

SEP 04 2018

STATE OF NEVADA
OFFICE OF THE SECRETARY OF STATE
SECURITIES DIVISION

SECURITIES DIVISION

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

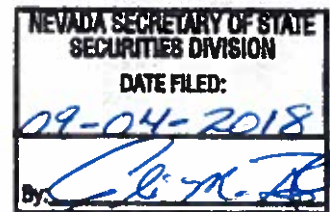
In the Matter of:

G.F. INVESTMENT SERVICES, LLC,
CRD No. 132939;

Respondent.

ADMINISTRATIVE CONSENT ORDER

File No. 114-275



TO: G.F. Investment Services, LLC
c/o Lewis Dellarco, Jr., Chief Compliance Officer
501 N. Cattlemen Road, Suite 106
Sarasota, FL 34232

WHEREAS, G.F. Investment Services, LLC ("Respondent"), CRD No. 132939, is a Florida-based broker-dealer firm licensed with the Securities Division of the Office of the Nevada Secretary of State ("Division") since June 20, 2006;

WHEREAS, pursuant to the authority provided in Nevada Revised Statutes ("NRS") 90.620, the Division initiated an investigation to ensure 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, based on the facts and circumstances revealed during the course of the Division's investigation, Respondent failed to comply with NAC 90.392, which requires the licensing of all branch offices in the State of Nevada;

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 investigation by responding to inquiries and providing documentary evidence;

...

WHEREAS, Respondent has advised the Division of its agreement to resolve the above failures to comply with the requirements in the State of Nevada on the terms specified in this Administrative Consent Order (“Order”); and

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.

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

I.

FINDINGS OF FACT

1. Ricardo Cabrera, CRD No. 5632596 ("Cabrera"), was licensed with the Division as a sales representative of Respondent on October 15, 2013.

2. According to information maintained electronically by the Financial Industry Regulatory Authority (“FINRA”) Central Registration Depository (“CRD”), Cabarera transacted business as a sales representative at Respondent’s branch office, located at 11201 S. Eastern Avenue, Suite 100, Henderson, Nevada 89052, CRD No. 546232 (“Eastern Avenue Location”), which was licensed as a branch office on September 26, 2013.

3. Cabrera was thereafter concurrently licensed with the Division as a representative of an investment adviser of Wittman Capital Management Investment & Estate Counsel, LLC, CRD No. 151676 ("WCM"), on June 5, 2014, whose principal office and place of business is the Eastern Avenue Location.

4. WCM also has another office located at 9300 Sun City Boulevard, Suite 105, Las Vegas, Nevada 89134 (“Sun City Location”). According to WCM’s websites, www.brianwittman.com and www.wittmancapital.com, starting in July 2014 and continuing through December 2017, Cabrera was identified as the “Managing Director – Summerlin,” with the Sun City Location address listed.

5. In addition to performing services in his capacity as a representative of an investment adviser of WCM at the Sun City Location, Cabrera transacted business on behalf of Respondent from the Sun City Location from approximately July of 2014 through December of 2017.

6. According to information maintained electronically in CRD, the Sun City Location is not and was never licensed as a branch office of Respondent.

7. Cabrera voluntarily terminated his employment with Respondent on December 31, 2017, and Respondent closed the branch office at the Eastern Avenue Location as of the same date.

II.

CONCLUSIONS OF LAW

1. The Division has jurisdiction over this matter pursuant to the Act, which authorizes the Division to regulate an entity or person acting as a broker-dealer. Specifically, NRS 90.630 allows the Division, through its Administrator, to take action against a person if it violates any provision of the Act or any regulation adopted or issued under said Act.

2. NRS 90.360(3) defines a “branch office” as “any place of business in this State other than the principal office in the state of the broker-dealer, from which one or more sales representatives transact business.” Similarly, NAC 90.027 defines a “branch office” as “any place of business in this State other than the principal office in this State of the broker-dealer, from which one or more sales representatives transact business.”

3. NAC 90.392 requires a broker-dealer to obtain a license from the Division for all branch office locations.

4. Respondent has violated NAC 90.392 by maintaining the Sun City Location as a branch office in the State of Nevada without obtaining a license from the Division for the period commencing approximately July of 2014 through December of 2017.

III.

ORDER

Finding the following appropriate and in the public interest, and 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 from violating the Act, and the regulations adopted thereunder, and will comply with said Act and regulations in the future.

2. Respondent shall obtain a license as a branch office for any and all places of business in the State of Nevada from which one or more sales representatives transact business in accordance with NAC 90.392.

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

4. In addition, Respondent shall pay the Nevada Secretary of State, on or before this Order is executed, the fee for the Division's investigative costs pursuant to NRS 90.630 in the amount of Six Hundred Forty-Seven Dollars and Twenty-Five Cents (\$647.25).


5. In consideration, the Division will take no further enforcement action based upon the circumstances covered by this investigation and this Order and close its administrative investigation of Respondent in connection with the aforementioned activities.

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

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

DATED this 4th day of September, 2018.

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


DIANA J. FOLEY
Securities Administrator

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

By: 2 Kelly
Authorized Representative

On this 28th day of August, 2018

Allen M. Hummer
Notary Public, in and for the County of
Sarasota, State of FL

