

MARY ANN SMITH
Deputy Commissioner
Attorney for Complainant

BEFORE THE DEPARTMENT OF FINANCIAL PROTECTION AND INNOVATION
OF THE STATE OF CALIFORNIA

In the Matter of:

CRD NO.: 289110

THE COMMISSIONER OF FINANCIAL
PROTECTION AND INNOVATION,

Complainant,

v.

PAUL FRANCIS CHAMBERLIN doing
business as CHAMBERLIN ASSET
MANAGEMENT,

Respondent.

ORDER REVOKING INVESTMENT
ADVISER CERTIFICATE OF PAUL
FRANCIS CHAMBERLIN DOING
BUSINESS AS CHAMBERLIN ASSET
MANAGEMENT

(Cal. Corp. Code § 25232.3)

The Commissioner of Financial Protection and Innovation (Commissioner) finds:

1. Paul Francis Chamberlin doing business as Chamberlin Asset Management (CAM), is a sole proprietorship with its principal place of business located at 4180 Via Candidiz, Unit # 178, San Diego, CA 92130.

2. On March 1, 2018, the Commissioner issued an investment adviser certificate to CAM (Central Registration Depository No. 289110)¹ pursuant Corporate Securities Law of 1968 (CSL). *See* Cal. Corp. Code §§ 25000-25707². Under Financial Code section 326(a), the Commissioner is authorized to administer and enforce the provisions of the CSL and the regulations promulgated thereunder³.

3. Paul Francis Chamberlin (Chamberlin) (CRD Number 2446804) is the sole owner and investment adviser representative of CAM.

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¹ The Central Registration Depository (CRD) is a database maintained by the Financial Industry Regulatory Authority (FINRA) since 2007 for all firms and individuals involved in the U.S. securities industry. It is used to store and maintain information on registered securities and broker firms, as well as individuals who dispense investing and financial advice.

² Unless stated otherwise, all section references are to the California Corporations Code.

³ *See* Cal. Code Regs. tit. 10, §§ 260.000-260.617. All further references will employ the format of 10 C.C.R. [section #].

1 4. On October 20, 2023, after conducting a routine examination of CAM under section
2 25241 (Examination), the Commissioner sent a regulatory report by certified mail return receipt,
3 and electronic mail, identifying various violations of laws and regulations related to investment
4 advisers. The Commissioner instructed CAM to submit a written response with the information
5 requested by the Commissioner no later than 20 days after October 20, 2023, the date of the letter.
6 CAM requested an extension until December 15, 2023; the Commissioner granted the request. On
7 December 20, 2023, the Commissioner notified CAM by email that CAM failed to address all the
8 violations detailed in the regulatory report. The email requested CAM to provide a complete
9 response within 10 days.

10 5. As of January 1, 2024, CAM had not responded with the information requested by the
11 Commissioner. On February 14, 2024, the Commissioner sent a follow-up letter by certified mail
12 return receipt and by electronic mail. The Commissioner informed CAM that non-compliance with
13 the examination and the regulatory report would result in the issuance of an enforcement action.

14 6. On August 15, 2024, the Commissioner issued an Order to Discontinue Violations
15 against CAM and served it by certified mail return receipt and electronic mail.

16 7. On September 24, 2024, the Commissioner issued an Order Summarily Suspending
17 Investment Adviser Certificate against CAM and served it by certified mail return receipt and
18 electronic mail.

19 8. To date, the Commissioner has not received a substantive response from CAM, and
20 CAM is in violation of the Order to Discontinue Violations.

21 9. To date, CAM continues to violate the Order to Discontinue Violations by:

- 22 i. Failing to maintain books and records (section 25241(a));
- 23 ii. Failing to file annual financial reports in accordance with generally accepted
24 accounting principles (10 C.C.R. 260.241.2(a)(3)-(4));
- 25 iii. Failing to maintain a true and accurate general ledger (10 C.C.R.
26 260.241.3(a)(2));
- 27 iv. Failing to prepare and maintain cash reconciliations (10 C.C.R.
28 260.241.3(a)(2));

- 1 v. Failing to maintain a true and accurate balance sheet and profit and loss
- 2 statement (10 C.C.R. 260.241.3(a)(6));
- 3 vi. Failing to maintain updated information on its investment adviser
- 4 representative’s Form U-4 in CRD (10 C.C.R. 260.236.1(a)(3));
- 5 vii. Failing to maintain updated information on its Form ADV on the Investment
- 6 Adviser Registration Depository (IARD)(10 C.C.R. 260.241.4(d)); and
- 7 viii. Failing to timely file annual updating amendments for Part 1 and 2 of its Form
- 8 ADV on the IARD (10 C.C.R. 260.241.4(e)).
- 9 10. Under section 25232.3, the Commissioner may immediately revoke the certificate of
- 10 an investment adviser if the investment adviser fails to comply with any currently effective order of
- 11 the Commissioner which is necessary for the protection of any investor, unless the investment
- 12 adviser secures a court order restraining the enforcement of the commissioner's revocation order
- 13 within 10 days of the date the order is issued.
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1 NOW, BASED UPON THE FOREGOING AND GOOD CAUSE APPEARING, IT IS
2 HEREBY ORDERED under section 25232.3, that the investment adviser certificate of Paul Francis
3 Chamberlin doing business as Chamberlin Asset Management is revoked for failure to comply with
4 the Order to Discontinue Violations. This Order is effective immediately. CAM is precluded from
5 soliciting or facilitating new business, including from existing clients. This immediate revocation
6 does not preclude CAM from engaging in activities necessary to wind down the business, such as
7 liquidating transactions, transferring accounts, responding to regulatory inquiries, filing Form U-5s
8 for investment adviser representatives, and/or fielding client requests for account servicing or
9 documents, for up to 60 days after the date of this order. The Commissioner finds this action is
10 appropriate, in the public interest, for the protection of investors, and consistent with the purposes
11 fairly intended by the CSL.

12 Dated: April 17, 2025

KHALIL MOHSENI
Commissioner of Financial Protection and Innovation



By:

JERRY TWOMEY
Deputy Commissioner
Broker-Dealer Investment Adviser