STATE OF OREGON
DEPARTMENT OF CONSUMER AND BUSINESS SERVICES
DIVISION OF FINANCE AND CORPORATE SECURITIES

BEFORE THE DIRECTOR OF THE DEPARTMENT OF CONSUMER AND BUSINESS SERVICES

In the Matter of **UMRAAN SYED HASAN, a/k/a Suvraan Hasan, a/k/a Ron Hasan, an individual, d/b/a STRATEGIC FUNDS GROUP, LP, d/b/a STRATEGIC HEDGE FUND, LP, and d/b/a STRATEGIC MINI HEDGE FUND, LP,** **Respondent.**	**S-05-0095** **FINAL ORDER TO CEASE AND DESIST AND ASSESSING CIVIL PENALTIES ENTERED BY DEFAULT**

On January 4, 2007, the Director of the Department of Consumer and Business Services for the State of Oregon (hereafter "the Director"), acting by and pursuant to the authority of the Oregon Securities Law, Oregon Revised Statutes ("ORS") chapter 59, and other applicable authority, issued Administrative Order No. S-05-0095 to **CEASE AND DESIST, ASSESSING CIVIL PENALTIES AND NOTICE OF RIGHT TO HEARING** ("the Cease and Desist Order") against **UMRAAN SYED HASAN**, a/k/a Suvraan Hasan, a/k/a Ron Hasan, ("**HASAN**"), d/b/a **STRATEGIC FUNDS GROUP, LP**, d/b/a **STRATEGIC HEDGE FUND, LP**, and d/b/a **STRATEGIC MINI HEDGE FUND, LP** ("**STRATEGIC**").

On or about January 6, 2007, **HASAN** was duly served with a true copy of the Cease and Desist Order by certified mail, postage prepaid, addressed to Respondent at 18352 Dallas Parkway #13-635, Dallas, Texas 75287-5227 and 4511 Doss Road #5M, Austin, Texas 78734.

HASAN has not made a written request for a contested case hearing in this matter and time to do so has expired.

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NOW THEREFORE, after consideration of the Investigation Report and accompanying exhibits submitted in this matter by Susan L. Schoaps, Enforcement Investigator, the Director hereby issues the following **FINDINGS OF FACT, CONCLUSIONS OF LAW AND FINAL ORDER.**

FINDINGS OF FACT

The Director **FINDS** that:

1. Respondent **UMRAAN SYED HASAN**, a/k/a Suvraan Hasan, a/k/a Ron Hasan, is an individual with a last known address of 4511 Doss Road, #5M, Austin, Texas 78734 or 18352 Dallas Parkway, 13-635, Dallas, Texas 75287-5227. At all relevant times hereto, **HASAN** was in business using the business names **STRATEGIC FUNDS GROUP, LP; STRATEGIC HEDGE FUND, LP**; and **STRATEGIC MINI HEDGE FUND, LP**, as well as others. Each of these businesses offered and sold securities.

2. At all times relevant hereto, Peter Leveque (hereinafter "Leveque") was a resident of the State of Oregon.

3. In 1997, Leveque read an advertisement for **STRATEGIC** in the Investor's Business Daily. Leveque contacted **STRATEGIC** and received a prospectus for the "Strategic Mini Hedge Fund, LP," accompanied by a cover letter from **HASAN** dated July 15, 1997.

4. The cover letter is written on stationery for **STRATEGIC** and is signed by **HASAN**, who is identified as "General Partner."

5. **HASAN**'s cover letter states: "Enclosed is a prospectus and account application for Strategic Mini Hedge Fund, LP." In the letter, **HASAN** describes the fund as one that "will participate in stocks, stock-options as well as commodity and stock-index contracts . . ." The letter also provides: "Eighty five percent (85%) of your contributed funds will be placed in 1yr. U.S. Treasury Bills, which will be used to post trading margins while providing you with a small stream of interest income."

6. The representations in the prospectus are consistent with the statements made by

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HASAN in the cover letter. The prospectus states: "THESE SECURITIES HAVE NOT BEEN APPROVED OR DISAPPROVED BY THE SECURITIES AND EXCHANGE COMMISSION OR ANY STATE SECURITIES COMMISSION NOR HAS THE SECURITIES AND EXCHANGE COMMISSION PASSED UPON THE ACCURACY OR ADEQUACY OF THIS PROSPECTUS." (Emphasis in original.)

7. Leveque invested thousands of dollars in the Strategic Mini Hedge Fund, LP.

8. In October 2001, Leveque received a disbursement from **STRATEGIC** in the amount of $11,140.00 signed by **HASAN**.

9. In March 2002, Leveque requested a $24,000.00 disbursement from **STRATEGIC**. He received e-mail from **STRATEGIC** stating that the requested disbursement would be made in July 2002. The disbursement was never made and Leveque has been unable to contact either **STRATEGIC** or **HASAN** since that time.

10. **HASAN** is not, and never has been, licensed to sell securities in the State of Oregon.

11. **STRATEGIC** is not, and never has been, licensed to sell securities in the State of Oregon.

12. The Strategic Mini Hedge Fund, LP was not registered with the Director.

CONCLUSIONS OF LAW

The Director **CONCLUDES** that:

13. The Strategic Mini Hedge Fund, LP offered and sold by **HASAN** and **STRATEGIC** is a security as defined by ORS 59.015(19)(a).

14. **HASAN** and **STRATEGIC** offered and sold securities in the State of Oregon without being licensed to do so in violation of ORS 59.165.

15. **HASAN** and **STRATEGIC** offered and sold securities in the State of Oregon, which were not registered with the Director in violation of ORS 59.055.

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ORDER

16. The Director, pursuant to ORS 59.245, hereby **ORDERS** that Respondents Umraan Syed **HASAN**, a/k/a Suvraan Hasan, a/k/a Ron Hasan and Strategic Funds Group, LP, and any successor business entity owned, operated or under the control of Umraan Syed Hasan, a/k/a Suvraan Hasan, a/k/a Ron Hasan, shall **CEASE and DESIST** from:

A. Selling securities without a license in violation of Oregon Securities Laws;

B. Selling unregistered securities in the State of Oregon in violation of Oregon Securities Laws; and

C. Violating any provision of the Oregon Securities Laws, including ORS Chapter 59 and OAR Chapter 441.

The Director, pursuant to ORS 59.995, **HEREBY ORDERS** assessment of the following **CIVIL PENALTIES:**

17. Respondents Umraan Syed Hasan, a/k/a Suvraan Hasan, a/k/a Ron Hasan and Strategic Funds Group, LP, and any successor business entity owned, operated or under the control of Umraan Syed Hasan, a/k/a Suvraan Hasan, a/k/a Ron Hasan, shall be denied the use of any securities licensing or registration exemptions contained in the Oregon Securities Laws, including ORS chapter 59 and OAR chapter 441.

18. Respondent Umraan Syed Hasan, a/k/a Suvraan Hasan, a/k/a Ron Hasan, shall pay monetary **CIVIL PENALTIES** in the following amounts, due upon execution of this Order:

A. $10,000 (ten thousand dollars) for violation of ORS 59.055 (sale of unregistered securities); and

B. $10,000 (ten thousand dollars) for violation of ORS 59.165 (unlicensed sale of securities) for a **TOTAL CIVIL PENALTY** of $20,000 (twenty thousand dollars).

19. The entry of this Order in no way limits further remedies which may be available to the Director under Oregon law.

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IT IS SO ORDERED.

Dated this 5th day of March, 2007 at Salem, Oregon, NUNC PRO TUNC, January 4, 2007.

CORY STREISINGER, Director
Department of Consumer and Business Services

David C. Tatman, Administrator
Division of Finance and Corporate Securities

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