UNITED STATES OF AMERICA Before the SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934 Release No. 83371 / June 4, 2018

INVESTMENT ADVISERS ACT OF 1940 Release No. 4936 / June 4, 2018

ADMINISTRATIVE PROCEEDING File No. 3-18529

In the Matter of

CHRISTOPHER C. BURTRAW.

Respondent.

ORDER INSTITUTING
ADMINISTRATIVE PROCEEDINGS
PURSUANT TO SECTION 15(b) OF THE
SECURITIES EXCHANGE ACT OF 1934
AND SECTION 203(f) OF THE
INVESTMENT ADVISERS ACT OF 1940,
MAKING FINDINGS, AND IMPOSING
REMEDIAL SANCTIONS

T.

The Securities and Exchange Commission ("Commission") deems it appropriate and in the public interest that public administrative proceedings be, and hereby are, instituted pursuant to Section 15(b) of the Securities Exchange Act of 1934 ("Exchange Act") and Section 203(f) of the Investment Advisers Act of 1940 ("Advisers Act") against Christopher C. Burtraw ("Burtraw" or "Respondent").

II.

In anticipation of the institution of these proceedings, Respondent has submitted an Offer of Settlement (the "Offer") which the Commission has determined to accept. Solely for the purpose of these proceedings and any other proceedings brought by or on behalf of the Commission, or to which the Commission is a party, Respondent admits the Commission's jurisdiction over him and the subject matter of these proceedings and the findings contained in Section III.2 below, and consents to the entry of this Order Instituting Administrative Proceedings Pursuant to Section 15(b) of the Securities Exchange Act of 1934 and Section 203(f) of the Investment Advisers Act of 1940, Making Findings, and Imposing Remedial Sanctions ("Order"), as set forth below.

III.

On the basis of this Order and Respondent's Offer, the Commission finds that

- 1. From October 2014 to September 2015, Burtraw was associated with a registered broker-dealer and a registered investment adviser. Burtraw, age 38, is a resident of Denver, Colorado.
- 2. On November 2, 2017, following a jury trial, Burtraw was convicted of one count of theft in violation of Colo. Rev. Stat. § 18-4-401 (1), (2)(i), a class three felony, before the District Court, Jefferson County, Colorado, in People v. Christopher C. Burtraw, Case No. 2016 CR 003246. On January 8, 2018, a judgment in the criminal case was entered against Burtraw. Burtraw was sentenced to four years of probation and one year of work release, and was ordered to pay restitution of \$75,000.
- 3. According to the criminal complaint, the theft count on which Burtraw was convicted alleged that between March 2015 and August 2015, Burtraw unlawfully, and knowingly, without authorization or by threat or deception, obtained, retained, or exercised control over, or knowing or believing it to have been stolen, received, loaned money by pawn or pledge on, or disposed of, a thing of value, namely, cash/U.S. currency, check, and personal property, belonging to another individual with the intent to deprive that individual of its use or benefit, and knowingly used, concealed, or abandoned the thing of value in such a manner as to permanently deprive that individual of its use or benefit.

IV.

In view of the foregoing, the Commission deems it appropriate and in the public interest to impose the sanctions agreed to in Respondent Burtraw's Offer.

Accordingly, it is hereby ORDERED pursuant to Section 15(b)(6) of the Exchange Act, and Section 203(f) of the Advisers Act, that Respondent Burtraw be, and hereby is barred from association with any investment adviser, broker, dealer, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization; and

Pursuant to Section 15(b)(6) of the Exchange Act that Respondent Burtraw be, and hereby is barred from participating in any offering of a penny stock, including: acting as a promoter, finder, consultant, agent or other person who engages in activities with a broker, dealer or issuer for purposes of the issuance or trading in any penny stock, or inducing or attempting to induce the purchase or sale of any penny stock.

Any reapplication for association by the Respondent will be subject to the applicable laws and regulations governing the reentry process, and reentry may be conditioned upon a number of factors, including, but not limited to, the satisfaction of any or all of the following: (a) any disgorgement ordered against the Respondent, whether or not the Commission has fully or partially waived payment of such disgorgement; (b) any arbitration award related to the conduct that served

as the basis for the Commission order; (c) any self-regulatory organization arbitration award to a customer, whether or not related to the conduct that served as the basis for the Commission order; and (d) any restitution order by a self-regulatory organization, whether or not related to the conduct that served as the basis for the Commission order.

By the Commission.

Brent J. Fields Secretary