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

11 In the Matter of:

12 THE COMMISSIONER OF FINANCIAL
13 PROTECTION AND INNOVATION,

14 Complainant,

15 v.

16 TAFARA ROBINSON,

17 Respondent.

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,

(Cal. Corp. Code § 25232.1)

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

5 **A. Cal. Corp. Code § 25110**

6 10. Beginning in at least May 2019, after Robinson obtained custody of Consumer's funds,
7 Robinson offered and sold securities in the form of investment contracts – in California, through
8 telephone calls and email correspondence.

9 11. The purported purpose of the securities offering was to raise money from members of
10 the public and in return Robinson promised a 10% annual return.

11 12. Robinson sold investment contracts to approximately two investors, residing in
12 California and elsewhere, in at least two separate transactions. Robinson raised at least \$194,000.00
13 from investors.

14 13. Corporations Code section 25110 prohibits the offer or sale of unqualified, non-exempt
15 securities in issuer transactions in the State of California. The securities offered and sold by Robinson
16 are subject to qualification under the CSL. These securities were offered or sold in this state in issuer
17 transactions. The Department has not issued a permit or other form of qualification authorizing any
18 person to offer or sell these securities in this state. The offer or sale of these securities is not exempt.

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

23 **B. Cal. Corp. Code § 25401**

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

26 16. In connection with the offer and sale of securities, Robinson made, or caused to be
27 made, misrepresentations of material fact to investors and potential investors, including that Robinson
28 Services was a brokerage services company. In fact, neither the California Department of Financial

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

3 17. Robinson also misrepresented that investor money would be held in a brokerage
4 account, in an escrow account earning interest, that the investment was safe, and that it would grow
5 10% annually. In fact, any money Robinson did return to investors was only a portion of their original
6 investment – no investor received any profits. And despite multiple requests for a refund, Robinson
7 has failed to pay back her investors.

8 18. Corporations Code section 25401 prohibits the offer or sale of securities in this state by
9 means of written or oral communications that include untrue statements of material fact or omit
10 materials facts necessary in order to make the statements made, in light of the circumstances under
11 which they were made, not misleading. The misrepresentations of Robinson are material facts
12 necessary in order to make the statements made, in the light of the circumstances under which they
13 were made, not misleading.

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

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IV.

CONCLUSION

Based upon the foregoing, the Commissioner finds that grounds exist, and that it is in the public interest, to enter an order to bar Tafara Robinson, from any position of employment, management or control of any investment adviser, broker-dealer or commodity adviser pursuant to Corporations Code section 25232.1. The Commissioner hereby notifies Tafara Robinson of her intention to make such orders final.

DATED: August 5, 2024
Sacramento, California

CLOTHILDE V. HEWLETT
Commissioner of Financial Protection and Innovation

By: _____
Ryan M. Cassidy
Counsel
Enforcement Division