

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

In the matters of:

CREO GLOBAL CAPITAL, LLC,
CRD/IARD# 159771

Complaint No. 344387

and

PETER SAVARINO
CRD# 1656139

Complaint No. 344388

Respondents.

Issued and entered
this 22nd day of February, 2022

STIPULATION AND CONSENT ORDER
RESOLVING NOTICES AND ORDERS TO CEASE AND DESIST

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

1. On September 30, 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"):
 - a. A Notice and Order to Cease and Desist to Creo Global Capital, LLC.

b. A Notice and Order to Cease and Desist to Peter Savarino.

2. Respondents are not presently registered in any capacity under the Act. Peter Savarino is a resident of the state of Michigan who was registered as an investment adviser representative in Michigan through Creo Global Capital, LLC ("Creo"), a Michigan-registered investment adviser, until on or around January 1, 2021, when Creo and Peter Savarino failed to renew their registrations as investment adviser and investment adviser representative, respectively.
3. Following issuance of the Disciplinary Orders, the Bureau and Respondents (collectively, "the Parties") engaged in settlement negotiations through this Stipulation and Consent Order ("Consent Order").
4. Respondents consulted with or had an opportunity to consult with legal counsel of their choosing before executing the following Stipulation.

B. STIPULATION

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

1. Respondents neither admit nor deny any wrongdoing in connection with these matters and consent to the entry of this Consent Order only for the purpose of resolving the Disciplinary Orders in an expeditious fashion that avoids the time and expense associated with an administrative proceeding and any appeals.

2. Respondents agree to comply with the Act in connection with all future conduct and activities, including but not limited to ensuring that they are registered or exempt from registration when providing investment advice for compensation.

3. Respondents agree to pay a civil fine in the amount of one thousand Dollars (\$1,000.00) within 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 Nos. 344387 & 344388"), and be mailed to:

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

4. If any portion of the fine is overdue, the Administrator may refer it to the Michigan Department of Treasury for collection action against Respondents or take other available legal action to collect the fine.

5. Respondents retained an Independent Compliance Consultant acceptable to the Bureau to conduct a review of the adequacy of Creo's policies, systems, and procedures (written and otherwise) and to make recommendations to Creo and Peter Savarino to enhance their abilities to remain in compliance with the regulatory requirements of the Act, associated rules, and orders issued under the Act.

6. Respondents are responsible for enforcing the terms of their engagement with the Independent Compliance Consultant.

7. Respondents are responsible for all costs and expenses incurred in complying with the terms of this Consent Order and must do so within the timeframes specified. The Administrator retains the right to pursue any action or proceeding permitted by law to enforce its provisions.

8. Respondents will cooperate with the Independent Compliance Consultant in all respects, including by providing staff support if necessary. Respondents will place no restrictions on the Independent Compliance Consultant's communications with any Bureau staff and, upon request, will make available to Bureau staff all communications between and among the Independent Compliance Consultant and Respondents and all documents reviewed by the Independent Compliance Consultant in connection with his or her engagement. Once retained, Respondents may not terminate the relationship with the Independent Compliance Consultant without the Bureau's written approval. Respondents are not in and do not have an attorney-client relationship with the Independent Compliance Consultant and agree that they may not invoke the attorney-client privilege or other doctrine or privilege to prevent the Independent Compliance Consultant from transmitting any information, reports, or documents to the Bureau.

9. At the conclusion of the review, and no more than 45 days after the issued and entered date of this Consent Order, Respondents will direct the Independent Compliance Consultant to submit to the Bureau, at the address identified in Paragraph B.3 above, or to LARA-CSCL-Securities-Audit@michigan.gov to the

attention of Final Order Monitoring, a written Report, and a Proposed Client Notification letter.

10. The Report required by paragraph B.9 must address, at a minimum:

a. The adequacy of Respondents' policies, procedures, systems, and training regarding compliance with its regulatory obligations under the Act and its rules and orders;

b. a description of the review performed, and the conclusions reached;

c. the Independent Compliance Consultant's recommendations for modifications and additions to Respondents' policies, systems, procedures, and training; and

d. a written implementation statement, certified by Respondents, attesting to, containing documentation of, and setting forth the details of Respondents' implementation of the Independent Compliance Consultant's recommendations

11. The Proposed Client Notification letter required by paragraph B.9 must include:

a. A description of the Disciplinary Orders and this Consent Order;

b. a statement that fees were charged to the client while Respondents were not registered to provide advisory services, and that the clients may have legal rights under the Michigan Uniform Securities Act; and

c. a copy of Respondents' updated Form ADV, Parts 2, A and B.

12. A copy of the proposed Client Notification Letter required by paragraph B.9 must be provided to the Bureau before Respondents send it to all clients from whom investment advisory fees were collected from January 1, 2021, through the issued and entered date of this order. The Bureau will have ten business days to object to the proposed Client Notification. If the Bureau does not object, Respondents must send the correspondence to all advisory firm clients no later than 15 days after submitting the Proposed Notification to the Bureau.

13. Within 65 days of issued and entered date of this Consent Order, Respondents must submit to the Bureau at the address identified in Paragraph B.3, or to LARA-CSCL-Securities-Audit@michigan.gov to the attention of Final Order Monitoring, a certification that the Notification to Clients was mailed. The submission must include a list identifying each client to whom the notification was mailed and the method of delivery.

14. Respondents must also retain the Independent Compliance Consultant to conduct a follow-up review and submit a written Final Report to the Parties, including the Bureau. The Final Report must be submitted to the Bureau one year from the issued and entered date of this Consent Order. In the Final Report, the Independent Compliance Consultant must address Respondent's implementation of the recommendations made in the report required by paragraphs B.9 and B.10. The Final Report must be submitted to the Bureau at the address identified in paragraph

B.3 above, or to LARA-CSCL-Securities-Audit@michigan.gov to the attention of
Final Order Monitoring.

15. Upon written request showing good cause, the Bureau may extend any of
the procedural dates set forth above in writing.

16. Respondents' Hearing Requests are revoked without further action by the
Parties.

17. Following the issuance and entry of this Consent Order, the Bureau will
file Forms U6 with the Central Registration Depository reflecting the Parties'
resolution of the Disciplinary Orders.

18. 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.

19. The Administrator may use any of the facts set out in the Disciplinary
Orders when considering future applications for registration by Respondents, and
Respondents agree to waive any assertion or claim under MCL 451.2412(9) which
would otherwise bar the Administrator from consideration of such facts in making
her determination.

20. Respondents 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.

21. The Parties acknowledge and agree that the Administrator retains the right to pursue any action or proceeding permitted by law to enforce the provisions of this Consent Order.

22. Respondents waive 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.

23. 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 Requests for adjudication through a formal administrative proceeding.

24. This Consent Order resolves only Respondents' activities, conduct, and statutory violations alleged in the Disciplinary Orders, but it does not address or resolve any other conduct or potential statutory violations engaged in by Respondents not expressly contained 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 Respondent.


25. This Consent Order may only be modified in writing signed by each Party and approved by the Administrator's subsequent Order.

26. 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.

[The remainder of this page intentionally left blank.]

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


Signed:  _____ Dated: 2/10/22
Peter Savarino

Signed:  _____ Dated: 2/10/22
Creo Global Capital, LLC
By: Peter Savarino, its Managing Member

Approved by:

Signed: /s/ Lindsay DeRosia _____ Dated: 2/11/22
Lindsay B. DeRosia
Interim Securities & Audit Division Director
Corporations, Securities, and Commercial Licensing Bureau

Reviewed and Drafted by:

Signed:  _____ Dated: 2/11/2022
Michael Hill (P73084)
Aaron Levin (P81310)
Assistant Attorneys General
Attorneys for the Bureau

C. ORDER

The Administrator NOW, THEREFORE, ORDERS:

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

By: /s/ Linda Clegg

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

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

In the matter of:

Agency No. 344387

CREO GLOBAL CAPITAL, LLC
Unregistered, IARD#159771

Respondent.

_____ /

This 30th day of September, 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 Creo Global Capital, LLC (“Respondent”) to cease and desist from acting as an unregistered investment adviser, contrary to the Securities Act. Respondent is notified of the opportunity to request a hearing in this matter.

I. BACKGROUND

A. The Respondent

1. Creo Global Capital, LLC is a Michigan limited liability company which is not registered in any capacity under the Securities Act in Michigan. It was registered as an investment adviser until December 31, 2020 at which time it failed to renew its registration.

B. Findings of Fact

1. Bureau staff began an investigation of Respondent’s activities under the Securities Act in Michigan after Respondent failed to renew its registration as an investment adviser at the end of 2020, and failed to complete an application to re-register itself thereafter.

2. Bureau staff's investigation developed evidence that Respondent holds itself out to the public as an investment adviser by maintaining a public-facing website advertising investment advisory services to Michigan investors.
3. Respondent is not registered as an investment adviser and has failed to claim an exemption, exception, preemption, or exclusion justifying the failure to register.

II. RELEVANT STATUTORY PROVISIONS

1. Section 102(e) of the Securities Act, MCL 451.2102(e) defines "investment adviser", in part, as:

"Investment adviser" means a person that, for compensation, engages in the business of advising others, either directly 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 a part of a regular business, issues or promulgates analyses or reports concerning securities. The term includes a financial planner or other person that, as an integral component of other financially related services, provides investment advice to others for compensation as part of a business or that holds itself out as providing investment advice to others for compensation... (Emphasis added).

2. Section 403(1) of the Securities Act, MCL 451.2403(1), states:

A person shall not transact business in this state as an investment adviser unless the person is registered under this act as an investment adviser or is exempt from registration as an investment adviser under subsection (2).

3. 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 Creo Global Capital, LLC meets the definition of investment adviser under the Securities Act, is not registered as an investment adviser, and has failed to claim a relevant exemption from registration, in violation of MCL 451.2403(1).

IV. ORDER

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

Notice & Order to Cease & Desist
Creo Global Capital, LLC (CN 344387)

- A. Respondent shall immediately CEASE AND DESIST from acting as an unregistered investment adviser, 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 a Final Order, the Administrator intends to impose civil fines of \$10,000.00 against Respondent under MCL 451.2604(4). This Notice and Order to Cease and Desist may become final pursuant to Section VI, below.
- 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

By email: CSCL-FOIA@Michigan.gov

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:

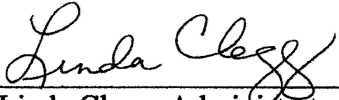
\$10,000.00 – Creo Global Capital, LLC, under section 604 of the Securities Act, MCL 451.2604.

- 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, Administrator and Director
Corporations, Securities & Commercial
Licensing Bureau

9/30/2021
Date