

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 Nos.: 287877, 6232177, and 6233887

7 THE COMMISSIONER OF FINANCIAL
8 PROTECTION AND INNOVATION,

ORDER TO DISCONTINUE VIOLATIONS

9 Complainant,

(Cal. Corp. Code § 25249)

10 v.

11 BWWP, LLC d/b/a BORACCHIA WIVIOTT
12 WEALTH PARTNERS LLC, LEA L. WIVIOTT
13 BORACCHIA, and MARC A. BORACCHIA,

14 Respondents.

15 TO: BWWP, LLC d/b/a Boracchia Wiviott Wealth Partners LLC, Lea L. Wiviott
16 Boracchia, and Marc A. Boracchia
17 74710 Highway 111, Suite 102
18 Palm Desert, CA 92260

19 The Commissioner of Financial Protection and Innovation (Commissioner) is authorized to
20 administer and enforce the provisions of the Corporate Securities Law of 1968 (CSL)¹ and the
21 regulations promulgated thereunder², pursuant to the authority granted in Financial Code section
22 326(a). The Commissioner finds that BWWP, LLC d/b/a Boracchia Wiviott Wealth Partners LLC
23 (Central Registration Depository No. 287877)³ an investment adviser licensed by the Commissioner
24 since June 6, 2017, Lea L. Wiviott Boracchia (CRD No. 6232177), managing member of BWWP,
25 LLC and Marc A. Boracchia (CRD No. 6233887), managing member of BWWP, LLC violated the
26 CSL by:

27 ¹ See Cal. Corp. Code §§ 25000-25707. Unless stated otherwise, all section references are to the California Corporations
28 Code.

² See Cal. Code Regs. tit. 10, §§ 260.000-260.617. All further references will employ the format of 10 C.C.R. [section #].

³ The Central Registration Depository (CRD) and Investment Adviser Registration Depository (IARD) are databases maintained by the Financial Industry Regulatory Authority (FINRA) since 2007. They are used to store and maintain information on registered securities and broker firms, as well as individuals who dispense investing and financial advice.

- 1 1. Conducting business as an investment adviser without meeting specified and
2 appropriate standards (section 25236(a)) by failing to maintain updated information on
3 its investment adviser representative's Form U-4 through IARD (10 C.C.R.
4 260.236.1(a)(3));
- 5 2. Failing to comply with safekeeping requirements while having custody of client funds
6 or securities (10 C.C.R. 260.237(a));
- 7 3. Failing to meet minimum net worth requirements (10 C.C.R. 260.237.2(a));
- 8 4. Transacting business in this state, when it failed to meet net worth requirements (10
9 C.C.R. 260.237.2(c));
- 10 5. Failing to notify the Commissioner by the close of business on the next business day,
11 when it failed to meet net worth requirements (10 C.C.R. 260.237.2(c));
- 12 6. Engaging in investment advisory activities in contradiction of such rules designed to
13 promote fair, equitable, and ethical principles (section 25238) by entering into any
14 investment advisory contract, unless such contract is in writing and discloses, in
15 substance, requisite information (10 C.C.R. 260.238(n));
- 16 7. Failing to maintain books and records (section 25241(a)) by failing to file true and
17 accurate annual financial reports in accordance with generally accepted accounting
18 principles (10 C.C.R. 260.241.2(a));
- 19 8. Failing to maintain books and records (section 25241(a)) by failing to file true and
20 accurate interim financial reports in accordance with generally accepted accounting
21 principles (10 C.C.R. 260.241.2(d));
- 22 9. Failing to maintain books and records (section 25241(a)) by failing to maintain cash
23 receipt and disbursement journals (10 C.C.R. 260.241.3(a)(1));
- 24 10. Failing to maintain books and records (section 25241(a)) by failing to maintain
25 ledgers or provide the Commissioner access to a general ledger (10 C.C.R.
26 260.241.3(a)(2));
- 27 11. Failing to maintain books and records (section 25241(a)) by failing to prepare and
28 maintain cash reconciliations (10 C.C.R. 260.241.3(a)(4));

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- 12. Failing to maintain books and records (section 25241(a)) by failing to maintain and provide true and accurate financial statements and computations of minimum financial requirements (10 C.C.R. 260.241.3(a)(6));
- 13. Failing to maintain books and records (section 25241(a)) by failing to maintain updated information on its Form ADV on IARD (10 C.C.R. 260.241.4(d)); and
- 14. Failing to timely file annual updating amendments for Parts 1 and 2 of its Form ADV on the IARD (10 C.C.R. 260.241.4(e)).

NOW, BASED UPON THE FOREGOING, AND GOOD CAUSE APPEARING, it is hereby ORDERED, under the provisions of section 25249, that BWWP, LLC d/b/a Boracchia Wiviott Wealth Partners LLC, Lea L. Wiviott Boracchia, and Marc A. Boracchia discontinue violating the following: section 25236; 10 C.C.R. 260.236.1(a)(3); 10 C.C.R. 260.237(a); 10 C.C.R. 260.237.2(a) and (c); section 25238; 10 C.C.R. 260.238(n); section 25241; 10 C.C.R. 260.241.2(a) and (d); 10 C.C.R. 260.241.3(a)(1)-(2),(4)-(6); and 10 C.C.R. 260.241.4(d)-(e) within 30 days of the date of this order. The Commissioner finds this action is appropriate, in the public interest, necessary for the protection of investors, and consistent with the purposes fairly intended by the CSL.

Dated: January 8, 2026

KHALIL MOHSENI
Commissioner of Financial Protection and Innovation



By: _____
 JERRY TWOMEY
 Deputy Commissioner
 Broker-Dealer Investment Adviser Division