

1 STATE OF CALIFORNIA  
2 BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY  
3 DEPARTMENT OF BUSINESS OVERSIGHT

4 TO: Earl N. Davenport  
5 Advent Group, Inc.  
6 Advent Group International  
7 Property Coast 2 Coast, LP  
8 ISquared Entertainment, LP  
14545 Victory Blvd., Suite 401  
Van Nuys, CA 91411

9 DESIST AND REFRAIN ORDER

10 (For violations of section 25401 of the Corporations Code)

11 The Commissioner of Business Oversight (“Commissioner”) finds that:

12 1. At all relevant times, Advent Group, Inc. (“Advent Group”) was a Nevada corporation  
13 doing business in California as Advent Group International (“Advent Group International”). Advent  
14 Group and Advent Group International are located at 14545 Victory Blvd., Suite 401, Van Nuys, CA  
15 91411.

16 2. At all relevant times, Property Coast 2 Coast, LP (“PC2C”) was a California limited  
17 partnership located at 14545 Victory Blvd., Suite 401, Van Nuys, CA 91411.

18 3. At all relevant times, I Squared Entertainment, LP (“I Squared”) was a California  
19 limited partnership located at 14545 Victory Blvd., Suite 401, Van Nuys, CA 91411.

20 4. At all relevant times, Earl N. Davenport (“Davenport”) was the president of Advent  
21 Group, and a general partner and manager of PC2C and I Squared.

22 5. Beginning at least as early as 2009 and continuing to a date unknown to the  
23 Commissioner, Davenport, Advent Group and Advent Group International offered or sold securities  
24 in the form of partnership units or interests in various different entities, including, but not limited to  
25 partnership units in PC2C and I Squared and partnership interests in Changing the Game, LP.

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1           6.       In connection with the offer or sale of these securities, Davenport, Advent Group,  
2 Advent Group International, PC2C and I Squared failed to disclose material facts, as follows:

3           (a)       Davenport was convicted in the State of Tennessee of a felony offense of theft over  
4 \$10,000, in 2001;

5           (b)       Pennsylvania Securities Commission issued a Cease and Desist Order to Davenport  
6 and Advent Group for violations of Pennsylvania securities laws in connection with the offer and sale  
7 of limited partnership interests in Changing the Game, LP, in September 2009; and

8           (c)       Davenport was found guilty of one felony count of conspiracy to possess a controlled  
9 substance, to-wit, cocaine, in the State of Washington in 2000.

10           Based upon the foregoing findings, the Commissioner of Business Oversight is of the opinion  
11 that these securities offered or sold by Earl N. Davenport, Advent Group, Inc., Advent Group  
12 International, Property Coast 2 Coast, LP and I Squared Entertainment, LP were offered or sold in  
13 this state by means of written or oral communications that omitted to state a material fact necessary in  
14 order to make the statements made, in the light of the circumstances under which they were made, not  
15 misleading, in violation of Corporations Code section 25401.

16           Pursuant to Corporations Code section 25532, Earl N. Davenport, Advent Group, Inc., Advent  
17 Group International, Property Coast 2 Coast, LP, and I Squared Entertainment, LP, and those who act  
18 on their behalf, are hereby ordered to desist and refrain from offering and selling securities in the  
19 state of California by means of any written or oral communication which includes an untrue  
20 statement of material fact or omits to state a material fact necessary in order to make the statements  
21 made, in the light of the circumstances under which they were made, not misleading.

22           This Order is necessary, in the public interest, for the protection of investors and consistent  
23 with the purposes, policies, and provisions of the Corporate Securities Law of 1968.

24 Dated: June 4, 2014  
25 Sacramento, California

JAN LYNN OWEN  
Commissioner of Business Oversight

26  
27 By \_\_\_\_\_  
28 MARY ANN SMITH  
Deputy Commissioner  
Enforcement Division