

**SUMMARY OF ENFORCEMENT ACTIONS (ADMINISTRATIVE AND CIVIL)**  
**BY THE CALIFORNIA DEPARTMENT OF FINANCIAL PROTECTION AND INNOVATION**  
**November 2023**

<b>SUBJECT</b>	<b>ACTION</b>	<b>VIOLATIONS &amp; CHARGING SECTIONS</b>
A.R.M. Solutions, Inc.  Thousand Oaks, California	Consent Order  November 1, 2023	Unlawful Debt Collection Licensing Act Activity  (Financial Code Section 100005(a))
LemonShark Franchising, LLC  Beverly Hills, California	Consent Order  November 2, 2023	Unlawful Franchise Investment Law Activity  (Corporations Code Sections 31200 and 31402)
Pylon Finance aka \$Pylon Ali Amer aka @xGrimReaper  High Point, North Carolina	Final Order Levying Administrative Penalties  November 7, 2023	Unlawful Offer and Sale of Securities  (Corporations Code Section 25252)

<b>SUBJECT</b>	<b>ACTION</b>	<b>VIOLATIONS &amp; CHARGING SECTIONS</b>
Start Connecting LLC dba USA Student Debt Relief Douglas R. Goodman  Sarasota, Florida	Consent Order  November 9, 2023	Unlawful Student Loan Servicing Act and California Financial Protection Law Activity  (Financial Code Sections 28160, 90015(d), 90015(e), 90012(b)(1) and (b)(2))
Impact Escrow, Inc.  Porter Ranch, California	Amended Accusation  November 14, 2023	Unlawful Escrow Law Activity  (Financial Code Sections 17408, 17406, 17602.5 and 17608)

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California Life Settlements LLC WDC Consulting LLC William Christiansen  Huntington Beach, California	Notice of Intent to Issue Order Levying Administrative Penalties and Statement in Support  Desist and Refrain Order  November 15, 2023	Unlawful Offer and Sale of Securities  (Corporations Code Sections 25252 and 25110)
First American National, LLC  Parsippany, New Jersey	Consent Order  November 16, 2023	Unlawful Debt Collection Licensing Act and California Financial Protection Law Activity  (Financial Code Sections 90015(d), 100001(a), 90003(a)(1) and (a)(2))

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GSB Gold Standard Bank Ltd. dba GSPartners dba GSP dba Gold Standard Partners <a href="http://www.gspartners.global">www.gspartners.global</a> Swiss Valorem Bank Ltd. <a href="http://www.swissvalorembank.com">www.swissvalorembank.com</a> GSB Gold Standard Corporation AG <a href="http://www.gsb.gold">www.gsb.gold</a> Josip Heit Bruce Innes Wylde Hughes Dirk Zahlmann  Fomboni, Mwali, Comoros Al Wasl, Dubai, United Arab Emirates Dusseldorf, Germany	Desist and Refrain Order  November 16, 2023	Unlawful Offer and Sale of Securities  (Corporations Code Sections 25110 and 25401)
Maria Dulce Pino Dickerson Creative Legal Fundings in CA  Sacramento, California	Desist and Refrain Order  November 17, 2023	Unlawful Offer and Sale of Securities  (Corporations Code Sections 25110 and 25401)

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Choctaw Trading & Analytics, Inc. Lawrence B. Hundley  Loma Linda, California	Order Barring Lawrence B. Hundley from any Position of Employment, Management, or Control of any Investment Adviser, Broker-Dealer, or Commodity Adviser  Consent Order  November 17, 2023	Unlawful Investment Adviser Activity  (Corporations Code Sections 25532, 25230, 25232(e) and (f), and 25232.1)
Prehired, LLC Prehired Recruiting, LLC Prehired Accelerator, LLC  Dover, Delaware	Stipulated Final Judgment and Order as to Debtors Prehired, LLC, Prehired Recruiting, LLC, and Prehired Accelerator, LLC  November 20, 2023	Unlawful Student Loan Servicing Act and California Financial Protection Law Activity  (Financial Code Sections 1036(a)(1)(B) and 1036(a)(1)(A))

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Zera Financial LLC Luis A. Romero  Westminster, California	Order Barring Luis A. Romero from any Position of Employment, Management, or Control of any Investment Adviser, Broker-Dealer, or Commodity Adviser  Consent Order  November 21, 2023	Unlawful Offer and Sale of Securities  (Corporations Code Sections 25232.1, 25532, 25401, 25232(e))
BaySierra Capital Fund, LLC Robert Ritter  Santa Rosa, California	Desist and Refrain Order  November 21, 2023  Statement in Support of: 1) Order Levying Administrative Penalties and; 2) Claim for Ancillary Relief and Costs  November 27, 2023	Unlawful Offer and Sale of Securities  (Corporations Code Sections 25110, 25401, 25252 and 25254)

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BaySierra Financial Inc. Bobby Ritter  Santa Rosa, California	Desist and Refrain Order  November 21, 2023  Statement in Support of: 1) Order Levying Administrative Penalties and; 2) Claim for Ancillary Relief and Costs  November 27, 2023	Unlawful Offer and Sale of Securities  (Corporations Code Sections 25110, 25401, 25252 and 25254)
BaySierra Mortgage Fund, LLC Robert Ritter Bobby Ritter  Santa Rosa, California	Desist and Refrain Order  November 21, 2023  Statement in Support of: 1) Order Levying Administrative Penalties and; 2) Claim for Ancillary Relief and Costs  November 27, 2023	Unlawful Offer and Sale of Securities  (Corporations Code Sections 25110, 25401, 25252 and 25254)

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Nobel Financial Inc.  Totowa, New Jersey	Findings and Order Accepting Voluntary Surrender of License Number 2617  November 22, 2023	Unlawful Money Transmission Act Activity  (Financial Code Sections 2038, 2081, 2120, 2124, 2148, 2617 and 2170)
D & G Escrow Corporation  Agoura Hills, California	Accusation to Issue Orders: (1) Revoking Escrow Agent's License and; (2) Imposing Penalties  November 30, 2023	Unlawful Escrow Law Activity  (Financial Code Sections 17602.5, 17608 and 17408)
Jeffrey Dwaine Gorman  Folsom, California	Consent Order Granting Conditional MLO License  November 1, 2023	Mortgage Loan Originator License  (Financial Code Sections 50141, 50144, 22109.1, and 22109.4)



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Mario John Valbrun  Peoria, Arizona	Consent Order Granting Conditional MLO License  November 7, 2023	Mortgage Loan Originator License  (Financial Code Sections 50141, 50144, 22109.1, and 22109.4)
Karen Alexander  Winchester, California	Consent Order Granting Conditional MLO License  November 8, 2023	Mortgage Loan Originator License  (Financial Code Sections 50141, 50144, 22109.1, and 22109.4)
Victor Ortega Jr.  Palmdale, California	Consent Order Granting Conditional MLO License  November 17, 2023	Mortgage Loan Originator License  (Financial Code Sections 50141, 50144, 22109.1, and 22109.4)

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Alexiz Nava Encizo  Tulare, California	Consent Order Granting Conditional MLO License  November 17, 2023	Mortgage Loan Originator License  (Financial Code Sections 50141, 50144, 22109.1, and 22109.4)
Mr. Dewie's LLC aka Mr. Dewie's Cashew Creamery, LLC  San Leandro, California	Consent Order  November 17, 2023	Unlawful Franchise Investment Law Activity  (Corporations Code Sections 31406, 31110 and 31119)
Falafel Corner Franchising Corp. aka Falafel Corner  Sacramento, California	Consent Order  November 17, 2023	Unlawful Franchise Investment Law Activity  (Corporations Code Sections 31406 and 31203)

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Skill Samurai, Inc.  Miami, Florida	Consent Order  November 27, 2023	Unlawful Franchise Investment Law Activity  (Corporations Code Sections 31406, 31123, 31203 and 31408(a))
Carmen Zoe Ojeda  San Diego, California	Consent Order Granting Conditional MLO License  November 28, 2023	Mortgage Loan Originator License  (Financial Code Sections 50141, 50144, 22109.1, and 22109.4)
Proof Financial, LLC  San Diego, California	Order Withdrawing Notice of Intention to Issue Order Revoking California Financing Law License  November 30, 2023	Unlawful California Financing Law Activity  (Financial Code Section 22714)