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## Texas State Securities Board

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Austin, Texas 78701-2407  
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Phone: (512) 305-8300  
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IN THE MATTER OF  
THE INVESTMENT ADVISER  
REGISTRATION OF  
MARVIN M. SLATER  
DBA MARVIN M. SLATER  
& ASSOCIATES

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Order No. IC15-SUS-05

TO: Marvin Slater (CRD # 132459)  
9656 Lynbrook Drive  
Dallas, Texas 75238

### DISCIPLINARY ORDER

Be it remembered that Marvin M. Slater ("Respondent") appeared before the Securities Commissioner of the State of Texas ("Securities Commissioner") and consented to the entry of this order ("Order") and the Findings of Fact and Conclusions of Law contained herein.

### FINDINGS OF FACT

1. Respondent has waived (a) Respondent's rights to notice and hearing in this matter; (b) Respondent's rights to appear and present evidence in this matter; (c) Respondent's rights to appeal this Order; and (d) all other procedural rights granted to the Respondent by The Securities Act, Tex. Rev. Civ. Stat. Ann. arts. 581-1 to 581-43 (West 2010 & Supp. 2014)("Texas Securities Act"), and the Administrative Procedure Act, Tex. Gov't Code Ann. §§ 2001.001 to 2001.902 (West 2008 & Supp. 2014)("Administrative Procedure Act").
2. On October 7, 2004, Respondent registered as an investment adviser with the Securities Commissioner. This registration is currently effective.
3. On August 24, 2014 Respondent posted the following publicly accessible message on his Facebook page:

Disappointed in your 401K? CDs are no good. I recently  
cane (sic) across secured notes paying 9.3% annual and  
that beats both and has nothing to do with the stock market.

They're backed by insurance plans. In fact, insurance is worth more than double the issued notes. There's a free fact sheet I'm sending out that gives details. Let me know if you would like one even if you just want more info.

4. Respondent's post relates to promissory notes issued by Verto Capital Management, LLC ("Verto").
5. The promissory notes issued by Verto have a maturity of nine (9) months and offer a seven (7) percent return, which amounts to a nine and three-tenths percent (9.30%) annualized return.
6. According to Verto's offering documents, Verto plans to use the funds raised through the promissory notes to buy life settlements. Verto's business plan purportedly involves re-selling the life settlements to financial institutions for a profit, and the profit would be used to generate the returns to promissory note investors.
7. Verto also claims that the life settlements purchased with investor funds will serve as collateral for the promissory notes.
8. On or about October 21, 2104 Respondent sold a ten thousand dollar (\$10,000) Verto promissory note to his wife. Respondent received transaction based compensation in connection with this sale and would receive a commission in connection with any other sales of the promissory notes.
9. On November 6, 2014, Respondent posted the following message related to the Verto promissory notes on his public Facebook page:

Sure enough. We checked it out and bought into the secured note paying 7% every 9 months. That's 9.3% a year. Very safe and we did it and would recommend it for a safe base to an investment plan. You're not going to get that from a Cd (sic) or savings account. \$50,000 minimum and we feel peace of mind.

10. Respondent is not, and has never been, registered with the Securities Commissioner as a dealer or as an agent of a registered dealer

#### CONCLUSIONS OF LAW

1. The Verto promissory notes constitute "securities" as the term "securities" is defined by Section 4.A of the Texas Securities Act.
2. Respondent's offering and sale of the Verto promissory notes at a time when Respondent was not registered with the Securities Commissioner as a dealer or

as an agent of a registered dealer constitute violations of Section 12.A of the Texas Securities Act.

3. Pursuant to Section 23.A of the Texas Securities Act, the Securities Commissioner may issue a cease and desist order prohibiting Respondent from violating Section 12.A of the Texas Securities Act by acting as an unregistered dealer.
4. Pursuant to Section 14.A(6) of the Texas Securities Act, Respondent's violations of Section 12.A of the Texas Securities Act constitute bases for the suspension of Respondent's registration with the Securities Commissioner.

ORDER

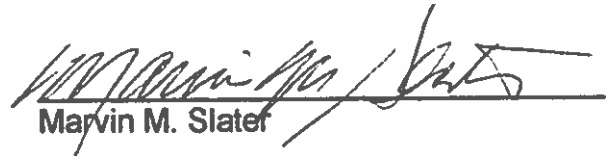
1. It is therefore ORDERED that Marvin M. Slater CEASE and DESIST from violating Section 12.A of the Texas Securities Act.
2. It is further ORDERED that the investment adviser registration of Marvin M. Slater is hereby SUSPENDED for a period of ninety (90) days from the date this Order is signed by the Securities Commissioner.

SIGNED AND ENTERED BY THE SECURITIES COMMISSIONER this 10th day of December, 2015.

JOHN MORGAN  
Securities Commissioner



Respondent:

  
Marvin M. Slater

Approved as to Form:



Ronak V. Patel  
Deputy Securities Commissioner

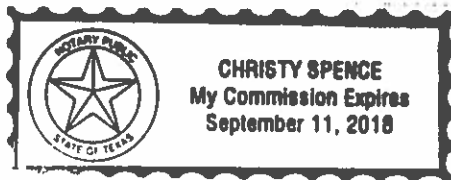


Callie Baker  
Attorney  
Inspections and Compliance Division

**ACKNOWLEDGMENT**

On the 7<sup>th</sup> day of December, 2015, Marvin M. Slater ("Respondent"), personally appeared before me, executed the foregoing Order, and acknowledged that:

1. Respondent has read the foregoing Order and Undertaking incorporated by reference herein;
2. Respondent has been full advised of his rights under the Texas Securities Act and the Administrative Procedures Act;
3. Respondent knowingly and voluntarily consents to the entry of the foregoing Order and the Findings of Fact and Conclusions of Law contained therein and Undertaking incorporated by reference herein; and
4. Respondent, by consenting to the entry of the foregoing Order, has knowingly and voluntarily waived its rights as set forth therein.



[affix notary seal here]

Christy Spence  
Notary Public in and for  
the State of Texas

My commission expires on: September 11, 2018