1	CLOTHILDE V. HEWLETT	
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3	JOANNE ROSS (State Bar No. 202338)	
4	Senior Counsel	
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	Counsel	-,
7	1 *	on
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	Facsimile: (916) 928-7929	
10	Attorneys for Complainant	
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12	BEFORE THE DEPARTMENT OF FINA	NCIAL PROTECTION AND INNOVATION
13	OF THE STATE OF CALIFORNIA	
14	In the Matter of:	CRD NO.: 129511
15	THE COMMISSIONER OF FINANCIAL	STATEMENT IN SUPPORT OF ORDER TO
16	PROTECTION AND INNOVATION,	DISCONTINUE VIOLATIONS PURSUANT
17		TO CORPORATIONS CODE SECTION 25249
	Complainant,	
18	v.	
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20	Rtj Financial Management, Inc.,	
	Respondent.	
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23	The Commissioner of Financial Protection	on and Innovation (Commissioner) alleges and
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25	1. RTJ FINANCIAL MANAGEME	NT, INC. (RTJ FINANCIAL MANAGEMENT
26	INC.) is a California formed Corporation, with its principal office located at 249 SPRUCE DRIVE	
27	GOLETA, CA 93117.	
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	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	Commissioner MARY ANN SMITH Deputy Commissioner JOANNE ROSS (State Bar No. 202338) Senior Counsel VANESSA LU (State Bar No. 295217) Senior Counsel TAYLOR HERRLINGER (State Bar No. 31479 Counsel Department of Financial Protection and Innovati 2101 Arena Boulevard Sacramento, California 95834 Telephone: (916) 936-7908 Facsimile: (916) 928-7929 Attorneys for Complainant BEFORE THE DEPARTMENT OF FINA OF THE STATE In the Matter of: THE COMMISSIONER OF FINANCIAL PROTECTION AND INNOVATION, Complainant, v. Rtj Financial Management, Inc., Respondent. The Commissioner of Financial Protection charges as follows: 1. RTJ FINANCIAL MANAGEME INC.) is a California formed Corporation, with it GOLETA, CA 93117.

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fiscal year.

2 DTLE	IN A NOTAT MANACEMENT INC holds a valid investment advisor
2. RTJ F	INANCIAL MANAGEMENT, INC. holds a valid investment adviser
certificate issued by t	he Commissioner pursuant to Corporations Code section 25230. RTJ
FINANCIAL MANA	GEMENT, INC. is assigned Central Registration Depository (CRD) Number
of 129511.	
3. JUPIL	LE, TRACIE, JO (CRD 4733124) and JUPILLE, ROBERT, HENRY (CRD
Number 1881492) is	the 100% owner and investment adviser representative of RTJ FINANCIAL
MANAGEMENT, IN	IC.
4. On Jun	ne 30, 2022, the Commissioner instructed RTJ FINANCIAL MANAGEMENT
INC. to file an annua	amendment to its Form ADV in Investment Adviser Registration Depository
(IARD) no later than	30 days after June 30, 2022, the date of the letter.
5. Accor	ding to the IARD, investment adviser has not filed an annual updating
amendment to its For	m ADV for 2022. Pursuant to California Code of Regulations, title 10, section
260.241.4, subdivisio	on (e), a licensed investment adviser shall file an annual updating amendment, in
accordance with the i	nstructions in Form ADV, with IARD in accordance with its procedures for

6. To date, the RTJ FINANCIAL MANAGEMENT, INC. did not file an update to its Form ADV on IARD.

transmission to the Commissioner within ninety (90) days of the end of the investment adviser's

- 7. Corporations Code section 25241 provides, in relevant part, that:
 - (a) Every broker-dealer or investment adviser licensed under Section 25230 shall make and keep accounts, correspondence, memorandums, papers, books, and other records and shall file financial and other reports as the commissioner by rule requires . . .
- 8. Corporations Code section 25242, subdivision (c)(2), states in relevant part, that:
 - (c) The commissioner may summarily suspend or revoke the certificate of a broker-dealer or investment adviser if he or she . . . (2) fails to file any report required under Section 25241 within 10 days after notice by the commissioner that the report is due.
- 9. Cal. Code of Regs., tit. 10, section 260.241.4, provides:
 - (a) Each licensed broker-dealer and each licensed investment adviser shall, upon any change in the information contained in its application

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for a certificate (other than financial information contained therein) promptly file an amendment to such application setting forth the changed information.

. . .

- (d) A licensed investment adviser shall file changed information contained in its Form ADV with the Investment Adviser Registration Depository ("IARD") in accordance with its procedures for transmission to the Commissioner.
- (e) A licensed investment adviser shall file an annual updating amendment, in accordance with the instruction in Form ADV, with IARD in accordance with its procedures for transmission to the Commissioner within ninety (90) days of the end of the investment adviser's fiscal year.
- (f) A licensed investment adviser shall notify the Commissioner of the employment or engagement of any new investment adviser representative, as defined in Section 25009.5(a) of the Code and the termination thereof in accordance with Section 260.236.1.
- 10. Corporations Code section 25249 authorizes the Commissioner to issue an order directing any investment adviser to discontinue any violation of the Financial Code, Corporations Code, or any rules promulgated thereunder. Specifically, Corporations Code section 25249 provides, in pertinent part, that:

If, after examination or investigation, the commissioner has reasonable grounds to believe that any broker-dealer or investment adviser has violated any law or rule binding upon it, the commissioner shall, by written order addressed to the broker-dealer investment adviser, direct the discontinuance of the violation. The order shall be effective immediately, but shall not become final except in accordance with the provisions of Section 25251.

- 11. Corporations Code section 25251 provides, in relevant part, that:
 - (a) No order issued pursuant to Section 25249 or 25250 may become final except after notice to the affected broker-dealer or investment adviser of the commissioner's intention to make the order final and of the reasons for the finding. The commissioner shall also notify the broker-dealer or investment adviser that upon receiving a request the matter shall be set for hearing to commence within 15 business days after receipt of the request. The broker-dealer or investment adviser may consent to have the hearing commence at a later date. If no hearing is

requested within 30 days after the mailing or service of the required notice, and none is ordered by the commissioner, the order may become final without a hearing and the broker-dealer or investment adviser shall immediately discontinue practices named in the order.

If a hearing is requested or ordered, it shall be held in accordance with the provisions of the Administrative Procedure Act (Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code), and the commissioner shall have all of the powers granted under that act. If, upon the conclusion of the hearing, it appears to the commissioner that the broker-dealer or investment adviser is conducting business in an unsafe and injurious manner or is violating any law of this state, or any rule binding upon it, the commissioner shall make the order of discontinuance final and the broker-dealer or investment adviser shall immediately discontinue the practices named in the order.

- (b) The broker-dealer or investment adviser may within 10 days after an order is made final commence an action to restrain enforcement of that order. If the enforcement of that order is not enjoined within 10 days by the court in which the action is brought, the broker-dealer or investment adviser shall comply with the order.
- 12. By reason of the foregoing, RTJ FINANCIAL MANAGEMENT, INC. violated Corporations Code sections 25241, subdivision (a), and California Code of Regulations, title 10, section 260.241.4, subdivision (e), which justifies the issuance of an Order to Discontinue Violations. RTJ FINANCIAL MANAGEMENT, INC., as a licensed investment adviser, was obligated to have knowledge of, and to comply with, the provisions of the Corporations Code, and regulations promulgated thereunder.

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1	13. Therefore, pursuant to Corporations Code section 25249, the Commissioner has	
2	issued an order directing RTJ FINANCIAL MANAGEMENT, INC. to discontinue violating	
3	Corporations Code section 25241, subdivision (a), as well as California Code of Regulations, title	
4	10, section 260.241.4, subdivision (e).	
5	WHEREFORE, good cause showing, and pursuant to Corporations Code section 25251, the	
6	Commissioner the Commissioner finds this action is appropriate, in the public interest, for the	
7	protection of investors, and consistent with the purposes fairly intended by the policies and	
8	procedures of the Corporate Securities Law of 1968 (Corp. Code, § 25000 et seq.).	
9	Dated: September 8, 2022 CLOTHILDE V. HEWLETT	
10	Commissioner of Financial Protection and Innovation	
11	By	
12	BALBIRO KAZLA	
13	Deputy Commissioner Broker-Dealer Investment Adviser Division	
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