



**COMMISSIONER OF SECURITIES  
STATE OF GEORGIA**

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**In the Matter of**

**CSG Wealth Management  
(CRD #153482), and  
Latavius Powell  
(CRD #5074848)**

**Respondents.**

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**Case Number: ENSC-180720**

**CONSENT ORDER**

Pursuant to O.C.G.A. § 10-5-71(a)(1) of the Georgia Uniform Securities Act of 2008, O.C.G.A. § 10-5-1, et seq. (“Act”), the Commissioner of Securities for the State of Georgia (“Commissioner”) caused an investigation to be made into CSG Wealth Management (“CSG”) and Latavius Powell (“Powell”) (collectively “Respondents”) to determine whether Respondents had violated the Act or a rule adopted by the Commissioner thereunder (“Rules”). The Commissioner subsequently determined that Respondents had in fact engaged in actions constituting violations of the Act and the Rules. As a result, pursuant to O.C.G.A. § 10-5-73, the Commissioner issued Respondents a Proposed Order to Cease and Desist, to Revoke Registration and Imposition of Civil Penalty and Notice of Opportunity for Hearing dated December 28, 2017 (“Proposed Order”).

On January 24, 2018 Respondents timely requested a pre-hearing conference pursuant to Rule 590-4-6-.12. Respondents’ request for a pre-hearing conference was duly accepted by the Commissioner, thereby tolling the thirty (30) day time period for requesting and setting any formal hearing before the Commissioner. Having considered information provided by Respondents and representations made by Respondents during the pre-hearing conference period, the Commissioner and Respondents hereby agree to the terms and conditions set forth

herein.

### **CONSENT TO JURISDICTION AND WAIVER**

1. Respondents consent to the jurisdiction of the Commissioner over Respondents and this matter pursuant to the Act.

2. Without Respondents admitting or denying the Findings of Fact and Conclusions of Law herein, Respondents and the Commissioner stipulate and agree to the issuance of this Consent Order without further proceedings in this matter, agreeing to be fully bound by the terms and conditions specified herein.

3. Respondents agree not to take any action or to make or permit to be made any public statements creating the impression that this Consent Order is without factual basis.

4. Respondents stipulate and agree with the Commissioner if at any time it appears to the Commissioner that Respondents have failed to comply with this Consent Order or has made any other material misrepresentations or omissions in regards to this matter, the Commissioner may take further action.

5. Respondents, through the execution of this Consent Order, voluntarily waive their rights to a formal hearing on this matter and to judicial review of this Consent Order.

6. Respondents enter into this Consent Order voluntarily and represent that no threats, offers, promises, or inducements of any kind have been made by the Commissioner or any member, officer, employee, agent, or representative of the Commissioner to induce Respondents to enter into this Consent Order.

### **FINDINGS OF FACT**

7. Pursuant to O.C.G.A. § 10-5-32, CSG is registered as an investment adviser with the Commissioner. CSG's principal office is located at 1590 Ethans Way, McDonough, Georgia 30252. CSG is registered in Georgia as a domestic limited liability company. As an investment adviser registered with the Commissioner, CSG is subject to the provisions of the Act and the Rules. CSG's CRD Number is 153482. CSG has been registered with the Commissioner as an investment adviser since April 22, 2010.

8. Powell is an investment advisor representative with CSG and is subject to the supervision of CSG. Pursuant to O.C.G.A. § 10-5-33, Powell is registered as an investment adviser representative with the Commissioner. Powell's last known residential address is 1590

Ethans Way, McDonough, Georgia 30252. Powell's CRD Number is 5074848. Powell serves as the chief executive officer ("CEO") of CSG. Powell has been registered with the Commissioner as an investment adviser representative of CSG since April 22, 2010.

9. The Commissioner conducted an on-site examination of the Respondents on July 27, 2017. During the course of the examination process, the Commissioner discovered several violations of the Act and Rules.

10. The Commissioner's staff found that Respondents failed to comply with the instructions for Part 1A of Form ADV ("Form ADV").

- i. CSG failed to disclose the identity of the Chief Compliance Officer ("CCO") in Item 1J and Schedule A, even though representations were made in CSG's policies and procedures manual that Powell served as the CCO.
- ii. CSG failed to disclose in Item 8C(3) that, according to its financial advisory agreements with clients, it has "discretion to supervise and direct the investments of all of Clients accounts maintained by CSG on Clients behalf with any brokerage firm."
- iii. CSG failed to disclose in Item 9A(1) and (2) that it has custody of client's securities, cash, and bank accounts as a result of its authority to perform bill payment services on behalf of the clients.

11. The Commissioner's staff found that Respondents failed to comply with the instructions for Part 2A of Form ADV ("Firm Brochure").

- i. CSG failed to follow the instructions for Item 12 regarding the disclosure of the factors considered when selecting or recommending broker-dealers for client transactions.
- ii. Item 14 of the Firm Brochure states, "Cadence has established an institutional relationship with TD Ameritrade" While CSG utilizes the services of TD Ameritrade, the Firm Brochure does not explain any relationship with "Cadence."
- iii. Item 15 of the Firm Brochure discloses that CSG "does not accept or maintain custody of any client accounts." This disclosure is a misrepresentation because CSG is deemed to have custody based on its authority to perform bill payment services on behalf of clients.

12. The Commissioner's staff found that Respondents failed to timely update information

on Powell's Uniform Application for Securities Industry Registration or Transfer ("Form U4"). In addition to his financial advisory business, Powell also works as a licensed insurance agent. Powell's disclosure of the licensed insurance agent business occurred outside the prescribed time for Form U4 amendments.

13. The Commissioner's staff found that Respondents failed to maintain certain required books and records regarding the Respondents' business activities.

- i. Respondents could not produce any trial balances, financial statements, or internal audit working papers relating to its business as an investment adviser.
- ii. Respondents could not produce the investment advisory agreements between CSG and at least two (2) individual clients.
- iii. Respondents could not produce any documentation to show that it had provided each client a copy of the Firm Brochure or Powell's Form ADV Part 2B ("Brochure Supplement").
- iv. Respondents could not produce any documentation to show that it provided any existing client with a summary of any material changes in the Firm Brochure and an offer to provide the updated Firm Brochure.

14. The Commissioner's staff found that Respondents failed to establish, maintain, and enforce written policies and procedures that are adopted to comply with the Act and Rules.

- i. CSG's written policies and procedures state that that certain books and records will be maintained by CSG, including "General and auxiliary ledgers (or other comparable records) reflecting assets, liability, reserve, capital, income and expense accounts" and "All trial balances, financial statements prepared in accordance with generally accepted accounting principles, and internal audit working papers relating to the investment adviser's business as an investment adviser." Respondents could not produce any documentation to show that it complied with this stated policy and procedure.
- ii. CSG's written policies and procedures set forth minimum content requirements for any client agreement entered into by CSG. One said requirement is that "[a]greements will include an acknowledgement of receipt of CSG's disclosure documents, including Form ADV Part 2A, 2A Appendix 1 and 2B(s)." The Commissioner's staff found that none of the Respondents client agreements

contain such an acknowledgement.

15. The Commissioner's staff found that the Respondents failed to inspect each office location at least annually to ensure that its written policies and procedures are enforced. Respondents could not produce any documentation to show that they conducted office inspections.

16. The Commissioner's staff found that the Respondents failed to furnish each advisory client and prospective client with the Firm Brochure and the Brochure Supplement for each individual providing investment advice and/or exercising discretion over client assets.

17. CSG has custody of client's securities, cash, and bank accounts as a result of its authority to perform bill payment services on behalf of the clients. The Commissioner's staff found that Respondents failed to file an audited balance sheet for any of the Respondent's fiscal years.

18. The Commissioner's staff found that the Respondents failed to fulfill their fiduciary duty as an investment adviser and investment adviser representative.

- i. Respondents did not provide continuous and regular supervisory or management services to client securities portfolios. While Respondents collected a management fee from all clients, the Commissioner's examination showed that Respondents only traded, on a limited basis, five (5) client accounts. For these five (5) accounts, Respondents invested in leveraged exchange traded products, VelocityShares 3x Long Natural Gas ETN ("UGAZ") and ProShares Ultra VIX Short-Term Futures ("UVXY"). Both product prospectuses include the disclosure that the products are "not suitable for investors with longer-term investment objectives" and that the products may not be suitable if "you seek an investment with a longer investment objective than one day." In light of the product disclosures, the examination showed that the products were held in client accounts for an extended period of time that resulted in losses to the clients in excess of sixty percent (60%) of the investment principal. Outside of these isolated securities trades, Respondents held client assets in cash accounts in anticipation of actively trading such accounts that failed to provide any investment advantage to clients.
- ii. Respondents failed to act in their clients' best interest when they failed to prevent

such clients from allowing non-account holders to draft and execute checks on such clients' brokerage accounts managed by Respondents. When advised by Respondent's custodian that Client #1 had allowed a family member to write and sign numerous checks where such family member was not an authorized signatory on the account, Respondents failed to take any action to stop this activity beyond issuing a warning to the client.

19. The Commissioner's staff found that on three (3) occasions Respondents made a short-term no-interest loan to a client. Respondents are not in the business of loaning funds.

- i. Powell executed a personal loan agreement dated March 15, 2015 to lend Client #2 one thousand five hundred dollars (\$1,500.00).
- ii. Powell executed a personal loan agreement dated March 1, 2016 to lend Client #3 three thousand dollars (\$3,000.00) and then later lent an additional two thousand dollars (\$2,000.00) to such Client #3.
- iii. Powell additionally loaned one thousand dollars (\$1,000.00) to Client #4 on or about June 10, 2016.

20. The Commissioner's staff found that Respondents misrepresented to clients and potential clients the nature of the advisory services offered. Item 4 of the Respondents' Firm Brochure discloses that management services are "furnished on a continuous basis." Item 5F of Respondents' Form ADV discloses that Respondents provide "continuous and regular supervisory or management services to securities portfolios." The Respondents' policies and procedures state that the Respondents "[e]mploy an active trading process." The Respondents' advisory agreement states that the client retains the Respondents to "provide financial advisory and investment counseling services." These disclosures are misrepresentations in light of the Respondents actual practice of maintaining many of its client's assets in cash accounts. The examination showed that during a three and half year period starting January 1, 2014, of a total of seventeen (17) accounts maintained by the Respondents, only five (5) accounts held any securities. Of those five (5) accounts, only one (1) showed a transaction in a security.

21. The Commissioner's staff found that the Respondents charged an unreasonable fee in light of the actual services provided to clients. While the Respondents' disclosure documents and advisory contracts state that client assets will be actively traded, the examination showed that the Respondents held certain client assets in cash accounts that gained a negligible interest rate.

Even though the Respondents were not performing any of the advisory functions set forth in the advisory agreement, the Respondents still charged a one and a half percent (1.5%) annualized assets under management (“AUM”) fee. Additionally, the Respondents charged at least ten (10) clients six hundred twenty five dollars (\$625.00) per month for “other” financial management services. These services, including bill payment services, though integral to the Respondents’ core non-investment advisory product offering, were not fully disclosed in any client agreement.

22. The Commissioner’s staff found that the Respondents made, in the solicitation of clients, certain untrue statements of a material fact and failed to state material facts necessary to make the statements made, not misleading. In both the Form ADV and Firm Brochure, the Respondents state that they manage thirty one (31) accounts with a total AUM of twenty two million six hundred fifty nine thousand twenty two dollars (\$22,659,022.00). The examination showed that the Respondents actually managed sixteen (16) accounts for a total AUM of five million four hundred thirty thousand nine hundred eighty three dollars (\$5,439,983.00).

23. The Commissioner’s staff found that the Respondents have custody of client assets as a result of its authority to provide bill payment services. While the Respondents have custody of clients’ assets, they failed to provide the appropriate notice to the Commissioner of this fact and failed to comply with the custody safeguards required by the Rules, including, the independent verification by an independent certified public accountant.

#### **CONCLUSIONS OF LAW**

24. Paragraphs 1 through 23 are incorporated by reference as though fully set forth herein.

25. The Commissioner has jurisdiction over this matter pursuant to the Act.<sup>1</sup>

26. Pursuant to O.C.G.A. §§ 10-5-40, 10-5-70, *et seq.*, the Commissioner is authorized to conduct this examination, institute this investigation and issue this Order.

27. Pursuant to O.C.G.A. § 10-5-41(b), the Commissioner may revoke, suspend, condition, or limit the registration of a registrant if the Commissioner finds that the penalty is in the public interest and the Commissioner’s action is authorized by O.C.G.A. § 10-5-41(d).

28. Pursuant to O.C.G.A. § 10-5-41(d)(2) a person may be disciplined if that person “[w]illfully violated or willfully failed to comply with the [Act] or the predecessor Act or a rule adopted or order issued under the [Act] or the predecessor Act within the previous ten years.”

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<sup>1</sup> See O.C.G.A. §§ 10-5-41, 10-5-70 and 10-5-71.

29. Pursuant to O.C.G.A. § 10-5-41(c), the Commissioner may impose a civil penalty on an individual not to exceed a maximum of fifty thousand (\$50,000.00) dollars for a single violation or five hundred thousand (\$500,000.00) dollars for several violations.

30. Rule 590-4-4-.02(4) requires every investment adviser to file amendments to their Form ADV in accordance with the instructions to Form ADV. Respondents' failure to file the appropriate amendments in accordance with the instructions to Form ADV, detailed in paragraphs 10 and 11 above, are violations of Rule 590-4-4-.02(4). The violations are actionable events pursuant to O.C.G.A. § 10-5-41(d)(2) and therefore, under O.C.G.A. §§ 10-5-41(b) and 10-5-41(c), the Respondents are subject to discipline.

31. Rule 590-4-4-.05(3) provides that every investment adviser representative is under a continuing obligation to update information required by Form U4 in a timely manner. Amendments are considered promptly filed if filed within thirty (30) days of the event that requires the filing of the amendment. Powell's failure to file the required Form U4 amendment to disclose his additional business as a licensed insurance agent, detailed in paragraph 12 above, is a violation of Rule 590-4-4-.05(3). The violation is an actionable event pursuant to O.C.G.A. § 10-5-41(d)(2) and therefore, under O.C.G.A. §§ 10-5-41(b) and 10-5-41(c), Powell is subject to discipline.

32. Rule 590-4-4-.14(1) requires an investment adviser to "make and keep true, accurate, and current" certain books, ledgers, and records relating to its advisory business. CSG's failure to maintain required books and records, detailed in paragraph 13 above, is a violation of Rule 590-4-4-.14(1). The violation is an actionable event pursuant to O.C.G.A. § 10-5-41(d)(2) and therefore, under O.C.G.A. §§ 10-5-41(b) and 10-5-41(c), CSG is subject to discipline.

33. Rule 590-4-4-.15(3) requires every investment adviser to establish, maintain, and enforce written policies and procedures that set forth the standards and procedures adopted to comply with the Act and Rules. CSG's failure to establish, maintain, and enforce written policies and procedure to adequately comply with the Act and Rules, detailed in paragraph 14 above, is a violation of Rule 590-4-4-.15(3). The violation is an actionable event pursuant to O.C.G.A. § 10-5-41(d)(2) and therefore, under O.C.G.A. §§ 10-5-41(b) and 10-5-41(c), CSG is subject to discipline.

34. Rule 590-4-4-.15(4) requires an investment adviser to inspect each office location at least annually to ensure that its written policies and procedures are enforced. CSG's failure to



conduct the required office inspections, detailed in paragraph 15 above, is a violation of Rule 590-4-4-.15(4). The violation is an actionable event pursuant to O.C.G.A. § 10-5-41(d)(2) and therefore, under O.C.G.A. §§ 10-5-41(b) and 10-5-41(c), CSG is subject to discipline.

35. Rule 590-4-4-.16(1) requires each investment adviser to provide each advisory client and prospective client with a copy of the Firm Brochure and Brochure Supplement. CSG's failure to provide each advisory client and prospective client with its Firm Brochure and Brochure Supplement, detailed in paragraph 16 above, is a violation of Rule 590-4-4-.16(1). The violation is an actionable event pursuant to O.C.G.A. § 10-5-41(d)(2) and therefore, under O.C.G.A. §§ 10-5-41(b) and 10-5-41(c), CSG is subject to discipline.

36. Rule 590-4-4-.18 requires each investment adviser with custody of client funds to furnish the Commissioner with an audited balance sheet as of the end of the adviser's fiscal year. CSG's failure to provide the Commissioner with the required audited balance sheet for each year that it had custody of client funds, detailed in paragraph 17 above, are violations of Rule 590-4-4-.18. The violations are actionable events pursuant to O.C.G.A. § 10-5-41(d)(2) and therefore, under O.C.G.A. §§ 10-5-41(b) and 10-5-41(c), CSG is subject to discipline.

37. Rule 590-4-4-.19 states that every investment adviser and investment adviser representative "is a fiduciary and has a duty to act primarily for the benefits of its clients." Respondents' failure to fulfill its fiduciary duty, detailed in paragraph 18 above, are violations of Rule 590-4-4-.19. The violations are actionable events pursuant to O.C.G.A. § 10-5-41(d)(2) and therefore, under O.C.G.A. §§ 10-5-41(b) and 10-5-41(c), the Respondents are subject to discipline.

38. Rule 590-4-4-.19(7) prohibits an investment adviser from "[l]oaning money or securities from a client unless the investment adviser is a financial institution engaged in the business of loaning funds or the client is an affiliate of the investment adviser." CSG's activity of loaning money to clients, detailed in paragraph 19 above, are violations of Rule 590-4-4-.19(7). The violations are actionable events pursuant to O.C.G.A. § 10-5-41(d)(2) and therefore, under O.C.G.A. §§ 10-5-41(b) and 10-5-41(c), CSG is subject to discipline.

39. Rule 590-4-4-.19(10) prohibits an investment adviser or investment adviser representative from "[c]harging a client an unreasonable fee." Respondents' practice of charging a percentage of AUM while keeping client assets in cash accounts, detailed in paragraph 21 above, are violations of Rule 590-4-4-.19(10). The violations are actionable events pursuant to

O.C.G.A. § 10-5-41(d)(2) and therefore, under O.C.G.A. §§ 10-5-41(b) and 10-5-41(c), Respondents are subject to discipline.

40. Rule 590-4-4-.19(19) prohibits an investment adviser or investment adviser representative with custody from not complying with the safeguard requirements of Rule 590-4-4-.20. Rule 590-4-4-.20 provides that “[i]t is unlawful and deemed to be a fraudulent, deceptive, or manipulative act, practice, or course of business for an investment adviser...to have custody of client funds or securities unless” it complies with the safeguard requirements. Respondents’ failure to comply with the custody safeguard requirements while maintaining custody of client assets are violations of Rule 590-4-4-.20 and Rule 590-4-4-.19(19). The violations are actionable events pursuant to O.C.G.A. § 10-5-41(d)(2) and therefore, under O.C.G.A. §§ 10-5-41(b) and 10-5-41(c), Respondents are subject to discipline.

#### **ORDER**

**WHEREFORE**, by the authority vested in me as the Commissioner of Securities for the State of Georgia, **IT IS HEREBY ORDERED**:

1. The registration of **CSG WEALTH MANAGEMENT** as an investment adviser pursuant to O.C.G.A. § 10-5-32 is placed in a status of **CONDITIONAL REGISTRATION** for **TWO (2) YEARS**. Said conditional registration is considered heightened supervision requiring compliance oversight from an unaffiliated third-party. The conditional registration period will commence upon execution of this Consent Order.

2. The registration of **LATAVIUS POWELL** as an investment adviser representative pursuant to O.C.G.A. § 10-5-33 is placed in a status of **CONDITIONAL REGISTRATION** for **TWO (2) YEARS**. Said conditional registration is considered heightened supervision requiring compliance oversight from an unaffiliated third-party. The conditional registration period will commence upon execution of this Consent Order.

3. That **CSG Wealth Management** shall secure the services of an unaffiliated third-party compliance consultant (“Consultant”) during the conditional registration period. The Consultant must be approved by the Georgia Securities and Charities Division (“Division”) and may not be in an attorney-client relationship with either Latavius Powell or CSG Wealth Management. The Consultant’s compensation and expenses shall be borne exclusively by CSG Wealth Management. Shall the engagement of the Consultant with CSG Wealth Management end for any reason during the conditional registration period, CSG Wealth Management must notify the

Division of any termination of Consultant within five (5) days of a termination and must engage the services of a new Consultant within thirty (30) days of the termination. Failure by CSG Wealth Management to secure the services of a Consultant within thirty (30) days will be treated as a violation of this Consent Order.

4. That **CSG Wealth Management** will submit to reviews conducted by the Consultant on a quarterly basis during the conditional registration period. A copy of the quarterly review report shall be submitted by the Consultant to the Division within thirty (30) days of completion. The Consultant's examination report to the Division shall include, but is not limited to, the following items:

- a. A listing of any and all violations of the written policies and procedures of CSG Wealth Management, the Georgia Uniform Securities Act of 2008 ("Act"), and the Rules and Regulations ("Rules") promulgated thereunder. For each reported violation, the Consultant will provide a written description of the violation and the steps taken to rectify such violation;
- b. A list including the name, address, phone number, beginning assets under management, and custodian of record for each new client or account obtained or established during the reporting period and a copy of each new client's executed investment advisory contract;
- c. A list including the name, address, phone number, ending assets under management, and custodian or record for each client or account terminated for any reason during the reporting period, and the reason for the termination;
- d. A list of any new employees hired by CSG Wealth Management during the reporting period;
- e. A list of any employees terminated for any reason by CSG Wealth Management, and the reason for such termination;
- f. Notice of any new bank or brokerage accounts opened on behalf of CSG Wealth Management;
- g. Notice of any new brokers or custodians used or approved for use by CSG Wealth Management;
- h. The total reportable regulatory assets under management as of the last day of the reporting period, distinguishing the amount of client assets managed on a

- discretionary bases and the amount of clients managed on a non-discretionary basis;
- i. The total number of clients as of the last day of the reporting period;
  - j. The total number of accounts as of the last day of the reporting period;
  - k. An unaudited copy of CSG Wealth Management's income statement, balance sheet, and statement of cash flows as of the last day of the reporting period;
  - l. Copies of any new marketing or advertising materials created by CSG Wealth Management and disseminated to any client or prospective client during the reporting period;
  - m. Copies of any lending or credit relationships negotiated by or concerning CSG Wealth Management and any client or prospective client of CSG Wealth Management.

5. That **CSG Wealth Management** and **Latavius Powell** will submit to further periodic inspections conducted by the Commissioner, at the Commissioner's discretion, during the conditional registration period. The Consultant shall conduct reviews in accordance with Rule 590-4-4-.15(4). A copy of said review shall be delivered to the Division within ten (10) days of the Consultant's review and shall include a description of the method of review, details of any findings, and if necessary, any remedial steps taken to address any finding.

6. That **CSG Wealth Management** and **Latavius Powell** will report to the Division, during the conditional registration period, in writing, any complaint received involving a resident of the State of Georgia. Said report shall be filed within ten (10) business days of receipt of the complaint. Said report shall include the name, address, phone number of complainant, and all documents relating to the complaint.

7. That **CSG Wealth Management** and **Latavius Powell** will reimburse the Commissioner a total of **five thousand dollars (\$5,000.00)** to reflect the cost of the Commissioner's examination and investigation.

The entry of this Consent Order is deemed to be in the public interest. If at any time it appears to the Commissioner that Respondents have failed to comply with this Consent Order or has made any other material misrepresentations or omissions in regards to this matter, the Commissioner may take further action.

**\*\*SIGNATURES ON FOLLOWING PAGE\*\***

SO ORDERED this 2<sup>nd</sup> day of July, 2018.

**BRIAN P. KEMP**  
**SECRETARY OF STATE**  
**COMMISSIONER OF SECURITIES**

By:   
\_\_\_\_\_  
C. Ryan Germany  
Assistant Commissioner of Securities

**CONSENT TO ENTRY OF CONSENT ORDER  
BY LATAVIUS POWELL AND CSG WEALTH MANAGEMENT, LLC**

Latavius Powell ("Powell") and CSG Wealth Management, LLC ("CSG") (collectively "Respondents") hereby acknowledge that they have been served with a copy of this Consent Order, have read the foregoing Consent Order, are aware of their rights to a hearing and appeal in this matter, and have waived the same.

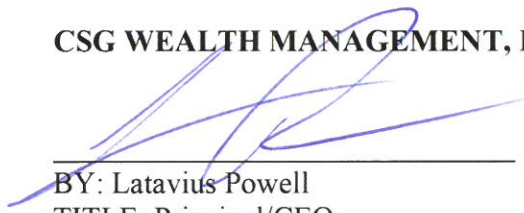
Respondents admit the jurisdiction of the Georgia Commissioner of Securities over this matter and, without admitting or denying the Findings of Facts therein, consent to the entry of this Consent Order as settlement of the issues contained in this Consent Order.

Respondents state that no promise of any kind or nature whatsoever was made to them to induce them to enter into this Consent Order and that they have entered into this Consent Order voluntarily.

Powell represents that he is an officer and principal of CSG and that, as such, has been authorized by CSG to enter into this Consent Order for and on behalf of CSG.

Dated this 20<sup>th</sup> day of June, 2018

**CSG WEALTH MANAGEMENT, LLC**

  
\_\_\_\_\_  
BY: Latavius Powell  
TITLE: Principal/CEO

State of GA

County of Henry

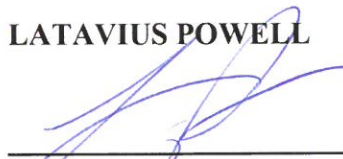
**SUBSCRIBED AND SWORN TO** before me this 20<sup>th</sup> day of June, 2018

My commission expires:  
04-12-2020

   
\_\_\_\_\_  
Notary Public

Dated this 20<sup>th</sup> day of June, 2018

**LATAVIUS POWELL**



BY: Latavius Powell  
TITLE: Individual

State of GA

County of Henry

**SUBSCRIBED AND SWORN TO** before me this 20<sup>th</sup> day of June, 2018



Notary Public

My commission expires:

04-12-2020

