

**UNITED STATES OF AMERICA**  
**Before the**  
**SECURITIES AND EXCHANGE COMMISSION**

**SECURITIES EXCHANGE ACT OF 1934**  
**Release No. 103246 / June 12, 2025**

**INVESTMENT ADVISERS ACT OF 1940**  
**Release No. 6884 / June 12, 2025**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-22484**

**In the Matter of**

**SURAGE KAMAL**  
**ROSHAN PERERA,**

**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 Surage Kamal Roshan Perera (“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 paragraphs III.2 and III.4 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. Perera, age 51, resided in Bellerose, NY. Perera identified himself variously as the President, Managing Director, and Executive Director of Janues Capital Incorporated (“Janues”). Perera was employed in the securities industry from 2004 to September 2022, and held Series 7, 24, and 63 licenses. Perera was associated with a dually-registered broker-dealer and investment adviser from April 2018 to September 2022. Before that, he was associated with 10 other broker-dealers and/or investment advisers or dually-registered firms.

2. On May 6, 2025, a final judgment was entered by consent against Perera, 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, as set forth in the judgment entered in the civil action entitled Securities and Exchange Commission v. Surage Kamal Roshan Perera, et al., Civil Action Number 23-CV-2316, in the United States District Court for the Eastern District of New York.

3. The Commission’s complaint alleged that from at least February 2022 and continuing to March 2023, Perera, through his unregistered investment adviser firm Janues, defrauded at least one advisory client out of millions of dollars by lying about investment opportunities and strategies; misappropriating the advisory client’s money by, in part, not purchasing the securities she subscribed to through Janues and using a substantial portion of her money to engage in high volume, highly leveraged trading in other securities; lying to her about non-existent investment profits; and concealing large trading losses.

4. On October 20, 2023, Perera pled guilty to one count of securities fraud in violation of Title 15 United States Code, Section 78j(b) before the United States District Court for the Eastern District of New York, in United States v. Surage Kamal Roshan Perera, Crim. No. 23-CR-129. On May 2, 2024, a judgment in the criminal case was entered against Perera. He was sentenced to a prison term of 78 months followed by three years of supervised release and ordered to make restitution in the amount of \$6,300,400.

5. In connection with that plea, Respondent admitted that he knowingly and willfully:

(a) employed devices, schemes and artifices to defraud,

(b) made untrue statements of material fact and omitted to state material facts necessary in order to make the statements made, in light of the circumstances in which they were made, not misleading, and

(c) engaged in acts, practices and courses of business which would and did operate as a fraud and deceit upon members of the investing public, in connection with the

purchases and sales of stock in companies traded on the NASDAQ and NYSE, directly and indirectly, by use of means and instrumentalities of interstate commerce and the mails.

#### IV.

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

Any application for reentry by the Respondent will be made to the appropriate self-regulatory organization, or if there is none, to the Commission by contacting the Division of Enforcement's Office of Chief Counsel at ENF-Reentry@sec.gov, and will be subject to the applicable laws and regulations governing the reentry process. Reentry may be conditioned upon a number of factors, including, but not limited to, compliance with the Commission's order and payment of any or all of the following: (a) any disgorgement or civil penalties ordered by a Court against the Respondent in any action brought by the Commission; (b) any disgorgement amounts ordered against the Respondent for which the Commission waived payment; (c) any arbitration award related to the conduct that served as the basis for the Commission order; (d) 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 (e) 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.

Vanessa A. Countryman  
Secretary