

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

TO: Thomas Joseph Doumani
Advanced Planning Concepts, Inc.
Venture Financial Services LLC, aka VFS LLC
751 South Weir Canyon Road, Suite 674
Anaheim Hills, CA 92808

3111 North Tustin Avenue, Suite 250
Orange, CA 92865

DESIST AND REFRAIN ORDER

(For Violations of Sections 25110, 25401, and 25230 of the Corporations Code)

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

1. Thomas Joseph Doumani (“Doumani”) is a California resident and California-licensed insurance agent, doing business as Advanced Planning Concepts, Inc. (“Advanced Planning Concepts”) and Venture Financial Services LLC, aka VFS LLC (“VFS LLC”).

2. Advanced Planning Concepts is a suspended California corporation with its last known address located at 751 S. Weir Canyon Road, Suite 674, Anaheim, California and/or 3111 North Tustin Avenue, Suite 250, Orange, California. The company’s promotional materials describe Advanced Planning Concepts as an “[e]state and [f]inancial [c]onsulting [f]irm.”

3. VFS LLC, form of business organization unknown, had its last known address located at 751 South Weir Canyon Road, Suite 674, Anaheim, California.

4. Beginning in or about November 2011, Doumani, Advanced Planning Concepts, and VFS LLC sold securities in the form of investment contracts labeled “Participation” Agreements in the “TD Sep[arate] Property Trust.” According to Doumani, the TD Separate Property Trust would generate high returns through the purchase of reinsurance on an unnamed billionaire’s life insurance policy. With a \$30,000.00 investment, Doumani promised investors a twenty-percent return (amounting to approximately \$6,000.00) at the end of a ninety-day period. But the investors never received the promised returns or the return of their investment principal.

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1 5. Doumani, Advanced Planning Concepts, and VFS LLC sold at least one California
2 resident a TD Separate Property Trust Participation Agreement in the amount of \$30,000.00.

3 6. Doumani also represented himself to investors as a financial planner and offered his
4 investment advisory services to at least one California investor during multiple in-person, telephone,
5 and e-mail conversations. He told the investor that he operated Advanced Planning Concepts along
6 with VFS, LLC. Doumani provided the investor with informational materials, including an Advanced
7 Planning Concepts/VFS LLC brochure, describing his services.

8 7. On or about January 18, 2010, Doumani entered into a financial planning agreement
9 with the investor. Under the terms of the agreement, Doumani was to design a comprehensive estate
10 plan for the investor, which included Doumani providing advice as to purchasing certain insurance
11 plans and investments, in exchange for a one-time fee of \$2,500.00.

12 8. On or about June 3, 2004, Doumani filed for Chapter 11 bankruptcy protection in the
13 United States Bankruptcy Court, Central District of California, case number 04-13625-RA.

14 9. On or about April 4, 2007, Doumani stipulated to the entry of a civil judgment against
15 him in the amount of \$259,917.51, in the matter captioned *General American Life Insurance*
16 *Company v. Doumani*, case number SACV05-739, before the United States District Court, Central
17 District of California.

18 10. In connection with the offer and sale of these securities, the above described
19 Participation Agreements, Doumani, Advanced Planning Concepts, Inc., and VFS LLC
20 misrepresented and/or failed to disclose to investors the following material facts:

- 21 a. the risks associated with the purchase of a TD Separate Property Trust
22 Participation Agreement;
- 23 b. that the Participation Agreement in the TD Separate Property Trust
24 was guaranteed and “risk-free”;
- 25 c. that the TD Separate Property Trust Participation Agreement would provide a
26 twenty-percent return in ninety days;
- 27 d. that Doumani had filed for Chapter 11 bankruptcy protection on or about June 3, 2004,
28 in the United States Bankruptcy Court, Central District of California, case number 04-

1 13625-RA; and

- 2 e. that Doumani was the subject of a \$259,917.51 civil judgment dated April 4, 2007 in
3 the matter captioned *General American Life Insurance Company v. Doumani*,
4 before the United States District Court, Central District of California, case number
5 SACV05-739.

6 11. These securities, the above described TD Separate Property Trust Participation
7 Agreements, were sold in this state in issuer transactions. The Department of Business Oversight has
8 not issued a permit or other form of qualification authorizing any person to offer or sell TD Separate
9 Property Trust Participation Agreements in this state.

10 12. Doumani, Advanced Planning Concepts, and VFS LLC are conducting business as
11 investment advisers by advising California residents to purchase securities in the form of
12 Participation Agreements in the TD Separate Property Trust, and their activities come within the
13 meaning of Corporations Code section 25009. Under Corporations Code section 25230, Doumani,
14 Advanced Planning Concepts, and VFS LLC were required to obtain a certificate from the
15 Commissioner to conduct business as investment advisers in the State of California.

16 13. The Commissioner has no record of having received an application from, or having
17 granted an investment adviser certificate to Doumani, Advanced Planning Concepts, or VFS LLC.

18 Based on the foregoing findings, the Commissioner of Business Oversight is of the opinion
19 that the Participation Agreements in the TD Separate Property Trust are securities subject to
20 qualification under the Corporate Securities Law of 1968 and are being or have been offered or sold
21 without first being qualified in violation of Corporations Code section 25110 of the Corporate
22 Securities Law of 1968. Under section 25532 of the Corporations Code, Thomas Joseph Doumani,
23 Advanced Planning Concepts, Inc., and Venture Financial Services LLC, aka VFS LLC are ordered
24 to desist and refrain from the further offer and sale of securities in California, including but not
25 limited to investment contracts in the form of Participation Agreements in the TD Separate Property
26 Trust, unless such sale has been qualified under Corporations Code section 25111, 25112, or 25113
27 or unless such security or transaction is exempted or not subject to qualification.

28 Furthermore, the Commissioner of Business Oversight is of the opinion that the securities
Thomas Joseph Doumani, Advanced Planning Concepts, Inc., and Venture Financial Services LLC,

1 aka VFS LLC offered or sold in this state were offered or sold by means of written or oral
2 communications which included an untrue statement of a material fact or omitted to state a material
3 fact necessary in order to make the statements made, in light of the circumstances under which they
4 were made, not misleading, in violation of section 25401 of the Corporations Code. Under section
5 25532 of the Corporations Code, Thomas Joseph Doumani, Advanced Planning Concepts, Inc., and
6 Venture Financial Services LLC, aka VFS LLC made, or caused to be made, misrepresentations or
7 omissions of material fact in connection with the offer or sale of securities and are hereby ordered to
8 desist and refrain from offering or selling or buying or offering to buy any security in the State of
9 California by means of any written or oral communication which includes an untrue statement of
10 material fact or omits to state a material fact necessary in order to make the statements made, in light
11 of the circumstances under which they were made, not misleading.

12 Finally, the Commissioner of Business Oversight is of the opinion that Thomas Joseph
13 Doumani, Advanced Planning Concepts, Inc., and Venture Financial Services LLC, aka VFS LLC
14 have conducted business as investment advisers in this state for compensation by advising others to
15 purchase Participation Agreements in the TD Separate Property Trust without first having applied for
16 and secured from the Commissioner a certificate authorizing them to act in that capacity, in violation
17 of section 25230 of the Corporations Code. Under Corporations Code section 25532, Thomas Joseph
18 Doumani, Advanced Planning Concepts, Inc., and Venture Financial Services LLC, aka VFS LLC
19 are further ordered to desist and refrain from conducting business as investment advisers in this state
20 unless and until they have applied for and secured from the Commissioner a certificate, then in effect,
21 authorizing them to act in that capacity.

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These orders are necessary, in the public interest, for the protection of investors and consistent with the purposes, policies, and provisions of the Corporate Securities Law of 1968.

Dated: April 22, 2015
Los Angeles, CA

JAN LYNN OWEN
Commissioner of Business Oversight

By _____
MARY ANN SMITH
Deputy Commissioner
Enforcement Division