

**SUMMARY OF ENFORCEMENT ACTIONS AND NON-ENFORCEMENT ISSUED ACTIONS  
(ADMINISTRATIVE AND CIVIL) BY THE CALIFORNIA DEPARTMENT OF FINANCIAL  
PROTECTION AND INNOVATION**

**April 2024**

**ENFORCEMENT ACTIONS**

<b>SUBJECT</b>	<b>ACTION</b>	<b>VIOLATIONS &amp; CHARGING SECTIONS</b>
Moss Westinghouse and Associates Prodigy Portfolio Management  Irvine, California Newport Beach, California	Consent Order as to Prodigy Portfolio Management  April 3, 2024	Unlawful California Consumer Financial Protection Law Activity  (Financial Code Sections 90015(d), 10001(a), 90003(a)(1) and 90003(a)(2))
The Coffee Franchise, Inc.  Wilmington, Delaware	Consent Order  April 4, 2024	Unlawful Franchise Investment Law Activity  (Corporations Code Sections 31402, 31406, 31110, 31119, and 31406(a))

SUBJECT	ACTION	VIOLATIONS & CHARGING SECTIONS
Permanent Value, Inc. Bruce Doole Bruce W and Susan L Doole Living Trust 2000 BSD Venture Capital Fund I, LP BSD Venture Capital, LLC  San Diego, California	Notice of Intent to Issue Order Levying Administrative Penalties and Statement in Support  Accusation to: 1. Revoke Respondent Permanent Value, Inc.'s Investment Adviser Certificate and 2. Bar Respondent Bruce Doole from any Position of Management or Control of an Investment Adviser, Broker-Dealer, or Commodity Adviser  Statement in Support of Order to Discontinue Violations  Order to Discontinue Violations  Notice of Intent to Issue Order Levying Administrative Penalties and Statement in Support  Desist and Refrain Order and Claim for Ancillary Relief  April 5, 2024	Unlawful Investment Adviser Activity  (Corporations Code Sections 25252, 25232, 25232.1, 25249 and 25532)

<b>SUBJECT</b>	<b>ACTION</b>	<b>VIOLATIONS &amp; CHARGING SECTIONS</b>
<p>Golden Trust Financial Bank</p> <p>San Jose, California</p>	<p>Cease and Desist Order</p> <p>April 12, 2024</p>	<p>Unlawful California Financial Institutions Law Activity</p> <p>(Financial Code Sections 560, 561, 562, 25110 and 25401)</p>
<p>Kiso Capital Management I, LLC</p> <p>Damon Doe</p> <p>San Jose, California</p>	<p>Accusation in Support of Order Suspending Damon Doe for a Period of 12 months, from any Position of Employment, Management, or Control of any Investment Adviser, Broker-Dealer or Commodity Adviser</p> <p>Notice of Intent to Issue Order Levying Administrative Penalties and Statement in Support</p> <p>Desist and Refrain Order and Claim for Ancillary Relief</p> <p>April 12, 2024</p>	<p>Unlawful Investment Adviser Law Activity</p> <p>(Corporations Code Sections 25232.1, 25252 and 25532)</p>

<b>SUBJECT</b>	<b>ACTION</b>	<b>VIOLATIONS &amp; CHARGING SECTIONS</b>
PV Wealth Advisors LLC Daniel Cunningham Christopher Leach  Rancho Palos Verdes, California	Accusation in Support of Order Barring Daniel Cunningham and Christopher Leach from any Position Employment, Management, or Control of any Investment Adviser, Broker-Dealer or Commodity Adviser  Notice of Intent to Issue Order Levying Administrative Penalties and Statement in Support  Desist and Refrain Order and Claim for Ancillary Relief  April 12, 2024	Unlawful Investment Adviser Law Activity  (Corporations Code Sections 25232.1, 25252 and 25532)

<b>SUBJECT</b>	<b>ACTION</b>	<b>VIOLATIONS &amp; CHARGING SECTIONS</b>
<p>Third Comma LLC Richard W. Simpson</p> <p>Rancho Santa Fe, California</p>	<p>Accusation in Support of Order Barring Richard W. Simpson from any Position of Employment, Management, or Control of any Investment Adviser, Broker-Dealer or Commodity Adviser</p> <p>Notice of Intent to Issue Order Denying Application for Investment Adviser Certificate and Statement in Support</p> <p>April 17, 2024</p>	<p>Unlawful Investment Adviser Law Activity</p> <p>(Corporations Code Sections 25232.1 and 25232)</p>

<b>SUBJECT</b>	<b>ACTION</b>	<b>VIOLATIONS &amp; CHARGING SECTIONS</b>
<p>Red Rock Secured, LLC  Sean Lowell Kelly fka  Shade L. Kelly-Johnson  Anthony Charles Spencer</p> <p>El Segundo, California</p>	<p>Consent Order of Permanent Injunction, Civil Monetary Penalty, and Other Statutory and Equitable Relief Against all Defendants</p> <p>April 23, 2024</p> <p>Order Barring Sean Lowell Kelly fka Shade L. Kelly-Johnson from any Position of Employment, Management or Control of any Investment Adviser, Broker-Dealer or Commodity Adviser</p> <p>Order Barring Anthony Charles Spencer from any Position of Employment, Management or Control of any Investment Adviser, Broker-Dealer or Commodity Adviser</p> <p>April 25, 2024</p>	<p>Unlawful Investment Adviser Activity</p> <p>(Corporations Code Sections 25230, 25235, 29536 and 25232.1)</p>

<b>SUBJECT</b>	<b>ACTION</b>	<b>VIOLATIONS &amp; CHARGING SECTIONS</b>
Trust Bail Bonds, Inc.  Van Nuys, California	Settlement Agreement  April 24, 2024	Unlawful Debt Collection Licensing Act Activity  (Financial Code Sections 90015(d), 90003(a)(1), 100021(a), and 90003(a)(2))
Higher Education Loan Authority of the State of Missouri (MOHELA)  Chesterfield, Missouri	Consent Order  April 24, 2024	Unlawful Student Loan Servicing Act Activity  (Financial Code Sections 28130(b), 90003(a)(1), 90005(f)(1), 90005(e)(1) and 90005(k)(1))
Lewis, Miller & Company, Inc.  Sacramento, California	Settlement Agreement  April 25, 2024	Unlawful Debt Collection Licensing Act Activity  (Financial Code Sections 90015(d), 90003(a)(1), 100021(a), and 90003(a)(2))

<b>SUBJECT</b>	<b>ACTION</b>	<b>VIOLATIONS &amp; CHARGING SECTIONS</b>
Adam Velasquez Ceresse, California	Desist and Refrain Order  April 29, 2024	Unlawful Investment Adviser Activity  (Corporations Code Section 25230)

**NON-ENFORCEMENT ACTIONS**

<b>SUBJECT</b>	<b>ACTION</b>	<b>VIOLATIONS &amp; CHARGING SECTIONS</b>
Eric Robert Semyck Deerfield, Illinois	Consent Order Granting Conditional MLO License  April 5, 2024	Mortgage Loan Originator License  (Financial Code Sections 50141, 50144, 22109.1 and 22109.4)
Kodak Law, LLP Pittsburgh, Pennsylvania	Desist and Refrain Order and Order Assessing Penalties  April 15, 2024	Unlawful Debt Collection Licensing Act Activity  (Financial Code Sections 90015(b)(c)(d)(1))



<b>SUBJECT</b>	<b>ACTION</b>	<b>VIOLATIONS &amp; CHARGING SECTIONS</b>
FPS-Nationwide, LLC Santa Rosa, California	Desist and Refrain Order and Order Assessing Penalties  April 15, 2024	Unlawful Debt Collection Licensing Act Activity  (Financial Code Sections 90015(b)(c)(d)(1))
Cuzco Capital Investment Management, LLC Great Neck, New York	Desist and Refrain Order and Order Assessing Penalties  April 15, 2024	Unlawful Debt Collection Licensing Act Activity  (Financial Code Sections 90015(b)(c)(d)(1))
Advanced Defense Development Corporation Santa Monica, California	Accusation  Desist and Refrain Order and Order Assessing Penalties  April 15, 2024	Unlawful Debt Collection Licensing Act Activity  (Financial Code Sections 100021(a), 10003(b)(3), 10003(b)(1) and 90015((b)(c)(d)(1))

<b>SUBJECT</b>	<b>ACTION</b>	<b>VIOLATIONS &amp; CHARGING SECTIONS</b>
<p>AmerAssist A R Solutions, Inc.  Pickerington, Ohio</p>	<p>Accusation  Desist and Refrain Order and Order Assessing Penalties  April 15, 2024</p>	<p>Unlawful Debt Collection Licensing Act Activity  (Financial Code Sections 100021(a), 10003(b)(3), 10003(b)(1) and 90015((b)(c)(d)(1))</p>
<p>Auto Financial Services, Inc.  Glendale, California</p>	<p>Accusation  Desist and Refrain Order and Order Assessing Penalties  April 15, 2024</p>	<p>Unlawful Debt Collection Licensing Act Activity  (Financial Code Sections 100021(a), 10003(b)(3), 10003(b)(1) and 90015((b)(c)(d)(1))</p>
<p>B To B National Services  Corona, California</p>	<p>Accusation  Desist and Refrain Order and Order Assessing Penalties  April 15, 2024</p>	<p>Unlawful Debt Collection Licensing Act Activity  (Financial Code Sections 100021(a), 10003(b)(3), 10003(b)(1) and 90015((b)(c)(d)(1))</p>

<b>SUBJECT</b>	<b>ACTION</b>	<b>VIOLATIONS &amp; CHARGING SECTIONS</b>
Credit Bureau of Northern California Collection Services, Inc.  Napa, California	Accusation  Desist and Refrain Order and Order Assessing Penalties  April 15, 2024	Unlawful Debt Collection Licensing Act Activity  (Financial Code Sections 100021(a), 10003(b)(3), 10003(b)(1) and 90015((b)(c)(d)(1))
J. Ritter Law P.C.  Orangeburg, New York	Accusation  Desist and Refrain Order and Order Assessing Penalties  April 15, 2024	Unlawful Debt Collection Licensing Act Activity  (Financial Code Sections 100021(a), 10003(b)(3), 10003(b)(1) and 90015((b)(c)(d)(1))
Lannister Law Corporation  Gold River, California	Accusation  Desist and Refrain Order and Order Assessing Penalties  April 15, 2024	Unlawful Debt Collection Licensing Act Activity  (Financial Code Sections 100021(a), 10003(b)(3), 10003(b)(1) and 90015((b)(c)(d)(1))

SUBJECT	ACTION	VIOLATIONS & CHARGING SECTIONS
Lewis, Miller Company, Inc.  Sacramento, California	Accusation  Desist and Refrain Order and Order Assessing Penalties  April 15, 2024	Unlawful Debt Collection Licensing Act Activity  (Financial Code Sections 100021(a), 10003(b)(3), 10003(b)(1) and 90015((b)(c)(d)(1))
LTD Financial Services, L.P.  Houston, Texas	Accusation  Desist and Refrain Order and Order Assessing Penalties  April 15, 2024	Unlawful Debt Collection Licensing Act Activity  (Financial Code Sections 100021(a), 10003(b)(3), 10003(b)(1) and 90015((b)(c)(d)(1))
Medical Society Business Services, Inc.  Phoenix, Arizona	Accusation  Desist and Refrain Order and Order Assessing Penalties  April 15, 2024	Unlawful Debt Collection Licensing Act Activity  (Financial Code Sections 100021(a), 10003(b)(3), 10003(b)(1) and 90015((b)(c)(d)(1))

<b>SUBJECT</b>	<b>ACTION</b>	<b>VIOLATIONS &amp; CHARGING SECTIONS</b>
National Credit Audit Corporation  Dallas, Texas	Desist and Refrain Order and Order Assessing Penalties  April 15, 2024	Unlawful Debt Collection Licensing Act Activity  (Financial Code Sections 90015((b)(c)(d)(1))
Resocore Asset Management Inc.  Gold River, California	Accusation  Desist and Refrain Order and Order Assessing Penalties  April 15, 2024	Unlawful Debt Collection Licensing Act Activity  (Financial Code Sections 100021(a), 10003(b)(3), 10003(b)(1) and 90015((b)(c)(d)(1))
Trust Bail Bonds, Inc.  Van Nuys, California	Desist and Refrain Order and Order Assessing Penalties  April 15, 2024	Unlawful Debt Collection Licensing Act Activity  (Financial Code Sections 90015((b)(c)(d)(1))

<b>SUBJECT</b>	<b>ACTION</b>	<b>VIOLATIONS &amp; CHARGING SECTIONS</b>
<p>William N. Elder Jr.  Anaheim, California</p>	<p>Accusation  Desist and Refrain Order and Order Assessing Penalties  April 15, 2024</p>	<p>Unlawful Debt Collection Licensing Act Activity  (Financial Code Sections 100021(a), 10003(b)(3), 10003(b)(1) and 90015((b)(c)(d)(1))</p>
<p>Zebit, Inc.  San Diego, California</p>	<p>Accusation  Desist and Refrain Order and Order Assessing Penalties  April 15, 2024</p>	<p>Unlawful Debt Collection Licensing Act Activity  (Financial Code Sections 100021(a), 10003(b)(3), 10003(b)(1) and 90015((b)(c)(d)(1))</p>