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8 Attorneys for the Complainant

10 BEFORE THE DEPARTMENT OF BUSINESS OVERSIGHT
11 OF THE STATE OF CALIFORNIA

12 In the Matter of:

CRD NO.: 144417

13 THE COMMISSIONER OF BUSINESS
14 OVERSIGHT,

15 Complainant,

ORDER SUMMARILY REVOKING
INVESTMENT ADVISER CERTIFICATE

16 v.

(CORP. CODE SECTION 25242)

17 TOUNJIAN ADVISORY GROUP, LLC, an
18 entity,

19 Respondent.

20
21 TO: Tounjian Advisory Group, LLC
22 8870 Daniels Parkway
Fort Meyers, Florida 33912

23
24 Jan Lynn Owen, Commissioner of Business Oversight (Commissioner) of the Department of
25 Business Oversight (DBO) finds that:

26 1. At all relevant times, Tounjian Advisory Group, LLC (Tounjian) was a Florida limited
27 liability company which held a valid and unrevoked investment adviser certificate issued by the
28 Commissioner on June 7, 2016, pursuant to Corporations Code section 25230. Tounjian is located at

1 8870 Daniels Parkway, Fort Meyers, Florida 33912.

2 2. On or about March 14, 2018, the Commissioner notified Tounjian that it must designate
3 an email address to receive an online examination form. The Commissioner did not receive a
4 response from Tounjian. The Commissioner therefore sent subsequent emails to email addresses
5 designated in the Financial Industry Regulatory Authority, Inc.'s (FINRA) Central Registration
6 Depository (CRD) system.

7 3. On or about October 2, 2018, the Commissioner sent the online examination to
8 Tounjian to an email address designated by Tounjian on CRD. The Commissioner informed
9 Tounjian that the online examination must be completed and submitted by November 16, 2018.

10 4. The Commissioner sent four emails, dated October 15, 2018, October 26 or 29, 2018,
11 November 5, 2018, and November 12, 2018, to Tounjian's designated email address, reminding
12 Tounjian of the November 16, 2018 deadline to complete and submit the online examination.

13 5. Despite the Commissioner's efforts, Tounjian failed to timely complete and submit the
14 online examination by the November 16, 2018 deadline.

15 6. Corporations Code section 25241 requires every investment adviser licensed by the
16 Commissioner to maintain books and records, file reports with the Commissioner, and submit to
17 examination by the Commissioner, as the Commissioner deems necessary or appropriate in the
18 public interest or for the protection of investors.

19 Therefore, and with good cause appearing, it is hereby ORDERED under the provisions of
20 Corporations Code section 25242, subdivision (c), that Tounjian Advisory Group, LLC's investment
21 adviser certificate is summarily revoked for violations of Corporations Code section 25241. This
22 order is effective immediately. This revocation precludes Tounjian Advisory Group, LLC from
23 engaging in normal investment adviser activities that includes soliciting or facilitating new business,
24 including for existing clients.

25 This revocation does not preclude Tounjian Advisory Group, LLC from engaging in
26 activities necessary to the winding down of the business such as liquidating transactions, transferring
27 accounts, forwarding any checks received to clearing firms, responding to regulatory inquiries, and
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1 otherwise fielding client/customer inquiries for account servicing or document requests, among other
2 things.

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

5 Dated: April 8, 2019

6 JAN LYNN OWEN
7 Commissioner of Business Oversight

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9 By: _____
10 MARY ANN SMITH
11 Enforcement Division
12 Department of Business Oversight
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