

1 managed by [the Imposter]” allegedly leading to customers “earn[ing] returns...without having
2 to invest hours researching the market.” The Imposter charged a performance-based fee of 10%
3 of the customer’s profits for these services.

4 5. Beginning in May 2023, the Imposter advised at least one California resident to
5 invest in the Alpha Crypto Private Fund, a fund allegedly managed by the Imposter and “other
6 top industry risk analysts, each with over 25 years of expertise in financial markets.” The
7 Imposter claimed the California resident could expect monthly returns of 6% and annual returns
8 of 72% on this investment. The Imposter also represented that the California resident would be
9 able to make “monthly withdrawals of their investment and accumulated profit.”

10 6. The California resident transferred approximately \$600,000 in cryptocurrency to
11 a wallet hosted by Secawallet.com to fund the investment in the Alpha Crypto Private Fund.

12 7. Beginning in January 2024, the California resident attempted to withdraw \$3,000
13 of the profit the California resident had allegedly earned on the investment in Alpha Crypto
14 Private Fund but was unable to do so.

15 8. The California resident repeatedly attempted to contact Secawallet.com and the
16 Imposter about the issues withdrawing funds from the account but received no response. To
17 date, the California resident has not received any of the funds invested with the Imposter.

18 9. CSL section 25004 defines “broker-dealer” as any person engaged in the business
19 of effecting transactions in securities in this state for the account of others or for his own
20 account. CSL section 25210, subdivision (a), prohibits a broker-dealer from effecting any
21 transaction in or induce or attempt to induce the purchase or sale of any security in this state
22 unless the broker-dealer has first applied for and secured from the commissioner a certificate,
23 then in effect, authorizing that person to act in that capacity.

24 10. The Imposter has never obtained a certificate to act as a broker-dealer under CSL
25 section 25210 and is not exempt from the licensure requirement.

26 11. CSL section 25230, subdivision (a) prohibits a person from conducting business
27 as an investment adviser in this state without first applying for and securing a certificate from
28 the Commissioner authorizing them to do so, unless exempt.

1 12. Beginning in at least 2023, the Imposter engaged in the business of providing
2 investment advice in connection with the website and email to consumers. The Imposter
3 advised at least one California resident regarding investments made with and through the
4 Imposter. The Imposter asserts that it charges a fee and/or a commission for services provided
5 in connection with providing investment advice.

6 13. The Imposter does not have a valid investment adviser certificate issued by the
7 Commissioner nor has the Imposter been registered as an investment adviser with the U.S.
8 Securities & Exchange Commission. The Imposter is not exempt from the certification
9 requirement set forth in the CSL.

10 14. Section 25235, subdivisions (a) and (b) of the CSL, prohibits “any investment
11 adviser, directly or indirectly, in this state to employ any device, scheme, or artifice to defraud
12 any client or prospective client” or “to engage in any transaction, practice, or course of business
13 which operates or would operate as a fraud or deceit upon any client or prospective client.”

14 15. The Imposter, in connection with the providing of investment advice, made the
15 following untrue statements of material fact:

- 16 • Investment accounts managed by the Imposter would “accrue a minimum
17 of 5% profit monthly.”
- 18 • The investment in the Alpha Crypto Private Fund offered “high liquidity,
19 allowing you to access your funds quickly when needed.”
- 20 • Investors can “make monthly withdrawals of their investment and
21 accumulated Profits.”

22 Based on the foregoing findings, the Commissioner is of the opinion that the Imposter
23 Mary Lorenz Asset Management & Consultancy LLC, also known as
24 www.maryllorenzassetmanagement.com, is subject to the laws regulating broker-dealers under
25 the CSL, and has effected transactions in, or induced, or attempted to induce the purchase or
26 sale of, securities as a broker-dealer, without having first applied for and secured from the
27 Commissioner a certificate authorizing the Imposter to act in that capacity, in violation of CSL
28 section 25210.

1 Pursuant to CSL section 25532, Mary Lorenz Asset Management & Consultancy LLC,
2 also known as www.marylornzassetmanagement.com, is hereby ordered to desist and refrain
3 from conducting business as a broker-dealer, unless and until certification has been made under
4 said law or unless exempt.

5 Moreover, based upon the foregoing findings, the Commissioner is of the opinion that
6 the Imposter Mary Lorenz Asset Management & Consultancy LLC, also known as
7 www.marylornzassetmanagement.com, conducted business as an investment adviser in this
8 state without first securing from the Commissioner a certificate, authorizing them to do so, in
9 violation of section 25230 of the CSL.

10 Pursuant to section 25532 of the CSL, Mary Lorenz Asset Management & Consultancy
11 LLC, also known as www.marylornzassetmanagement.com, is hereby ordered to desist and
12 refrain from conducting business as an investment adviser in the State of California, unless and
13 until Mary Lorenz Asset Management & Consultancy LLC, also known as
14 www.marylornzassetmanagement.com, has first applied for and secured from the
15 Commissioner a certificate, then in effect, authorizing him to act as an investment advisor or
16 unless exempt.

17 Further, based upon the foregoing findings, the Commissioner is of the opinion that the
18 Imposter Mary Lorenz Asset Management & Consultancy LLC, also known as
19 www.marylornzassetmanagement.com, conducted business as an investment adviser in this
20 state and employed a device, scheme, or artifice to defraud any client or prospective client and
21 engaged in a transaction, practice, or course of business which operates or would operate as a
22 fraud or deceit upon any client or prospective client, in violation of section 25235, subdivisions
23 (a) and (b) of the CSL.

24 Pursuant to section 25532 of the CSL, Mary Lorenz Asset Management & Consultancy
25 LLC, also known as www.marylornzassetmanagement.com, is hereby ordered to desist and
26 refrain from directly or indirectly employing any device, scheme, or artifice to defraud any
27 client or prospective client and to engage in any transaction, practice, or course of business
28 which operates or would operate as a fraud or deceit upon any client or prospective client.

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This Order is necessary, in the public interest, for the protection of investors and consistent with the purposes, policies and provisions of the Corporate Securities Law of 1968.

Date: August 16, 2024
Sacramento, California

CLOTHILDE V. HEWLETT
Commissioner of Financial Protection and Innovation



By: _____
MARY ANN SMITH
Deputy Commissioner
Enforcement Division