

STATE OF NEVADA
OFFICE OF THE SECRETARY OF STATE
SECURITIES DIVISION

2250 LAS VEGAS BOULEVARD NORTH, SUITE 400
NORTH LAS VEGAS, NEVADA 89030

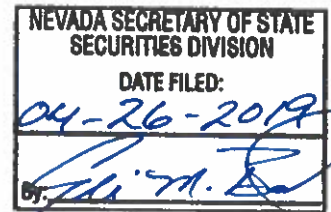
In the Matter of:

**GK WEALTH MANAGEMENT , LLC,
CRD No. 296847; and GRIFFIN MICHAEL
KIRSCH, CRD No. 6388640**

Respondents.

ADMINISTRATIVE CONSENT ORDER

File No. IA-2421



**TO: GK Wealth Management, LLC
c/o Griffin Kirsch, Chief Compliance Officer
1 East Liberty Street, Suite 505
Reno, NV 89501**

**Griffin Kirsch
1 East Liberty Street, Suite 505
Reno, NV 89501**

WHEREAS, GK Wealth Management, LLC, CRD No. 296847 ("GK Wealth"), has a pending application with the Securities Division of the Office of the Secretary of State ("Division") to be licensed as an investment adviser in Nevada;

WHEREAS Griffin Kirsch, CRD No. 6388640 ("Kirsch"), has a pending application with the Division to be licensed as the sole representative of an investment adviser for GK Wealth;

WHEREAS, during the application process the Division concluded that the licensing of Respondents should be subject to the limitations contained herein;

WHEREAS, as a condition to licensing, and for the purpose of approving GK Wealth's application to be licensed as an investment adviser and Kirsch's application to be licensed as a representative of an investment adviser, Respondents consent to the entry of this Administrative Consent Order ("Order"); and

WHEREAS, Respondents elect to permanently and expressly waive any right to a hearing and appeal under the Nevada Uniform Securities Act ("Act"), codified at Chapter 90 of

1 the Nevada Revised Statutes ("NRS"), and/or to seek judicial review under the Nevada
2 Administrative Procedures Act, NRS Chapter 233B, with respect to this Order.

3 **NOW THEREFORE**, the Administrator of the Division, pursuant to the Act, hereby
4 enters this Order:

5 **I.**

6 **FINDINGS OF FACTS**

7 1. On or about April 19, 2018, GK Wealth applied to be licensed as an investment
8 adviser.

9 2. On or about June 28, 2018, Kirsch applied to be licensed as a representative of an
10 investment adviser. Kirsch passed the required Uniform Combined State Law Examination,
11 commonly known as the Series 66, on November 7, 2014.

12 3. Limiting the licensing of Respondents is appropriate pursuant to NRS 90.420(1)
13 due to the fact that Kirsch has two prior disclosed events on his U4 and GK Wealth's initial
14 application contained unresolved inconsistencies which reflected a lack of understanding of
15 regulatory compliance issues.

16 4. The Division has proposed a supervision agreement as contained herein requiring
17 the engagement of an outside compliance firm as a condition to GK Wealth's licensing as an
18 investment adviser and Kirsch's licensing as a representative of an investment adviser, to which
19 Respondents have agreed.

20 **II.**

21 **CONCLUSIONS OF LAW**

22 1. The Division has jurisdiction over this matter pursuant to the Act, which authorizes
23 the Division to regulate any person acting as an investment adviser or a representative of an
24 investment adviser in Nevada. Specifically, NRS 90.420 allows the Division, through its
25 Administrator, to limit the activities that an applicant for licensing as an investment adviser or a
26 representative of an investment adviser may perform.

27 2. Limiting the activities of Respondents as set forth below is appropriate and in the
28 public interest.

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III.

ORDER

Finding the following appropriate and in the public interest, and on the basis of the Findings of Fact, Conclusions of Law, and Respondents' consent to the entry of this Order,

IT IS HEREBY ORDERED that GK Wealth's license as an investment adviser and Kirsch's license as a representative of an investment adviser is limited and conditioned on the following terms and conditions:

1. This Order will be effective until the Administrator finds good cause to withdraw this Order after Respondents' written request ("Supervisory Period"), which request shall not be made for at least a period of twenty-four (24) months following the date of Respondents' licensing approval.

2. At all times during the Supervisory Period, Respondents will hire and maintain an outside compliance consulting firm, which will initially be **LUXOR FINANCIAL GROUP** ("Compliance Firm"), who will provide the following consulting services to Respondents:

- a. monthly reviews of transaction blotters;
- b. real time reviews of each new account opened;
- c. review of GK Wealth's monthly financial statements and bank statements;
- d. review of correspondence and advertising; and
- e. on-site inspections of GK Wealth's place of business approximately every six (6) months.

3. The engagement with the Compliance Firm shall require such firm to prepare and submit to the Division within ten (10) business days after the end of each calendar month a written report describing the Compliance Firm's reviews and any issues noted.

4. The engagement with the Compliance Firm shall require such firm to provide written notice to the Division no later than ten (10) business days prior to termination of such engagement. If the engagement with the Compliance Firm terminates, and a new Compliance Firm is not selected and approved by the Division within 30 days of notification, the Division may summarily suspend Respondents' licenses unless Respondents engage a successor

1 Compliance Firm acceptable to the Division to perform the consulting services required by the
2 Order.

3 5. Respondents shall provide the Division with copies any written customer
4 complaints within ten (10) business days of receipt along with an explanation of the facts and
5 circumstances surrounding such complaints (including Respondents' position in response
6 thereto) should Respondents choose to provide such explanation. The Administrator may
7 summarily suspend Respondents' licenses after receiving notice of a customer complaint and
8 considering Respondents' explanation, if provided by Respondents.

9 6. Any notice or report required to be sent to the Division pursuant to the terms of
10 this Order should be sent to:

11 Bonnie Moore
12 Chief Investigator, Compliance/Audit
13 Nevada Secretary of State
14 Securities Division
15 555 E Washington Avenue, Suite 5200
16 Las Vegas, NV 89101

17 8. This Order shall be effective as of the date on which it is signed by the
18 Administrator as set forth below.

19 DATED this 1st day of APRIL, 2019.

20 **BY ORDER OF THE ADMINISTRATOR**
21 Securities Division, Office of the Secretary of State

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23 ERIN HOUSTON
24 Securities Administrator
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Griffin Michael Kirsch represents that no promise of any kind or nature, other than the consideration set forth in this Order, was made to him to induce him to enter into this Order and that he has entered into this Order voluntarily.

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2 **CONSENT TO ENTRY OF ADMINISTRATIVE ORDER**

3 GK Wealth Management, LLC ("GK Wealth"), by and through its authorized
4 representative, hereby acknowledged that he has been served with a copy of the attached Order,
5 has read the foregoing Order, is aware of its rights to a hearing and appeal in this matter, and has
6 waived the same.

7 GK Wealth, by and through its authorized representative, specifically acknowledges that
8 a violation of this Order may constitute grounds for taking additional regulatory action.

9 GK Wealth, by and through its authorized representative, admits the jurisdiction of the
10 Securities Division of the Office of the Secretary of State ("Division") and consents to entry of
11 this Order by the Administrator of the Division.

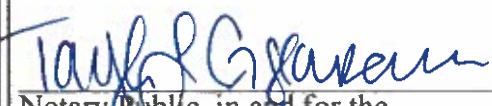
12 GK Wealth, by and through its authorized representative, represents that no promise of
13 any kind or nature, other than the consideration set forth in this Order, was made to it to induce it
14 to enter into this Order and that it has entered into this Order voluntarily.

15 Griffin Michael Kirsch represents that he is the authorized representative of GK Wealth
16 and that as such, he has been authorized by GK Wealth to enter into this Order for and on behalf
17 of GK Wealth.

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19 GK Wealth Management, LLC

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21 
22 By: Griffin Michael Kirsch,
Chief Compliance Officer

23 Subscribed and sworn to before me
24 On this 1st day of APRIL, 2019

25 
26 Notary Public, in and for the
27 County of Washoe, State of Nevada
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