

1 MARY ANN SMITH  
Deputy Commissioner  
2 MIRANDA LEKANDER  
Assistant Chief Counsel  
3 TIMOTHY L. Le BAS (State Bar No. 135565)  
Senior Counsel  
4 Department of Business Oversight  
5 1515 K Street, Suite 200  
6 Sacramento, California 95814  
Telephone: (916) 322-2050  
7 Facsimile: (916) 445-6985  
8 Attorneys for Complainant

9  
10 BEFORE THE DEPARTMENT OF BUSINESS OVERSIGHT  
11 OF THE STATE OF CALIFORNIA

12 In the Matter of: )  
)  
13 THE COMMISSIONER OF BUSINESS ) STATEMENT IN SUPPORT OF ORDER  
OVERSIGHT, ) LEVYING ADMINISTRATIVE PENALTIES  
14 ) PURSUANT TO CORPORATIONS CODE  
15 Complainant, ) SECTION 25252  
)  
16 v. )  
)  
17 PYRAMID SCREENING TECHNOLOGY, )  
18 INC. doing business as BULLETHIRE, and )  
STEVEN GANESH, )  
19 )  
20 Respondents. )  
)

21  
22 Jan Lynn Owen, the Commissioner of Business Oversight (Commissioner), alleges and charges  
23 as follows:

24 I.  
25 STATEMENT OF FACTS

26 At all relevant times, Pyramid Screening Technology, Inc. doing business as BulletHire  
27 (Pyramid Screening) was a California corporation with a primary place of business at 5994 West Las  
28 Positas Boulevard, Suite 225, Pleasanton, California 94588.





1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

(a) Any person subject to this division, other than a broker-dealer or investment adviser, who willfully violates any provision of this division, or who willfully violates any rule or order adopted or issued pursuant to this division, is liable for administrative penalties of not more than one thousand dollars (\$1,000) for the first violation, and not more than two thousand five hundred dollars (\$2,500) for each subsequent violation.

12. Based on the foregoing findings of fact, as set forth fully above, Pyramid Screening and Ganesh willfully violated the following:

A) Corporations Code section 25110 by offering and selling notes or shares of stock that are not qualified by the Department or exempt to the following investors:

- 1) P.H.
- 2) D.W.
- 3) D.G. and K.G.
- 4) P.A. Real Estate 401k Plan
- 5) N.H.
- 6) R.D.
- 7) B.P.

B) Corporations Code section 25401 by making material omissions in association with the offer and sale of notes or stock to the following investors:

- 1) P.H.
- 2) D.W.
- 3) D.G. and K.G.
- 4) P.A. Real Estate 401k Plan
- 5) N.H.
- 6) R.D.
- 7) B.P.

C) The Desist and Refrain Order issued by the Commissioner on January 7, 2010, by continuing to offer and sell unqualified non-exempt securities to the following investors:

- 1) P.H.
- 2) D.W.

- 1                    3)     D.G. and K.G.
- 2                    4)     P.A. Real Estate 401k Plan
- 3                    5)     N.H.
- 4                    6)     R.D.
- 5                    7)     B.P.

6                    **WHEREFORE**, good cause showing, and pursuant to Corporations Code section 25252, the  
7 Commissioner prays for an order levying administrative penalties against Pyramid Screening  
8 Technology, Inc. doing business as BulletHire and Steven Ganesh, jointly and severally, as follows:

9                    A)     That pursuant to Corporations Code section 25252, the Commissioner levy  
10 administrative penalties of \$1,000.00 for the first violation of Corporations Code section 25110 and  
11 \$2,500.00 for each subsequent violation, as listed below, for a total amount of \$16,000.00.

- 12                    1)     P.H. - \$1,000.00
- 13                    2)     D.W. - \$2,500.00
- 14                    3)     D.G. and K.G. - \$2,500.00
- 15                    4)     P.A. Real Estate 401k Plan - \$2,500.00
- 16                    5)     N.H. - \$2,500.00
- 17                    6)     R.D. - \$2,500.00
- 18                    7)     B.P. - \$2,500.00

19                    B)     That pursuant to Corporations Code section 25252, the Commissioner levy  
20 administrative penalties of \$1,000.00 for the first violation of Corporations Code section 25401 and  
21 \$2,500.00 for each subsequent violation, as listed below, for a total amount of \$16,000.00.

- 22                    1)     P.H. - \$1,000.00
- 23                    2)     D.W. - \$2,500.00
- 24                    3)     D.G. and K.G. - \$2,500.00
- 25                    4)     P.A. Real Estate 401k Plan - \$2,500.00
- 26                    5)     N.H. - \$2,500.00
- 27                    6)     R.D. - \$2,500.00
- 28                    7)     B.P. - \$2,500.00

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

C) That pursuant to Corporations Code section 25252, the Commissioner levy administrative penalties of \$1,000.00 for the first violation of the Desist and Refrain Order and \$2,500.00 for each subsequent violation, as listed below, for a total amount of \$16,000.00.

- 1) P.H. - \$1,000.00
- 2) D.W. - \$2,500.00
- 3) D.G. and K.G. - \$2,500.00
- 4) P.A. Real Estate 401k Plan - \$2,500.00
- 5) N.H. - \$2,500.00
- 6) R.D. - \$2,500.00
- 7) B.P. - \$2,500.00

D) The total amount of administrative penalties for Pyramid Screening and Ganesh's violations of Corporations Code sections 25110 and 25401 and the Desist and Refrain Order is \$48,000.00.

Dated: May 9, 2018  
Sacramento, CA

JAN LYNN OWEN  
Commissioner of Business Oversight

By \_\_\_\_\_  
TIMOTHY L. Le BAS  
Senior Counsel  
Enforcement Division