

1 STATE OF CALIFORNIA  
2 BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY  
3 DEPARTMENT OF FINANCIAL PROTECTION AND INNOVATION

4 To: Light Bank and Trust  
5 [LightBankandTrust@gmail.com](mailto:LightBankandTrust@gmail.com)  
6 [info@Lightbanktrust.com](mailto:info@Lightbanktrust.com)

7 CEASE AND DESIST ORDER  
8 (For violations of Financial Code sections 560, 561, 562)

9 The Commissioner of Financial Protection and Innovation (Commissioner) finds that:

10 1. At all relevant times, Light Bank and Trust (Light Bank) is and was a business entity  
11 of unknown form purportedly located and doing business in the State of California. There is no  
12 record of any corporate filings for an entity named “Light Bank and Trust” in California.

13 2. At all relevant times, Light Bank maintained websites at [www.lightbanktrust.com](http://www.lightbanktrust.com) and  
14 [www.lightbank.net](http://www.lightbank.net). Both websites recite (877) 796-2190 as the entity’s telephone number. Both  
15 websites also recite Michael Johannes as the principal of the entity. Social media webpages for the  
16 company at LinkedIn, Facebook and X (fka Twitter) recite the same phone number and  
17 [www.lightbanktrust.com](http://www.lightbanktrust.com), and list the company’s location as “Los Angeles, CA and Salt Lake City  
18 UT.”

19 3. At all relevant times, Light Bank’s websites and social media profiles advertised  
20 services normally offered by banks, such as checking accounts, savings accounts and loans. For  
21 example:

- 22 a. Lightbanktrust.com states, “We are a private investment bank and trust committed to  
23 excellence in financial and many aspects of both traditional and modern banking,”  
24 and lists the following services, among others: “Accounts/Loans: Banking, Checking,  
25 Savings, Private Money and Crypto”.
- 26 b. Lightbank.net states, “Fast and simple banking and loans. Instant online and mobile  
27 banking. Top quality investments. Our goal is to provide you with the best banking,  
28 loans, investments and money related experiences ... We offer fast set up online bank

1 accounts, checking, savings, debit cards and crypto! Move your money, or crypto  
2 onto your debit card with ease! Get your loans completed in record times with  
3 simplicity!”

4 c. Light Bank and Trust’s Facebook page lists the following services: “Accounts: Fast  
5 simple banking, checking, savings, mobile finances, and investments. We’re not just  
6 your bank, we’re here to make your financial life the best!”

7 4. On or about October 11, 2023, a California consumer visited the website  
8 [www.lightbanktrust.com](http://www.lightbanktrust.com) and filled out a form to make an appointment to discuss loan options. On  
9 or about October 12, 2023, an individual identifying himself as Mike Johannes from Light Bank and  
10 Trust called the consumer from the telephone number (801) 419-2037. Mr. Johannes left a voice  
11 mail message stating that he was calling to discuss the consumer’s inquiry about interest rates for  
12 loans. He further stated that interest rates could vary depending on the type of loan desired (e.g. car  
13 loan, home loan, equity loan, personal loan), and invited the consumer to call him back to discuss  
14 the loans and request a digital application.

15 5. The Commissioner has not issued Light Bank a certificate authorizing it to engage in  
16 the banking business in the State of California, or to transact business under any name or title that  
17 contains the word “bank.”

18 **APPLICABLE LAW**

19 6. The Commissioner is responsible for enforcing provisions of the California Financial  
20 Institutions Law (Fin. Code, § 550 et seq.), and is authorized to pursue administrative actions and  
21 remedies against persons who violate those provisions.

22 7. Financial Code section 560 provides, “No person who has not received a certificate  
23 from the commissioner authorizing it to engage in the banking business shall solicit or receive  
24 deposits, issue certificate of deposits with or without provision for interest, make payments on  
25 checks, or transact business in the way or manner of a bank or trust company.”

26 8. Financial Code section 561 provides: “No person who has not received a certificate  
27 from the commissioner authorizing it to engage in the banking business shall . . . make use of or  
28 circulate any letterheads, billheads, blank notes, blank receipts, certificates, or circulars, or any

1 written or printed paper, whatever, having thereon any artificial or corporate name or other words  
2 indicating that the business is the business of a bank or trust company, or transact business in a way  
3 or manner as to lead the public to believe that its business is that of a bank or trust company, except  
4 to the extent expressly authorized by this division.”

5 9. Financial Code section 562 provides, “No person who has not received a certificate  
6 from the commissioner authorizing it to engage in the banking business shall transact business under  
7 any name or title that contains the word “bank” or “banker” or “banking” . . . or act or advertise in  
8 any manner that indicates that the business is the business of a bank . . . ”

9 10. Pursuant to Financial Code section 567, “If the commissioner finds that a person has  
10 conducted, or that there is reasonable cause to believe that a person is about to conduct, business that  
11 requires a license issued by the commissioner and that person has not been issued the required  
12 license, the commissioner may, without any prior notice or hearing, order the person to cease and  
13 desist from conducting any unauthorized business unless and until the person is issued a license to  
14 engage in appropriate license business.”

15 **CEASE AND DESIST ORDER**

16 Based on the foregoing findings, the Commissioner is of the opinion that Light Bank and  
17 Trust is engaged in the business of soliciting or receiving deposits or transacted business in the way  
18 or manner of a bank, without first obtaining a certificate from the Commissioner authorizing it to  
19 engage in the banking business in this state, in violation of Financial Code section 560.

20 The Commissioner is of the further opinion that Light Bank and Trust has made use of or  
21 circulated written words indicating that their business is the business of a bank, or have transacted  
22 business in a way or manner as to lead the public to believe that its business is that of a bank, without  
23 first obtaining a certificate from the Commissioner authorizing it to engage in the banking business in  
24 this state, in violation of Financial Code section 561.

25 The Commissioner is of the further opinion that Light Bank and Trust transacted business  
26 under a name that contains the word “bank” or acted or advertised in a manner that indicates that  
27 their business is the business of a bank, without first obtaining a certificate from the Commissioner  
28

1 authorizing it to engage in the banking business in this state, in violation of Financial Code section  
2 562.

3 The Commissioner is of the further opinion that Light Bank and Trust is purposefully  
4 reaching out to California consumers through its advertising over the internet and on its website.

5 Pursuant to Financial Code section 567, Light Bank and Trust is hereby ordered to cease and  
6 desist from engaging in the business of soliciting or receiving deposits or transacting business in the  
7 way or manner of a bank or trust company, and/or from making use of or circulating written words  
8 indicating that their business is the business of a bank, or transacting business in a way or manner as  
9 to lead the public to believe that its business is that of a bank, and/or from transacting business under  
10 a name that contains the word "bank" or acting or advertising in a manner that indicates that their  
11 business is the business of a bank, without first obtaining a certificate from the Commissioner  
12 authorizing them to engage in the banking business in this state, or otherwise being exempt.

13 This Order is necessary, in the public interest, for the protection of consumers and consistent  
14 with the purposes, policies and provision of the California Financial Institutions Law.

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DATED: December 6, 2023  
Sacramento, California

CLOTHILDE V. HEWLETT  
Commissioner of Financial Protection and Innovation



By: \_\_\_\_\_  
MARY ANN SMITH  
Deputy Commissioner  
Enforcement Division