

1 invest the funds into various real estate opportunities. At least one California resident gave money to
2 Inclusive Realty and Blaylock to invest in real estate.

3 Under California Corporations Code section 25230, it is unlawful to conduct business as an
4 investment adviser in this state unless the investment adviser has first applied for and secured from
5 the Commissioner a certificate authorizing the investment adviser to do so, or unless the investment
6 adviser is exempt. Inclusive Realty and Blaylock do not have a valid investment adviser certificate
7 issued by the Commissioner nor have been registered as an investment adviser with the U.S.
8 Securities & Exchange Commission. Inclusive Realty and Blaylock are not exempt from the
9 certification requirement of California Corporations Code section 25230.

10 Based upon the foregoing findings, the Commissioner is of the opinion that Inclusive Realty
11 Services Inc. and James Brian Blaylock conducted business as an investment adviser in this state
12 without first applying for and securing from the Commissioner a certificate, then in effect,
13 authorizing them to do so, in violation of section 25230 of the Corporate Securities Law of 1968.

14 Pursuant to section 25532 of the Corporate Securities Law of 1968, Inclusive Realty Services
15 Inc. and James Brian Blaylock are hereby ordered to desist and refrain from conducting business as
16 an investment adviser in the State of California, unless and until he has first applied for and secured
17 from the Commissioner a certificate, then in effect, authorizing him to act as an investment advisor or
18 unless exempt.

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

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22 Dated: January 2, 2018
23 Los Angeles, CA

JAN LYNN OWEN
Commissioner of Business Oversight

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