

**Government of the District of Columbia**  
**Department of Insurance, Securities and Banking**



**Thomas E. Hampton**  
**Commissioner**

IN THE MATTER OF: )  
 )  
Byron K. Brown, Sr., ) ADMINISTRATIVE ORDER  
IGT Investment Company, and ) ORDER NO.: SB-04-02  
IGT Financial Services )  
RESPONDENT(s) )

**SUMMARY ORDER TO CEASE AND DESIST AND  
NOTICE OF OPPORTUNITY FOR HEARING**

In accordance with the provisions of the District of Columbia Administrative Procedure Act, D.C. Official Code § 1-1509(a) (2001), the Rules of Practice and Procedures for Hearings in the District of Columbia §§ 17 DCMR 8100 et seq. (2002) and the Securities Act of 2000, D.C. Official Code § 31-5601.01 et seq. (2001) ("Act"), you - Byron K. Brown, Sr., IGT Investment Company, and IGT Financial Services (collectively "Respondents") are hereby ordered to immediately Cease and Desist your activities as an unregistered securities broker-dealer, broker-dealer agent, investment adviser and/or investment adviser representative in the District of Columbia, pursuant to D.C. Official Code § 31-5606.02(a).

**I. JURISDICTION**

D.C. Official Code § 31-5606.02(a) grants the Commissioner of the Department of Insurance, Securities and Banking ("Commissioner") the power to issue, without a hearing, a summary order directing the Respondents to cease and desist from engaging in acts or practices which constitute, or will constitute, a violation of provisions of the Act or any rule or order thereunder.

Under D.C. Official Code § 31-5606.02(a)(1), this summary cease and desist order constitutes notice of the opportunity for a hearing before the Commissioner, or his designee, to

determine whether the summary cease and desist order should be vacated, modified, or entered as final; and constitutes notice that the summary cease and desist order will be entered as final if the Respondents do not request a hearing within 15 days of the receipt of the summary cease and desist order, pursuant to D.C. Official Code § 31-5606.02(a)(2).

## **II. RESPONDENTS**

1. Byron K. Brown, Sr. ("Brown") is the owner and operator of IGT Investment ("IGT Investment"), and IGT Financial Services ("IGT Financial").
2. IGT Investment has a business address of 1101 30<sup>th</sup> Street NW, Suite 500, Washington DC 20007.
3. IGT Financial has a business address of 1461 A First Avenue, Suite 360, New York NY 10021-2209.

## **III. STATEMENT OF FACTS**

On information and belief, the Commissioner alleges the following as the basis for this Order.

4. On January 27, 2007, an anonymous caller contacted the Department of Insurance, Securities and Banking ("Department) and reported to a Department fraud investigator that Byron K. Brown of IGT Investment Company had been conducting securities business in the District without a proper license.
5. An investigation by the Department revealed that Byron K. Brown, through its companies, IGT Investment and IGT Financial had been offering financial services, including brokerage and banking services to District of Columbia ("District") investors without being licensed in the District to offer such services.
6. Further investigation revealed that Respondents offered broker-dealer services, investment advisory services, and an array of equity investment products and corporate assets for

a variety of private clients to purchase in the District through its website, igtinvestments.com, without a license to offer such services.

7. In addition, the investigation revealed that Respondents had been advertising in the District of Columbia through its website that: "IGT Investment Company can now offer every banking services as any bank or broker-dealer!!!" and that it has "a brokerage firm that help[s] us assist our clients on critical financial, economic and strategic events and transactions." Respondents' website also advertised that it will "assist with complete financial guidance for individual investors and small investment companies."

8. Respondents have not registered in the District of Columbia with the Department as a broker-dealer, broker-dealer agent, investment adviser and/or an investment adviser representative, nor has any claim of exemption been made with respect to any such registrations.

#### **IV. VIOLATIONS**

##### **COUNT I**

(Unlicensed broker-dealer and broker-dealer agent)

9. Paragraphs 1 through 8 are incorporated by reference and are re-alleged.

10. Section 201(a) of the Act (D.C. Official Code § 31-5602.01(a)) makes it unlawful for any person to transact business in the District of Columbia as a broker-dealer or agent unless the person is licensed or exempt from licensure.

11. Respondents have offered and sold, and continue to offer and sell, securities in the District in violation of the licensing requirements of section 201 of the Act (D.C. Official Code § 31-5603.01).

##### **COUNT II**

(Employment of an unlicensed agent)

12. Paragraphs 1 through 10 are incorporated by reference and are re-alleged.

13. Section 201(b) of the Act (D.C. Official Code § 31-5602.01(b)) makes it unlawful for a broker-dealer or issuer to employ an agent to represent the broker-dealer or issuer unless the person is licensed or exempt from licensure.

14. Respondent firms have employed Respondent Brown in the District as a broker-dealer agent without licensure, in violation of Section 31-5602.01(b) of the Act.

### COUNT III

(Unlicensed investment adviser and investment adviser representative)

15. Paragraphs 1 through 13 are incorporated by reference and are re-alleged.

16. Section 202(a) of the Act (D.C. Official Code § 31-5602.02(a)) makes it unlawful for any person to transact business in the District as an investment adviser or an investment adviser representative unless the person is licensed or exempt from licensure.

17. Respondents have transacted business in the District as an investment adviser and allowed Respondent Brown to act as an investment adviser representative without licensure in violation of Section 31-5602.02(a) of the Act.

### SUMMARY ORDER

It is hereby determined that the Respondents have engaged and are about to engage in acts and practices which constitute violations of District of Columbia law, as described above and it is further determined that immediate action against the Respondents is in the public interest. Accordingly, it is hereby ORDERED by the Commissioner of the Department of Insurance, Securities and Banking, in accordance with Section 31-5606.02(a) of the Act, that:

1. Respondents, together with their employees, agents, affiliates, assignees, successors, and associated entities, shall immediately CEASE AND DESIST from transacting business in the District as a broker-dealer, agent, investment adviser or investment adviser representative.

APPROVED and so ORDERED:

In Witness Whereof, I have hereunto  
set my hand and affixed the official seal  
Of this Department in the District of Columbia,  
this 23<sup>rd</sup> day of April, 2008.

