

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 66666 / March 27, 2012

INVESTMENT ADVISERS ACT OF 1940
Release No. 3385 / March 27, 2012

ADMINISTRATIVE PROCEEDING
File No. 3-14814

In the Matter of

Rafael Sanchez,

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**

I.

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 Rafael Sanchez (“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, and without admitting or denying the findings herein, except as to the Commission’s jurisdiction over him and the subject matter of these proceedings, and the findings contained in Section III.2 below, which are admitted, Respondent 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. Sanchez, 54 years old, is a resident of Altadena, California. From September 2007 to February 2011, Sanchez was a registered representative with MAM Wealth Management, LLC (dba MAM Securities, LLC) ("MAM"), a California limited liability company formed in 2003, with its principal place of business in Sherman Oaks, California. From January 28, 2003 to August 16, 2011, MAM was a Commission registered broker-dealer and a California registered investment adviser.

2. On February 1, 2012, a judgment was entered by consent against Sanchez, permanently enjoining him from future violations of Section 17(a) of the Securities Act of 1933 ("Securities Act"), Section 10(b) of the Exchange Act and Rule 10b-5 thereunder, and Sections 206(1) and 206(2) of the Advisers Act, in the civil action entitled Securities and Exchange Commission v. MAM Wealth Management, LLC, et al., Civil Action Number CV 11-2934 SJO (JCx), in the United States District Court for the Central District of California, Western Division.

3. The Commission's complaint alleged that from July 2007 through March 2009, Sanchez and his codefendant, Alex Martinez, invested approximately \$10.3 million of their advisory clients' funds in MAM Wealth Management Real Estate Fund, LLC ("Fund"), a speculative and risky investment suitable only for sophisticated investors. Despite his knowledge of these risks, Sanchez knowingly and recklessly misrepresented to clients that the Fund was a safe and relatively liquid investment. In addition, Sanchez and Martinez used their discretionary authority over the funds of MAM clients to invest substantial client assets into the Fund, in breach of their fiduciary duty because the Fund was an unsuitable investment for their clients who were unaccredited investors, retirees with limited means, or the Fund was contrary to the clients' stated conservative investment goals.

IV.

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

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

Elizabeth M. Murphy
Secretary