1	CLOTHILDE V. HEWLETT	
2	Commissioner   MARY ANN SMITH	
	Deputy Commissioner	
3	AMY J. WINN Assistant Chief Counsel	
4	DANIELLE A. STOUMBOS (CA Bar No. 264784)	
5	Senior Counsel KELLY SUK (State Bar No. 301757)	
6	Senior Counsel DENISE R. SMITH (State Bar No. 309225) Senior Counsel	
7	Department of Financial Protection and Innovation One Sansome Street, Suite 600	
8	San Francisco, California 94104 Telephone: (415) 966-5985	
9	Attorneys for Complainant	
10		
11	BEFORE THE DEPARTMENT OF FINANCIAL PROTECTION AND INNOVATION	
12	OF THE STATE OF CALIFORNIA	
13		
14	In the Matter of:	
15	THE COMMISSIONER OF FINANCIAL	<i>)</i> )
16	PROTECTION AND INNOVATION,	ORDER BARRING JEFFREY IKAHN (a/k/a ) JEFFREY S. SANTULAN and JEFF HILL)
17	Complainant.	FROM ANY POSITION OF EMPLOYMENT,
18	v.	) MANAGEMENT OR CONTROL OF ANY ) INVESTMENT ADVISER, BROKER-
19		DEALER OR COMMODITY ADVISER
20	JEFFREY IKAHN (a/k/a JEFFREY S. SANTULAN and JEFF HILL),	) PURSUANT TO CORPORATIONS CODE ) SECTION 25232.1
21	Respondent.	) )
22		
23		<i>)</i>
24	The Commissioner of Financial Protection and Innovation (Commissioner) finds that:	
25	1. The Commissioner has jurisdiction over the licensing and regulation of investment	
26	advisers in California under the Corporate Securities Law of 1968 (CSL) (Cal. Corp. Code, §§ 25000	
27	- 25707)	
28	2. Jeffrey Ikahn (Ikahn) is the sole owner and sole manager of Safeguard Metals LLC	
	1	

(Safeguard). Ikahn has used the pseudonym "Jeff Hill" while representing Safeguard Metals to customers and potential customers. Ikahn's legal name was once Jeffrey Santulan. In July 2021, his name was legally changed from Jeffrey Santulan to Jeffrey Ikahn.

- 3. On February 1, 2022, the California Department of Financial Protection and Innovation, U.S. Commodity Futures Trading Commission, and 26 other state regulators (Plaintiffs) filed a civil complaint in federal court against Safeguard and Ikahn. Plaintiffs joined by several additional state regulators filed a First Amended Complaint (Complaint) on May 25, 2022. The Complaint sought injunctive and other equitable relief, and the imposition of civil penalties, for violations of the federal Commodity Exchange Act, as well as violations of state laws, including California Corporations Code sections 25230 and 25235.
- 4. On July 25, 2023 Ikahn and Safeguard consented to entry of a Consent Order of Permanent Injunction and Other Statutory and Equitable Relief Against Defendants Safeguard Metals and Jeffrey Ikahn (Consent Order) to partially settle the matters alleged in the Complaint, and all amendments to the Complaint, without a trial on the merits. The court approved the Consent Order on October 20, 2023.
- 5. Pursuant to the terms of the Consent Order, Ikahn and Safeguard consented to the entry of this order barring Ikahn. In signing the Consent Order, Ikahn waived the filing of an accusation pursuant to Government Code sections 11415.40 and 11415.60, as well as the right to a hearing, any reconsideration, appeal, or other right to review provided by the CSL, the California Administrative Procedure Act, the California Code of Civil Procedure, or any other provision of law.

## NOW THEREFORE, GOOD CAUSE SHOWING, IT IS ORDERED that:

Jeffrey Ikahn (a/k/a Jeffrey S. Santulan and Jeff Hill) is barred in the State of California from any position of employment, management or control of any investment adviser, broker-dealer, or commodity adviser pursuant to California Corporations Code section 25232.1.

This Order is effective as of the date hereof.

Dated: October 24, 2023 San Francisco, California CLOTHILDE V. HEWLETT Commissioner of Financial Protection and Innovation



Ву

MARY ANN SMITH Deputy Commissioner Enforcement Division