

1 5. CSL section 25230, subdivision (a) prohibits a person from conducting business as an
2 investment adviser in this state without first applying for and securing a certificate from the
3 Commissioner authorizing them to do so, unless exempt.

4 6. Beginning in at least 2015, Janki and Dhamsania offered, induced the purchase of,
5 sold, and effected transactions in securities in the form of promissory notes or investment agreements
6 in Janki to California investors in an amount of at least \$10,000.00 or more. Janki and Dhamsania
7 also provided “investor certificates” to each California investor summarizing their securities
8 transactions. At year end, Janki and Dhamsania provided each investor with a performance report
9 and an Internal Revenue Service Taxation Form 1099 statement. During all relevant times, Janki and
10 Dhamsania did not have broker-dealer certificates issued by the California Department of Business
11 Oversight.

12 7. CSL section 25210, subdivision (a), prohibits a broker-dealer from effect any
13 transaction in or induce or attempt to induce the purchase or sale of, any security in this state unless
14 the broker-dealer has first applied for and secured from the commissioner a certificate, then in effect,
15 authorizing that person to act in that capacity.

16 Based upon the foregoing findings, the Commissioner is of the opinion that Janki Corporation
17 and Mehul Dhamsania conducted business as an investment adviser in this state without first securing
18 from the Commissioner a certificate, authorizing them to do so, in violation of section 25230 of the
19 CSL.

20 Pursuant to section 25532 of the CSL Janki Corporation and Mehul Dhamsania, are hereby
21 ordered to desist and refrain from conducting business as an investment adviser in the State of
22 California, unless and until Janki Corporation and Mehul Dhamsania, have first applied for and
23 secured from the Commissioner a certificate, then in effect, authorizing him to act as an investment
24 advisor or unless exempt.

25 Further, based upon the foregoing findings, the Commissioner is of the opinion that Janki
26 Corporation and Mehul Dhamsania effected transactions in securities as a broker-dealer without
27 having first applied for and secured from the Commissioner a certificate authorizing him to act in that
28 capacity, in violation of Corporations Code section 25210.

1 Pursuant to Corporations Code section 25532, Janki Corporation and Mehul Dhamsania is
2 hereby ordered to desist and refrain from effecting any transaction in, or inducing or attempting to
3 induce the purchase or sale of, any security in this state, unless he has applied for and secured from
4 the Commissioner a certificate, then in effect, authorizing him to act in that capacity, unless exempt.

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

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Dated: October 22, 2018
Sacramento, California

JAN LYNN OWEN
Commissioner of Business Oversight

By _____
MARY ANN SMITH
Deputy Commissioner
Enforcement Division