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

TO: Deadra Joiyon Williams
I-Strategy, LLC
I-Health and Wellness, LLC
1521 Hobson Avenue
West Sacramento, California 95605

DESIST AND REFRAIN ORDER

(For violations of sections 25110 and 25230 of the Corporations Code)

The Commissioner of Business Oversight (Commissioner) finds that:

1. I-Strategy, LLC was formed on October 1, 2015, as a limited liability company in California.
2. I-Health and Wellness, LLC was formed on December 2, 2016, as a limited liability company in California.
3. The current address of I-Strategy, LLC and I-Health and Wellness, LLC is 1521 Hobson Avenue, West Sacramento, California 95605.
4. Deadra Joiyon Williams (Williams) is the managing member of I-Strategy, LLC and I-Health and Wellness, LLC.
5. Beginning on or about October 2015, Deadra Joiyon Williams offered or sold securities in California in the form of memberships in I-Strategy, LLC and I-Health and Wellness, LLC to at least four investors in each entity.
6. The Commissioner has no record of qualification or notice of exemption from qualification being filed by Williams, I-Strategy, LLC, or I-Health and Wellness, LLC for the offer or sale of these memberships.
7. Williams and I-Strategy, LLC received investment funds from members. As the managing member of I-Strategy, LLC, Williams created and/or directed investment of these funds into securities, thereby providing investment advice to these members.

1 8. As compensation, Williams received various fees from members of I-Strategy, LLC,
2 including entrance fees, placement fees, and fees for investment administration and management.

3 9. The Commissioner has not issued an investment adviser certificate to Williams or I-Strategy,
4 LLC.

5 Based on the foregoing findings, the Commissioner of Business Oversight is of the opinion
6 that the memberships in I-Strategy, LLC and I-Health and Wellness, LLC are securities subject to
7 qualification under the Corporate Securities Law of 1968, and have been offered or sold without first
8 being qualified or exempt from qualification in violation of Corporations Code section 25110.
9 Pursuant to Corporations Code section 25532, Deadra Joiyon Williams, I-Strategy, LLC, and I-
10 Health and Wellness, LLC are hereby ordered to desist and refrain from the further offer or sale of
11 securities in California, unless and until qualification has been made or unless exempt.

12 In addition, the Commissioner of Business Oversight is of the opinion that Deadra Joiyon
13 Williams and I-Strategy, LLC have conducted business as investment advisers in this state for
14 compensation by advising members to invest in various securities without first having applied for and
15 secured from the Commissioner a certificate authorizing them to act in that capacity, in violation of
16 Corporations Code section 25230. Pursuant to Corporations Code section 25532, Deadra Joiyon
17 Williams and I-Strategy, LLC are further ordered to desist and refrain from conducting business as an
18 investment adviser in this state unless and until they have applied for and secured from the
19 Commissioner a certificate, then in effect, authorizing them to act in that capacity.

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

22 Dated: April 20, 2018
23 Sacramento, California

JAN LYNN OWEN
Commissioner of Business Oversight

24
25 By _____
26 MARY ANN SMITH
27 Deputy Commissioner
28 Enforcement