STATE OF CALIFORNIA BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY DEPARTMENT OF FINANCIAL PROTECTION AND INNOVATION

TO: Welther Oaks, LLC Ali Rameh Bazzi

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6 Parklane Boulevard Dearborn, Michigan 48126

400 Renaissance Center, Suite 2600 Detroit, Michigan 48243

DESIST AND REFRAIN ORDER

(For violations of sections 25110 and 25401 of the Corporations Code)

The Commissioner of Financial Protection and Innovation (Commissioner) finds that:

1. At all relevant times, Welther Oaks, LLC (Welther Oaks) was a Michigan limited liability company with its last known addresses located at 6 Parklane Boulevard, Dearborn, Michigan 48126, and 400 Renaissance Center, Suite 2600, Detroit, Michigan 48243.

2. At all relevant times, Ali Rameh Bazzi (Bazzi) was the officer and managing member of Welther Oaks.

3. Beginning in or about 2019, Welther Oaks and Bazzi offered or sold unqualified, nonexempt securities in the form of investment contracts to California residents.

4. The securities were offered and sold in this state in issuer transactions. The Department of Financial Protection and Innovation had not issued a permit or other form of qualification authorizing any person to offer or sell these securities in this state pursuant to the California Securities Law of 1968.

5. The purported purpose of the securities offerings was for Welther Oaks and Bazzi to use investor funds to trade in foreign currency exchange and precious metals, with trading profits to be shared among the investors and Bazzi.

In connection with the offer or sale of these securities, Welther Oaks and Bazzi made

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1 untrue statements of material facts, including but not limited to:

Falsely representing to investors that Welther Oaks and Bazzi were registered to offer a. 3 and sell securities, and registered or licensed to trade in commodities, and were complying with all of 4 the applicable rules and regulations. Welther Oaks and Bazzi did not hold any relevant securities or commodities registrations.

Falsely representing to investors that investors could withdraw their investments at b. any time, when in fact, Welther Oaks and Bazzi refused to process investment withdrawal requests. Bazzi repeatedly promised to return investment funds to investors, however the investors never received refunds.

Promising an annual return of 20% or greater, however, the investors never received c. any returns.

Based on the foregoing findings, the Commissioner is of the opinion that the investment contracts offered or sold by Welther Oaks, LLC and Ali Rameh Bazzi are securities subject to qualification under the Corporate Securities Law of 1968 and are being or have been offered or sold without first being qualified in violation of Corporations Code section 25110.

Pursuant to Corporations Code section 25532, Welther Oaks, LLC and Ali Rameh Bazzi are ordered to desist and refrain from the further offer and sale of securities in California, including but not limited to investment contracts, unless and until qualification has been made under the Corporate Securities Law of 1968, or unless exempt.

Further, the Commissioner is of the opinion that Welther Oaks, LLC and Ali Rameh Bazzi offered or sold securities in this state by means of oral or written communications which included untrue statements of material facts 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 Corporations Code section 25401.

25 Pursuant to Corporations Code section 25532, Welther Oaks, LLC and Ali Rameh Bazzi are 26 hereby ordered to desist and refrain from offering or selling or buying or offering to buy any security 27 in the State of California, including but not limited to interests in any company or shares of stock, by 28 means of any written or oral communication which includes an untrue statement of a material fact or

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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: July 20, 2021



CHRISTOPHER S. SHULTZ Acting Commissioner of Financial Protection and Innovation

By:_____

-3-DESIST AND REFRAIN ORDER

MARY ANN SMITH Deputy Commissioner Enforcement Division