

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

In the matter of:

CHRISTOPHER ROUMAYEH
CRD# 4510051

Complaint No. 343041

Respondent.

Issued and entered
this 23rd day of June, 2021

ADMINISTRATIVE CONSENT AGREEMENT AND ORDER

A. Relevant information and statutory provisions, under the Michigan Uniform Securities Act (2002) (“Securities Act”), 2008 PA 551, MCL 451.2101 *et seq.*:

1. On February 3, 2021, the State of Michigan, Department of Licensing and Regulatory Affairs, Corporations, Securities & Commercial Licensing Bureau (“Bureau”) and the Director of the Bureau, who serves as Administrator of the Act (the “Administrator”), issued the following two orders (“Disciplinary Orders”), which are superseded by this Consent Agreement and Order:
 - a. A Notice and Order to Cease and Desist to Christopher Roumayeh;
and
 - b. A Notice of Intent to Revoke Investment Adviser Representative Registration to Christopher Roumayeh.

2. Christopher Roumayeh (“Respondent”) is an investment adviser representative associated with Capital Asset Advisory Services, LLC (“CAAS”), a federal covered investment adviser notice-filed in Michigan.
3. Following issuance of the Disciplinary Orders, the Bureau and Respondent (collectively, “the Parties”) engaged in settlement negotiations resulting in this Administrative Consent Agreement and Order (“Consent Order”).
4. Respondent consulted with or had ample opportunity to consult with legal counsel of his choosing before executing this Consent Order.

B. STIPULATION

The Parties agree to resolve the Disciplinary Orders based on the following terms:

1. Respondent neither admits nor denies the allegations made in the Disciplinary Orders and consents to entry of this Consent Order for the purpose of resolving the Disciplinary Orders in an expeditious fashion that avoids the time and expense associated with an administrative hearing and any related appeals.
2. Respondent’s registration as an investment adviser representative is suspended effective on the issued and entered date of this Consent Order. The Administrator will update Respondent’s registration status on the Central Registration Depository (“CRD”) to “suspended” effective on the issued and entered date of this Consent Order.

3. The suspension imposed by paragraph B.2 of this Consent Order will be in effect until the close of business on February 28, 2022, and may only be lifted by order of the Administrator after Respondent demonstrates compliance with the terms of this Consent Order to the Bureau's satisfaction. On or after March 1, 2022, Respondent may request in writing that the Administrator issue an order lifting the suspension. The written request to lift the suspension must include Respondent's name, complaint number (343041), and proof of payment of the fine imposed in paragraph B.4. The written request to lift the suspension may be mailed to:

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

Or by E-Mail to: LARA-CSCL-Securities-Audit@michigan.gov

4. Respondent must pay a civil fine in the amount of Five Thousand Dollars (\$5,000.00) within sixty (60) calendar days after the issued and entered date of this Consent Order. It must be paid by check or money order made payable to the "State of Michigan," contain identifying information (name and "Complaint No. 343041"), and be mailed to:

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

5. If any portion of the fine is overdue, the Administrator may refer it to the Michigan Department of Treasury for collection action against Respondent or take other available legal action to collect the fine. Respondent is responsible for all costs and expenses incurred in complying with the terms of this Consent Order and must do so within the timeframe specified. Failure to comply within the time limitations will constitute a violation of this Consent Order. The Administrator retains the right to pursue any action or proceeding permitted by law to enforce its provisions.
6. Respondent's Hearing Request is revoked without further action by the Parties. Following the issuance and entry of this Consent Order, the Bureau will file Forms U6 with the CRD reflecting the Parties' resolution of the Disciplinary Orders.
7. This matter is a public record required to be published and made available to the public, under section 11 of the Michigan Freedom of Information Act, MCL 15.241. The Bureau publishes copies of orders issued under the Act to its website and includes a summary of order content in monthly disciplinary action reports separately published there.
8. The Administrator may use any of the facts set out in the Disciplinary Orders when considering future applications for registration by Respondent, and Respondent agrees to waive any assertion or claim under MCL

451.2412(9) which would otherwise bar the Administrator from consideration of those facts in making her determination.

9. Respondent must comply with any reasonable investigative demands made by the Bureau in the future for purposes of ensuring compliance with this Consent Order or the Act.
10. Respondent waives any right to a hearing or appeal of this Consent Order and the Disciplinary Orders under the Act, the rules promulgated under the Act, the Administrative Procedures Act of 1969, 1969 PA 306, MCL 24.201 *et seq.*, or other applicable law.
11. This Consent Order is fully effective and binding on its issued and entered date. The Administrator may accept or reject it. If the Administrator rejects it, the Bureau will submit the Hearing Request for adjudication through a formal administrative proceeding. The Parties waive any objection to the Administrator remaining the final decisionmaker at the conclusion of that proceeding.
12. This Consent Order resolves only Respondents' activities, conduct, and Securities Act violations alleged in the Disciplinary Orders, but it does not address or resolve any other conduct or potential Securities Act violations engaged in by Respondents not expressly alleged in the Disciplinary Orders or occurring after the date this Consent Order is entered. Further, this Consent Order does not preclude any other individual or entity, including but

not limited to other authorized state or federal agencies or officials, from initiating or pursuing civil or criminal action against Respondents, and does not preclude Bureau staff from referring this matter to any law enforcement agency. The Consent Order does not preclude the Bureau or its staff from fully cooperating with any state or federal agency or official that may investigate or pursue its own civil or criminal enforcement against Respondents.

13. This Consent Order contains the entire understanding of the Parties; it supersedes and terminates all prior and contemporaneous representations, promises, agreements, understandings, and negotiations, whether oral or written, with respect to its subject matter. This Consent Order may only be modified in writing signed by each Party and approved by the Administrator's subsequent Order.
14. The Parties agree that facsimile or electronically transmitted signatures may be submitted in connection with this Consent Order and are binding on that party to the same extent as an original signature.

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writing signed by each Party and approved by the Administrator's subsequent Order.

14. The Parties agree that facsimile or electronically transmitted signatures may be submitted in connection with this Consent Order and are binding on that party to the same extent as an original signature.

[This space intentionally left blank]

Through their signatures, Respondents confirm that they read, understand, and agree to the above terms.

Signed: 
Dated: 6-15-2021
Christopher Roumayeh

Reviewed by:

Signed: _____

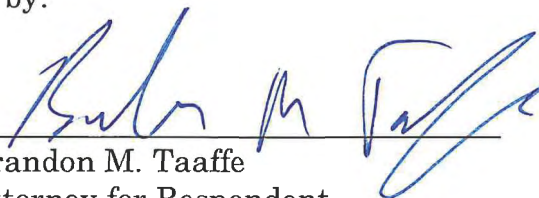
Dated:

Through their signatures, Respondents confirm that they read, understand, and agree to the above terms.

Signed: _____
Christopher Roumayeh


Dated: _____

Reviewed by:

Signed: 
Brandon M. Taaffe
Attorney for Respondent

Dated: 6-15-21

Approved on behalf of Bureau staff by:

Signed: 
Lindsay DeRosia
Securities & Audit Division Acting Director
Corporations, Securities & Commercial
Licensing Bureau

Dated: 6/16/21

C. ORDER

The Administrator NOW, THEREFORE, ORDERS:

THE TERMS AND CONDITIONS IN THE ABOVE FULLY EXECUTED
CONSENT AGREEMENT ARE INCORPORATED IN THIS CONSENT ORDER.

By: 
Linda Clegg
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 No. 343041

CHRISTOPHER M. ROUMAYEH
CRD# 4510051

Respondent.

_____ /

This 3rd day of February, 2021

Issued and entered

NOTICE AND ORDER TO CEASE AND DESIST

Linda Clegg, the Director (“Administrator”) of the Corporations, Securities, and Commercial Licensing Bureau (“Bureau”), 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 Christopher M. Roumayeh (“Respondent”) to cease and desist from making or causing to be made statements that are false or misleading in records to the Administrator, contrary to the Securities Act. Respondent is notified of the opportunity to request a hearing in this matter.

I. BACKGROUND

A. The Respondent

1. Christopher M. Roumayeh (CRD#4510051, “Respondent”) is registered as an investment adviser representative associated with Capital Asset Advisory Services, LLC (CRD/IARD#110929, “CAAS”), a federal covered investment adviser notice-filed in Michigan. Respondent was previously registered as an agent and an investment adviser representative associated with Merrill, Lynch, Pierce, Fenner & Smith Incorporated (CRD#7691, “ML”); he voluntarily resigned from ML in or around June of 2019 after ML began an internal review of Respondent’s activities.

B. Findings of Fact

1. The Bureau investigated Respondent's activities under the Securities Act after a Financial Industry Regulatory Authority ("FINRA") regulatory filing notified the Bureau of an Acceptance, Waiver, and Consent ("AWC") was entered wherein Respondent agreed to be suspended from association with any FINRA member.
2. Respondent agreed in the AWC to be suspended from association with any FINRA member from June 1, 2020 until February 28, 2022 because of allegations related to his association an undisclosed E-Sports business while employed by ML.
3. FINRA alleged, and Respondent neither admitted nor denied¹, that between 2014 and 2019 he failed to disclose outside business activities ("OBAs") involving an E-Sports team business, submitted false statements to ML regarding the OBAs, participated in a private securities transaction to raise capital for the OBAs without notifying or receiving permission from ML, and concealed his relationships with the OBAs by forming entities and establishing bank accounts in his spouse's name.
4. Respondent was the subject of an investigation by the Bureau in 2019 in relation to the OBAs and his regulatory disclosures. In connection with the investigation, Respondent made various representations to Bureau staff in correspondence dated October 4, 2019, including:

A. "Mr. Roumayeh did not participate in any capital raising and/or investment matters regarding [the E-Sports team]. Mr. Roumayeh did not solicit any investment(s) in [the E-Sports team] from clients and /or employees, or from any other individuals and/or entities."

B. "[Mr. Roumayeh] also did not participate in the formation of [the E-Sports team], or in any investment, borrowing and/or any other financial matters concerning [the E-Sports team].

C. "[The E-Sports team] was formed as an independent business venture solely between [ML Customer] and [Respondent's spouse]... Mr. Roumayeh did not have banking or check signing authority for [the E-Sports team], and did not pay any invoices or execute any other financial transactions for [the E-Sports team].

¹ Respondent, through counsel, stated in correspondence to the Bureau that the statements of fact in the AWC are accurate recitations of what occurred with respect to Respondent's OBAs.

5. The above representations quoted from the October 4, 2019 correspondence to the Bureau directly contradict the facts outlined in the FINRA AWC. Respondent has acknowledged through counsel in writing that the FINRA AWC is factually accurate. Specifically:

A. Respondent stated in October 2019 that he did not engage in any capital raising activities for the E-Sports team even though the FINRA AWC identifies that he did; the statement was not true at the time and was submitted in writing to the Bureau in connection with its investigation at the time.

B. Respondent stated in October 2019 that he did not participate in the formation of the E-Sports team or any financial matters on its behalf even though the FINRA AWC states that he did; the statement was not true at the time and was submitted in writing to the Bureau in connection with its investigation at the time.

C. Respondent stated in October 2019 that the E-Sports team venture was “solely” between a ML customer and Respondent’s spouse and that Respondent executed no financial transactions for the venture even though the FINRA AWC states that he did; the statement was not true at the time and was submitted in writing to the Bureau in connection with its investigation at the time.

II. RELEVANT STATUTORY PROVISIONS

1. Section 505 of the Securities Act, MCL 451.2505, states:

A person shall not make or cause to be made, in a record that is used in an action or proceeding or filed under this act, a statement that, at the time and in the light of the circumstances under which it is made, is false or misleading in a material respect, or, in connection with the statement, omit to state a material fact necessary to make the statement made, in the light of the circumstances under which it was made, not false or misleading.

III. CONCLUSIONS OF LAW

1. Respondent Christopher M. Roumayeh made or caused to be made multiple written statements that at the time and in light of the circumstances under which they were made were false and misleading in a material respect when he made multiple false statements regarding his participation in an E-Sports team Other Business Activity. The false statements Respondent submitted were in violation of section 505 of the Securities Act, MCL 451.2505.

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 filing false information with the Administrator, contrary to the Securities Act.
- B. Pursuant to section 604(2) of the Securities Act, MCL 451.2604(2) this Notice and Order to Cease and Desist is IMMEDIATELY EFFECTIVE.
- C. In a Final Order, the Administrator intends to impose a civil fine of \$10,000.00 against Respondent under section 604(4) of the Securities Act, MCL 451.2604(4).
- 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:

\$10,000.00 – Christopher M. Roumayeh, 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 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.

DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
CORPORATIONS, SECURITIES, AND COMMERCIAL LICENSING BUREAU



Linda Clegg, Director and Administrator
Corporations, Securities & Commercial Licensing Bureau

2/3/2021
Date

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

In the matter of:

Agency No. 343041

CHRISTOPHER M. ROUMAYEH
CRD# 4510051

Respondent.

_____ /

This 3rd day of February, 2021

Issued and entered

**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* ("Securities Act"):

1. Christopher M. Roumayeh (CRD#4510051, "Respondent") is registered as an investment adviser representative associated with Capital Asset Advisory Services, LLC (CRD/IARD#110929, "CAAS"), a federal covered investment adviser notice-filed in Michigan. Respondent was previously registered as an agent and an investment adviser representative associated with Merrill, Lynch, Pierce, Fenner & Smith Incorporated (CRD#7691, "ML"); he voluntarily resigned from ML in or around June of 2019 after ML began an internal review of Respondent's business activities.
2. The Corporations, Securities, and Commercial Licensing Bureau ("the Bureau") within the Michigan Department of Licensing and Regulatory Affairs routinely monitors disclosures made through the Financial Industry Regulatory Authority's ("FINRA") Central Registration Depository ("CRD"). One such disclosure related to Respondent and was filed by ML with respect to an internal review into Respondent's activities in the securities industry.
3. The Bureau's investigation developed evidence that Respondent, while employed as an agent and investment adviser representative of ML, engaged in an undisclosed outside business activity ("OBA"), intentionally withheld information about the OBA from ML, and that submitted false information to the Bureau in a prior investigation related to the OBA.
4. The Bureau previously requested information from Respondent on various topics associated with the OBA. The question topics included organization of entities

associated with the OBA, capital raising for the OBA, operations of and transactions for the OBA, among others. Respondent repeatedly denied his significant involvement with the OBA and stated that it was his spouse's business venture. These assertions were made in writing to the Bureau on or around October 4, 2019 and were false. Examples of false statements include:

A. "Mr. Roumayeh did not participate in any capital raising and/or investment matters regarding [the E-Sports team]. Mr. Roumayeh did not solicit any investment(s) in [the E-Sports team] from clients and/or employees, or from any other individuals and/or entities."

B. "[Mr. Roumayeh] also did not participate in the formation of [the E-Sports team], or in any investment, borrowing and/or any other financial matters concerning [the E-Sports team].

C. "[The E-Sports team] was formed as an independent business venture solely between [ML Customer] and [Respondent's spouse]... Mr. Roumayeh did not have banking or check signing authority for [the E-Sports team], and did not pay any invoices or execute any other financial transactions for [the E-Sports team].

5. Each of the representations in paragraphs I.4.A – I.4.C were false when they were made to the Bureau in June of 2019, and Respondent acknowledged¹ as much in an Acceptance, Waiver, and Consent ("AWC") with FINRA in or around May of 2020 which suspended him from association with any FINRA member:

A. Respondent stated in October 2019 that he did not engage in any capital raising activities for the E-Sports team even though the FINRA AWC identifies that he did; the statement was not true at the time and was submitted in writing to the Bureau in connection with its investigation at the time.

B. Respondent stated in October 2019 that he did not participate in the formation of the E-Sports team or any financial matters on its behalf even though the FINRA AWC states that he did; the statement was not true at the time and was submitted in writing to the Bureau in connection with its investigation at the time.

C. Respondent stated in October 2019 that the E-Sports team venture was "solely" between a ML customer and Respondent's spouse and that Respondent executed no financial transactions for the venture even though the FINRA AWC

¹ Respondent, through counsel, stated in correspondence to the Bureau that the statements of fact in the AWC are accurate recitations of what occurred with respect to Respondent's OBAs.

states that he did; the statement was not true at the time and was submitted in writing to the Bureau in connection with its investigation at the time.

6. Respondent, concurrent with the issuance of this Notice of Intent to Revoke Investment Adviser Representative Registration, is the subject of a Notice and Order to Cease and Desist for submitting false statements to the Administrator in violation of MCL 451.2505.
7. 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 it is authorized, appropriate, and in the public interest to revoke Respondent's investment adviser representative registration.
8. 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, suspend, condition, or limit 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...

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

A person may be disciplined under subsections (1) to (3) if any of the following apply to the person:

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

(iii) The securities and exchange commission or a self-regulatory organization suspending or expelling the registrant from membership in a self-regulatory organization.

(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...

10. 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.

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

- A. Respondent is the subject of an order issued by a self-regulatory organization suspending him from membership, causing the applicability of section 412(4)(e)(iii), MCL 451.2412(4)(e)(iii);
- B. 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); and
- C. Respondent engaged in dishonest or unethical behavior in the securities industry by being dishonest with his previous employer in regulatory filings and by submitting false information to the Bureau in written submissions during an investigation, causing the applicability of section 412(4)(m), MCL 451.2412(4)(m).

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:

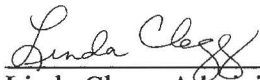
1. The Administrator intends to revoke the investment adviser representative registration of Christopher M. Roumayeh under section 412(2) of the Securities Act, MCL 451.2412(2), because he is subject to an order from a self-regulatory organization suspending him from membership; he is the subject of a cease and desist order issued by a state; and, because he engaged in dishonest or unethical business practices in the securities industry within the previous 10 years, all of which support the revocation of the investment adviser representative registration under the Michigan Uniform Securities Act (2002), 2008 PA 551, MCL 451.2101 *et seq.*

2. 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.

Requests for compliance conferences and hearings may be submitted by e-mail to CSCL-FOIA@michigan.gov.

DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
CORPORATIONS, SECURITIES, AND COMMERCIAL LICENSING BUREAU



Linda Clegg, Administrator and Director
Corporations, Securities & Commercial Licensing Bureau

2/3/2021
Date



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
LANSING

ORLENE HAWKS
DIRECTOR

**RESPONDENT'S NOTICE OF OPPORTUNITY TO SHOW COMPLIANCE
OR REQUEST A FORMAL HEARING DATE**

Dated: February 3, 2021

CHRISTOPHER ROUMAYEH
CRD #4510051

Agency No. 343041

Respondent.

_____/

You have been served with a Notice of Intent to Revoke Investment Adviser Representative Registration ("Order"), alleging that you violated the Michigan Uniform Securities Act (Act), 2008 PA 551, MCL 451.2101 *et seq.* The procedures in this matter will be governed by the Act; the Michigan Administrative Procedures Act, 1969 PA 306, MCL 24.201 *et seq.*; Michigan Office of Administrative Hearings and Rules Procedural Rules (MOAHR Rules), Part 1, R 792.10101 – R 792.10137, and Part 8, R 792.10801 – R 792.10809; and, any other applicable laws and rules.

If you admit to the alleged violations or are found responsible for violations after an administrative hearing, you will be subject to penalties provided for in the Act. The Order and associated disciplinary records are subject to disclosure and publication to the public in accord with Section 11 of the Michigan Freedom of Information Act, 1976 PA 442, MCL 15.241. Publication may include posting of the disciplinary record on the Department's website or in other reporting formats.

Pursuant to Section 92(1) of the Administrative Procedures Act, MCL 24.292(1), and the MOAHR Rules, you may choose one of the following opportunities regarding this Order:

- (a) Request in writing to meet with Department staff by telephone or video conference at a Compliance Conference to discuss the allegations in the Order, present evidence demonstrating compliance with the Act and the rules thereunder, and to discuss potential resolutions of the matter short of proceeding to a formal hearing. A resolution is not guaranteed to result from the Compliance Conference. Failure to reach a resolution at the Compliance Conference will result in the scheduling of a formal hearing before an administrative law judge.
- (b) Submit a written showing of compliance by within thirty (30) calendar days of the date of mailing of this Order and Notice.
- (c) Request a contested case hearing within thirty (30) calendar days of the mailing date of this Order and Notice.

LARA is an equal opportunity employer/program.
Auxiliary aids, services and other reasonable accommodations are available upon request to individuals with disabilities.

CORPORATIONS, SECURITIES & COMMERCIAL LICENSING BUREAU
P.O. BOX 30018• LANSING, MICHIGAN 48909
www.michigan.gov/lara

If you choose option (a), submit a written request and a Department staff will work with you and your attorney, if you have one, to schedule a date and time for the Compliance Conference. The Compliance Conference may be rescheduled if necessary at the discretion of the Department on a showing of good cause in a written request. A showing of compliance may be made in writing or by personal participation at the scheduled meeting. You have the right, at your own expense, to have an attorney represent you in this conference and/or in preparing a written response. The primary purpose of the conference is to afford you with an opportunity to discuss the Order in an attempt to resolve the matter. Any statements made, either in the written response or at the meeting, may be used as evidence against you at any later proceedings.

If a resolution short of the complete withdrawal of the Order is reached at the conference, a Stipulation or Consent Order may be prepared for your signature. The signed Stipulation or Consent Order will be submitted to the Administrator for acceptance or rejection. You will be notified as to whether the Administrator accepts or rejects the proposed resolution. If a resolution is not reached at the conference, the matter will proceed to a contested case hearing.

If you choose option (c), or you fail to respond to the Order within the time frame specified, the matter will be scheduled for a contested case hearing before an administrative law judge. You have the right, at your own expense, to have an attorney represent you at the hearing. Following the hearing, the administrative law judge will issue a Proposal for Decision. The Proposal for Decision will be forwarded to the Administrator for review and the issuance of a Final Order in this matter.

Please do not telephone our office to discuss the specifics of the Order. We cannot provide you with legal advice. You may contact cscl-foia@michigan.gov or (517) 241-9590 with procedural questions about the Order.

For your convenience, enclosed is a Compliance Conference Election Form to be completed and returned to this office indicating your selection. All correspondence should be addressed to:

Corporations, Securities & Commercial Licensing Bureau
Regulatory Compliance Division – Attn: Support & Scheduling Unit
P.O. Box 30018
Lansing, Michigan 48909.

You may also email the completed form to cscl-foia@michigan.gov.

The Department will request and schedule a contested case hearing if you fail to respond to this Order and Notice.

COMPLIANCE CONFERENCE ELECTION FORM
Agency No. 343041

I wish to:

- _____ Schedule a meeting to discuss the Order with Department staff.
- _____ Submit a written showing of compliance within thirty (30) days of the date of mailing of this Order and Notice.
- _____ Proceed directly to a contested case hearing in front of an administrative law judge.

Dates **unavailable** to attend conference/hearing: _____

If you fail to respond, attend the scheduled compliance conference or to request a contested case hearing within 30 calendar days, a contested case hearing will be requested and scheduled.

Printed Name

Phone No.

Email Address

Signature

Date

This form must be signed by the respondent or his/her attorney if an individual or sole proprietorship, or by an individual legally authorized to do so on behalf of the respondent if the respondent is a partnership, limited liability company (L.L.C.), or corporation.

Please do not telephone our office to discuss the specifics of the Order. We cannot provide you with legal advice. You may contact cscl-foia@michigan.gov or (517) 241-9590 with procedural questions about the Order.

Return this form and/or any written response to:

Corporations, Securities & Commercial Licensing Bureau
Regulatory Compliance Division
P.O. Box 30018
Lansing, Michigan 48909
Fax: (517) 241-0290
cscl-foia@michigan.gov