STATE OF OREGON
DEPARTMENT OF CONSUMER AND BUSINESS SERVICES
DIVISION OF FINANCIAL REGULATION

In the Matter of:	Case No. S-15-0089
RELIANCE INVESTING, INC. and DESTRY WITT, Respondents.	ORDER TO CEASE AND DESIST, ORDER ASSESSING CIVIL PENALTIES, AND CONSENT TO ENTRY OF ORDER

The Director of the Department of Consumer and Business Services for the State of Oregon ("the Director"), acting in accordance with the Oregon Securities Law, Oregon Revised Statutes ("ORS") 59.005 to 59.451, 59.991 and 59.995, and Oregon Administrative Rules ("OAR") chapter 441, has investigated the securities business activities of Reliance Investing, Inc. and Destry Witt (collectively, "Respondents").

Respondents wish to resolve this matter with the Director;

Now, therefore, as evidenced by the signatures subscribed herein, Respondents hereby CONSENT to the entry of this Order.

Division of Financial Regulation
Labor and Industries Building
350 Winter Street NE, Suite 410
Salem, OR 97301-3881
Telephone: (503) 378-4387

FINDINGS OF FACT

The Director FINDS that:

1. Reliance Investing, Inc. ("Reliance") is a state investment adviser with a principal place of business in Sandy, Utah. Reliance is licensed in Utah, California, Texas, and Washington. The Investment Advisor Registration Depository ("IARD") number for Reliance is #148481.

2. At times material to this Order, the principal place of business of Reliance was in Vancouver, Washington.

3. Destry Witt ("Witt") is the president of Reliance, and he owns 75 percent or more of Reliance. At times material to this Order, Witt was the president and chief compliance officer of Reliance. The Central Registration Depository number for Witt is #2176013.

4. During 2013 and 2014, Reliance transacted business as a state investment adviser for at least six clients who reside in Oregon. Reliance received fees for advising Oregon clients as to the value of securities or as to the advisability of investing in, purchasing or selling securities.

5. During 2013 and 2014, Witt conducted business as an investment adviser representative for Reliance by making recommendations, or otherwise rendering advice regarding securities, to at least six clients who reside in Oregon. Witt received fees in connection with those business activities.

6. At all times material to this Order, Reliance was not licensed in Oregon as a state investment adviser.

7. At all times material to this Order, Witt was not licensed in Oregon as an investment adviser representative to work for Reliance.

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CONCLUSIONS OF LAW

The Director CONCLUDES that:

8. At times material to this Order, Reliance acted as a "state investment adviser" in Oregon, as defined by ORS 59.015(20)(a).

9. At times material to this Order, Witt acted as an "investment adviser representative" of Reliance in Oregon, as defined by ORS 59.015(8)(a).

10. During 2013 and 2014, Reliance transacted business in Oregon as a state investment adviser without a license under the Oregon Securities Law, in violation of ORS 59.165(6).

11. During 2013 and 2014, Witt transacted business in Oregon as an investment adviser representative without an investment adviser representative license, in violation of ORS 59.165(4)(c).

ORDERS

The Director issues the following ORDERS:

12. In accordance with ORS 59.245(4), Witt is hereby ORDERED to CEASE AND DESIST from:

A. Transacting business in Oregon as an investment adviser representative without the required license, in violation of ORS 59.165(4)(c), unless exempt from the licensing requirements; and

B. Violating any provision of Oregon Revised Statutes chapter 59 or Oregon Administrative Rules chapter 441.

13. In accordance with ORS 59.245(4), Reliance is hereby ORDERED to CEASE AND DESIST from:

A. Transacting business in Oregon as a state investment adviser without the required license, in violation of ORS 59.165(6), unless exempt from the licensing requirements; and

B. Violating any provision of Oregon Revised Statutes chapter 59 or Oregon Administrative Rules chapter 441.

Orders Assessing Civil Penalties

14. In accordance with ORS 59.995, the Director may assess CIVIL PENALTIES in an amount not to exceed $20,000 per violation against any person who violates or who procures, aids or abets in a violation of the Oregon Securities Law. In the case of a continuing violation, each day's continuance is a separate violation, but the maximum penalty for any continuing violation shall not exceed $100,000.

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15. In accordance with ORS 59.995(1), the Director hereby ORDERS Reliance to pay a CIVIL PENALTY of $5,000 for violations of ORS 59.165(6), transacting business in Oregon as a state investment adviser without being licensed as such under the Oregon Securities Law.

16. The Director SUSPENDS the collection of $2,500 of the civil penalties assessed against Reliance, so long as Reliance complies with all terms and conditions of this Order and all requirements of the Oregon Securities Law. If Reliance complies with the terms of this Order and the Director has not initiated an enforcement action for new violations of the Oregon Securities Law during the three-year period from the effective date of this Order, the Director WAIVES the collection of the suspended CIVIL PENALTY assessed against Reliance herein.

17. Reliance must pay $2,500 of the civil penalties at signing, prior to the entry of this Order.

18. In accordance with ORS 59.995(1), the Director hereby ORDERS Witt to pay a CIVIL PENALTY of $5,000 for violations of ORS 59.165(4)(c), transacting business in Oregon as an investment adviser representative without an investment adviser representative license.

19. The Director SUSPENDS the collection of $2,500 of the civil penalties assessed against Witt, so long as Witt complies with all terms and conditions of this Order and all requirements of the Oregon Securities Law. If Witt complies with the terms of this Order and the Director has not initiated an enforcement action for new violations of the Oregon Securities Law during the three-year period from the effective date of this Order, the Director WAIVES the collection of the suspended CIVIL PENALTY assessed against Witt herein.

20. Witt must pay $2,500 of the civil penalties at signing, prior to the entry of this Order.

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21. The Director reserves the right to immediately take enforcement action, pursuant to the procedures set forth in ORS 183.745, to impose the suspended CIVIL PENALTIES if Reliance or Witt violates any term of this Order.

22. This Order is a "Final Order" under ORS 183.310(6)(b). Subject to that provision, the entry of this Order does not limit other remedies that are available to the Director under Oregon law.

SO ORDERED this 17th day of June, 2019.

CAMERON C. SMITH, Director
Department of Consumer and Business Services

/s/ Dorothy Bean
Dorothy Bean, Chief of Enforcement
Division of Financial Regulation

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CONSENT OF DESTRY WITT TO ENTRY OF ORDER

I, Destry Witt, state that I am a resident of the State of Washington, that I have read the foregoing Order and that I know and fully understand the contents hereof; that the factual allegations stated herein are true and correct; that I have been advised of my right to a hearing, and that I have been represented by counsel in this matter; that I voluntarily consent to the entry of this Order without any force or duress, expressly waiving any right to a hearing in this matter; that I understand that the Director reserves the right to take further actions against me to enforce this Order or to take appropriate action upon discovery of other violations of the Oregon Securities Law by me; and that I will fully comply with the terms and conditions stated herein.

I understand that this Order is a public document.

/s/ Destry Witt
Destry Witt

State of _____

County of _____

Subscribed and affirmed before me by Destry Witt this _____ day of _____, 2019.

***SEE ATTACHED NOTARIAL DOCUMENT #2*

_____
Notary Public

Division of Financial Regulation
Labor and Industries Building
350 Winter Street NE, Suite 410
Salem, OR 97301-3881
Telephone: (503) 378-4387

NOTARY DOCUMENT # 2

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California
County of ORANGE

Subscribed and sworn to (or affirmed) before me on this 10th day of JUNE, 2019, by DESTRY WITT,

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

BCT3 ABBA KO-KIM COMM...2187672 NOTARY PUBLIC-CALIFORNIA ORANGE COUNTY My Term Exp. March 23, 2021 BCT3

(Seal) Signature

ADDITIONAL DOCUMENT DETAILS (Optional, Used for Document Security)

Name/Title of Document: Consent of Destry Witt to Entry of Order

Capacity Claimed by Signer(s):

Total Number of Pages in Document (not including this certificate):

Right Thumbprints of Signer(s):

Initials: Initials:

Document Date:

Additional Details:

CONSENT TO ENTRY OF ORDER BY RELIANCE INVESTING, INC.

Reliance Investing, Inc. ("Reliance") states that one or more of its employees and/or officers with appropriate authority has read this Consent Order, fully understands its contents, and the factual allegations stated herein are true and correct. Reliance consents to the entry of this Consent Order, and will take any necessary steps to ensure that Reliance fully complies with the terms of the Order.

Reliance further states that it has been represented by counsel in this matter, advised of its right to a hearing, and voluntarily and without any force or duress expressly waives any right to a hearing in this matter. Reliance understands that the Director reserves the right to take further actions against Reliance to enforce this Order or to take appropriate action upon discovery of other violations of the Oregon Securities Law by Reliance.

Reliance understands that this Consent Order is a public document.

Destry Witt is president of Reliance and is authorized to execute this Consent to Entry of Order on behalf of Reliance.

Reliance Investing, Inc.

By: */s/ Destry Witt*
Destry Witt
President

State of *California*

County of _____

Subscribed and affirmed before me by Destry Witt this ____ day of

_____, 2019.

***SEE ATTACHED NOTARIAL DOCUMENT #1*

_____
Notary Public

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NOTARY DOCUMENT # 1

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State of California
County of ORANGE

Subscribed and sworn to (or affirmed) before me on this 10th day of JUNE, 2019, by DESTRY WITT,

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

BCT3 ABBA KO-KIM COMM...2187672 NOTARY PUBLIC-CALIFORNIA ORANGE COUNTY My Term Exp. March 23, 2021 BCT3

(Seal) Signature

ADDITIONAL DOCUMENT DETAILS (Optional, Used for Document Security)

Name/Title of Document: Consent to Entry of Order By Reliance Investing

Capacity Claimed by Signer(s): _____

Total Number of Pages in Document (not including this certificate): _____

Right Thumbprints of Signer(s):

Initials: Initials:

Document Date: _____

Additional Details: _____