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10 BEFORE THE DEPARTMENT OF FINANCIAL PROTECTION AND INNOVATION
11 OF THE STATE OF CALIFORNIA

12 In the Matter of:) CRD Nos. 166408, 5306819
13)
14 THE COMMISSIONER OF FINANCIAL) ORDER TO DISCONTINUE VIOLATIONS
PROTECTION AND INNOVATION,)
15) (CORPORATIONS CODE SECTION 25249)
Complainant,)
16 v.)
17)
CURVE CAPITAL LLC, an entity; and)
18 KEVIN JOSEPH MARTIN, an individual,)
19 Respondents.)
_____)

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21 TO: CURVE CAPITAL LLC
22 KEVIN JOSEPH MARTIN
23 7545 IRVINE CENTER DRIVE, SUITE 200
24 IRVINE, CALIFORNIA, 92618.

25 Clothilde V. Hewlett, Commissioner of the Department of Financial Protection and Innovation
26 (Commissioner), finds that Respondents Curve Capital LLC and Kevin Joseph Martin act, or have
27 acted as follows:

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1 (i) Failed to Comply with Safeguard Requirements, in violation of
2 Corporations Code section 25235 and California Code of Regulations, title 10, section 260.237,
3 subdivisions (a)(1)(5)(A)(B)(6).

4 (ii) Failed to meet the minimum net worth requirements, in violation of
5 Corporations Code section 25241 and California Code of Regulations, title 10 § 260.237.2,
6 subdivisions (a)(c)(d)(e).

7 (iii) Failed to file an Annual Report in violation of California Code of
8 Regulations, title 10, section 260.241.2, subdivisions (d)(2)(3)(4).

9 (iv) Failed to maintain books and records, in violation of Corporations Code
10 section 25241, subd. (a). and California Code of Regulations, title 10, section 260.241.3, subdivisions
11 (a)(3)(7).

12 (v) Engaged in activities that do not promote fair, equitable and ethical
13 principles in violation of Corporations Code section 25238 and California Code of Regulations, title
14 10, section 260.238 subdivisions (a) (h) and (n).

15 (vi) Unlawfully offered and sold Unqualified, Nonexempt Securities in
16 violation of Corporations Code section 25110.

17 NOW, BASED UPON THE FOREGOING, AND GOOD CAUSE APPEARING, it is hereby
18 ORDERED, pursuant to Corporations Code section 25249, that Curve Capital LLC, and Kevin Joseph
19 Martin:

- 20 a) Discontinue violating Corporations Code section 25235 and California Code of
21 Regulations, title 10, section 260.237, subdivisions (a)(1)(5)(A)(B)(6).
- 22 b) Discontinue violating Corporations Code section 25241 and California Code of
23 Regulations, title 10, subdivisions (a)(c)(d)(e).
- 24 c) Discontinue violating California Code of Regulations, title 10, section 260.241.2,
25 subdivisions (d)(2)(3)(4).
- 26 d) Discontinue violating Corporations Code section 25241, subd. (a). and California Code
27 of Regulations, title 10, section 260.241.3, subdivisions (a)(3)(7).

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- e) Discontinue violating Corporations Code section 25238 and California Code of Regulations, title 10, section 260.238 subdivisions (a) (h) and (n).
- f) Discontinue violating Corporations Code sections 25110 and 25102 (f)(4).

The Commissioner finds this action is appropriate, in the public interest, and for the protection of investors and consistent with the intentions fairly intended by the policies and procedures of the Corporate Securities Laws of 1968. This Order shall remain in full force and effect until further order of the Commissioner.

Dated: March 22, 2023

CLOTHILDE V. HEWLETT
Commissioner of Financial Protection and Innovation



By _____
MARY ANN SMITH
Deputy Commissioner
Enforcement Division