BrokerCheck Report

christopher michael roumayeh

CRD# 4510051

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When communicating online or investing with any professional, make sure you know who you're dealing with. Imposters might link to sites like BrokerCheck from phishing or similar scam websites, or through social media, trying to steal your personal information or your money.

Please contact FINRA with any concerns.

About BrokerCheck®

BrokerCheck offers information on all current, and many former, registered securities brokers, and all current and former registered securities firms. FINRA strongly encourages investors to use BrokerCheck to check the background of securities brokers and brokerage firms before deciding to conduct, or continue to conduct, business with them.

- **What is included in a BrokerCheck report?**
- BrokerCheck reports for individual brokers include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards. BrokerCheck reports for brokerage firms include information on a firm's profile, history, and operations, as well as many of the same disclosure events mentioned above.
- Please note that the information contained in a BrokerCheck report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the broker or brokerage firm, or concluded through a negotiated settlement with no admission or finding of wrongdoing.
- **Where did this information come from?**
- The information contained in BrokerCheck comes from FINRA's Central Registration Depository, or CRD® and is a combination of:
    - information FINRA and/or the Securities and Exchange Commission (SEC) require brokers and brokerage firms to submit as part of the registration and licensing process, and
    - information that regulators report regarding disciplinary actions or allegations against firms or brokers.
- **How current is this information?**
- Generally, active brokerage firms and brokers are required to update their professional and disciplinary information in CRD within 30 days. Under most circumstances, information reported by brokerage firms, brokers and regulators is available in BrokerCheck the next business day.
- **What if I want to check the background of an investment adviser firm or investment adviser representative?**
- To check the background of an investment adviser firm or representative, you can search for the firm or individual in BrokerCheck. If your search is successful, click on the link provided to view the available licensing and registration information in the SEC's Investment Adviser Public Disclosure (IAPD) website at https://www.adviserinfo.sec.gov. In the alternative, you may search the IAPD website directly or contact your state securities regulator at http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/P455414.
- **Are there other resources I can use to check the background of investment professionals?**
- FINRA recommends that you learn as much as possible about an investment professional before deciding to work with them. Your state securities regulator can help you research brokers and investment adviser representatives doing business in your state.
-

Thank you for using FINRA BrokerCheck.

Using this site/information means that you accept the FINRA BrokerCheck Terms and Conditions. A complete list of Terms and Conditions can be found at

brokercheck.finra.org

For additional information about the contents of this report, please refer to the User Guidance or www.finra.org/brokercheck. It provides a glossary of terms and a list of frequently asked questions, as well as additional resources. For more information about FINRA, visit www.finra.org.

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This broker is not currently registered.

Report Summary for this Broker

This report summary provides an overview of the broker's professional background and conduct. Additional information can be found in the detailed report.

Broker Qualifications

This broker is not currently registered.

This broker has passed:

- 0 Principal/Supervisory Exams
- 2 General Industry/Product Exams
- 2 State Securities Law Exams

Registration History

This broker was previously registered with the following securities firm(s):

B **MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED**
CRD# 7691
BLOOMFIELD HILLS, MI
11/2008 - 07/2019

B **CITIGROUP GLOBAL MARKETS INC.**
CRD# 7059
SOUTHFIELD, MI
11/2004 - 11/2008

B **WACHOVIA SECURITIES, LLC**
CRD# 19616
ST. LOUIS, MO
08/2003 - 11/2004

Disclosure Events

All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.

Are there events disclosed about this broker? **Yes**

The following types of disclosures have been reported:

Type	Count
Regulatory Event	3

Investment Adviser Representative Information

The information below represents the individual's record as a broker. For details on this individual's record as an investment adviser representative, visit the SEC's Investment Adviser Public Disclosure website at

https://www.adviserinfo.sec.gov

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Broker Qualifications

Registrations

This section provides the self-regulatory organizations (SROs) and U.S. states/territories the broker is currently registered and licensed with, the category of each license, and the date on which it became effective. This section also provides, for every brokerage firm with which the broker is currently employed, the address of each branch where the broker works.

This broker is not currently registered.

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Broker Qualifications

Industry Exams this Broker has Passed

This section includes all securities industry exams that the broker has passed. Under limited circumstances, a broker may attain a registration after receiving an exam waiver based on exams the broker has passed and/or qualifying work experience. Any exam waivers that the broker has received are not included below. A passed exam or exam waiver does not permit a broker to do business without an active SRO or state registration.

This individual has passed 0 principal/supervisory exams, 2 general industry/product exams, and 2 state securities law exams.

Principal/Supervisory Exams

	Exam	Category	Date
	No information reported.		

General Industry/Product Exams

	Exam	Category	Date
B	Securities Industry Essentials Examination	SIE	10/01/2018
B	General Securities Representative Examination	Series 7	04/25/2002

State Securities Law Exams

	Exam	Category	Date
IA	Uniform Investment Adviser Law Examination	Series 65	04/26/2012
B	Uniform Securities Agent State Law Examination	Series 63	02/06/2003

Additional information about the above exams or other exams FINRA administers to brokers and other securities professionals can be found at www.finra.org/brokerqualifications/registeredrep/.

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Broker Qualifications

Professional Designations

This section details that the representative has reported **0** professional designation(s).

No information reported.

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Registration and Employment History

Registration History

The broker previously was registered with the following firms:

	Registration Dates	Firm Name	CRD#	Branch Location
B	11/2008 - 07/2019	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	7691	BLOOMFIELD HILLS, MI
B	11/2004 - 11/2008	CITIGROUP GLOBAL MARKETS INC.	7059	SOUTHFIELD, MI
B	08/2003 - 11/2004	WACHOVIA SECURITIES, LLC	19616	ST. LOUIS, MO
B	04/2002 - 09/2003	AMERICAN EXPRESS FINANCIAL ADVISORS INC.	6363	MINNEAPOLIS, MN
B	04/2002 - 09/2003	IDS LIFE INSURANCE COMPANY	6321	MINNEAPOLIS, MN

Employment History

This section provides up to 10 years of an individual broker's employment history as reported by the individual broker on the most recently filed Form U4.

Please note that the broker is required to provide this information only while registered with FINRA or a national securities exchange and the information is not updated via Form U4 after the broker ceases to be registered. Therefore, an employment end date of "Present" may not reflect the broker's current employment status.

Employment	Employer Name	Position	Investment Related	Employer Location
06/2022 - Present	San Blas Securities	REP	Y	Atlanta, GA, United States
06/2021 - 06/2022	unemployed	Unemployed	N	Lake Orion, MI, United States
06/2019 - 06/2021	Capital Asset Advisory Service	Licensed Admin	Y	Haslett, MI, United States
12/2009 - 06/2019	BANK OF AMERICA, NA	FINANCIAL ADVISOR	Y	FARMINGTON HILLS, MI, United States
10/2008 - 06/2019	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	FA	Y	FARMINGTON HILLS, MI, United States

Other Business Activities

This section includes information, if any, as provided by the broker regarding other business activities the broker is currently engaged in either as a proprietor, partner, officer, director, employee, trustee, agent or otherwise. This section does not include non-investment related activity that is exclusively charitable, civic, religious or fraternal and is recognized as tax exempt.

Team Renegade, LLC; Not investment related; 5700 Crooks Rd, Troy, MI; Technology; Partner; 5 hours per week
Cliff Summit, LLC Real Estate Investment related; 5700 Crooks Rd, Troy MI 2 hours per week Partner

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Registration and Employment History

Other Business Activities, continued

Sommerset LLC, Real Estate Investment Related 5700 Crooks Rd, Troy MI 2 Hours Per weekPartner
Phoenix 4 LLC, Real Estate Investment Related 5700 Crooks Rd, Troy MI 2 Hours Partner

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Disclosure Events

What you should know about reported disclosure events:

1. All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.

2. **Certain thresholds must be met before an event is reported to CRD, for example:**
   - A law enforcement agency must file formal charges before a broker is required to disclose a particular criminal event.
   - A customer dispute must involve allegations that a broker engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least $5,000.
   -
3. **Disclosure events in BrokerCheck reports come from different sources:**
   - As mentioned at the beginning of this report, information contained in BrokerCheck comes from brokers, brokerage firms and regulators. When more than one of these sources reports information for the same disclosure event, all versions of the event will appear in the BrokerCheck report. The different versions will be separated by a solid line with the reporting source labeled.
   -
4. **There are different statuses and dispositions for disclosure events:**
   - A disclosure event may have a status of *pending, on appeal,* or *final.*
     - A "pending" event involves allegations that have not been proven or formally adjudicated.
     - An event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
     - A "final" event has been concluded and its resolution is not subject to change.
   - A final event generally has a disposition of *adjudicated, settled* or *otherwise resolved.*
     - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
     - A "settled" matter generally involves an agreement by the parties to resolve the matter. Please note that brokers and brokerage firms may choose to settle customer disputes or regulatory matters for business or other reasons.
     - A "resolved" matter usually involves no payment to the customer and no finding of wrongdoing on the part of the individual broker. Such matters generally involve customer disputes.

For your convenience, below is a matrix of the number and status of disclosure events involving this broker. Further information regarding these events can be found in the subsequent pages of this report. You also may wish to contact the broker to obtain further information regarding these events.

	Pending	Final	On Appeal
Regulatory Event	0	3	0

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Disclosure Event Details

When evaluating this information, please keep in mind that a discloure event may be pending or involve allegations that are contested and have not been resolved or proven. The matter may, in the end, be withdrawn, dismissed, resolved in favor of the broker, or concluded through a negotiated settlement for certain business reasons (e.g., to maintain customer relationships or to limit the litigation costs associated with disputing the allegations) with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to CRD and therefore some of the specific data fields contained in the report may be blank if the information was not provided to CRD.

Regulatory - Final

This type of disclosure event may involve (1) a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulatory such as the Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations; or (2) a revocation or suspension of a broker's authority to act as an attorney, accountant, or federal contractor.

Disclosure 1 of 3

Reporting Source:	Regulator
Regulatory Action Initiated By:	Michigan
Sanction(s) Sought:	Cease and Desist
Date Initiated:	02/03/2021
Docket/Case Number:	343041
URL for Regulatory Action:	
Employing firm when activity occurred which led to the regulatory action:	
Product Type:	Investment Contract
Allegations:	Respondent Christopher M. Roumayeh made or caused to be made multiple written statements that at the time and in light of the circumstances under which they were made were false and misleading in a material respect when he made multiple false statements regarding his participation in an E-Sports team Other Business Activity. The false statements Respondent submitted were in violation of section 505 of the Securities Act, MCL 451.2505.
Current Status:	Final
Resolution:	Administrative Consent Agreement and Order

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Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Resolution Date:	06/23/2021
Sanctions Ordered:	Civil and Administrative Penalty(ies)/Fine(s) Suspension
Sanction 1 of 1	
Sanction Type:	Suspension
Capacities Affected:	Investment Adviser Representative Registration
Duration:	8 Months 5 Days
Start Date:	06/23/2021
End Date:	03/16/2022
Monetary Sanction 1 of 1	
Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)
Total Amount:	$5,000.00
Portion Levied against individual:	$5,000.00
Payment Plan:	
Is Payment Plan Current:	
Date Paid by individual:	
Was any portion of penalty waived?	No
Amount Waived:	
Regulator Statement	Order Lifting Investment Adviser Representative Suspension entered and issued on March 16, 2022.

Disclosure 2 of 3

Reporting Source:	Regulator

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Regulatory Action Initiated By:	Michigan
Sanction(s) Sought:	Revocation
Date Initiated:	02/03/2021
Docket/Case Number:	343041
URL for Regulatory Action:	
Employing firm when activity occurred which led to the regulatory action:	
Product Type:	Investment Contract
Allegations:	The Administrator issued a Notice of Intent to Revoke Investment Adviser Representative Registration to Christopher M. Roumayeh under section 412(2) of the Securities Act, MCL 451.2412(2), because he is subject to an order from a self-regulatory organization suspending him from membership; he is the subject of a cease and desist order issued by a state; and, because he engaged in dishonest or unethical business practices in the securities industry within the previous 10 years, all of which support the revocation of the investment adviser representative registration under the Michigan Uniform Securities Act (2002), 2008 PA 551, MCL 451.2101 et seq.
Current Status:	Final
Resolution:	Administrative Consent Agreement and Order
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Resolution Date:	06/23/2021
Sanctions Ordered:	Civil and Administrative Penalty(ies)/Fine(s) Suspension
Sanction 1 of 1	
Sanction Type:	Suspension
Capacities Affected:	Investment Adviser Representative Registration
Duration:	8 Months 5 days

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Start Date:	06/23/2021
End Date:	03/16/2022
Monetary Sanction 1 of 1	
Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)
Total Amount:	$5,000.00
Portion Levied against individual:	$5,000.00
Payment Plan:	
Is Payment Plan Current:	
Date Paid by individual:	
Was any portion of penalty waived?	No
Amount Waived:	
Regulator Statement	Order Lifting Investment Adviser Representative Suspension entered and issued on March 16, 2022.

Disclosure 3 of 3

Reporting Source:	Regulator
Regulatory Action Initiated By:	FINRA
Sanction(s) Sought:	
Date Initiated:	05/20/2020
Docket/Case Number:	2019063147101
Employing firm when activity occurred which led to the regulatory action:	Merrill Lynch, Pierce, Fenner & Smith Inc.
Product Type:	No Product
Allegations:	Without admitting or denying the findings, Roumayeh consented to the sanctions and to the entry of findings that he engaged in outside business activities without providing prior written notice to his member firm. The findings stated that Roumayeh and a firm customer purchased a franchise involved in the professional video gaming industry. As the owner, Roumayeh managed the franchise's day-to-

day operations. Roumayeh also formed corporate entities related to the franchise's operations, served as an officer and director for them, and solicited prospective investors in the franchise. Roumayeh concealed his relationship with the entities by forming them in his wife's name and named her as the sole authorized representative on an entity's bank account. In addition, Roumayeh formed and managed a separate limited liability company that he purchased commercial real estate through. Roumayeh also made false statements to the firm on annual compliance questionnaires concerning his outside business activities. The findings also stated that Roumayeh participated in a private securities transaction without providing prior written notice to or receiving approval from his firm. Roumayeh solicited and facilitated the investment of a publicly-traded company in the franchise. Roumayeh's participation included identifying other potential investors, responding to questions from the company during its due diligence, and negotiating the terms and structure of the company's investment. To facilitate the company's $5.5 million investment, Roumayeh formed a new holding company that he sold and issued shares of preferred stock to the company through.

Current Status:	Final
Resolution:	Acceptance, Waiver & Consent(AWC)
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Resolution Date:	05/20/2020
Sanctions Ordered:	Civil and Administrative Penalty(ies)/Fine(s) Suspension
If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise?	No

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(1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation?

(2) willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board? or

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(3) failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation by such person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any such Acts, or any of the rules of the Municipal Securities Rulemaking Board?

Sanction 1 of 1

Sanction Type:	Suspension
Capacities Affected:	All capacities
Duration:	21 months
Start Date:	06/01/2020
End Date:	02/28/2022

Monetary Sanction 1 of 1

Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)
Total Amount:	$15,000.00
Portion Levied against individual:	$15,000.00
Payment Plan:	Deferred
Is Payment Plan Current:	
Date Paid by individual:	
Was any portion of penalty waived?	No
Amount Waived:	

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Reporting Source:	Firm
Regulatory Action Initiated By:	FINRA
Sanction(s) Sought:	
Date Initiated:	05/20/2020
Docket/Case Number:	2019063147101
Employing firm when activity occurred which led to the regulatory action:	Merrill Lynch, Pierce, Fenner & Smith Incorporated
Product Type:	Other: N/A
Allegations:	Without admitting or denying the findings, Roumayeh consented to the sanctions and to the entry of findings that he engaged in outside business activities without providing prior written notice to his member firm. The findings stated that Roumayeh and a firm customer purchased a franchise involved in the professional video gaming industry. As the owner, Roumayeh managed the franchise's day-to-day operations. Roumayeh also formed corporate entities related to the franchise's operations, served as an officer and director for them, and solicited prospective investors in the franchise. Roumayeh concealed his relationship with the entities by forming them in his wife's name and named her as the sole authorized representative on an entity's bank account. In addition, Roumayeh formed and managed a separate limited liability company that he purchased commercial real estate through. Roumayeh also made false statements to the firm on annual compliance questionnaires concerning his outside business activities. The findings also stated that Roumayeh participated in a private securities transaction without providing prior written notice to or receiving approval from his firm. Roumayeh solicited and facilitated the investment of a publicly-traded company in the franchise. Roumayeh's participation included identifying other potential investors, responding to questions from the company during its due diligence, and negotiating the terms and structure of the company's investment. To facilitate the company's $5.5 million investment, Roumayeh formed a new holding company that he sold and issued shares of preferred stock to the company through.
Current Status:	Final
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	05/20/2020
Sanctions Ordered:	Civil and Administrative Penalty(ies)/Fine(s) Suspension

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If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise?	No
(1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation?	
(2) willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board? or	

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(3) failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation by such person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any such Acts, or any of the rules of the Municipal Securities Rulemaking Board?

Sanction 1 of 1

Sanction Type:	Suspension
Capacities Affected:	All Capacities
Duration:	21 MONTHS
Start Date:	06/01/2020
End Date:	02/28/2022

Monetary Sanction 1 of 1

Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)
Total Amount:	$15,000.00
Portion Levied against individual:	$15,000.00
Payment Plan:	DEFERRED
Is Payment Plan Current:	
Date Paid by individual:	
Was any portion of penalty waived?	No
Amount Waived:	

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Reporting Source:	Broker
Regulatory Action Initiated By:	FINRA
Sanction(s) Sought:	
Date Initiated:	05/20/2020
Docket/Case Number:	2019063147101
Employing firm when activity occurred which led to the regulatory action:	Merrill Lynch, Pierce, Fenner & Smith Incorporated
Product Type:	Other: N/A
Allegations:	Without admitting or denying the findings, Roumayeh consented to the sanctions and to the entry of findings that he engaged in outside business activities without providing prior written notice to his member firm. The findings stated that Roumayeh and a firm customer purchased a franchise involved in the professional video gaming industry. As the owner, Roumayeh managed the franchise's day-to-day operations. Roumayeh also formed corporate entities related to the franchise's operations, served as an officer and director for them, and solicited prospective investors in the franchise. Roumayeh concealed his relationship with the entities by forming them in his wife's name and named her as the sole authorized representative on an entity's bank account. In addition, Roumayeh formed and managed a separate limited liability company that he purchased commercial real estate through. Roumayeh also made false statements to the firm on annual compliance questionnaires concerning his outside business activities. The findings also stated that Roumayeh participated in a private securities transaction without providing prior written notice to or receiving approval from his firm. Roumayeh solicited and facilitated the investment of a publicly-traded company in the franchise. Roumayeh's participation included identifying other potential investors, responding to questions from the company during its due diligence, and negotiating the terms and structure of the company's investment. To facilitate the company's $5.5 million investment, Roumayeh formed a new holding company that he sold and issued shares of preferred stock to the company through.
Current Status:	Final
Resolution:	Acceptance, Waiver & Consent(AWC)

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Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Resolution Date:	05/20/2020
Sanctions Ordered:	Civil and Administrative Penalty(ies)/Fine(s) Suspension
Sanction 1 of 1	
Sanction Type:	Suspension
Capacities Affected:	All Capacities
Duration:	21
Start Date:	06/01/2020
End Date:	02/28/2022
Monetary Sanction 1 of 1	
Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)
Total Amount:	$15,000.00
Portion Levied against individual:	$15,000.00
Payment Plan:	Deferred
Is Payment Plan Current:	
Date Paid by individual:	
Was any portion of penalty waived?	No
Amount Waived:	

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End of Report

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