

1 in Beverly, executed documents and interacted closely with investors on behalf of Beverly
2 throughout the investment transactions referenced herein. Robinson represented to investors that he is
3 or was the “managing director” of Beverly and a successful trader. Robinson managed the hedge fund
4 operated by Beverly in addition to effecting all investment transactions made in and through Beverly
5 by investors.

6 3. Beginning in September, 2010, to at least March 2013, Beverly and Robinson offered
7 and sold securities in the form of investment agreements to investors. The terms of the investment are
8 as follows: Investors pay to Beverly and Robinson a large amount of money as a capital investment
9 for the purpose of investing in the business growth of Beverly and other business opportunities.
10 Beverly and Robinson term this capital investment as a “Capital Contribution” in Beverly. In return,
11 investors are promised at least thirty percent (30%) interest on their investment as profit paid at the
12 end of each investment term of approximately one (1) year in addition to the return of their initial
13 capital investment with Beverly and Robinson. Investors do not have any other involvement in the
14 company, other than providing investment capital for a profit.

15 4. Beverly and Robinson, by effecting transactions in securities using the account of
16 another person for compensation, are broker-dealers within the meaning of Corporations Code
17 section 25004. The Commissioner of Business Oversight has no record of having received a broker-
18 dealer certificate application from Robinson and/or Beverly or granting a broker-dealer certificate to
19 Robinson and/or Beverly pursuant to Corporations Code section 25210.

20 Based on the foregoing findings, the Commissioner of Business Oversight finds that Beverly
21 Highland Capital, L.L.C., a.k.a. Beverly Highland Capital AGF, LLC, [www.beverlyhighlandcapital](http://www.beverlyhighlandcapital.com),
22 and Dale Robert Robinson, effected at least two (2) or more transactions in, or induced or attempted
23 to induce the purchase or sale of a security in California, without having first applied for and having
24 secured from the Commissioner a certificate, then in effect, authorizing each one to act in that
25 capacity.

26 Pursuant to section 25532, subdivision (b) of the Corporate Securities Law of 1968, Beverly
27 Highland Capital, L.L.C., a.k.a. Beverly Highland Capital AGF, LLC, [www.beverlyhighlandcapital](http://www.beverlyhighlandcapital.com),
28 and Dale Robert Robinson is hereby ordered to desist and refrain from conducting business as a

1 broker-dealer unless and until Beverly Highland Capital, L.L.C., a.k.a. Beverly Highland Capital
2 AGF, LLC, www.beverlyhighlandcapital, and Dale Robert Robinson have applied for and secured
3 from the Commissioner a certificate, then in effect, authorizing either one to act in that capacity.

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

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7 Dated: December 16, 2015

8 JAN LYNN OWEN
9 California Commissioner of Business Oversight

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12 By _____
13 MARY ANN SMITH
14 Deputy Commissioner
15 Enforcement Division
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