



**COMMONWEALTH OF KENTUCKY
PUBLIC PROTECTION CABINET
DEPARTMENT OF FINANCIAL INSTITUTIONS
ADMINISTRATIVE ACTION NO. 2026-DFI-0003**

KENTUCKY DEPARTMENT OF FINANCIAL INSTITUTIONS

COMPLAINANT

v.

ASPIRING VENTURES LLC
d/b/a BRILLIANT ADVICE, LLC
and
CERN WILLIAM BASHER

RESPONDENTS

AGREED ORDER

PARTIES

1. The Kentucky Department of Financial Institutions (hereinafter, the “Department”) is responsible for administering the provisions of Kentucky Revised Statutes (KRS) Chapter 292, the Securities Act of Kentucky, as well as any applicable rules, regulations, and orders enacted pursuant to the Code.

2. Aspiring Ventures LLC, d/b/a Brilliant Advice, LLC (“Brilliant Advice, LLC”)(CRD # 282891) is an Ohio limited liability company formed in Delaware with a principal address at 8044 Montgomery Road, Suite 700, Cincinnati, Ohio 45236.

3. Cern William Basher (CRD # 4401337) is the owner of and an investment adviser representative on behalf of Brilliant Advice, LLC.

STATEMENT OF FACTS

4. On October 25, 2023, the Department received an investment adviser registration application from Brilliant Advice, LLC seeking registration in Kentucky.

5. The Department discovered that before the company had sought registration, Brilliant Advice, LLC and Cern William Basher appeared to serve as an investment adviser and investment

adviser representative, respectively, to more than five Kentucky clients for the period August 2020 to July 2022.

STATUTORY AUTHORITY

6. KRS 292.330(8) states,

It is unlawful for any person to transact business in this state as an investment adviser unless the person is registered under this chapter as an investment adviser or is exempt from registration under subsection (9) of this section.

7. KRS 292.330(9) states in part:

The following investment advisers are exempt from the registration requirement of subsection (8) of this section:

...

(b) An investment adviser that has no place of business in this state if, during any period of twelve (12) consecutive months, the investment adviser does not have more than five (5) clients, other than those specified in paragraph (a) of this subsection;....

8. KRS 292.330(11) states,

It is unlawful for an individual to transact business in this state as an investment adviser representative unless the individual is registered under this chapter as an investment adviser representative or is exempt from registration under subsection (12) of this section.

9. KRS 292.330(10) states,

It is unlawful for an investment adviser to employ or associate with an investment adviser representative unless the representative is registered under this chapter or exempt from registration.

10. 15 U.S.C. §80b-18a(d) states:

No law of any State or political subdivision thereof requiring the registration, licensing, or qualification as an investment adviser shall require an investment adviser to register with the securities commissioner of the State (or any agency or officer performing like functions) or to comply with such law (other than any provision thereof prohibiting fraudulent conduct) if the investment adviser—

(1) does not have a place of business located within the State; and
(2) during the preceding 12-month period, has had fewer than 6 clients who are residents of that State.

11. KRS 292.470 states, in pertinent part,

Whenever it appears to the commissioner that any person has engaged or is about to engage in any act or practice constituting a violation of any provision of this chapter or any rule or

order under this chapter, the commissioner may in his or her discretion bring any or all of the following remedies:

...

Issue a final order, after notice and an opportunity for a hearing, containing findings of fact and conclusions of law, directing any person or persons found to have engaged in, or about to be engaged in, activity that constitutes a violation of this chapter or any rule or order under this chapter:

- (a) To cease and desist from the activity;
- (b) To perform any other reasonable mandates directed by the commissioner pursuant to an appropriate remedy fashioned by the commissioner and reasonably calculated to carry out the provisions of this chapter; or
- (c) To pay fines assessed under KRS 292.500(14) and costs assessed under KRS 292.500(15).

12. KRS 292.500(14) states,

The commissioner may impose civil fines against any person who violates any provision of this chapter or any rule or order or voluntary agreement entered into under this chapter. The fine shall not exceed twenty thousand dollars (\$20,000) per violation...

VIOLATIONS

13. In contravention of KRS 292.330(8), Brilliant Advice, LLC transacted business in Kentucky as an investment adviser without registration.

14. In contravention of KRS 292.330(11), Cern William Basher transacted business in Kentucky as an investment adviser representative on behalf of Brilliant Advice, LLC without registration.

15. In contravention of KRS 292.330(10), Brilliant Advice, LLC employed Cern William Basher as an investment adviser representative to conduct the business of securities in Kentucky while he was unregistered.

16. In contravention of KRS 292.330(9)(b) and 15 U.S.C. §80b-18a(d), Brilliant Advice, LLC and Cern William Basher did not qualify for an exemption from Kentucky registration because they each served more than five Kentucky clients within a period of twelve consecutive months during the period of August 2020 to July 2022.

AGREEMENT AND ORDER

17. To resolve this matter without litigation or other adversarial proceedings, the Department, Brilliant Advice, LLC, and Cern William Basher agree to compromise and settle all claims arising from the above-referenced factual background in accordance with the terms set forth herein.

18. In the interest of economically and efficiently resolving the violations described herein, it is hereby **AGREED** and **ORDERED**:

i. Brilliant Advice, LLC and Cern William Basher agree to pay, jointly and severally, a civil penalty fine of **seven thousand dollars (\$7,000.00)**, which shall be due and payable within thirty (30) days of the entry of this Order;

ii. All payments under this Order shall be in the form of an ACH payment made via secure website, pursuant to instructions provided to Cern William Basher, or by a certified check or money order made payable to “Kentucky State Treasurer” and mailed to the Department of Financial Institutions, Securities Division, 2026-DFI-0003, 500 Mero Street, Frankfort, Kentucky 40601;

iii. Brilliant Advice, LLC and Cern William Basher waive the right to demand a hearing at which they would be entitled to legal representation, to confront and cross-examine witnesses, and to present evidence on their behalf, or to otherwise appeal or set aside this Agreed Order;

iv. Brilliant Advice, LLC and Cern William Basher consent to and acknowledge the jurisdiction of the Department over this matter and that this Agreed Order is a matter of public record and may be disseminated as such;

v. In consideration of execution of this Agreed Order, Brilliant Advice, LLC and Cern William Basher for themselves, and for their successors and assigns, hereby release and forever discharge the Commonwealth of Kentucky, the Department, Office of Legal Services, and each

of their members, agents, and employees in their individual capacities, from any and all manner of actions, causes of action, suits, debts, judgments, executions, claims and demands whatsoever, known and unknown, in law or equity, that Brilliant Advice, LLC and Cern William Basher ever had, now have, may have or claim to have against any or all of the persons or entities named in this paragraph arising out of or by reason of this investigation, this disciplinary action, this settlement or its administration;

vi. By signing below, the parties acknowledge they have read the foregoing Agreed Order, fully understand its contents, and that they are authorized to enter into and execute this Agreed Order and legally bind their respective parties; and

vii. This Agreed Order shall constitute the Final Order in this matter.

SO ORDERED on this the 20th day of February, 2026.



MARNI ROCK GIBSON
COMMISSIONER

Consented to:

On behalf of the Department of Financial Institutions,

This 19th day of February, 2026.

Chad Harlan

Assistant Director, Division of Securities
Department of Financial Institutions

and

On behalf of Aspiring Ventures LLC, d/b/a Brilliant Advice, LLC and Cern William Basher,

This 18th day of February, 2026.

Cern William Basher

Cern William Basher
Aspiring Ventures LLC, d/b/a Brilliant Advice, LLC

ACKNOWLEDGEMENT

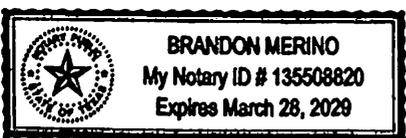
STATE OF TX)
)
COUNTY OF Williamson)

On this the 18th day of February, 2026, Cern William Basher, in my presence, acknowledged himself to be the authorized representative of Aspiring Ventures LLC, d/b/a Brilliant Advice, LLC and himself and, being authorized to do so, did enter into and execute the foregoing instrument, on behalf of Aspiring Ventures LLC, d/b/a Brilliant Advice, LLC and himself, for the purposes therein contained, acknowledging the same.

My Commission Expires: 03/28/2029

Brandon Merino

Notary Public



CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Agreed Order was sent on this the 20 day of February, 2026, by the method(s) described below to the following:

Via electronic delivery:

Cern William Basher
ASPIRING VENTURES LLC, D/B/A BRILLIANT ADVICE, LLC
8044 Montgomery Road, Suite 700
Cincinnati, Ohio 45236
cern@brilliantadvice.net
Respondents

Brandon Adcock, Staff Attorney III
DEPARTMENT OF FINANCIAL INSTITUTIONS
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Counsel for Department of Financial Institutions

Kentucky Department of Financial Institutions

Name: Allison Reed by Victoria Ward-Bishop

Title: Executive Staff Advisor