

1 CLOTHILDE V. HEWLETT
Commissioner
2 MARY ANN SMITH
Deputy Commissioner
3 JOANNE ROSS (State Bar No. 202338)
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11 BEFORE THE DEPARTMENT OF FINANCIAL PROTECTION AND INNOVATION
12 OF THE STATE OF CALIFORNIA
13

14 In the Matter of:) CRD NO. 136354
15)
16 THE COMMISSIONER OF FINANCIAL)
PROTECTION AND INNOVATION,)
17 Complainant,) ORDER SUMMARILY SUSPENDING
18 v.) INVESTMENT ADVISER
19 FREEDOM ADVISORY SERVICES, LLC,) CERTIFICATE
20 Respondent.) (Corp. Code, § 25242, subdivision (c))
21)

22 The Commissioner of Financial Protection and Innovation (Commissioner) finds:

23 1. FREEDOM ADVISORY SERVICES, LLC (FREEDOM ADVISORY), is a
24 California Limited Liability Company with its principal place of business at 1557 GRAND
25 AVENUE, SUITE A, SAN MARCOS, CA 92078-2484.

26 2. On October 19, 2005, the Commissioner issued an investment adviser certificate to
27 FREEDOM ADVISORY pursuant to Corporations Code section 25230, Central Registration
28 Depository (CRD) Number 136354.

1 3. WALTER DOBROWOLSKI, CRD Number 1408735, is the owner of FREEDOM
2 ADVISORY.

3 4. According to the Investment Adviser Registration Depository (IARD), investment
4 adviser has not filed an annual updating amendment to its Form ADV for 2021. Pursuant to
5 California Code of Regulations, title 10, section 260.241.4, subdivision (e), a licensed investment
6 adviser shall file an annual updating amendment, in accordance with the instruction in Form ADV,
7 with IARD in accordance with its procedures for transmission to the Commissioner within ninety
8 (90) days of the end of the investment adviser’s fiscal year.

9 5. By March 31, 2022, the investment adviser had not updated its Form ADV on IARD.

10 6. On September 8, 2022, the Commissioner issued an Order to Discontinue Violation
11 against FREEDOM ADVISORY and served it by certified mail return receipt and electronic mail.

12 7. To date, the Commissioner still has not received a response from FREEDOM
13 ADVISORY and FREEDOM ADVISORY is in violation of the Order to Discontinue Violation.

14 8. The Commissioner finds that FREEDOM ADVISORY violated Cal. Code of Regs.,
15 tit. 10, section 260.241.4, subdivision (e), investment advisers are required to file any report required
16 under Corporations Code section 25241 within 10 days after notice by the Commissioner that the
17 report is due.

18 9. Under Corporations Code section 25242, subdivision (c)(2), the Commissioner may
19 summarily suspend the certificate of the investment adviser if the investment adviser fails to file any
20 report required under Cal. Code of Regs., tit. 10, section 260.241.4 and Corporations Code section
21 25241 within 10 days after notice by the Commissioner that the report is due.

22 10. Under Corporations Code section 25242, subdivision (c)(6), the Commissioner may
23 summarily suspend the certificate the investment adviser if the investment adviser fails to maintain
24 records as required by Cal. Code of Regs., tit. 10, section 260.241.4 and Corporations Code section
25 25241.

26 NOW, BASED UPON THE FOREGOING AND GOOD CAUSE APPEARING, IT IS
27 HEREBY ORDERED under Corporations Code section 25242, subdivision (c), that the investment
28 adviser certificate of FREEDOM ADVISORY SERVICES, LLC is summarily suspended for thirty

1 (30) days. This Order is effective immediately. FREEDOM ADVISORY SERVICES, LLC is
2 precluded from soliciting or facilitating new business, including existing clients. This summary
3 suspension does not preclude FREEDOM ADVISORY SERVICES, LLC from engaging in activities
4 necessary to wind down the business, such as liquidating transactions, transferring accounts,
5 forwarding checks received to the clearing firm, responding to regulatory inquiries, filing Form U-5s
6 for registered representatives, fielding client requests for account servicing or documents, for up to
7 30 days after the date of this Order.

8 The Commissioner finds this action is appropriate, in the public interest, for the protection of
9 investors, and consistent with the purposes fairly intended by the policies and procedures of the
10 Corporate Securities Law of 1968 (Corp. Code, § 25000 et seq.).

11 Dated: November 7, 2022

CLOTHILDE V. HEWLETT
Commissioner of Financial Protection and Innovation



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13
14 By: _____
15 BALBIRO KAZLA
16 Deputy Commissioner
17 Broker-Dealer Investment Adviser
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