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STATE OF CALIFORNIA
BUSINESS, TRANSPORTATION AND HOUSING AGENCY
DEPARTMENT OF CORPORATIONS

TO: Rameon Michael Witt, a.k.a. Ray M. Witt, President and CEO
R. Witt & Company, LLC
10940 Wilshire Blvd., 16th Floor
Los Angeles, CA 90024

DESIST AND REFRAIN ORDER
(For violations of section 25230 of the Corporations Code)

The California Corporations Commissioner finds that:

1. At all relevant times, Rameon Michael Witt (“Witt”), also known as Ray M. Witt, was President and CEO of R. Witt & Company, LLC (“R. Witt & Company”), a California limited liability company.
2. Beginning in or about at least as early as March 3, 2006, Witt operated a website for R. Witt & Company. The website described R. Witt & Company as “...a sophisticated privately owned financial services/Investment Advisor boutique firm that specializes in personal financial management for high net-worth individuals and corporations....” The website address was <http://www.rwittfinancial.com>.
3. Among the services to clients that the website listed were advisory services to individual and business clients in the areas of mutual funds, money markets, investment banking, debt and financing, stocks, fixed income products, and options. The website stated that the company conducted a thorough analysis of each client’s situation and combined it with an individual consultation to design a plan to reach the client’s goals, and that the company had the capacity to manage the finances of the high net worth investor. The website also provided contact information

1 for further information regarding the company's services, with the mailing address and telephone
2 numbers located in Los Angeles, California.

3 4. The Commissioner has no record of having received an application from, or having granted an
4 investment adviser certificate to Rameon Michael Witt, Ray M Witt, and/or R. Witt & Company,
5 LLC.

6 Based upon the foregoing, the California Corporations Commissioner is of the opinion that
7 Rameon Michael Witt, a.k.a. Ray M. Witt, and R. Witt & Company, LLC, have conducted business
8 as an investment adviser in this state without having first applied for and secured from the
9 Commissioner a certificate, authorizing these persons to act in that capacity, in violation of section
10 25230 of the Corporate Securities Law of 1968. Pursuant to section 25532 of the Corporate
11 Securities Law of 1968, Rameon Michael Witt, a.k.a. Ray M. Witt, and R. Witt & Company, LLC,
12 are hereby ordered to desist and refrain from conducting business as an investment adviser in this
13 state unless and until they have applied for and secured from the Commissioner a certificate, then in
14 effect, authorizing these persons to act in that capacity. This Order is necessary, in the public
15 interest, for the protection of investors and consistent with the purposes, policies, and provisions of
16 the Corporate Securities Law of 1968.

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18 Dated: May 3, 2006
19 Los Angeles, California

20 WAYNE STRUMPFER
21 Acting California Corporations Commissioner

22 By _____
23 ALAN S. WEINGER
24 Acting Deputy Commissioner
25 Enforcement Division
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