

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

November 2024

ENFORCEMENT ACTIONS

SUBJECT	ACTION	VIOLATIONS & CHARGING SECTIONS
d.coinmetrohv.top d.coinmetrodkgk.top Xiao (William) Su	Desist and Refrain Order November 1, 2024	Unlawful California Consumer Financial Protection Law Activity (Financial Code Section 90003)
Trage Technologies Ltd. aka Trage Tech www.tragetech.com Michael "Mike" Holloway Simon Lee Panama City, Panama	Desist and Refrain Order November 4, 2024	Unlawful Offer and Sale of Securities (Corporations Code Sections 25110 and 25401)

SUBJECT	ACTION	VIOLATIONS & CHARGING SECTIONS
<p>Xpotential Fitness, Inc., Xpotential Fitness, LLC, XPOF Assetco, LLC, Xpotential Intermediate Holdings, LLC, AKT Franchise, LLC, AKT Franchise SPV, LLC, BFT Franchise Holdings, LLC, BFT Franchise SPV, LLC, Club Pilates Franchise, LLC, Club Pilates Franchise SPV, LLC, Cyclebar Franchising, LLC, Cyclebar Franchising SPV, LLC, Lindora Franchise, LLC, PB Franchising, LLC aka Pure Barre Franchising, LLC, PB Franchise, LLC, PB Franchising SPV, LLC, Row House Franchise, LLC, Row House Franchise SPV, LLC, Rumble Franchise, LLC, Rumble Franchise SPV, LLC, Stretch Lab Franchise, LLC, Stretch Lab Franchise SPV, LLC, Stride Franchise, LLC, Stride Franchise SPV, LLC, Yoga Six Franchise, LLC, Yoga Six Franchise SPV, LLC</p> <p>Irvine, California</p>	<p>Consent Order</p> <p>November 4, 2024</p>	<p>Unlawful Franchise Investment Law Activity</p> <p>(Corporations Code Sections 31402, 31406, 31110, 31200 and 31201)</p>

SUBJECT	ACTION	VIOLATIONS & CHARGING SECTIONS
Dora Financial LLC Chelmsford, Massachusetts	Consent Order November 6, 2024	Unlawful Financial Institutions Law Activity (Financial Code Sections 561 and 562)
Kiso Capital Management I, LLC Damon Doe San Jose, California	Settlement Agreement November 10, 2024	Unlawful Investment Adviser Activity (Corporations Code Sections 25532 and 25230)
LoanSnap, Inc. Costa Mesa, California	Accusation in Support of Order Revoking of California Financing Law License of Respondent LoanSnap, Inc. November 14, 2024	Unlawful California Financing Law Activity (Financial Code Sections 22701 and 22714)

SUBJECT	ACTION	VIOLATIONS & CHARGING SECTIONS
<p>Andrew L. Penn West Hills, California</p>	<p>Final Order Levying Administrative Penalties and Ancillary Relief</p> <p>Order Barring Andrew L. Penn from any Position of Employment, Management or Control of any Investment Adviser, Broker-Dealer or Commodity Adviser</p> <p>November 14, 2024</p>	<p>Unlawful Offer and Sale of Securities</p> <p>(Corporations Code Sections 25232, 25532 and 25232.1)</p>
<p>NFM, Inc. Linthicum, Maryland</p>	<p>Order to Discontinue Violations</p> <p>November 15, 2024</p> <p>Accusation to Suspend California Residential Mortgage Lender and Servicer Licenses and to Levy Administrative Penalties</p> <p>November 27, 2024</p>	<p>Unlawful California Residential Mortgage Lending Act Activity</p> <p>(Financial Code Sections 50204(o), 50327(a)(1) and (2) and 50513(b))</p>

SUBJECT	ACTION	VIOLATIONS & CHARGING SECTIONS
Robinson Services Tafara Robinson Rancho Cucamonga, California	Final Order Levying Administrative Penalties and Ancillary Relief Order Barring Tafara Robinson from any Position of Employment, Management or Control of any Investment Adviser, Broker-Dealer or Commodity Adviser November 15, 2024	Unlawful Offer and Sale of Securities (Corporations Code Sections 25252, 25532 and 25232.1)
Anchored Tiny Homes Franchising, LLC dba Anchored Tiny Homes Fair Oaks, California	Statement in Support of Stop Order Denying Effectiveness of Franchise Registration Application Stop Order Denying Effectiveness of Franchise Registration Application November 15, 2024	Unlawful Franchise Investment Law Activity (Corporations Code Sections 31115 and 31117)
California Life Settlements LLC WDC Consulting LLC William Christiansen Huntington Beach, California	Final Order Levying Administrative Penalties November 19, 2024	Unlawful Offer and Sale of Securities (Corporations Code Section 25252)

SUBJECT	ACTION	VIOLATIONS & CHARGING SECTIONS
Hedonova LLC Hedonova Research LLC Alexander Cavendish Los Angeles, California	Settlement Agreement November 19, 2024	Unlawful Offer and Sale of Securities (Corporations Code Sections 25532 and 25401)
Independent Mortgage Brokers LLC Denver, Colorado	Settlement Agreement November 20, 2024	Unlawful California Financing Law Activity (Financial Code Section 22109(b))
APN Escrow Services, Inc. Aliso Viejo, California	Accusation to Revoke Escrow Agent's License November 20, 2024	Unlawful Escrow Law Activity (Financial Code Sections 17608 and 17602.5)
Capital Escrow, Inc. Encino, California	Accusation to Revoke Escrow Agent's License November 22, 2024	Unlawful Escrow Law Activity (Financial Code Sections 17608 and 17602.5)

SUBJECT	ACTION	VIOLATIONS & CHARGING SECTIONS
James Myers Esler San Diego, California	Joint Stipulation and Request for Entry of Order of Expungement and Dismissal; Order Thereon November 24, 2024	Unlawful Investment Adviser Activity (Corporations Code Sections 25241, 25404, 25235 and 25238)
Lending Circle Daniel Walker Tyron Lincoln James Parker Los Angeles, California Tempe, Arizona	Desist and Refrain Order November 24, 2024	Unlawful California Financing Law Activity (Corporations Code Section 22100)
Green Loans Corporation David Bright	Desist and Refrain Order November 24, 2024	Unlawful California Financing Law Activity (Corporations Code Section 22100)
Empire Estates Escrow, Inc. Rancho Cucamonga, California	Accusation to Revoke Escrow Agent's License November 22, 2024	Unlawful Escrow Law Activity (Financial Code Sections 17608 and 17602.5)

SUBJECT	ACTION	VIOLATIONS & CHARGING SECTIONS
Family First Funding LLC Toms River, New Jersey	Settlement Agreement November 25, 2024	Unlawful California Residential Mortgage Lending Act Activity (Financial Code Sections 50321, 50323 and 50401(a)-(d))
Cal Smart Escrow, Inc. Glendale, California	Accusation to Revoke Escrow Agent's License November 25, 2024	Unlawful Escrow Law Activity (Financial Code Sections 17608 and 17602.5)
Dorian J. Mckelvy Portola Valley, California	Expungement Award November 26, 2024	Unlawful Broker-Dealer Activity (Corporations Code Sections 25003, 25004 and 25241)

SUBJECT	ACTION	VIOLATIONS & CHARGING SECTIONS
<p>Focal Point Capital Management, LLC Alfred Kai Kwong Chan</p> <p>Burlingame, California Alameda, California San Bruno, California</p>	<p>Order Revoking Investment Adviser Certificate</p> <p>Order Barring Alfred Kai Kwong Chan from any Position of Employment, Management or Control of any Investment Adviser, Broker-Dealer or Commodity Adviser</p> <p>Notice of Errata Regarding Accusation in Support of Order to Bar Alfred Kai Kwong Chan from any Position of Employment, Management, or Control of any Investment Adviser, Broker-Dealer, or Commodity Adviser</p> <p>November 26, 2024</p>	<p>Unlawful Investment Adviser Activity</p> <p>(Corporations Code Sections 25232, 25242 and 25232.1)</p>

NON-ENFORCEMENT ACTIONS

SUBJECT	ACTION	VIOLATIONS & CHARGING SECTIONS
Martin Valcarcel Olson South Pasadena	Consent Order Granting Conditional MLO License November 15, 2024	Mortgage Loan Originator License (Financial Code Sections 50141, 50144, 22109.1 and 22109.4)
Eleno Serna Romero Jr. Woodland Hills, California	Consent Order Granting Conditional MLO License November 20, 2024	Mortgage Loan Originator License (Financial Code Sections 50141, 50144, 22109.1 and 22109.4)
Yvette Marlo Huizar Irvine, California	Consent Order Granting Conditional MLO License November 21, 2024	Mortgage Loan Originator License (Financial Code Sections 50141, 50144, 22109.1 and 22109.4)

SUBJECT	ACTION	VIOLATIONS & CHARGING SECTIONS
Sara Hyun Joo Kang Stockton, California	Consent Order Granting Conditional MLO License November 25, 2024	Mortgage Loan Originator License (Financial Code Sections 50141, 50144, 22109.1 and 22109.4)