

1 MARY ANN SMITH  
2 Deputy Commissioner  
3 Attorney for Complainant

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

6 In the Matter of:

CRD NO.: 289110

7 THE COMMISSIONER OF FINANCIAL  
8 PROTECTION AND INNOVATION,

ORDER SUMMARILY SUSPENDING  
INVESTMENT ADVISER CERTIFICATE  
OF PAUL FRANCIS CHAMBERLIN,  
DOING BUSINESS AS CHAMBERLIN  
ASSET MANAGEMENT

9 Complainant,

v.

10 PAUL FRANCIS CHAMBERLIN, doing  
11 business as CHAMBERLIN ASSET  
12 MANAGEMENT,

(Cal. Corp. Code § 25242 (c))

Respondent.

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

14 1. Paul Francis Chamberlin d.b.a. Chamberlin Asset Management (CAM), is a sole  
15 proprietorship, doing business as Chamberlin Asset Management with its principal place of business  
16 at 4180 Via Candidiz, # 178, San Diego, California 92130.

17 2. On March 1, 2018, the Commissioner issued an investment adviser certificate to Paul  
18 Francis Chamberlin (Central Registration Depository No. 289110)<sup>1</sup> pursuant Corporate Securities  
19 Law of 1968 (CSL). *See* CAL. CORP. CODE §§ 25000-25707<sup>2</sup>. Under section 25600, the  
20 Commissioner is authorized to administer and enforce the provisions of the CSL and the regulations  
21 promulgated thereunder<sup>3</sup>.

22 3. Paul Francis Chamberlin (Chamberlin) (CRD Number 2446804) is the owner of  
23 CAM.

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26 <sup>1</sup> The Central Registration Depository (CRD) and Investment Adviser Registration Depository (IARD) are databases  
27 maintained by the Financial Industry Regulatory Authority (FINRA) since 2007. They are used to store and maintain  
28 information on registered securities and broker firms, as well as individuals who dispense investing and financial advice.

<sup>2</sup> Unless stated otherwise, all section references are to the California Corporations Code.

<sup>3</sup> *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, the Commissioner sent a regulatory letter by certified mail return receipt and electronic mail  
3 identifying various violations of laws and regulations relating to investment advisers. The  
4 Commissioner instructed CAM to submit a written response no later than 20 days after November 9,  
5 2023, the date of the letter. CAM requested an extension until December 15, 2023; the  
6 Commissioner granted such request. On December 20, 2023, the Commissioner notified CAM, by  
7 email, that CAM failed to address all the violations detailed in the regulatory report. The email  
8 requested CAM provide a complete response within 10 days.

9           5.       On January 1, 2024, the Commissioner did not receive a complete response. The  
10 Commissioner sent a follow-up letter by certified mail return receipt and electronic mail on February  
11 14, 2024. The Commissioner informed CAM that non-compliance with the examination and the  
12 regulatory letter would result in the issuance of an enforcement action. The Commissioner received a  
13 certified mail return receipt from the United States Postal Service with Chamberlin's signature dated  
14 February 17, 2024.

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

17           7.       To date, the Commissioner still has not received a response from CAM and CAM is  
18 in violation of the Order to Discontinue Violations.

19           8.       The Commissioner finds that CAM violated sections of the CSL, by:

- 20           • Failing to maintain books and records (Cal. Corp Code § 25241(a));
- 21           • Failing to file annual financial reports, in accordance with generally accepted  
22           accounting principles (Cal. Code Regs., tit. 10, §260.241.2(a)(3)-(4));
- 23           • Failing to maintain a true and accurate general ledger (Cal. Code Regs., tit. 10, §  
24           260.241.3(a)(2));
- 25           • Failing to prepare and maintain cash reconciliations (Cal. Code Regs., tit. 10, §  
26           260.241.3(a)(2));
- 27           • Failing to maintain a true and accurate balance sheet and profit and loss statement  
28           (Cal. Code Regs., tit. 10, § 260.241.3(a)(6));



1 NOW, BASED UPON THE FOREGOING AND GOOD CAUSE APPEARING, IT IS  
2 HEREBY ORDERED under section 25242(c), that the investment adviser certificate of Paul Francis  
3 Chamberlin d.b.a. Chamberlin Asset Management is summarily suspended for 6 months. This Order  
4 is effective immediately. Paul Francis Chamberlin d.b.a. Chamberlin Asset Management is  
5 precluded from soliciting or facilitating new business, including existing clients. This summary  
6 suspension does not preclude Paul Francis Chamberlin d.b.a. Chamberlin Asset Management from  
7 engaging in activities necessary to wind down the business, such as liquidating transactions,  
8 transferring accounts, forwarding checks received to the clearing firm, responding to regulatory  
9 inquiries, filing Form U-5s for registered investment adviser representatives, fielding client requests  
10 for account servicing or documents, for up to 60 days after the date of this Order. The Commissioner  
11 finds this action is appropriate, in the public interest, for the protection of investors, and consistent  
12 with the purposes fairly intended by the policies and procedures of the CSL.

13 Dated: October 18, 2024

CLOTHILDE V. HEWLETT  
Commissioner of Financial Protection and Innovation



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15  
16 By: \_\_\_\_\_  
17 JERRY TWOMEY  
18 Deputy Commissioner  
19 Broker-Dealer Investment Adviser  
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