

1 MARY ANN SMITH
Deputy Commissioner
2 DANIEL P. O'DONNELL
Assistant Chief Counsel
3 RYAN M. CASSIDY (State Bar No. 340274)
4 Counsel
5 Department of Financial Protection and Innovation
651 Bannon Street, Suite 300
6 Sacramento, CA 95811
7 Telephone: (916) 764-8358
Attorneys for Complainant

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

10 In the Matter of:

CRD Nos.: 287877, 6232177, and 6233887

11 THE COMMISSIONER OF FINANCIAL
12 PROTECTION AND INNOVATION,

AMENDED ORDER TO DISCONTINUE
VIOLATIONS

13 Complainant,

(Cal. Corp. Code § 25249)

14 v.

14 BWWP, LLC d/b/a BORACCHIA WIVIOTT
15 WEALTH PARTNERS LLC, LEA L. WIVIOTT
16 BORACCHIA, and MARC A. BORACCHIA,

17 Respondents.

18 TO: BWWP, LLC d/b/a Boracchia Wiviott Wealth Partners LLC, Lea L. Wiviott
19 Boracchia, and Marc A. Boracchia
20 74710 Highway 111, Suite 102
Palm Desert, CA 92260

21 The Commissioner of Financial Protection and Innovation (Commissioner) is authorized to
22 administer and enforce the provisions of the Corporate Securities Law of 1968 (CSL)¹ and the
23 regulations promulgated thereunder², pursuant to the authority granted in Financial Code section
24 326(a). The Commissioner finds that BWWP, LLC d/b/a Boracchia Wiviott Wealth Partners LLC

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

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

1 (Central Registration Depository No. 287877)³ an investment adviser licensed by the Commissioner
2 since June 6, 2017, Lea L. Wiviott Boracchia (CRD No. 6232177), managing member of BWWP,
3 LLC and Marc A. Boracchia (CRD No. 6233887), managing member of BWWP, LLC violated the
4 CSL by:

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

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28 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.

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- 8. 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
- 9. 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); section 25238; 10 C.C.R. 260.238(n); section 25241; 10 C.C.R. 260.241.2(a); 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 29, 2026
Sacramento, California

KHALIL MOHSENI
Commissioner of Financial Protection and Innovation



By: _____
MARY ANN SMITH
Deputy Commissioner
Enforcement Division