

COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION
AT RICHMOND, NOVEMBER 30, 2023

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COMMONWEALTH OF VIRGINIA, *ex. rel.*

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STATE CORPORATION COMMISSION

v.

CASE NO. SEC-2020-00014

REDE WEALTH, LLC,
Defendant

SETTLEMENT ORDER

The Division of Securities and Retail Franchising ("Division") of the State Corporation Commission ("Commission") conducted an investigation of Rede Wealth, LLC ("Rede Wealth" or "Defendant") pursuant to § 13.1-518 of the Virginia Securities Act ("Act"), § 13.1-501 *et seq.* of the Code of Virginia.

Rede Wealth is a Delaware limited liability company with a location at 600 Peter Jefferson Parkway, Suite 250, Charlottesville, Virginia 22911. Rede Wealth registered with the Securities and Exchange Commission as an investment advisor on January 2, 2015, and notice filed with the Division on January 16, 2015. From January 16, 2015 to August 13, 2019, Rede Wealth employed five individuals, three of whom were registered as investment advisor representatives. Based on information obtained during the Division's investigation, effective January 1, 2019, Rede Wealth reduced the role of one of its three investment advisor representatives to that of a solicitor due to Rede Wealth's dissatisfaction with the performance of that investment advisor representative ("the IAR") in his employment. On August 13, 2019, Rede Wealth terminated its association with the IAR completely.

Based on its investigation, the Division alleges that, while the IAR was employed, Rede Wealth violated Rule 21 VAC 5-80-200 A of the Commission's rules regarding investment

advisors and investment advisor representatives ("Rules"), 21 VAC 5-80-10 *et seq.*, by allowing the IAR to continue servicing client accounts despite the IAR's alleged pattern of unprofessional and concerning conduct.

If the provisions of the Act or Rules are violated, the Commission is authorized by § 13.1-506 of the Act to revoke the Defendant's registration; by § 13.1-518 A of the Act to impose costs of investigation; by § 13.1-519 of the Act to issue temporary or permanent injunctions; by § 13.1-521 A of the Act to impose certain civil penalties; by § 13.1-521 C of the Act to order the defendant to make rescission and restitution; and by § 12.1-15 of the Code to settle matters within its jurisdiction.

The Defendant neither admits nor denies these allegations but admits to the Commission's jurisdiction and authority to enter this Settlement Order ("Order").

As a proposal to settle all matters arising from these allegations, the Defendant has made an offer of settlement to the Division wherein the Defendant will abide by and comply with the following terms:

- (1) The Defendant will pay to the Treasurer of Virginia, within one year of the entry of this Order, the amount of Thirty Thousand Dollars (\$30,000) in monetary penalties;
- (2) The Defendant will pay to the Treasurer of Virginia, contemporaneously with the entry of this Order, the amount of Five Thousand Dollars (\$5,000) to defray the costs of investigation in this matter; and
- (3) The Defendant will not violate the Act or Rules in the future.

The Division supports the Defendant's offer of settlement and has recommended that the Commission accept the settlement.

NOW THE COMMISSION, having considered this matter, is of the opinion and finds that the settlement should be accepted.

Accordingly, IT IS ORDERED THAT:

- (1) The settlement is accepted.
- (2) The Defendant shall fully comply with the terms of the settlement.
- (3) This Commission shall retain jurisdiction in this matter for all purposes, including the institution of a show cause proceeding, or taking such other action it deems appropriate on account of the Defendant's failure to comply with the terms of the settlement.

Commissioner James C. Dimitri participated in this matter.

A COPY hereof shall be sent by the Clerk of the Commission by electronic mail to: Todd Ratner, Esquire, Counsel for Rede Wealth, LLC, at Todd.Ratner@ratnerplc.com, 7201 Glen Forest Drive, Suite 102, Richmond, Virginia 23226; and a copy shall be delivered to the Commission's Office of General Counsel and Division of Securities and Retail Franchising.

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STATE CORPORATION COMMISSION

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Defendant

ADMISSION AND CONSENT

Rede Wealth, LLC ("Defendant") admits to the jurisdiction of the State Corporation Commission ("Commission") as to the party and subject matter hereof. The Defendant, while neither admitting nor denying the allegations made herein by the Division of Securities and Retail Franchising, hereby consents to the form, substance and entry of the foregoing Settlement Order ("Order").

The Defendant further states that no offer, tender, threat or promise of any kind whatsoever has been made by the Commission or any member, subordinate, employee, agent or representative thereof in consideration of the foregoing Order.

REDE WEALTH, LLC

11/2/2023 | 10:52:01 EDT
Date: _____

DocuSigned by:
Stephen McNaughton
83FA43782273417

CEQts: _____

Seen by:

Todd Ratner
Todd Ratner, Esquire