

STATE OF CALIFORNIA

BUSINESS TRANSPORTATION AND HOUSING AGENCY

DEPARTMENT OF CORPORATIONS

TO: Luther Tyrone Feltus-Curry aka Tyrone Feltus-Curry
1229 Arkansas Street
Vallejo, CA 94590

Philanthropy LLC
180 HG, INC LLC
Grand Trine LLC
400 Dorla Court
Zephyr Cove, NV 89448

DESIST AND REFRAIN ORDER
(For violations of sections 25110 and 25401 of the Corporations Code)

The Commissioner of Corporations finds that:

1. At all relevant times, Philanthropy LLC (hereinafter “Philanthropy”) was a company formed in Nevada on October 20, 2008 as a domestic limited liability company with entity number E0652702008-4. The registered address was 400 Dorla Court, Zephyr Cove, NV 89448. The company was dissolved on October 15, 2010.

2. At all relevant times, Grand Trine LLC (“Grand Trine”) was a company formed in Nevada as a domestic limited liability company with entity number E0298502008-0. The registered address was 400 Dorla Court, Zephyr Cove, NV 89448. The company’s status is listed as revoked as of May 31, 2011.

3. At all relevant times, 180 HG, INC LLC is a company formed in Nevada on November 3, 2008 as a domestic limited liability company with entity number E0676082008-6. The registered address is 400 Dorla Court, Zephyr Cove, NV 89448. The company is in default as of December 1, 2012.

4. At all relevant times, Luther Tyrone Feltus-Curry (hereinafter “Feltus-Curry”) was an officer, managing member or control person of Philanthropy LLC, Grand Trine LLC, and 180 HG, INC LLC. Between 1985 and 2008 Feltus-Curry was a registered representative of three

1 broker-dealers in California and his most recent broker-dealer employment terminated in
2 February, 2008. From July, 1995 to October, 1998 he was licensed in California as a finance
3 lender. Feltus-Curry was also an Associate Pastor of Revival Center Ministries in Vallejo,
4 California. He taught adult education classes at the church in “Total Prosperity” and “Debt
5 Freedom.” Feltus-Curry carried a business card that identified him as a “Financial Services
6 Professional.” At no time was Feltus-Curry a licensed investment adviser in California. All of
7 the victims of Feltus-Curry’s investment fraud scheme were members of the church of Revival
8 Center Ministries.

9 5. In 2008 and 2009, Feltus-Curry approached several members of Revival Center
10 Ministries and discussed with them his concept of “Private Investing.” He provided the potential
11 investors with a printed sheet which stated “private placement is part of the sophisticated world
12 of private financing—a world where investors earn high returns in a low risk investment.” It
13 went on to say “...under normal conditions...investor funds are never at risk with Private
14 Placement Programs.”

15 6. Feltus-Curry offered 18% return every 90 days on investments of \$100,000, or 72%
16 annually, “with little or no risk.” Feltus-Curry encouraged and directed each investor/church
17 member to open a self-directed IRA account at an entity known as EntrustCAMA at 5 Valley
18 Square, Suite 103, 512 E. Township Line Road, Blue Bell, Pennsylvania. As part of the process
19 of opening this self-directed IRA account, Feltus-Curry would assist each investor in filling out
20 the account documents. Each investor signed an “Interested Party” declaration wherein the
21 investor listed Feltus-Curry as a financial advisor, with full access to the information pertaining
22 to the account at EntrustCAMA. Each investor was presented with a prepared promissory note,
23 as part of the account opening documentation issued by Philanthropy LLC, Grand Trine LLC, or
24 180 HG, INC LLC, (collectively referred to as the “LLCs”) all of which were formed, managed
25 or controlled by Feltus-Curry. The promissory notes were for the exact dollar amount that the
26 investor was depositing into the EntrustCAMA account, plus the interest rate that had been
27 promised the investor. Each note was a promise by the respective LLC to pay back to the IRA
28 account for the benefit of the investor in a certain period of time the amount of funds being

1 deposited in the account.

2 7. At such time as the investor's funds had been placed in the EntrustCAMA account, a
3 statement would be sent to the investor reflecting the deposit of the funds. Within a short period
4 of time, Feltus-Curry would produce the promissory note signed by the respective investor in
5 favor of one of the "LLCs" to the management of EntrustCAMA, who would then pay all of the
6 funds in the investor's account to Feltus-Curry in the name of one of the "LLCs". The notes
7 were unsecured. The investors would then receive an account statement from EntrustCAMA
8 showing that their account had the same dollar value as it did when the cash was deposited, but
9 now the dollar value was listed under a heading "Market Value." The net effect was that
10 EntrustCAMA was assigning a market value of the dollar amount reflected in the promissory
11 note from one of the "LLCs" with no revenue or assets and which was unsecured. For each
12 investor the scheme was exactly the same. The account would be opened, funded with cash, and
13 then emptied by a payment by the account custodian to one of the "LLCs" connected to Feltus-
14 Curry in exchange for a worthless promissory note. The promissory note in each instance was
15 provided to the investor by Feltus-Curry as part of the account formation process with
16 EntrustCAMA. The only difference in each case was the amount of the deposit and the name of
17 the LLC that provided the promissory note.

18 8. The interests offered or sold to California investors by Feltus-Curry, Philanthropy
19 LLC, Grand Trine LLC and 180 HG, INC LLC were securities in the form of promissory notes
20 and loan agreements, and were offered or sold in this state in an issuer transaction.

21 9. Feltus-Curry, Philanthropy LLC, Grand Trine LLC, and 180 HG, INC LLC in the
22 process of offering securities in the form of promissory notes, made the following misstatements
23 and omissions to investors:

24 a) On the face of the promissory notes issued by the LLC's it was stated "This note is a
25 part of a group of notes used to fund entry by (the respective LLC) into a private placement
26 investment program that is administered through a large, well-respected bank. "...The
27 investment amount is insured with a fidelity bond, or is deposited in a sole-signatory, non-
28 depleting account. Investor funds are never put at risk." None of this was true.

1 b) Feltus-Curry failed to disclose to each investor that he intended, and in fact did, use
2 the promissory notes from the respective LLC's to remove all of the investor's cash from the
3 IRA accounts. He further failed to disclose that he controlled the LLC's, that they had no
4 business operations, assets, or revenues, and that the unsecured notes issued by these entities had
5 no real value.

6 c) Feltus-Curry failed to disclose or explain to the investors that the statements they
7 received from EntrustCAMA reflected "market worth" evaluation of their account, and not an
8 accurate reflection of cash in that account. While investors thought the IRA account held their
9 investment funds, in fact the account had been looted and held only a worthless promissory note.

10 d) Feltus-Curry represented to investors that they would be able to participate in the
11 wholesale (not retail) side of how bank instruments are bought and sold daily. "In the private
12 placement world each transaction is closely regulated to assure that when a bank instrument is
13 purchased, it is without risk." This information was contained in a printed sheet entitled "The
14 Private World of Private Placement." In fact no investor funds were ever used to purchase any
15 bank instruments at any time.

16 Based on the foregoing findings, the Commissioner of Corporations is of the opinion that
17 the securities in the form of promissory notes issued by Feltus-Curry, Philanthropy LLC, Grand
18 Trine LLC, and 180 HG, INC LLC are subject to qualification under the California Corporate
19 Securities Law of 1968 and are being or have been offered or sold without being qualified in
20 violation of Corporations Code section 25110 of the Corporate Securities Law of 1968.

21 Pursuant to Section 25532 of the Corporate Securities Law of 1968, Luther Tyrone Feltus
22 Curry, aka Tyrone Feltus Curry, Philanthropy LLC, Grand Trine LLC and 180 HG, INC LLC are
23 hereby ordered to desist and refrain from the further offer or sale in the State of California of
24 securities in the form of promissory notes and/or loan agreements unless and until qualification
25 has been made under said law or unless exempt. The sale of such securities is subject to
26 qualification under said law and such securities are being or have been offered for sale without
27 first being so qualified.

28 Further, the Commissioner of Corporations is of the opinion that the securities issued by

1 Feltus-Curry, Philanthropy LLC, Grand Trine LLC, and 180 HG, INC LLC were offered or sold
2 in this state by means of oral or written communications which included an untrue statement of a
3 material fact or omitted to state a material fact necessary in order to make the statements made,
4 in the light of the circumstances under which they were made, not misleading, in violation of
5 section 25401 of the Corporate Securities Law of 1968.

6 Pursuant to section 25532 of the Corporate Securities Law of 1968, Luther Tyrone
7 Feltus-Curry aka Tyrone Feltus-Curry, Philanthropy LLC, Grand Trine LLC and 180 HG, INC
8 LLC are hereby ordered to desist and refrain from offering or selling any security in the State of
9 California, including but not limited to investments in promissory notes and/or loan agreements,
10 by means of any written or oral communication which includes an untrue statement of a material
11 fact or omits to state a material fact necessary in order to make the statements made, in the light
12 of the circumstances under which they were made, not misleading.

13 This Order is necessary, in the public interest, for the protection of investors and
14 consistent with the purposes, policies and provisions of the Corporate Securities Law of 1968.
15 This Order shall remain in full force and effect until further order of the California Corporations
16 Commissioner.

17 Dated: March 19, 2013
18 Sacramento, California

JAN LYNN OWEN
Commissioner of Corporations

By _____
MARY ANN SMITH
Deputy Commissioner
Enforcement Division

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