

**STATE OF ILLINOIS
SECRETARY OF STATE
SECURITIES DEPARTMENT**

IN THE MATTER OF:)	
)	
TIMOTHY JOHN ROTH)	Case No. 1100183
CRD #722565)	

TEMPORARY ORDER OF SUSPENSION AND PROHIBITION

**TO RESPONDENT: TIMOTHY J. ROTH
 2203 FLETCHER ST.
 URBANA, ILLINOIS
 61801**

On information and belief, I, Jesse White, Secretary of State for the State of Illinois, through my designated representative, who has been fully advised in the premises by the staff of the Illinois Securities Department (the "Department"), Office of the Secretary of State, herein find:

1. Respondent Timothy John Roth ("Roth") with a last known address of 2203 Fletcher Street in Urbana, Illinois, was from January 2, 2007 to February 28, 2011, an Illinois registered investment advisor representative for Comprehensive Capital Management, Inc., ("CCM", a Federally Covered Investment Adviser) and was from January 25, 2005 until February 28, 2011 an Illinois registered securities salesperson for Comprehensive Asset Management and Servicing, Inc ("CAMAS", an Illinois registered securities dealer).
2. Roth is also the President of Keysoft Group, Inc with a business address of 108 Hessel Blvd Champaign, Illinois 61820. Keysoft Group, Inc. a successor organization of Keysoft Consulting Group, LLC, is a software development company, consulting firm and software developer for third party administration of Internal Revenue Code Section 83 compensation plans relating to non-qualified deferred compensation plans.
3. Additionally, Roth is the Chairman and CEO of Managed Income Strategies, LLC, an Indiana registered Limited Liability Company located in Indianapolis, IN.

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4. From October 7, 2008 through October 7, 2010, Roth was an Illinois licensed insurance producer with the Illinois Department of Insurance.
5. While employed with CCM and CAMAS as an investment adviser representative and securities salesperson, Roth worked from a branch office of CCM and CAMAS located at 108 Hessel Blvd, Suite 201, Champaign, Illinois, 61820.
6. According to records of the Department, this office is not reported to the Department as a branch office.
7. On or about February 28, 2011, CCM and CAMAS terminated Roth's employment after an internal review by the Qualified Custodian for CCM and/or CAMAS, triggered an inquiry into money being diverted from accounts of large institutional employers under Roth's investment management and for which he was the designated investment adviser representative and/or securities salesperson.
8. At least four of these accounts were characterized as non qualified deferred compensation plan accounts for key personnel of these institutions.
9. Roth had, during the time period of the inquiry utilized his discretion for these accounts through his position at CCM and CAMAS to divert cash and securities from those accounts into other accounts under Roth's control.
10. Through this scheme, Roth diverted at least \$4,000,000.00, from these accounts into accounts under his control.
11. Section 12.F of the Act provides, *inter alia*, that it shall be a violation of the Act for any person to engage in any transaction, practice or course of business in connection with the sale or purchase of securities which works or tends to work a fraud or deceit upon the purchaser or seller thereof.
12. Section 12.G of the Act provides, *inter alia*, that it shall be a violation of the Act for any person to obtain money or property through the sale of securities by means of any untrue statement of a material fact or any omission to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading.
13. Section 12. J of the Act provides, *inter alia* that it shall be a violation of the Act for any person when acting as an investment adviser representative, by any mean or instrumentality, directly or indirectly: employ any device, scheme or artifice to defraud any client or prospective client, engage in any act, practice or course of business which operates as a fraud or deceit upon any client or prospective client, or engage in any act, practice or course of business which is fraudulent, deceptive or manipulative.

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14. That by virtue of the foregoing the Respondent's registrations are subject to suspensions pursuant to Section 8.E.1(b), (g) and (m) of the Act.
15. That Section 8.E.3 of the Act provides, *inter alia*, that the Secretary of State may institute within two years after withdrawal of registration became effective and enter a revocation or suspension order as of the last date on which registration was effective.
16. That Section 11.F.(2) of the Act provides, *inter alia*, that the Secretary of State may temporarily suspend the registrations of a salesperson or investment adviser representative if the Secretary of State in his or her opinion, based upon credible evidence, deems it necessary to prevent an imminent violation of the Act or to prevent losses to investors which the Secretary of State reasonably believes will occur as a result of a prior violation of the Act.
17. Also, Section 11.F(2) of the Act provides, *inter alia*, that the Secretary of State may temporarily or prohibit suspend the offer or sale of securities by any person, without notice and prior hearing, if the Secretary of State shall deem it necessary to prevent an imminent violation of the Act or to prevent losses to investors that will occur as a result of prior violations of the Act.
18. That based upon the foregoing, the Secretary of State deems it necessary, in order to prevent imminent and additional violations of the Act, and to prevent losses to investors as a result of the referenced prior violation of the Act, to enter an order pursuant to the authority granted under Section 11.F of the Act which suspends the salesperson and investment adviser representative registrations of the Respondent.
19. The entry of this Temporary Order of Suspension and Prohibition prohibiting Roth from offering or selling securities and suspending his registrations as an investment adviser representative and salesperson of securities in the State of Illinois is in the public interest and for the protection of the investing public and is consistent with the purposes intended by the provisions of the Act.

NOW THEREFORE IT IS HEREBY ORDERED THAT: pursuant to the authority granted by Section 11.F of the Act, Respondent, **TIMOTHY JOHN ROTH, is Temporarily Prohibited** from offering or selling securities in or from this State until the further Order of the Secretary of State and is registrations in Illinois as an investment adviser representative and salesperson **Are Temporarily Suspended.**

NOTICE is hereby given that Respondent may request a hearing on this matter by transmitting such request in writing to the Director, Illinois Securities Department, 69 West Washington Street, Suite 1220, Chicago, Illinois 60602. Such request must be made within thirty (30) calendar days of the date of entry of the Temporary Order of Suspension and Prohibition. Upon receipt of a request for hearing, a hearing will be scheduled as soon as reasonably practicable. A request for hearing will not stop the effectiveness of this Temporary

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Order of Suspension and Prohibition and will extend the effectiveness of this Temporary Order of Suspension and Prohibition for sixty (60) days from the date the hearing request is received by the Department.

FAILURE BY ANY RESPONDENT TO REQUEST A HEARING WITHIN THIRTY (30) CALENDAR DAYS AFTER ENTRY OF THIS TEMPORARY ORDER OF PROHIBITION SHALL CONSTITUTE AN ADMISSION OF ANY FACTS ALLEGED HEREIN AND SHALL CONSTITUTE SUFFICIENT BASIS TO MAKE THIS TEMPORARY ORDER OF PROHIBITION FINAL.

Dated: This 15th day of March, 2011.

A handwritten signature in black ink that reads "Jesse White" with a stylized flourish at the end.

JESSE WHITE
Secretary of State
State of Illinois

Attorney for the Secretary of State:

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