

1 STATE OF CALIFORNIA
2 BUSINESS, TRANSPORTATION AND HOUSING AGENCY
3 DEPARTMENT OF CORPORATIONS

4 TO: Alex Lewis
5 Karis Brokerage, Inc.
6 1313 N. Grand Avenue, Ste. 342
7 Walnut, California 91789

8 **DESIST AND REFRAIN ORDER**

9 **(For violations of section 25401 of the Corporations Code)**

10 The California Corporations Commissioner finds that:

11 1. At all relevant times herein, Karis Brokerage, Inc. (“Karis”), a California corporation,
12 which was formed in September 2002 was located at 1313 N. Grand Avenue, Suite 342, Walnut,
13 California 91789.

14 2. At all relevant times herein, Alex Lewis (“Lewis”) was the President and owner of
15 Karis.

16 3. Beginning in around March 2006 and continuing through at least October 2006,
17 Lewis and Karis offered and sold securities in the form of investment contracts in a private offering
18 in Karis to at least two investors totaling over \$350,000. Lewis obtained investor money from those
19 who shared his same religious beliefs and took advantage of this affinity.

20 4. Lewis and Karis gave at least one investor a private offering confirmation stating that
21 in consideration for the \$300,000 investment the investor received 7 years shared equity in a real
22 estate and business portfolio consisting of apartments, 1-4 unit residences, commercial projects and
23 associated businesses. Lewis and Karis told this investor that he would receive his principal back at
24 the end of two years and a total of \$5 million at the end of five years.

25 5. In connection with the offer and sale of these securities, Lewis and Karis made, or
26 caused to be made, misrepresentations of material fact or omitted to state material facts necessary in
27 order to make the statements made, in the light of the circumstances under which they were made, not
28 misleading. These misrepresentations and omissions included, but are not limited to the following:

a. Investors were told that their money would be used for real estate investments;

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- b. Investors were not told that Lewis was using investor money for his own personal use; and
- c. Investors were not told that Lewis and Karis were engaging in a ponzi scheme by returning some money to investors from other investor money.

The California Corporations Commissioner is of the opinion that the securities offered and sold by Lewis and Karis were offered and sold in this state by means of written or oral communications that included untrue statements of material fact or omitted to state material facts necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, in violation of section 25401 of the Corporate Securities Law of 1968.

Pursuant to Section 25532 of the Corporate Securities Law of 1968, Alex Lewis and Karis Brokerage, Inc. are hereby ordered to desist and refrain from offering or selling or buying or offering to buy any security in the State of California, including, but not limited to, investment contracts in the form of a private offering in Karis by means of any written or oral communication which includes an untrue statement of a material fact or omits to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading.

This Order is necessary, in the public interest, for the protection of investors and consistent with the purposes, policies, and provisions of the Corporate Securities Law of 1968.

Dated: April 15, 2009
Los Angeles, California

PRESTON DuFAUCHARD
California Corporations Commissioner

By _____
ALAN S. WEINGER
Acting Deputy Commissioner
Enforcement Division