1	CLOTHILDE V. HEWLETT		
2	Commissioner MARY ANN SMITH		
3	Deputy Commissioner		
4	DANIEL P. O'DONNELL		
4	Assistant Chief Counsel RYAN M. CASSIDY (State Bar No. 340274)		
5	Counsel		
6	Department of Financial Protection and Innovation		
7	2101 Arena Boulevard		
	Sacramento, CA 95834 Telephone: (916) 764-8358		
8	Attorneys for Complainant		
9	BEFORE THE DEPARTMENT OF FINANCIAL PROTECTION AND INNOVATION OF THE STATE OF CALIFORNIA		
10			
11	In the Matter of:		
12	In the france of	STATEMENT IN SUPPORT OF ORDER	
13	THE COMMISSIONER OF FINANCIAL	LEVYING ADMINISTRATIVE	
	PROTECTION AND INNOVATION,	PENALTIES	
14	Complainant,	(Cal. Fin. Code § 90015 and Cal. Corp. Code	
15	V.	§ 25252)	
16	ROBINSON SERVICES, and TAFARA ROBINSON,		
17	Respondents.		
18			
19	The Commissioner of Financial Protection and Innovation (Commissioner) is informed and		
20	believes, and based upon such information and believe, alleges and charges as follows:		
21	I.		
22			
	INTRODUCTION		
23	1. The Commissioner has jurisdiction	n over the regulation of persons engaged in offering	
24	or providing a consumer financial product or service in California under the California Consumer		
25	Financial Protection Law (Cal. Fin. Code §§ 90000-90019) (CCFPL).		
26	2. The Commissioner is authorized to	administer and enforce the provisions of the	
27	Corporate Securities Law of 1968 (Cal. Corp. Code §§ 25000-25707) (CSL), which includes the		

regulation of the offer and sale of securities in California.

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	3. At all relevant times herein, Robinson Services was a business entity of unknown				
	formation, with a principal place of business located at 9330 Baseline Rd., Ste 203, Rancho				
	Cucamonga, California 91701 and 15477 McDonnell Ave, Fontana, California 92336.				
	4. At all relevant times, Tafara Robinson is and was the owner and operator of Robinson				
	Services, conducting business by email at tafara11wfg@gmail.com.				
	5. Robinson Services and Robinson are collectively referred to as Robinson.				
	II.				
	STATEMENT OF FACTS				
	6. Between November 2018 through October 2022 (the relevant time period), Tafara				
Robinson was a licensed insurance agent with the California Department of Insurance. However,					
neither she nor Robinson Services ever held a broker-dealer certificate nor an investment adviser					
	certificate.				
	7. During the relevant time period, Tafara Robinson represented to the public that she was				
	a financial adviser and provided insurance services, brokerage services, debt relief services, money				
	management services, brokerage services, and custodial services.				
	Violations of Cal. Fin. Code §§ 90003 (a)(1) and 90005(k)(4)				

(4)

(Deceptive Act or Practice relating to Deposit-Taking Activities)

- 8. Beginning in at least May 2019, Robinson offered services as a custodian of consumer funds, to at least two California residents (Consumers), after she learned of the death of their mother, and of their impending inheritance. Robinson convinced the Consumers to transfer \$194,000 to her, and represented that:
 - She would provide deposit-taking or custodial account services on their a. behalf through a brokerage account;
 - b. Their funds would be held in escrow;
 - c. Their money would grow 10% annually; and
 - d. They could withdraw funds at any time.
- 9. In truth and in fact, these funds were not held in escrow, nor did Robinson invest any of the money on the Consumers' behalf or purchase any securities. Instead, Robinson created fake

account records of account balances through "Robinson Services – Financial Services Brokerage." These records and Robinson's communications led the Consumers to falsely believe that their money was earning profits through Robinson's efforts. Nor did Robinson allow the Consumer to withdraw any funds, even when they asked.

- 10. Robinson's representations set forth in Paragraph 8 above constitute deceptive acts or practices with respect to a consumer financial product or service, to wit, engaging in deposit-taking activities, transmitting or exchanging funds, or otherwise acting as a custodian of funds or any financial instrument on behalf of a consumer.
- 11. Financial Code section 90003 prohibits a covered person from engaging or proposing to engage in any unlawful, unfair, deceptive, or abusive act or practice with respect to consumer financial products or services. A "financial product or service" includes, among other things, "[e]ngaging in deposit-taking activities, transmitting or exchanging funds, or otherwise acting as a custodian of funds or any financial instrument for use by or on behalf of a consumer." Cal. Fin. Code § 90005(k)(4).

Violations of Cal. Fin. Code §§ 90003 (a)(1) and 90005(k)(8)(B) (Deceptive Act or Practice relating to Debt Relief Services)

- 12. Beginning in at least May 2019, Robinson offered to help consumers with debt relief by stating, "We will look into debt relief / student loan balance reduction payment and settlement options for you."
- 13. In one case, at least one Consumer agreed to pay Robinson one thousand dollars for debt relief services. However, after the Consumer paid Robinson, Robinson never provided any services.
- 14. Robinson's representations set forth in Paragraph 13 above constitute deceptive acts or practices with respect to a consumer financial product or service, to wit, by representing that Robinson would provide debt relief services, but upon receiving payment no services were ever provided.
- 15. Financial Code section 90003 prohibits a covered person from engaging or proposing to engage in any unlawful, unfair, deceptive, or abusive act or practice with respect to consumer financial products or services. A "financial product or service" includes, among other things, "[p]roviding financial advisory services . . . including . . . [p]roviding services to assist a consumer with debt

management or debt settlement, modifying the terms of any extension of credit, or avoiding foreclosure." Cal. Fin. Code § 90005 (k)(8)(B).

Violation of Cal. Corp. Code § 25110

(Unqualified, Non-Exempt Offer and Sale of Securities)

- 16. Beginning in at least May 2019, after Robinson obtained custody of Consumer's funds, Robinson offered and sold securities in the form of investment contracts in California, through telephone calls and email correspondence.
- 17. The purported purpose of the securities offering was to raise money from members of the public and in return Robinson promised a 10% annual return.
- 18. Robinson sold investment contracts to approximately two investors, residing in California and elsewhere, in at least two separate transactions. Robinson raised at least \$194,000.00 from investors.
- 19. Corporations Code section 25110 prohibits the offer or sale of unqualified, nonexempt securities in issuer transactions in the State of California. The securities offered and sold by Robinson Services and Tafara Robinson are subject to qualification under the CSL. These securities were offered or sold in this state in issuer transactions. The Department has not issued a permit or other form of qualification authorizing any person to offer or sell these securities in this state. The offer or sale of these securities is not exempt.

Violation of Cal. Corp. Code § 25401

(Misrepresentations of Material Facts regarding the Offer and Sale of Securities)

- 20. Robinson and their agents solicited investors and prospective investors through telephone calls and email correspondence.
- 21. In connection with the offer and sale of securities, Robinson made, or caused to be made, misrepresentations of material fact to investors and potential investors, including that Robinson Services was a brokerage services company. In fact, neither the California Department of Financial Protection and Innovation (Department) nor the United States Securities and Exchange Commission has ever issued a broker-dealer certificate to Robinson.

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- 22. Robinson also misrepresented that investor money would be (1) held in a brokerage account; (2) in an escrow account earning interest; (3) that the investment was safe; and (4) that it would grow 10% annually. In fact, any money Robinson did return to investors was only a portion of their original investment no investor received any profits. And despite multiple requests for a refund, Robinson has failed to pay back her investors.
- 23. Corporations Code section 25401 prohibits the offer or sale of securities in this state by means of written or oral communications that include untrue statements of material fact or omit materials facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading. The misrepresentations of Robinson are material facts necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading.

III.

INTENT TO ISSUE ORDER LEVYING ADMINISTRATIVE PENALTIES

- 24. The Commissioner re-alleges and incorporates by reference paragraphs 1-23 of this Statement in Support, also contained in the Commissioner's Desist and Refrain Orders, as though fully set forth herein.
- 25. Financial Code section 90015 (c) authorizes the Commissioner to issue an order levying administrative penalties against any person for violations of any provisions of the CCFPL.
- 26. Corporations Code section 25252 authorizes the Commissioner to issue an order levying administrative penalties against any person for any willful violations of any provisions of the CSL.
- 27. The Commissioner sets forth her notice of intent to issue an Order Levying Administrative Penalties.

A. CCFPL

28. Financial Code section 90015 (c) authorizes the Commissioner to issue an order assessing penalties under Financial Code section 90012 (c).

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- 29. Based on the foregoing findings, the Commissioner finds that Robinson engaged in deceptive acts or practices with respect to consumer financial products or services, which includes deposit-taking activities and debt relief services, in violation of Financial Code section 90003 (a)(1).
- 30. Pursuant to Financial Code sections 90012 (c)(1)(A)(i) and 90015 (c), the Commissioner hereby provides notice of intent to levy administrative penalties against Robinson for the statutory amount of not more than the greater of either five thousand dollars (\$5,000.00) for each day during which the violation or failure to pay continues, or two thousand five hundred dollars (\$2,500.00) for each act or omission in violation, or according to proof, for Robinson's repeated violations of Financial Code section 90003 (a)(1).

WHEREFORE, good cause showing, and pursuant to Financial Code sections 90012 (c)(1)(A)(i) and 90015 (c), the Commissioner prays for an order levying administrative penalties, individually, jointly and severally, against Robinson Services and Tafara Robinson, as follows:

- That pursuant to Financial Code section 90012 (c)(1)(A)(i), the Commissioner levy administrative penalties of \$2,500.00 for each violation, as listed below, for a total amount of \$22,500.00 or according to proof:
 - i. \$2,500.00 for the deceptive act in paragraph 9a, made to two California residents;
 - ii. \$2,500.00 for the deceptive act in paragraph 9b, made to two California residents;
 - iii. \$2,500.00 for the deceptive act in paragraph 9c, made to two California residents;
 - iv. \$2,500.00 for the deceptive act in paragraph 9d, made to two California residents; and
 - v. \$2,500.00 for the deceptive act in paragraph 14, made to one California consumer.

The total amount of administrative penalties for violations of Financial Code section 90003 (a)(1) is \$22,500.00, or according to proof.

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B. CSL

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- 31. Corporations Code section 25252 (a) authorizes the Commissioner to issue an order levying administrative penalties against any person for willful violations of any provisions of the CSL and any rules promulgated thereunder.
- 32. Based on the foregoing findings, the Commissioner finds that Robinson offered and sold unqualified, non-exempt securities in an amount of at least \$194,000.00, and made numerous material misrepresentations and omissions of fact, to at least two investors, in violation of Corporations Code sections 25110 and 25401.
- 33. Pursuant to Corporations Code section 25252 (a), the Commissioner hereby provides notice of intent to levy administrative penalties against Robinson for the statutory amount of not more than one thousand dollars (\$1,000.00) for the first violation, and not more than two thousand five hundred dollars (\$2,500.00) for each subsequent violation, or according to proof, for Robinson's repeated willful violations of section 25110 and 25401.

WHEREFORE, good cause showing, and pursuant to Corporations Code section 25252 (a), the Commissioner prays for an order levying administrative penalties, individually, jointly and severally, against Robinson Services and Tafara Robinson, as follows:

- That pursuant to Corporations Code section 25252 (a), the Commissioner levy a. administrative penalties of \$1,000.00 for the first violation of Corporations Code section 25110 and \$2,500.00 for each subsequent violation, as listed below, for a total amount of \$3,500.00 or according to proof:
 - i. First violation: \$1,000.00 for the first sale of a security; and
 - ii. Additional violations: \$2,500.00 for the second sale of a security.
- b. That pursuant to Corporations Code section 25252 (a), the Commissioner levy administrative penalties of \$2,500.00 for each violation, as listed below, for a total amount of \$25,000.00, or according to proof:
 - \$2,500.00 for the misrepresentation in paragraph 21, made in the two transactions;

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2		transactions;
3	iii.	\$2,500.00 for the misrepresentation in paragraph 22.(2), made in the two
4		transactions;
5	iv.	\$2,500.00 for the misrepresentation in paragraph 22.(3), made in the two
6		transactions;
7	v.	\$2,500.00 for the misrepresentation in paragraph 22.(4), made in the two
8		transactions.
9	The total amount of adminis	trative penalties for violations of Corporations Code sections 25110 and
10	25401 is \$28,500.00, or according to proof.	
11		IV.
12	CONCLUSION	
13	Based upon the foregoing, the Commissioner finds that grounds exist, and that it is in the	
14	public interest, to enter an order levying administrative penalties, pursuant to Financial Code sections	
15	90012 (c)(1)(A)(i) and 90015 (c), and Corporations Code section 25252 (a). The total amount of	
16	administrative penalties for violations of Financial Code section 90003 (a) and Corporations Code	
17	sections 25110 and 25401 is \$51,000.00, or according to proof. The Commissioner hereby notifies	
18	Robinson Services and Tafara Robinson of her intention to make such orders final.	
19	Dated: August 5, 2024	CLOTHILDE V. HEWLETT
20	Sacramento, California	Commissioner of Financial Protection and Innovation
21		By RYAN M. CASSIDY
22		Counsel
23		Enforcement Division
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ii.

\$2,500.00 for the misrepresentation in paragraph 22.(1), made in the two