

1 STATE OF CALIFORNIA  
2 BUSINESS, TRANSPORTATION AND HOUSING AGENCY  
3 DEPARTMENT OF BUSINESS OVERSIGHT

4 TO: Savvy Wellness  
5 Ira Warkol  
6 Bruce Robinson  
7 7334 Topanga Canyon Boulevard, Suite 115  
8 Canoga Park, California 91303

9 **DESIST AND REFRAIN ORDER**  
10 **(For violations of Corporations Code section 25110)**

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

12 1. Savvy Wellness (Savvy) was incorporated in the State of Wyoming.  
13 2. On August 22, 2018 Savvy was a business operating at 7334 Topanga Canyon Boulevard,  
14 Suite 115, Canoga Park, California. Ira Warkol (Warkol) is the President and agent for service of  
15 process for Savvy.

16 3. At all relevant times, Bruce Robinson (Robinson) held himself out as an agent working for  
17 Savvy. Starting in or about 2018, Robinson solicited investments in Savvy by cold-calling  
18 California residents. On August 22, 2018, Robinson emailed and provided the California resident  
19 with a link to a You Tube video regarding a product Savvy was attempting to market. The subject of  
20 the You Tube video involves Cannabidiol (CBD) which is a cannabis compound that is marketed to  
21 have potential medical benefits but does not make the consumer “high” or mentally compromised.

22 4. Savvy’s private placement memorandum reveals that Savvy seeks to raise \$3,000,000 for  
23 10,000,000 shares of common stock sold at \$0.10 per share for the first 5,000,000 shares and at \$0.50  
24 per share for the remaining 5,000,000 shares. The private placement memorandum states that Savvy is  
25 in the business formed to engage in the development, manufacturing and marketing of CBD-related  
26 products in the State of California.

27 5. The shares in Savvy Wellness were offered or sold in this state in an issuer transaction.  
28 6. The Commissioner has not issued a permit or other form of qualification authorizing  
Savvy, Warkol or Robinson to offer and sell these securities in this state.

1 Based on the foregoing findings, the Commissioner finds that the securities offered and sold  
2 by Savvy Wellness, Ira Warkol and Bruce Robinson, including but not limited to shares in Savvy  
3 Wellness, are securities subject to qualification under the Corporate Securities Law of 1968 (CSL)  
4 (Corp. Code, § 25000 et seq.). These securities are or have been offered or sold without being  
5 qualified or exempt, in violation of Corporations Code section 25110.

6 Pursuant to Corporations Code section 25532, Savvy Wellness, Ira Warkol and Bruce  
7 Robinson are hereby ordered to desist and refrain from the further offer or sale in the State of  
8 California of securities, unless and until qualification has been made under said law or unless exempt.

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

11 Dated: November 19, 2018  
12 Sacramento, California

JAN LYNN OWEN  
Commissioner of Business Oversight

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14 By \_\_\_\_\_  
15 Mary Ann Smith  
16 Deputy Commissioner  
17 Enforcement Division  
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