

**STATE OF NEVADA**  
**OFFICE OF THE SECRETARY OF STATE**  
**SECURITIES DIVISION**  
**2250 N. LAS VEGAS BOULEVARD, 4<sup>TH</sup> FLOOR**  
**NORTH LAS VEGAS, NEVADA 89130**

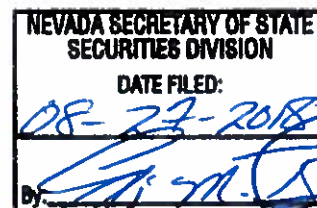
In the Matter of:

MWF Consulting Solutions, LLC, CRD No.  
173857 and Christopher Bennett, CRD No.  
5743257),

Respondents.

ADMINISTRATIVE CONSENT ORDER

File No. CI16-132



TO: Christopher Bennett  
1150 Hideout Way  
Henderson, Nevada 89052

MWF Consulting Solutions, LLC  
c/o Christopher Bennett, Registered Agent  
1150 Hideout Way  
Henderson, Nevada 89052

WHEREAS, Respondent MWF Consulting Solutions, LLC, CRD No. 173857 ("MWF"), was first licensed as an investment adviser in the State of Nevada on or about March 9, 2015;

WHEREAS, Respondent Christopher Bennett, CRD No. 5743257 ("Bennett,") (collectively "Respondents" with MWF hereinafter), was licensed as a representative investment adviser for MWF in the State of Nevada on or about March 9, 2015;

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

WHEREAS, Respondents failed to produce documentation and files requested pursuant to NRS 90.410;

WHEREAS, a Complaint for Summary Order and Final Order Revoking Licenses was filed on March 30, 2018, naming Respondents' and seeking a Summary Order Revoking Licenses;

**WHEREAS, a Notice of Summary Order Revoking Licenses Pursuant to NRS 90.420 and Opportunity for Hearing Pursuant to NRS 90.800 and Summary Order was filed on March 13, 2018;**

**WHEREAS, Respondents requested a hearing within forty-five (45) days of receiving the Notice of Summary Order Revoking Licenses Pursuant to NRS 90.420 and Opportunity for Hearing Pursuant to NRS 90.800 and Summary Order;**

**WHEREAS, Respondents produced all information requested by the Division pursuant to NRS 90.410 and made the same available for inspection by the Administrator;**

**WHEREAS, the Administrator noted that there were no deficiencies or violations of the applicable provisions of the Nevada Revised Statutes or Nevada Administrative Code;**

**WHEREAS, Respondents have advised the Division of their agreement to resolve the above-referenced violations and to comply with the requirements in the State of Nevada on the terms specified in this Administrative Consent Order ("Order"); and**

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

I.

## FINDINGS OF FACT

1. MWF, was first licensed as an investment adviser in the State of Nevada on or about March 9, 2015.

2. Bennett was first licensed as a representative of an investment adviser for MWF in the State of Nevada on or about March 9, 2015.

3. The Division issued a request to inspect the records of both Bennett and MWF pursuant to NRS 90.410 on or about September 16, 2016. This request was sent via standard US Mail to the address that was then on file with the Division, 2552 Hitchcock Street, Henderson, Nevada 89052. This letter was returned to the Division as undeliverable with no forwarding address on or about September 6, 2016.

4. On or about September 7, 2016, the Division contacted Bennett personally, who informed the Division that he had moved to 1150 Hideout Way, Henderson, Nevada 89052. Bennett

1 advised the Division that he intended to close the firm, MWF, due to lack of revenue. The Division  
2 informed Bennett that a firm withdrawal would not be approved while an active inspection file  
3 remained open.

4 5. On or about December 16, 2016, the Division sent another letter requesting records  
5 from Respondents Bennett and MWF pursuant to NRS 90.410 at 1150 Hideout Way, Henderson,  
6 Nevada 89052. Respondents failed to reply to the Division.

7 6. On or about July 11, 2017, investigators for the Division visited Respondents at the  
8 1150 Hideout Way location. No one answered the door upon knocking. The Division investigators  
9 left a business card for Respondents but Respondents failed to reply to the same.

10 7. Respondents thereafter failed to contact the Division at any point and failed to submit  
11 to an inspection.

12 8. On or about January 5, 2018, Respondent Bennett was approved in the Division to act  
13 as an investment adviser representative for De Groote Financial Group, LLC.

14 9. Based on the facts and circumstances set forth in paragraphs 1-7, the Respondents  
15 initially failed to comply with the requirements set forth in NRS 90.410, requiring all investment  
16 advisers to make their records available and known to the Administrator for inspection.

17 10. On or about March 30, 2018, the Division filed and served a Complaint for Summary  
18 Order and Final Order Revoking Licenses, which was served properly on Respondents and a  
19 representative of De Groote Financial Group, LLC. Respondents did not respond to the Division,  
20 although records maintained by CRD reflect that Respondent Bennett was terminated by De Groote  
21 Financial Group, LLC, effective March 30, 2018.

22 11. On or about April 13, 2018, the Division filed and served a Notice of Summary Order  
23 Revoking Licenses pursuant to NRS 90.420 and Opportunity for Hearing pursuant to NRS 90.800 and  
24 Summary Order on Respondents.

25 12. Bennett requested a hearing for Respondents within forty-five (45) days of receiving  
26 the Notice of Summary Order Revoking Licenses Pursuant to NRS 90.420 and Opportunity for  
27 Hearing Pursuant to NRS 90.800 and Summary Order.  
28

1 13. Bennett agreed to enlarge the time for hearing in a Stipulation to Enlarge Time for  
2 Hearing On Summary Order Revoking License pursuant to NRS 90.420, which provided that the  
3 hearing date on the underlying Complaint would be August 22, 2018 at 10:00 a.m.

4 14. On or about May 8, 2018, Respondents provided all documents and records requested  
5 by the Division pursuant to NRS 90.410 and made the same available for inspection by the  
6 Administrator or her designated employees.

7 15. On or about August 21, 2018, Respondents executed an additional Stipulation to  
8 Enlarge Time for Hearing On Summary Order Revoking License pursuant to NRS 90.420, which  
9 provided that the hearing date on the underlying Complaint would be continued to October 24, 2018  
10 at 10:00 a.m.

11 16. The Division, upon review of the documents and records provided by the Respondents,  
12 noted no deficiencies in the same.

13 17. Respondents elect to permanently and expressly waive any right to a hearing and appeal  
14 under the Act and/or to seek judicial review under the Nevada Administrative Procedures Act, codified  
15 in NRS Chapter 233B, with respect to this Order.

## 16 II.

### 17 CONCLUSIONS OF LAW

18 1. The Division has jurisdiction over this matter pursuant to the Act, which authorizes the  
19 Division to regulate any entity or person acting as an investment adviser or investment adviser  
20 representative. Specifically, NRS 90.630 allows the Division, through its Administrator, to take action  
21 against an investment adviser or investment adviser representative if either violates any provision of  
22 Act or any regulation adopted under said Act.

23 2. Pursuant to NRS 90.420(1), the Administrator of the Division may revoke a license  
24 of an investment adviser or a representative of an investment adviser if the Administrator finds that  
25 revocation is in the public interest and the investment adviser "(b) has violated or failed to comply  
26 with a provision of this chapter as now or formerly in effect or a regulation or order adopted or issued  
27 under this chapter."  
28

1           3.     Up and until May 2018, Respondents failed to comply with the requirements set forth  
2 in NRS 90.410, which requires all investment advisers and representatives of investment advisers to  
3 make their records available to the Administrator for examination. Specifically, Respondents failed  
4 to respond to requests to review Respondents' records and files despite numerous requests from the  
5 Division. Therefore Respondents violated the Act and MWF's license as an investment adviser and  
6 Bennett's license as a representative of an investment adviser are subject to revocation pursuant to  
7 NRS 90.420(1)(b).

8           4.     The Division has jurisdiction over this matter pursuant to the Act which authorizes the  
9 Division to regulate the business activities of investment advisers and investment adviser  
10 representatives acting in the State of Nevada.

11                               **III.**

12                               **ORDER**

13           Finding the following appropriate and in the public interest, and on the basis of the Findings  
14 of Facts, Conclusions of Law, and Respondent's consent to the entry of this Order,

15           **IT IS HEREBY ORDERED:**

16           1.     Respondents shall cease from violating the Act, and the regulations adopted thereunder,  
17 and shall comply with said Act and regulations in the future.

18           2.     Respondents shall pay the Nevada Secretary of State a civil penalty in the total amount  
19 of Seven Thousand Dollars and No Cents (\$7,000.00) and the fee for the Division's inspection of  
20 records performed pursuant to NRS 90.410 in the amount of One Thousand Dollars and No Cents  
21 (\$1,000.00) as follows:

22           a.     On or before the entry of this Order, the sum of Five Hundred Dollars (\$500.00) shall  
23 be paid in the form of a cashier's check, made payable to the Nevada Secretary of State  
24 and shall be hand delivered to the Division.

25           b.     The balance of the civil penalty and inspection fee shall be paid in the form of a  
26 cashier's check, made payable to the Nevada Secretary of State, and shall be hand  
27 delivered to the Division on the following dates: October 1, 2018; November 1, 2018;  
28 December 1, 2018; January 1, 2019; February 1, 2019; March 1, 2019; April 1, 2019;

May 1, 2019; June 1, 2019; July 1, 2019; August 1, 2019; September 1, 2019; October 1, 2019; November 1, 2019; December 1, 2019.

3. Bennett shall immediately file a Notice of Withdrawal from Registration as an Investment Adviser (Form ADV-W) with the appropriate regulatory agencies for MWF.

4. Upon completion of the payment of the above civil penalty and inspection fee and in consideration of the Respondents' consent to entry of this Order, the Division will close this matter and not pursue any further administrative proceedings or charges in connection with the above facts.

5. Upon receipt of both the Notice of Withdrawal from Registration as an Investment Adviser (Form ADV-W) for MWF and the civil penalties and fees, and a completed, accurate application for licensing as a representative of an investment adviser the Division will allow Bennett to seek licensing as an investment adviser representative for De Groote Financial Services, LLC. The instant Order shall not be a disqualifying event.

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

7. If Respondents fail to comply with this Order, the Division shall proceed with its administrative proceedings and take any and all appropriate action regarding the Respondents, including action regarding the above facts. In addition, Respondents shall have no claim or refund of any civil penalty or inspection fee payments previously made.

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

DATED this 23<sup>rd</sup> day of August, 2018.

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

  
DIANA J. FOLEY  
Deputy Secretary for Securities  
Securities Administrator

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MWF, by and through an Authorized Representative, admits the jurisdiction of the Securities Division of the Nevada Office of the Secretary of State and consents to entry of this Order by the Administrator of the Division as settlement of the issues contained within this Order.

Christopher Bennett represents that he is the Authorized Representative of MWF and that as such, has been authorized by MWF to enter into this Order for and on behalf of MWF.

  
CHRISTOPHER BENNETT  
Title:

M. F. Gonzalez  
Notary Public, in and for the  
County of Clark, State of Nevada.




1                                    **CONSENT TO ENTRY OF ADMINISTRATIVE ORDER**

2            Christopher Bennett, CRD No. 574257 ("Bennett"), hereby acknowledges that he has been  
3 served with a copy of this Administrative Consent Order ("Order"), has read the foregoing Order, is  
4 aware of his rights to a hearing and appeal in this matter, and has waived the same.


5            Bennett admits the jurisdiction of the Securities Division of the Nevada Office of the Secretary  
6 of State and consents to entry of this Order by the Administrator of the Division as settlement of the  
7 issues contained within this Order.

8            Bennett states that no promise of any kind or nature, other than the consideration set forth in  
9 the Order, was made to it to induce him to enter into this Order and that it has entered into this Order  
10 voluntarily.

11  
12                                    CHRISTOPHER BENNETT

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14                                      
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17            Subscribed and sworn to before me  
18            On this 22 day of August, 2018

19              
20            Notary Public, in and for the  
21            County of Clark, State of Nevada.

