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California Corporations Commissioner  
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7 Attorneys for Complainant

9 BEFORE THE DEPARTMENT OF CORPORATIONS  
10 OF THE STATE OF CALIFORNIA

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| 12 | In the Matter of the Accusation of THE | ) | Case No.: 607-2007; 607-2053; 607-2054; 607- |
| 13 | CALIFORNIA CORPORATIONS                | ) | 2055; 607-2056; 607-2057; & 607-2061         |
| 13 | COMMISSIONER,                          | ) |  |
| 14 |  | ) | ACCUSATION IN SUPPORT OF NOTICE OF           |
| 14 | Complainant,                           | ) | INTENTION TO ISSUE ORDER REVOKING            |
| 15 |  | ) | FINANCE LENDERS LICENSES                     |
| 16 | vs.                                    | ) |  |
| 17 | DREAMLIFE INVESTMENTS, INC. doing      | ) |  |
| 18 | business as DREAMLIFE FINANCIAL,       | ) |  |
| 19 | Respondent.                            | ) |  |

20 The Complainant is informed and believes, and based upon such information and belief,  
21 alleges and charges Respondent as follows:

22 I

23 1. Respondent DreamLife Investments, Inc. dba DreamLife Financial (“DreamLife”) is  
24 a lender/broker licensed by the California Corporations Commissioner (“Commissioner”) pursuant  
25 to the California Finance Lenders Law of the State of California (California Financial Code § 22000  
26 et seq.) (“CFL”). DreamLife currently holds seven (7) licenses issued under the CFL. The main  
27 licensed location is at 2130 Geer Road, Suite A, Turlock, California 95382 and was issued on June  
28 29, 2004. The remaining 6 locations were licensed on November 29, 2004.

1           2.       California Financial Code section 22101 provides that an application for a CFL  
2 license shall be in the form and contain the information that the Commissioner may by rule require.  
3 California Financial Code section 22101 and California Code of Regulations, title 10, section 1422,  
4 requires corporate applicants to disclose to the Commissioner in the application all officers,  
5 directors, any person owning or controlling, directly or indirectly, 10% or more of the applicant, and  
6 all person(s) who would be in charge of the business.

7           3.       On or about April 7, 2004, DreamLife filed its initial application for a lender/broker  
8 license with the Commissioner pursuant to California Financial Code section 22101 (File No. 607-  
9 2007 hereinafter the “application”). The application identified only Donald Benjamin (“Benjamin”).  
10 Specifically, Benjamin was identified in the application as the president, secretary, treasurer, sole  
11 shareholder and person in charge of DreamLife. Benjamin executed the application under penalty of  
12 perjury as president of DreamLife.

13           4.       California Financial Code section 22102 provides that a CFL licensee with one or  
14 more licensed locations may apply for additional licensed locations through a short form application  
15 as may be established by the Commissioner pursuant to California Financial Code section 22101.  
16 California Financial Code sections 22101 and 22102 and California Code of Regulations, title 10,  
17 section 1422, require additional location applicants to disclose to the Commissioner in the short form  
18 applications all person(s) who would be in charge of these additional locations.

19           5.       Commencing on or about August 6, 2004 and continuing through August 18, 2004,  
20 DreamLife filed six short form applications with the Commissioner pursuant to California Financial  
21 Code section 22102 (File Nos. 607-2053; 607-2054; 607-2055; 607-2056; 607-2057; & 607-2061  
22 hereinafter “short form applications”). The short form applications named Benjamin, Angel  
23 Longoria, Gwendolyn Brown, Jose Perez, and Kimberly Classen, respectively, as the persons in  
24 charge of these additional locations. Benjamin executed these short form applications under penalty  
25 of perjury as Chief Operating Officer of DreamLife.

26           6.       California Financial Code section 22108 and California Code of Regulations, title 10,  
27 section 1422, requires CFL licensees to amend their application(s) if there is any change in any of  
28 the persons required to be identified in the application(s). DreamLife has not filed any application

1 amendment with the Commissioner.

2 7. On or about December 16, 2004, the Department received information that although  
3 Benjamin was the sole shareholder of record of DreamLife, Tony Danilo (“Danilo”) had provided  
4 the financial backing for DreamLife and was to receive 50% of the profits from the business. The  
5 Department was further informed that Danilo, while never reported as such, was the president of  
6 DreamLife, and Paul Orvo (“Orvo”) was the chief executive officer. The information provided to  
7 the Department further disclosed that Benjamin had been locked out of the business since September  
8 2, 2004 and formally terminated by Danilo and Orvo on October 15, 2004.

9 8. Accordingly, the initial application submitted by DreamLife was false in that (i)  
10 Benjamin was not the president of DreamLife, (ii) Benjamin was not the sole officer of DreamLife,  
11 (iii) Danilo had not been listed as a person owning or controlling, directly or indirectly, 10% or  
12 more of DreamLife, and (iv) Benjamin was not the person in charge of the business. In the  
13 alternative, if the changes occurred after licensure, DreamLife violated California Financial Code  
14 section 22108 and California Code of Regulations, title 10, section 1422, by failing to amend its  
15 initial application to disclose Danilo and Orvo’s positions with DreamLife.

16 9. The short form applications submitted by DreamLife were also false in that Danilo  
17 was not listed as a person in charge of the business. In the alternative, if the changes occurred after  
18 licensure, DreamLife violated California Financial Code section 22108 and California Code of  
19 Regulations, title 10, sections 1409 and 1422, by failing to amend its short form applications to  
20 disclose that Danilo was a person in charge of the business.

21 10. DreamLife violated California Code of Regulations, title 10, section 1409 by failing  
22 to continually maintain a current list of officers and directors with the Commissioner.

23 II

24 California Financial Code section 22714 provides in pertinent part:

25 (a) The commissioner shall suspend or revoke any license, upon  
26 notice and reasonable opportunity to be heard, if the commissioner  
27 finds any of the following:

28 (2) The licensee has violated any provision of this division or any rule or regulation  
made by the commissioner under and within the authority of this division.

1 (3) A fact or condition exists that, if it had existed at the time of the original  
2 application for the license, reasonably would have warranted the commissioner  
3 in refusing to issue the license originally.

4 California Financial Code section 22109 provides in pertinent part:

5 (a) Upon reasonable notice and opportunity to be heard, the commissioner  
6 may deny the application for any of the following reasons:

7 (1) A false statement of a material fact has been made in the application.

8 (2) Any officer, director, general partner, or person owning or controlling,  
9 directly or indirectly, 10 percent or more of the outstanding interests or equity  
10 securities of the applicant has, within the last ten years . . . (B) committed any act  
11 involving dishonesty, fraud, or deceit, if the . . . act is substantially related to the  
12 qualifications, functions, or duties of a person engaged in business in accordance  
13 with this division.

14 (3) The applicant or any officer, director, general partner, or person owning or  
15 controlling, directly or indirectly, 10 percent or more of the outstanding interests or  
16 equity securities of the applicant has violated any provision of this division or the  
17 rules thereunder . . .

18 III

19 Complainant finds that, by reason of the foregoing, Respondent DreamLife has violated  
20 California Financial Code sections 22101, 22102 and 22108 and California Code of Regulations,  
21 title 10, sections 1409 and 1422, and that a fact(s) or condition(s) now exists, that if they had existed  
22 at the time of original licensure, reasonably would have warranted the Commissioner in refusing to  
23 issue the licenses to DreamLife, and based thereon, grounds exist to revoke the finance lenders  
24 licenses of DreamLife.

25 WHEREFORE, IT IS PRAYED that the CFLL licenses of Respondent DreamLife be  
26 revoked.

27 Dated: December 27, 2004  
28 Los Angeles, CA

WILLIAM P. WOOD  
California Corporations Commissioner

By \_\_\_\_\_  
Judy L. Hartley  
Senior Corporations Counsel

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