1 2 3 4 5 6 7	CLOTHILDE V. HEWLETT Commissioner MARY ANN SMITH Deputy Commissioner DANIEL P. O'DONNELL Assistant Chief Counsel RYAN M. CASSIDY (State Bar No. 340274) Counsel Department of Financial Protection and Innovatio 2101 Arena Boulevard Sacramento, CA 95834	on			
8 9	Telephone: (916) 764-8358 Attorneys for Complainant				
10	BEFORE THE DEPARTMENT OF FINANCIAL PROTECTION AND INNOVATION OF THE STATE OF CALIFORNIA				
11 12	In the Matter of:	ACCUSATION IN SUPPORT OF ORDER			
13	THE COMMISSIONER OF FINANCIAL PROTECTION AND INNOVATION,	TO BAR TAFARA ROBINSON, FROM ANY POSITION OF EMPLOYMENT,			
14	Complainant,	MANAGEMENT OR CONTROL OF ANY INVESTMENT ADVISER, BROKER-			
15	V.	DEALER OR COMMODITY ADVISER,			
16	TAFARA ROBINSON,	(Cal. Corp. Code § 25232.1)			
17	Respondent.				
18					
19 20	The Commissioner of Financial Protection and Innovation (Commissioner) is informed and				
20 21	believes, and based upon such information and be				
22		ON AND VENUE			
23	1. The Commissioner is authorized to administer and enforce the provisions of the				
24	Corporate Securities Law of 1968 (Cal. Corp. Code §§ 25000-25707) (CSL), which includes the				
25	regulation of the offer and sale of securities in California.				
26	2. The Commissioner brings this action pursuant to the provisions of Corporations Code				
27	sections 25232 and 25232.1, and the rules and regulations promulgated thereunder.				
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	-1- ACCUSATION IN SUPPORT OF ORDER TO BAR TAFARA ROBINSON FROM ANY POSITION OF EMPLOYMENT, MANAGEMENT OR CONTROL OF ANY INVESTMENT ADVISER, BROKER-DEALER OR COMMODITY ADVISER				

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1	3.	This action is brought in order to issue an order barring Tafara Robinson, from any	
2	position of e	employment, management or control of any investment adviser, broker-dealer or	
3	commodity a	adviser pursuant to Corporations Code section 25232.1.	
4		II.	
5		STATEMENT OF FACTS	
6	4.	At all relevant times herein, Robinson Services was a business entity of unknown	
7	formation, w	with a principal place of business located at 9330 Baseline Rd., Ste 203, Rancho	
8	Cucamonga, CA 91701 and 15477 McDonnell Ave, Fontana, California 92336.		
9	5.	At all relevant times, Tafara Robinson is and was the owner and operator of Robinson	
10	Services, con	nducting business by email at tafara11wfg@gmail.com.	
11	6.	Robinson Services and Robinson are collectively referred to as Robinson.	
12		III.	
13	<u><u>T</u></u>	HE COMMISSIONER HAS GROUNDS TO BAR TAFARA ROBINSON	
14	7.	Corporations Code section 25232.1 provides, in pertinent part:	
15		The commissioner may, after appropriate notice and opportunity for hearingbarfrom any position of employment, management or control of any	
16 17 18		<i>investment adviser, broker-dealer or commodity adviser,</i> any officer, director, partner, employee of, or person performing similar functions for, an investment adviser, or any other person, <i>if he or she finds</i> that the <i>bar</i> is in the public interest and <i>that the person has committed any act or omission enumerated in subdivision(e)of Section 25232</i> [Emphasis added.]	
19			
20	_	Code § 25232.1)	
21	8.	Corporations Code section 25232, in relevant part, provides:	
22	25000) [Emphasis added.]		
23 24	(Cal. Corp. (	Code § 25232 (e))	
25	9.	In accordance with Corporations Code section 25232.1, the Commissioner may bar any	
26		d on willful violations of sections of the CSL or rules adopted thereunder. In this case,	
27	Robinson willfully violated multiple CSL codes and regulations including: (1) Corporations Code		
28		0, by offering and sell securities in this state, unless such security or transaction has been	
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	ACCU	-2- SATION IN SUPPORT OF ORDER TO BAR TAFARA ROBINSON FROM ANY	
		ON OF EMPLOYMENT, MANAGEMENT OR CONTROL OF ANY INVESTMENT	

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ADVISER, BROKER-DEALER OR COMMODITY ADVISER

qualified or unless such security is exempted or not subject to qualification; and (2) Corporations Code
section 25401, by offering and selling securities by means of written or oral communications which
included untrue statements of material fact or omitted to state material facts necessary in order to make
the statements made, in the light of the circumstances under which they were made, not misleading.

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## A. <u>Cal. Corp. Code § 25110</u>

10. 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.

11. 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.

12. 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.

13. Corporations Code section 25110 prohibits the offer or sale of unqualified, non-exempt securities in issuer transactions in the State of California. The securities offered and sold by 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.

14. Based on the foregoing findings, the Commissioner is of the opinion that the securities, in the form of an investment contract, offered and sold by Robinson, are securities, subject to qualification under the CSL and are being or have been offered or sold without being qualified, in violation of Corporations Code section 25110.

B. <u>Cal. Corp. Code § 25401</u>

24 15. Robinson and their agents solicited investors and prospective investors through
25 telephone calls and email correspondence.

16. 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

ACCUSATION IN SUPPORT OF ORDER TO BAR TAFARA ROBINSON FROM ANY POSITION OF EMPLOYMENT, MANAGEMENT OR CONTROL OF ANY INVESTMENT ADVISER, BROKER-DEALER OR COMMODITY ADVISER

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Protection and Innovation (Department) nor the United States Securities and Exchange Commission
 has ever issued a broker-dealer certificate to Robinson.

17. Robinson also misrepresented that investor money would be held in a brokerage account, in an escrow account earning interest, that the investment was safe, and 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.

18. 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.

19. Based on the foregoing findings, the Commissioner is of the opinion that the securities issued by Robinson were offered and sold in this state by means of written or oral communications which included untrue statements of material fact or omitted to state material facts necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, in violation of Corporations Code section 25401.

-4-ACCUSATION IN SUPPORT OF ORDER TO BAR TAFARA ROBINSON FROM ANY POSITION OF EMPLOYMENT, MANAGEMENT OR CONTROL OF ANY INVESTMENT ADVISER, BROKER-DEALER OR COMMODITY ADVISER

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1	IV.	
2	CONCLUSION	
3	Based upon the foregoing, the Commissioner finds that grounds exist, and that it is in the	
4	public interest, to enter an order to bar Tafara Robinson, from any position of employment,	
5	management or control of any investment adviser, broker-dealer or commodity adviser pursuant to	
6	Corporations Code section 25232.1. The Commissioner hereby notifies Tafara Robinson of her	
7	intention to make such orders final.	
8 9	DATED: August 5, 2024 Sacramento, CaliforniaCLOTHILDE V. HEWLETT Commissioner of Financial Protection and Innovation	
10	By:	
11	Ryan M. Cassidy Counsel	
12	Enforcement Division	
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ŀ	-5- ACCUSATION IN SUPPORT OF ORDER TO BAR TAFARA ROBINSON FROM ANY	
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