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

5 TO: Roy Graigo  
6 Roy Graigo Private Lending Services, LLC  
7 14121 Enfield Circle  
8 Westminster, California 92683

9 **DESIST AND REFRAIN ORDER**

10 **(For violations of section 22100 of the Financial Code)**

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

12 1. Beginning in or about August 2016, Roy Graigo Private Lending Services, LLC  
13 represented that it was a company organized in the State of Delaware to engage in the business of a  
14 “Finance Lender” and “Broker” with a principal business address located at 14121 Enfield Circle,  
15 Westminister, California 92683.

16 2. Commencing in or about August 2016, Roy Graigo Private Lending Services, LLC  
17 also represented in emails with a prospective business partner that it was licensed by the  
18 Commissioner as a finance lender and broker pursuant to a license allegedly issued on April 28,  
19 2016, under the auspices of the California Finance Lenders Law (CFLL) (Fin. Code, § 22000 et seq.).

20 3. At no time was Roy Graigo Private Lending Services, LLC ever organized as a  
21 business under the laws of the State of Delaware or registered to do business in the State of  
22 California.

23 4. Neither Roy Graigo nor Roy Graigo Private Lending Services, LLC has obtained a  
24 license from the Commissioner to engage in the business of a finance lender or broker as required by  
25 Financial Code section 22100.

26 5. Beginning on or about September 30, 2016, despite lacking a license from the  
27 Commissioner, Roy Graigo and Roy Graigo Private Lending Services, LLC provided to a potential  
28 borrower what was purported to be a license issued by the Commissioner as part of an effort to  
convince the borrower to forward information as part of a loan application.

1           6.       Financial Code section 22100, subdivision (a), states, “No person shall engage in the  
2 business of a finance lender or broker without obtaining a license from the Commissioner.”

3           7.       Financial Code section 22712, subdivision (a), provides in relevant part:

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5                   Whenever, in the opinion of the Commissioner, any person is engaged in the  
6 business as a broker or finance lender, or a mortgage loan originator, as defined in  
7 this division, without a license from the Commissioner, or any licensee is violating  
8 any provision of this division, the Commissioner may order that person or licensee  
9 to desist and to refrain from engaging in the business or further violating this  
10 division. . . .

11                   Pursuant to Financial Code section 22712, Roy Graigo and Roy Graigo Private Lending  
12 Services, LLC are hereby ordered to desist and refrain from engaging in the business of a finance  
13 lender and/or broker in the State of California without first obtaining a license from the  
14 Commissioner, or otherwise being exempt. This Order is necessary, in the public interest, for the  
15 protection of consumers and is consistent with the purposes, policies, and provisions of the CFLL.

16 Dated: March 2, 2017  
17 Sacramento, California

JAN LYNN OWEN  
Commissioner of Business Oversight

18 By: \_\_\_\_\_  
19 MARY ANN SMITH  
20 Deputy Commissioner  
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