

STATE OF NEVADA
OFFICE OF THE SECRETARY OF STATE
SECURITIES DIVISION
555 EAST WASHINGTON AVE., SUITE 5200
LAS VEGAS, NEVADA 89101

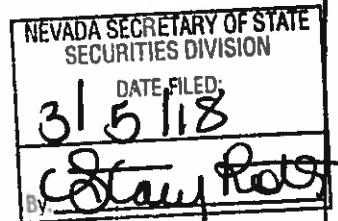
In the Matter of:

**STEVE SUSOEFF, LLC, D/B/A
MERITAGE FINANCIAL GROUP,
CRD No. 147070,**

Respondent.

ADMINISTRATIVE CONSENT ORDER

File No. CI16-013



**TO: Steve Susoeff, LLC, d/b/a Meritage Financial Group
c/o Steven J. Susoeff, CCO
2904 West Horizon Ridge Parkway, Suite 120
Henderson, Nevada 89052**

WHEREAS, Steve Susoeff, LLC, doing business as Meritage Financial Group ("Respondent"), CRD No. 147070, has been licensed in the State of Nevada as an investment adviser since May 28, 2008;

WHEREAS, pursuant to the authority provided in Nevada Revised Statutes ("NRS") 90.410, the Securities Division of the Office of the Nevada Secretary of State ("Division") conducted an inspection of Respondent's records to determine compliance with the Nevada Uniform Securities Act ("Act"), codified at NRS Chapter 90, and the regulations adopted thereunder and codified in Chapter 90 of the Nevada Administrative Code ("NAC");

WHEREAS, based on the facts and circumstances revealed during the course of this inspection, the Division has concluded that Respondent failed to file the required annual updating amendments to the Form ADV for the fiscal years ending December 31 of 2011 and 2013 and was late in filing the required annual updating amendments to the Form ADV for fiscal years ended December 31 of 2012 and 2015;

WHEREAS, pursuant to the Act and the regulations adopted thereunder, Respondent is charged with complying with all applicable requirements while engaged in any securities related business in or from the State of Nevada;

WHEREAS, Respondent has cooperated with the Division's inspection by responding to inquiries, and providing documentary evidence;

WHEREAS, Respondent advised the Division of its agreement to resolve the aforementioned violations on the terms specified in this Administrative Consent Order (“Order”);

WHEREAS, Respondent elects to permanently and expressly waive any right to a hearing and appeal under the Act and/or to seek judicial review under the Nevada Administrative Procedures Act, codified in NRS Chapter 233B, with respect to this Order; and

WHEREAS, Respondent consents to the entry of this Order solely for the purpose of terminating the Division's inspection and in settlement of the issues contained in this Order.

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

I.

FINDINGS OF FACTS

1. Respondent has been licensed with the State of Nevada as an investment adviser since May 28, 2008, with a principal place of business located at 2904 West Horizon Ridge Parkway, Suite 120, Henderson, Nevada.

2. On or about February 11, 2016, the Division initiated an inspection of Respondent's records pursuant to NRS 90.410.

3. At the time of the inspection, Respondent failed to file its annual updating amendments to the Form ADV for the fiscal years ending December 31 of 2011 and 2013. Furthermore, Respondent filed the required annual updating amendment to the Form ADV for fiscal year ending December 31 of 2012 on July 9, 2013, and filed such required annual amendment for fiscal year ending December 31 of 2015 on July 27, 2016.

4. The Administrator of the Division further finds that this Order is in the public interest.

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II.

CONCLUSIONS OF LAW

1. The Division has jurisdiction over this matter pursuant to the Act, which authorizes the Division to regulate any person acting as an investment adviser. Specifically, NRS 90.420 allows the Division, through its Administrator, to take action against the Respondent for failing to comply with the provisions of the Act or the regulations adopted thereunder.

2. NAC 90.380(3) provides: "Within 90 days after the end of the fiscal year, an investment adviser must file an updated Form ADV with the Administrator in the manner set forth in NAC 90.3293."

3. Respondent violated NAC 90.380(3) by failing to file the required annual updated amendments to the Form ADV for fiscal years ending in December 31 of 2011 and 2013. Furthermore, Respondent violated NAC 90(3) by failing to timely file the required annual updating amendments to the Form ADV for fiscal years ended December 31 of 2012 and 2015.

4. NRS 90.420(1)(b) provides, in part, that the Administrator of the Division may, by order, fine an investment adviser if such order is in the public interest and such investment adviser "[h]as violated or failed to comply with a provision of this chapter as now or formerly in effect or a regulation or order adopted or issued under this chapter[.]"

III.

ORDER

On the basis of the Findings of Facts, Conclusions of Law, and Respondent's Consent to the entry of this Order,

IT IS HEREBY ORDERED:

1. Respondent will cease violating the Nevada Uniform Securities Act and will comply with said Act.

2. Respondent shall comply with NAC 90.380(3) by timely filing the required annual updated amendments to the Form ADV within ninety (90) days of Respondent's fiscal year.

1 3. Respondent shall pay the Nevada Secretary of State, on or before this Order is
2 executed, a civil penalty in the amount of One Thousand Dollars and No Cents (\$1,000.00).

3 4. In addition, Respondent shall pay the Nevada Secretary of State, on or before this
4 Order is executed, the sum of Eight Hundred Fifteen Dollars and Fifty-Four Cents (\$815.54) for
5 its fee for the inspection of records performed under NRS 90.410.

6 5. In consideration, the Division will not pursue any further action, other than as set
7 forth in this Order against Respondent in connection with the subject matter of this Order.

8 6. Nothing in this Order shall be construed as a waiver of the Division's right to
9 investigate and pursue any violations by Respondent in connection with any action other than the
10 actions as set forth herein.

11 7. This Order shall be effective as of the date on which it is signed by the
12 Administrator as set forth below.

13 DATED this 5th day of March, 2018.

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15 **BY ORDER OF THE ADMINISTRATOR**
16 Securities Division, Office of the Secretary of State

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19 DIANA J. FOLEY
20 Securities Administrator
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(“Respondent”), by and through its authorized representative, hereby acknowledges that it has been served with a copy of this Administrative Consent Order (“Order”), has read the foregoing Order, is aware of its rights to a hearing and appeal in this matter, and has waived the same.

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

**STEVE SUSOEFF, LLC, d/b/a
MERITAGE FINANCIAL GROUP**

Subscribed and sworn to before me
On this 5 day of MARCH, 2018.

Finer

