly known as a “security”; or a certificate of interest or participation in, temporary or interim certificate for, receipt for, guarantee of, or warrant or right to subscribe to or purchase, any of the foregoing...

2. Section 301 of the Securities Act, MCL 451.2301, states:

A person shall not offer or sell a security in this state unless 1 or more of the following are met:

- (a) The security is a federal covered security.
- (b) The security, transaction, or offer is exempted from registration under sections 201 to 203.
- (c) The security is registered under this act.

3. Section 411(6) of the Securities Act, MCL 451.2411, states:

(6) Subject to section 15(h) of the securities exchange act of 1934, 15 USC 78o, or section 222 of the investment advisers act of 1940, 15 USC 80b-18a, an agent shall not have custody of funds or securities of a customer



except under the supervision of a broker-dealer and an investment adviser representative shall not have custody of funds or securities of a client except under the supervision of an investment adviser or federal covered investment adviser. A rule or order under this act may prohibit, limit, or impose conditions on the custody of funds or securities of a customer by a broker-dealer and on the custody of securities or funds of a client by an investment adviser.

4. Order No. 2011-009-M, Transition Order 6, states in part:

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7. An investment adviser is permitted to take and maintain custody of client funds and securities as long as the investment adviser meets the requirements of at least one of paragraphs (a), (b), or (c) below:

(a) The investment adviser (i) satisfies the requirements of Rule 206(4)-2 promulgated under the Advisers Act, 17 CFR 275.206(4)-2, such that the custody of client funds by the investment adviser would not be deemed a fraudulent, deceptive or manipulative act, practice or course of business under such rule if it were applicable to the investment adviser, or (ii) would otherwise not be precluded from taking and maintaining customer funds under federal law or regulations then in effect and applicable to federal covered investment advisers, if they were applied to the investment adviser; or

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(c) the investment adviser is otherwise permitted by rule or order of the Administrator to take and maintain custody of client funds or securities and complies with such rule or order....

5. Section 501 of the Securities Act, MCL 451.2501, states:

It is unlawful for a person, in connection with the offer, sale, or purchase of a security or the organization or operation of a Michigan investment market under article 4A, to directly or indirectly do any of the following:...

(b) Make an untrue statement of a material fact or omit to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading...

6. Section 502 of the Securities Act, MCL 451.2502, states in part:

(1) It is unlawful for a person that advises others for compensation, either directly or indirectly or through publications or writings, as to the value of securities or the advisability of investing in, purchasing, or selling securities, or that, for compensation and as part of a regular business, issues or promulgates analyses or reports relating to securities, to do any of the following:

(a) Employ a device, scheme, or artifice to defraud another person.

(b) Engage in an act, practice, or course of business that operates or would operate as a fraud or deceit upon another person.

7. Section 503(1) of the Securities Act, MCL 451.2503(1), states:

In a civil action or administrative proceeding under this act, a person claiming an exemption, exception, preemption, or exclusion has the burden to prove the applicability of the exemption, exception, preemption, or exclusions.

### **III. CONCLUSIONS OF LAW**

1. Respondent Lawrence R. Roberson offered and sold a security in the form of a bond or debenture in the State of Michigan that was not federally covered, exempt from registration, or registered, contrary to section 301 of the Securities Act, MCL 451.2301.
2. Respondent Lawrence R. Roberson, as a registered investment adviser representative associated with a registered investment adviser, took custody of client funds or securities when he solicited and took ownership of \$40,000.00 from his investment advisory client, TT, and failed to comply with the custody requirements of Transition Order 6, contrary to section 411(6) of the Securities Act, MCL 451.2411(6).
3. Respondent Lawrence R. Roberson misstated material facts in connection with the offer and sale of securities in the following ways:
  - a. Roberson represented to TT that TT would receive documents related to the terms and conditions of the bond or debenture within weeks after the investment was made, when in fact no such documents existed or could exist, as the investment was fictitious and Roberson intended to put the proceeds of the

investment to personal use. The statement was material and was untrue, contrary to section 501 of the Securities Act, MCL 451.2501.

- b. Roberson represented to TT that TT would receive a rate of return between \$5,000.00 and \$10,000.00 on the investment, when in fact no return would be paid, as the investment was fictitious, and Roberson put the funds to personal use. The statement was material and was untrue, contrary to section 501 of the Securities Act, MCL 451.2501.
4. Respondent Lawrence R. Roberson, as a person who advised others for compensation on the advisability of investing in, purchasing, or selling securities, engaged in an act, practice, or course of business that operated as a fraud or deceit on TT by recommending that TT purchase the fictitious bond or debenture, and subsequently putting the proceeds of that investment to personal use, contrary to section 502(1) of the Securities Act, MCL 451.2502(1).

#### IV. ORDER

IT IS THEREFORE ORDERED, pursuant to section 604 of the Securities Act, MCL 451.2604, that:

- A. Respondent shall immediately CEASE AND DESIST from offering and selling unregistered, non-exempt securities, unlawfully taking custody of client funds, misstating material facts in the offer and sale of securities, and from engaging in an act, practice, or course of business that would operate as a fraud or deceit upon another person in the provision of investment advice, contrary to the Securities Act.
- B. Pursuant to section 604(2) of the Securities Act, this Notice and Order to Cease and Desist is IMMEDIATELY EFFECTIVE.
- C. In her Final Order, the Administrator, under section 604(4) of the Securities Act, MCL 451.2604(4), intends to impose a civil fine of \$500,000.00 against Respondent.
- D. Pursuant to section 508 of the Securities Act, MCL 451.2508, a person that willfully violates the Securities Act, or an order issued under the Securities Act, is guilty of a felony punishable by imprisonment for not more than 10 years or a fine of not more than \$500,000.00 for each violation, or both. An individual convicted

of violating a rule or order under this act may be fined, but shall not be imprisoned, if the individual did not have knowledge of the rule or order.

V. **NOTICE OF OPPORTUNITY FOR HEARING**

Section 604 of the Securities Act, MCL 451.2604, provides that Respondent has 30 days beginning with the first day after the date of service of this Notice and Order to Cease and Desist to submit a written request to the Administrator asking that this matter be scheduled for a hearing. If the Administrator receives a written request in a timely manner, the Administrator shall schedule a hearing within 15 days after receipt of the request. The written request for a hearing must be addressed to:

Corporations, Securities & Commercial Licensing Bureau  
Regulatory Compliance Division  
P.O. Box 30018  
Lansing, MI 48909

VI. **ORDER FINAL ABSENT HEARING REQUEST**

A. Under section 604 of the Securities Act, MCL 451.2604, the Respondent's failure to submit a written request for a hearing to the Administrator within 30 days after the service date of this **NOTICE AND ORDER TO CEASE AND DESIST** shall result in this order becoming a **FINAL ORDER** by operation of law. The **FINAL ORDER** includes the imposition of the fines cited described in section IV.C., and the fine amounts set forth below will become due and payable to the Administrator within sixty (60) days after the date this order becomes final:

\$500,000.00 – Lawrence R. Roberson, under section 604 of the Securities Act, MCL 451.2604.

B. CIVIL FINE payments should be payable to the STATE OF MICHIGAN and contain identifying information (e.g., names and complaint numbers) and mailed to the following address:

Corporations, Securities & Commercial Licensing Bureau  
Final Order Monitoring  
P.O. Box 30018  
Lansing, MI 48909


C. Failure to comply with the terms of this Order within the time frames specified may result in additional administrative penalties, including the summary suspension or continued suspension of all registrations held by Respondent under the Securities Act, the denial of any registration renewal, and/or the denial of any future applications for

Notice & Order to Cease & Desist  
Lawrence R. Roberson (CN 329668)  
CRD#1347434

registration, until full compliance is made. Respondent may voluntarily surrender or withdraw a registration under the Securities Act; however, the surrender or withdrawal will not negate the summary suspension or continued suspension of the relevant registrations or any additional administrative proceedings if a violation of this Order or the Securities Act occurred.

- D. Failure to pay the civil fines within six (6) months after this Order becomes final may result in the referral of the civil fines to the Michigan Department of Treasury for collection action against Respondents.

CORPORATIONS, SECURITIES & COMMERCIAL LICENSING BUREAU

  
By: Julia Dale, Director, Corporations, Securities  
& Commercial Licensing Bureau

10/4/16  
Date

**STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
CORPORATIONS, SECURITIES & COMMERCIAL LICENSING BUREAU**

In the matter of:

Agency Nos. 329668 & 329920

LAWRENCE R. ROBERSON  
CRD# 1347434

Respondent.

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Issued and entered  
This 4<sup>th</sup> day of October, 2016

**NOTICE OF INTENT TO REVOKE  
INVESTMENT ADVISER REPRESENTATIVE REGISTRATION**

**I. RELEVANT FACTS AND APPLICABLE LAW.**

Relevant information and statutory provisions, under the Michigan Uniform Securities Act (2002), 2008 PA 551, as amended, MCL 451.2101 *et seq* (the "Securities Act"):

1. Lawrence R. Roberson (CRD#1347434) ("Respondent") is registered as an investment adviser representative through Wealth Management Group, Inc. (IARD#124527) ("the Firm"), a Michigan-registered investment adviser firm. Respondent has been registered as an investment adviser representative through the Firm since on or around October 14, 2010.
2. Respondent's investment adviser representative registration has been suspended since on or around March 10, 2016 as a result of his failure to cooperate with an examination or inspections of the Firm. (Exhibit 1 – Roberson Summary Suspension Order). Respondent continues to impede the examination as of the date of this Notice of Intent to Revoke Investment Adviser Representative Registration.
3. Respondent was previously registered as a securities agent through Capital City Securities, LLC (CRD#146001), a Michigan-registered broker-dealer. Respondent became subject to a bar from the Financial Industry Regulatory Authority ("FINRA") on or around July 19, 2016 as a result of an Acceptance, Waiver, and Consent ("AWC") entered into by Respondent and FINRA. (Exhibit 2 – FINRA AWC). The bar related to violations of federal antifraud provisions in the offer and sale of a security to a customer, wherein there was no actual security, and Respondent actually used the proceeds of the sale to fund personal expenses.

4. The Corporations, Securities & Commercial Licensing Bureau (“the Bureau”) within the Department of Licensing and Regulatory Affairs opened an investigation to review Respondent’s securities activities.
5. The investigation also developed evidence that led to the issuance of a Notice & Order to Cease and Desist against Respondent for violations of sections 301, 411(6), 501, and 502 of the Securities Act, MCL 451.2301, MCL 451.2411(6), MCL 451.2501, and MCL 451.2502. (See Exhibit 3 – Notice & Order to Cease and Desist).
6. The Director (“Administrator”) of the Bureau has reviewed materials relating to Respondent’s actions as a registrant under the Securities Act. The Administrator has determined that the REVOCATION OF RESPONDENT’S REGISTRATION AS AN INVESTMENT ADVISER REPRESENTATIVE is authorized, appropriate, and in the public interest based upon Respondent’s conduct discussed above and hereafter.
7. Section 412(2) of the Securities Act, MCL 451.2412(2), states:

If the administrator finds that the order is in the public interest and subsection (4) authorizes the action, an order under this act may revoke... the registration of a registrant and if the registrant is a broker-dealer or investment adviser, of a partner, officer, or director, or a person having a similar status or performing similar functions, or a person directly or indirectly in control of the broker-dealer or investment adviser...

8. Section 412(4) of the Securities Act, MCL 451.2412(4) states in relevant part:

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(b) The person willfully violated or willfully failed to comply with this act or the predecessor act or a rule adopted or order issued under this act or the predecessor act within the previous 10 years.

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(e) The person is the subject of an order, issued after notice and opportunity for hearing by any of the following:

- (i) The securities or other financial services regulator of a state, or the securities and exchange commission or other federal agency denying, revoking, barring, or suspending registration as a broker-dealer, agent, investment adviser, federal covered investment adviser, or investment adviser representative...

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(h) The person refuses to allow or otherwise impedes the administrator from conducting an audit or inspection under section 411(4) or refuses access to a registrant's office to conduct an audit or inspection under section 411(4).

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(l) The person is the subject of a cease and desist order issued by the securities and exchange commission or issued under the securities, commodities, investment, franchise, banking, finance, or insurance laws of a state.

(m) The person has engaged in dishonest or unethical practices in the securities, commodities, investment, franchise, banking, finance, or insurance business within the previous 10 years...

9. Section 412(7) of the Securities Act, MCL 451.2412(7) states:

(7) Except under subsection (6), an order shall not be issued under this section unless all of the following have occurred:

- (a) Appropriate notice has been given to the applicant or registrant.
- (b) Opportunity for hearing has been given to the applicant or registrant.
- (c) Findings of fact and conclusions of law have been made on the record pursuant to the administrative procedures act of 1969, 1969 PA 306, MCL 24.201 to 24.328.

10. The Administrator may revoke Respondent's investment adviser representative registration pursuant to section 412(2) of the Securities Act, MCL 451.2412(2), because it is in the public interest, and because:

- A. Respondent willfully violated the Securities Act within the previous ten years by selling an unregistered security, accepting custody of client funds, and by misstating material facts in the offer and sale of a security, causing the applicability of section 412(4)(b), MCL 451.2412(4)(b);
- B. Respondent has been barred from association with any FINRA member pursuant to the FINRA AWC executed in July of 2016 (Exhibit 2), causing the applicability of section 412(4)(e)(i), MCL 451.2412(4)(e)(i);
- C. Respondent continues to impede the Bureau's examination or inspection of Wealth Management Group, Inc., a registered investment adviser, causing the applicability of section 412(4)(h), MCL 451.2412(4)(h);
- D. Respondent is the subject of a cease and desist order issued by a state securities regulator, causing the applicability of section 412(4)(l), MCL 451.2412(4)(l) (See Exhibit 3 – Notice & Order to Cease and Desist); and
- E. Respondent engaged in dishonest and unethical behaviors in the securities industry by offering and selling an unregistered security, contrary to section 301 of the Securities Act, MCL 451.2301; by accepting custody of client funds in



violation of section 411(6) of the Securities Act, MCL 451.2411; by misstating material facts, in violation of section 501 of the Securities Act, MCL 451.2501; and by engaging in an act, practice, or course of business that operated as a fraud upon another person, in violation of section 502 of the Securities Act, MCL 451.2502, causing the applicability of section 412(4)(m), MCL 451.2412(4)(m). (Refer to Exhibit 3 for details related to the dishonest and unethical behavior identified in this paragraph).

## II. ORDER.

The Administrator finds that this ORDER is authorized, appropriate, and in the public interest based on the above-cited facts and law.

IT IS ORDERED as follows:

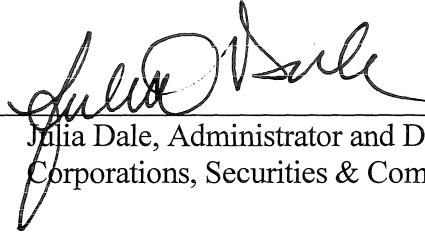
1. The Administrator intends TO REVOKE THE INVESTMENT ADVISER REPRESENTATIVE REGISTRATION OF LAWRENCE R. ROBERSON under section 412(2) of the Securities Act, MCL 451.2412(2), because he willfully violated the Securities Act; he continues to impede an examination or inspection of Wealth Management Group, Inc.; he is subject to a cease and desist order; and, because he engaged in dishonest and unethical behaviors in the securities industry, which support the revocation of his investment adviser representative registration under the above-cited provisions of the Michigan Uniform Securities Act (2002), 2008 PA 551, MCL 451.2101 *et seq.*

3. In accordance with sections 412(2) and 412(7) of the Securities Act, MCL 451.2412(2) and MCL 451.2412(7): This is NOTICE that the Administrator intends to commence administrative proceedings to REVOKE Respondent's investment adviser representative registration, and that Respondent has thirty (30) days after the date that this Order is served on Respondent to respond in writing to the enclosed Notice of Opportunity to Show Compliance. If the Administrator timely receives a written request, depending upon the election, the Administrator shall either promptly schedule a compliance conference, or schedule a hearing within fifteen (15) days after receipt of the written request. If you fail to respond to this Notice and Order within the time frame specified, the Administrator shall schedule a hearing. If a hearing is requested or ordered, the Administrator, after notice of and an opportunity for hearing to Respondent, may modify or vacate this Order or extend the Order until final determination.

**If Respondent requests a hearing, the request must be in writing and filed with the Department of Licensing and Regulatory Affairs, Corporations, Securities & Commercial Licensing Bureau, Regulatory Compliance Division, P.O. Box 30018, Lansing, MI 48909.**

DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS

By: \_\_\_\_\_



Julia Dale, Administrator and Director  
Corporations, Securities & Commercial Licensing Bureau