

1 **STATE OF WASHINGTON**  
2 **DEPARTMENT OF FINANCIAL INSTITUTIONS**  
3 **SECURITIES DIVISION**

4 IN THE MATTER OF DETERMINING  
Whether there has been a violation of the  
Securities Act of Washington by:

5 RRIM Asset Strategies, LLC;  
6 Robert Alexander Ritter,  
Respondents.

Order No.: S-18-2481-24-SC01

STATEMENT OF CHARGES AND NOTICE OF  
INTENT TO ENTER AN ORDER TO DENY  
FUTURE REGISTRATIONS, TO IMPOSE A  
FINE, AND TO CHARGE COSTS

7 **THE STATE OF WASHINGTON TO:** RRIM ASSET STRATEGIES, LLC, CRD 117297  
8 ROBERT ALEXANDER RITTER, CRD 1985776

9 **STATEMENT OF CHARGES**

10 Please take notice that the Securities Administrator of the state of Washington has reason to believe  
11 that Respondents, RRIM Asset Strategies, LLC, and Robert Alexander Ritter, violated the Securities Act of  
12 Washington. The Securities Administrator believes these violations justify the entry of an order against  
13 Respondents RRIM Asset Strategies, LLC, and Robert Alexander Ritter to deny future registrations, to  
14 impose a fine, and to charge costs pursuant to RCW 21.20.110, RCW 21.20.390, and RCW 21.20.395. The  
15 Securities Administrator finds as follows:

16 **TENTATIVE FINDINGS OF FACT**

17 **Respondents**

18 1. RRIM Asset Strategies, LLC (“RRIM” or “Adviser”) is a Washington limited liability  
19 company formed on July 18, 1997, with its principal place of business in Chandler, Arizona. RRIM was  
20 registered as an investment adviser with the Washington State Securities Division (“Securities Division”)  
21 from June 4, 1997, until December 31, 2023. RRIM failed to renew its registration in 2024. The investment  
22 adviser has a Central Registration Depository (“CRD”) number of 117297.  
23



1 10. On October 4, 2023, Respondents entered into a consent order with the Arizona Securities  
2 Division that denied Respondents' investment adviser application and required payment of restitution in the  
3 amount of \$32,430.91 and an administrative penalty in the amount of \$10,000.

4 *False Filing*

5 11. RRIM and Ritter filed an annual updating amendment to Form ADV each year as required.

6 12. From December 11, 2002, through March 19, 2019, Respondents reported their principal  
7 office and place of business to be in Kenmore, Washington, despite being physically located in Chandler,  
8 Arizona since 2010.

9 13. Respondents attested under penalty of perjury that no other places of business existed outside  
10 of the Kenmore office.

11 14. Respondents attested under penalty of perjury that no required books or records were kept  
12 outside of the principal place of business.

13 15. Respondents did not notify the Securities Division of any change in location until March 20,  
14 2019.

15 Based upon the above Tentative Findings of Fact, the following Conclusions of Law are made:

16 **CONCLUSIONS OF LAW**

17 1. The Arizona Securities Administrator entered an order against RRIM Asset Strategies, LLC  
18 denying registration as an investment adviser, which constitutes an order entered by a state securities  
19 administrator after notice and an opportunity for hearing. Arizona's order is grounds pursuant to RCW  
20 21.20.110(1)(e)(i) to deny any future investment adviser or broker-dealer registrations that it may seek.

21 2. The Arizona Securities Administrator entered an order against Robert Alexander Ritter  
22 denying registration as an investment adviser representative, which constitutes an order entered by a state  
23 securities administrator after notice and an opportunity for hearing. Arizona's order is grounds pursuant to

1 RCW 21.20.110(1)(e)(i) to deny any future investment adviser representative or securities salesperson  
2 registrations that Robert Alexander Ritter may seek.

3 3. Respondent RRIM Asset Strategies, LLC violated RCW 21.20.350 by making Form ADV  
4 filings from 2010 to 2019 that were materially false or misleading, as described in the Tentative Findings of  
5 Fact. Pursuant to RCW 21.20.110(1) and (7), such conduct is grounds for fines, costs, and denial of any  
6 future investment adviser and broker-dealer applications that RRIM Asset Strategies, LLC may file.

7 4. Respondent Robert Alexander Ritter violated RCW 21.20.350 by making Form ADV filings  
8 from 2010 to 2019 that were materially false or misleading, as described in the Tentative Findings of Fact.  
9 Pursuant to RCW 21.20.110(1) and (7), such conduct is grounds for fines, costs, and denial of any future  
10 investment adviser representative and securities salesperson applications that Robert Alexander Ritter may  
11 file.

### 12 **NOTICE OF INTENT TO DENY FUTURE REGISTRATIONS**

13 Pursuant to RCW 21.20.110(1), and based upon the above Tentative Findings of Fact and Conclusions  
14 of Law, the Securities Administrator intends to enter an order to deny any future investment adviser and  
15 broker-dealer registrations for RRIM Asset Strategies, LLC.

16 Pursuant to RCW 21.20.110(1), and based upon the above Tentative Findings of Fact and Conclusions  
17 of Law, the Securities Administrator intends to enter an order to deny any future investment adviser  
18 representative and securities salesperson registrations for Robert Alexander Ritter.

### 19 **NOTICE OF INTENT TO IMPOSE FINES**

20 Pursuant to RCW 21.20.395(1) and RCW 21.20.110, and based upon the Tentative Findings of Fact  
21 and Conclusions of Law, the Securities Administrator intends to order that RRIM Asset Strategies, LLC and  
22 Robert Alexander Ritter shall be jointly and severally liable for and shall pay a fine of \$20,000.

### 23 **NOTICE OF INTENT TO CHARGE COSTS**

1 Pursuant to RCW 21.20.390(5) and RCW 21.20.110(7), and based upon the above Tentative Findings  
2 of Fact and Conclusions of Law, the Securities Administrator intends to order that RRIM Asset Strategies,  
3 LLC and Robert Alexander Ritter shall be jointly and severally liable for and shall pay costs, fees, and other  
4 expenses incurred in the administrative investigation and hearing of this matter, in an amount not less than  
5 \$1,500.

6 **AUTHORITY AND PROCEDURE**

7 This Statement of Charges is entered pursuant to the provisions of Chapter 21.20 RCW and is  
8 subject to the provisions of RCW 21.20.120 and Chapter 34.05 RCW. RRIM Asset Strategies, LLC and  
9 Robert Alexander Ritter may make a written request for a hearing as set forth in the Notice of Opportunity  
10 for Hearing accompanying this Order. If a respondent does not request a hearing in the allowed time, the  
11 Securities Administrator intends to adopt the above Tentative Findings of Fact and Conclusions of Law as  
12 final and enter an order denying each respondent's future registrations and imposing the fine and charging  
13 the costs sought.

14 SIGNED AND ENTERED THIS 11th day of December, 2024.



17 /s/

18 \_\_\_\_\_  
19 William M. Beatty  
20 Securities Administrator

21 Approved by:

Presented by:

22 \_\_\_\_\_ /s/  
23 Brian Guerard

\_\_\_\_\_/s/  
Sara Lewis

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Chief of Enforcement

Financial Legal Examiner