

**SUMMARY OF ENFORCEMENT ACTIONS (ADMINISTRATIVE AND CIVIL)  
BY THE CALIFORNIA DEPARTMENT OF FINANCIAL PROTECTION AND INNOVATION  
December 2020**

<b>SUBJECT</b>	<b>ACTION</b>	<b>VIOLATIONS &amp; CHARGING SECTIONS</b>
Neal Allen Pepper PhD  Northridge, California	Statement of Issues  Order to Discontinue Violations  December 2, 2020	Unlawful Investment Adviser Activity  (Corporations Code Sections 25238, 25241(a) and 25249)
Toni Lynn Williams  Brea, California	Order Barring Toni Lynn Williams from Employment, Management or Control of any Escrow Agent  December 3, 2020	Unlawful Escrow Law Activity  (Financial Code Section 17423)
Rushmore Loan Management Services, LLC  Irvine, California	Consent Order  December 3, 2020	Unlawful California Residential Mortgage Lending Act Activity  (Financial Code Sections 50321, 50323 and 50204(e) and (o))

SUBJECT	ACTION	VIOLATIONS & CHARGING SECTIONS
David George Daniel  San Ramon, California	Consent Order  December 7, 2020	Mortgage Loan Originator License  (Financial Code Sections 22109.1(a)(3) and 50141(a)(3))
TT Travel & Investment, Inc.  Westminster, California	Cease and Desist Order  December 8, 2020	Unlawful Money Transmitter Law Activity  (Financial Code Section 2030)
Tiffani Wai VonAlvensleben aka Tiffani Wai Vallone aka Tiffani Wai Moffitt  Newcastle, California	Statement of Issues  December 8, 2020	Mortgage Loan Originator License  (Financial Code Sections 22109(a)(3) and 50513(a)(2))
TradersFXinc.com  Avila Beach, California Chicago, Illinois	Desist and Refrain Order  December 9, 2020	Unlawful Offer and Sale of Securities  (Corporations Code Sections 25110, 25210 and 25401)

<b>SUBJECT</b>	<b>ACTION</b>	<b>VIOLATIONS &amp; CHARGING SECTIONS</b>
Byung Hyun Ye Anaheim, California	Statement of Issues December 10, 2020	Mortgage Loan Originator License  (Financial Code Sections 22109.1(a)(2)(A), 50141(a)(2)(A), 22712(a)(2) and 50513(a)(2))
North American Financial Corp. Henderson, Nevada	Settlement Agreement December 10, 2020	Unlawful California Financing Law Activity  (Financial Code Sections 22712, 22100(a), 22159, 22159(a) and 22713)
Timothy Stewart Catellier Avondale, Arizona	Stipulation to Withdrawal of Application December 10, 2020	Mortgage Loan Originator License  (Financial Code Section 50513)

<b>SUBJECT</b>	<b>ACTION</b>	<b>VIOLATIONS &amp; CHARGING SECTIONS</b>
Stefanie Shackelford aka Stephanie Shackelford  Sonoma, California	Order Barring Stefanie Shackelford aka Stephanie Shackelford from any Position of Employment, Management or Control of any Investment Adviser, Broker-Dealer or Commodity Adviser  December 10, 2020	Unlawful Investment Adviser Activity  (Corporations Code Section 25232.1)
Jeffrey C. Borneman Rampart Portfolio Partners, LLC  Los Angeles, California	Settlement Agreement  December 14, 2020	Unlawful Investment Adviser Activity  (Corporations Code Sections 25241(a)(c), 25249, title 10 § 260.241.3(a)(ii) and 260.241.4 (a)(d))
Anne McClure  San Diego, California	Consent Order  December 15, 2020	Unlawful Credit Union Law Activity  (Financial Code Section 14765)

<b>SUBJECT</b>	<b>ACTION</b>	<b>VIOLATIONS &amp; CHARGING SECTIONS</b>
Legacy Private Client Group, Inc.  Kamas, Utah	Order Revoking Investment Adviser Certificate  December 15, 2020	Unlawful Investment Adviser Activity  (Corporations Code Section 25232(h))
Paul Horton Smith, Senior  Moreno Valley, California	Order Barring Paul Horton Smith, Senior from any Position of Employment, Management, or Control of any Investment Adviser, Broker-Dealer or Commodity Adviser  December 15, 2020	Unlawful Investment Adviser Activity  (Corporations Code Section 25232.1)
Robert Mark Racusen  Buffalo Grove, Illinois	Order Revoking Mortgage Loan Originator License  December 15, 2020	Non-Issuance of Mortgage Loan Originator License  (Financial Code Section 22172)

<b>SUBJECT</b>	<b>ACTION</b>	<b>VIOLATIONS &amp; CHARGING SECTIONS</b>
Susan Silverman Cribb  Westlake Village, California	Consent Order  December 17, 2020	Mortgage Loan Originator License  (Financial Code Section 50145(b))
Brynn Garrett Downey  Yorba Linda, California	Statement of Issues  December 18, 2020	Mortgage Loan Originator License  (Financial Code Sections 22109.1(a)(2), 50141(a)(2), 22172(a)(2), 50513(a)(2), 22109.1(a)(3) and 50141(a)(3))
George Michael Baker Timeline Investment Group LLC  Los Angeles, California	Desist and Refrain Order  December 18, 2020	Unlawful Offer and Sale of Securities  (Corporations Code Section 25110)