

1 CLOTHILDE V. HEWLETT  
Commissioner  
2 MARY ANN SMITH  
Deputy Commissioner  
3 DANIEL P. O'DONNELL  
Assistant Chief Counsel  
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5 Counsel  
6 Department of Financial Protection and Innovation  
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9 Attorneys for Complainant

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

12 In the Matter of:

13 THE COMMISSIONER OF FINANCIAL  
14 PROTECTION AND INNOVATION,

15 Complainant,

16 v.

17 ALVIN D. PARRA

18 Respondent.

CRD No.: 5449273

CONSENT ORDER

19 The Commissioner of Financial Protection and Innovation (Commissioner) and respondent  
20 Alvin D. Parra (Parra) enter into this Consent Order (Order) with respect to the following facts:

21 **I.**

22 **RECITALS**

23 A. The Commissioner is authorized to administer and enforce the provisions of the Corporate  
24 Securities Law of 1968 (Corp. Code, § 25000-25707) (CSL) and the regulations promulgated  
25 thereunder at title 10 of the California Code of Regulations, which include the licensure, examination,  
26 and regulation of investment advisers.

27 B. Alvin D. Parra (Parra) (CRD NO. 5449273) is a California resident.

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1 C. American Alternative Investments, LLC (AAI) was an Indiana limited liability company, with  
2 its principal place of business in Indianapolis, Indiana. AAI described itself as an “alternative  
3 financial services firm.”

4 D. From at least July 2018 through December 2020, AAI presented various investment  
5 opportunities to numerous financial professionals, including Parra, which in turn, Parra effected the  
6 securities, in the form of promissory notes and investment agreements, with Choice Energy Holdings  
7 II LLC, Choice Energy Holdings III LLC, PRMH Lenders Fund IV, LLC, and Legacy Energy, LLC,  
8 in California, for the account of others. During this time, Parra effected securities for at least five  
9 clients, totaling \$26,838.77 in compensation.

10 E. On May 13, 2022, AAI entered into a Consent Agreement and Order with the Commonwealth  
11 of Pennsylvania Department of Banking and Securities, Bureau of Securities Compliance and  
12 Examinations (Pennsylvania). AAI agreed to be permanently barred as a broker-dealer, investment  
13 adviser, or affiliated with an issuer.

14 F. On June 29, 2022, AAI entered into a Consent Order with the State of Washington  
15 Department of Financial Institutions Securities Division (Washington). AAI agrees to cease and  
16 desist from acting as an unregistered broker-dealer and violating Washington’s anti-fraud section of  
17 the Securities Act of Washington. In addition, AAI agreed to be liable for a fine of \$50,000.00 and  
18 investigative costs of \$16,868.00.

19 G. Parra effected the securities by identifying the offering to the investors, providing them with  
20 offering documents, discussing the offering with them, assisting them with completing their  
21 investment, facilitating the submission of the paperwork, and communicating with the issuers or other  
22 entities in the investment process about the status of the investment to provide updates to the  
23 investors. Parra was the primary point of contact for the investors.

24 H. At all relevant times, Parra has not held a valid broker-dealer license, pursuant to  
25 Corporations Code section 25210.

26 I. Parra admits to the jurisdiction of the Department of Financial Protection and Innovation  
27 (Department) and it is the intention of the Parties to resolve this matter without the necessity of a  
28 hearing and/or other litigation.

1 J. The Commissioner finds this action is appropriate, in the public interest, is necessary for the  
2 protection of investors, and is consistent with the purposes fairly intended by the policies and  
3 procedures of the CSL.

4 K. NOW, THEREFORE, in consideration of the foregoing, and the terms and conditions set  
5 forth herein, the Parties agree as follows:

6 **II.**

7 **TERMS AND CONDITIONS**

8 1. Purpose. This Consent Order resolves the issues before the Commissioner, set forth  
9 above, in a manner that avoids the expense of a hearing and other possible court proceedings, protects  
10 consumers, is in the public interest, and is consistent with the purposes and provisions of the CSL.

11 2. Desist and Refrain Order for Violations of Section 25210. Pursuant to Corporations  
12 Code section 25532, Parra is hereby ordered to desist and refrain from any unlicensed broker-dealer  
13 activities in violation of Corporations Code section 25210.

14 3. Waiver of Hearing Rights. Parra acknowledges that the Commissioner is ready,  
15 willing, and able to proceed with the filing of an administrative enforcement action on the charges  
16 contained in this Consent Order. Parra hereby waives the right to any hearings, and to any  
17 reconsideration, appeal, or other right to review which may be afforded pursuant to the CSL, the  
18 California Administrative Procedure Act, the California Code of Civil Procedure, or any other  
19 provision of law. Parra further expressly waives any requirement for the filing of an action pursuant  
20 to Government Code section 11415.60 (b). By waiving such rights, Parra effectively consents to this  
21 Consent Order and all the terms becoming final.

22 4. Failure to Comply with Consent Order. Parra agrees that if he fails to meet any requirement  
23 of this Consent Order, the Commissioner may, in addition to all other available remedies she may invoke  
24 under the CSL, immediately bar Parra. Parra hereby waives any notice and hearing rights to contest the  
25 immediate bar which may be afforded under the CSL, the California Administrative Procedure Act, the  
26 California Code of Civil Procedure, or any other provision of law in connection therewith.

27 5. Information Willfully Withheld or Misrepresented. This Consent Order may be  
28 revoked, and the Commissioner may pursue any and all remedies available under law against Parra if

1 the Commissioner discovers that Parra knowingly or willfully withheld or misrepresented  
2 information used for and relied upon in this Consent Order.

3         6.     Future Actions by Commissioner. If Parra fails to comply with any terms of the  
4 Consent Order, the Commissioner may institute proceedings for any and all violations otherwise  
5 resolved under this Consent Order. The Commissioner reserves the right to bring any future actions  
6 against Parra, for any and all unknown violations of the CSL or any other law under the  
7 Commissioner's jurisdiction.

8         7.     Assisting Other Agencies. Nothing in this Consent Order limits the Commissioner's  
9 ability to assist any other government agency (whether city, county, state, or federal) with any  
10 administrative, civil or criminal action brought by that agency against Parra or any other person based  
11 upon any of the activities alleged in this matter or otherwise.

12         8.     Headings. The headings to the paragraphs of this Consent Order are inserted for  
13 convenience only and will not be deemed a part hereof or affect the construction or interpretation of  
14 the provisions hereof.

15         9.     Binding. This Consent Order is binding on all heirs, assigns, and/or successors in  
16 interest.

17         10.    Reliance. Each of the Parties represents, warrants, and agrees that in executing this  
18 Consent Order it has relied solely on the statements set forth herein and the advice of its own counsel.  
19 Each of the Parties further represents, warrants, and agrees that in executing this Consent Order it has  
20 placed no reliance on any statement, representation, or promise of any other party, or any other  
21 person or entity not expressly set forth herein, or upon the failure of any party or any other person or  
22 entity to make any statement, representation or disclosure of anything whatsoever. The Parties have  
23 included this clause: (1) to preclude any claim that any party was in any way fraudulently induced to  
24 execute this Consent Order; and (2) to preclude the introduction of parol evidence to vary, interpret,  
25 supplement, or contradict the terms of this Consent Order.

26         11.    Waiver, Amendments, and Modifications. No waiver, amendment, or modification of  
27 this Consent Order will be valid or binding unless it is in writing and signed by each of the Parties.  
28 The waiver of any provision of this Consent Order will not be deemed a waiver of any other

1 provision. No waiver by either party of any breach of, or of compliance with, any condition or  
2 provision of this Consent Order by the other party will be considered a waiver of any other condition  
3 or provision or of the same condition or provision at another time.

4 12. Full Integration. This Consent Order is the final written expression and the complete  
5 and exclusive statement of all the agreements, conditions, promises, representations, and covenant  
6 between the Parties with respect to the subject matter hereof, and supersedes all prior or  
7 contemporaneous agreements, negotiations, representations, understandings, and discussions between  
8 and among the Parties, their respective representatives, and any other person or entity with respect to  
9 the subject matter covered hereby.

10 13. Governing Law. This Consent Order will be governed by and construed in accordance  
11 with California law. Each of the Parties hereto consents to the jurisdiction of such court, and hereby  
12 irrevocably waives, to the fullest extent permitted by law, the defense of an inconvenient forum to the  
13 maintenance of such action or proceeding in such court.

14 14. Counterparts. This Consent Order may be executed in one or more separate  
15 counterparts, each of which when so executed, shall be deemed an original. Such counterparts shall  
16 together constitute a single document.

17 15. Effect Upon Future Proceedings. If Parra applies for any license, certificate,  
18 registration, permit, or qualification under the Commissioner’s current or future jurisdiction, or is the  
19 subject of any future action by the Commissioner to enforce this Consent Order, then the subject  
20 matter hereof shall be admitted for the purpose of such application(s) or enforcement proceeding(s).

21 16. Voluntary Agreement. Parra enters into this Consent Order voluntarily and without  
22 coercion and acknowledges that no promises, threats or assurances have been made by the  
23 Commissioner or any officer, or agent thereof, about this Consent Order. The Parties each represent  
24 and acknowledge that he, she or it is executing this Consent Order completely voluntarily and  
25 without any duress or undue influence of any kind from any source.

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1 17. Notice. Any notice required under this Consent Order shall be provided to each party  
2 at the following addresses:

3 To Respondent: Alvin D. Parra  
4 1445 Huntington Drive, Suite 325  
5 South Pasadena, CA 91030  
6 alvin@strategicchoices.com

6 To the Commissioner: Ryan M. Cassidy, Counsel  
7 Department of Financial Protection and Innovation  
8 2101 Arena Boulevard  
9 Sacramento, California 95834  
10 Ryan.Cassidy@dfpi.ca.gov

10 18. Signatures. A fax or electronic mail signature shall be deemed the same as an original  
11 signature.

12 19. Public Record. Parra hereby acknowledges that this Consent Order is and will be a  
13 matter of public record.

14 20. Effective Date. This Consent Order shall become final and effective when signed by  
15 all Parties and delivered by the Commissioner’s agent via e-mail to Alvin D. Parra, at  
16 alvin@strategicchoices.com.

17 21. Authority to Sign. Each signatory hereto covenants that he/she possesses all necessary  
18 capacity and authority to sign and enter into this Consent Order and undertake the obligations set  
19 forth herein.

20 Dated: January 30, 2024  
21 Sacramento, California

CLOTHILDE V. HEWLETT  
Commissioner  
Department of Financial Protection and Innovation



23 By \_\_\_\_\_  
24 MARY ANN SMITH  
25 Deputy Commissioner  
26 Enforcement Division

26 Dated: January 29, 2024

27 By \_\_\_\_\_  
28 ALVIN D. PARRA, as an Individual