

[REDACTED]

Prior to that time, he was registered with several different state regulators and FINRA as either a broker-dealer agent or investment adviser representative at various times dating back to July of 1999.

Respondent had attempted to make investment changes on accounts of prior clients who had remained at a prior broker-dealer without the clients' knowledge or consent.

5. On November 22, 2010, FINRA suspended the Respondent for four months after finding that the Respondent attempted to reallocate variable annuities for former customers without their authorization.

6. On May 21, 2019, for the Respondent's activities outlined below, the SEC permanently barred the Respondent from associating with "any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent, or NRSRO" and from selling penny stocks. The Respondent consented to this bar.

IV. FINDINGS OF FACT

7. The Woodbridge Group of Companies, LLC ("Woodbridge") is a California-based entity, which purported to be a commercial lender that made hard-money loans, secured by mortgages on commercial property.

8. To help fund these purported hard-money loans, Woodbridge raised money from investors throughout the country through the offer and sale of promissory notes (the "Woodbridge Notes").

Ponzi Scheme Targeting Retail Investors, Press Release, Jan. 26, 2017, <https://www.sec.gov/news/press/2017/20170126>; Investment News, *Ex-Woodbridge Group CEO Robert Shapiro pleads guilty in \$1.3 billion Ponzi*

scheme, Aug. 6, 2017, <https://www.investorintelligents.com/ex-woodbridge-group-ceo-robert-shapiro-pleads-guilty-in-1-3-billion-ponzi-scheme-80778>; Miami Herald, *Judge gives 25-year max to Ponzi schemer who stole millions from Florida to California*, Oct. 15, 2019, <https://www.miamiherald.com/news/local/article236215238.html>.

was not allowed to sell unregistered non-exempt securities in South Carolina.

19. The Woodbridge Notes constitute securities, pursuant to S.C. Code Ann. § 35-1-102(29).

20. The Woodbridge Notes were not registered with the Division or exempt from registration requirements.

violations of the Act.

26. The Respondent's violation of S.C. Code Ann. § 35-1-412(u)(2) provides the basis for this order, pursuant to S.C. Code Ann § 35-1-412(c).

27. This Order is in the public interest.

VI. ORDER

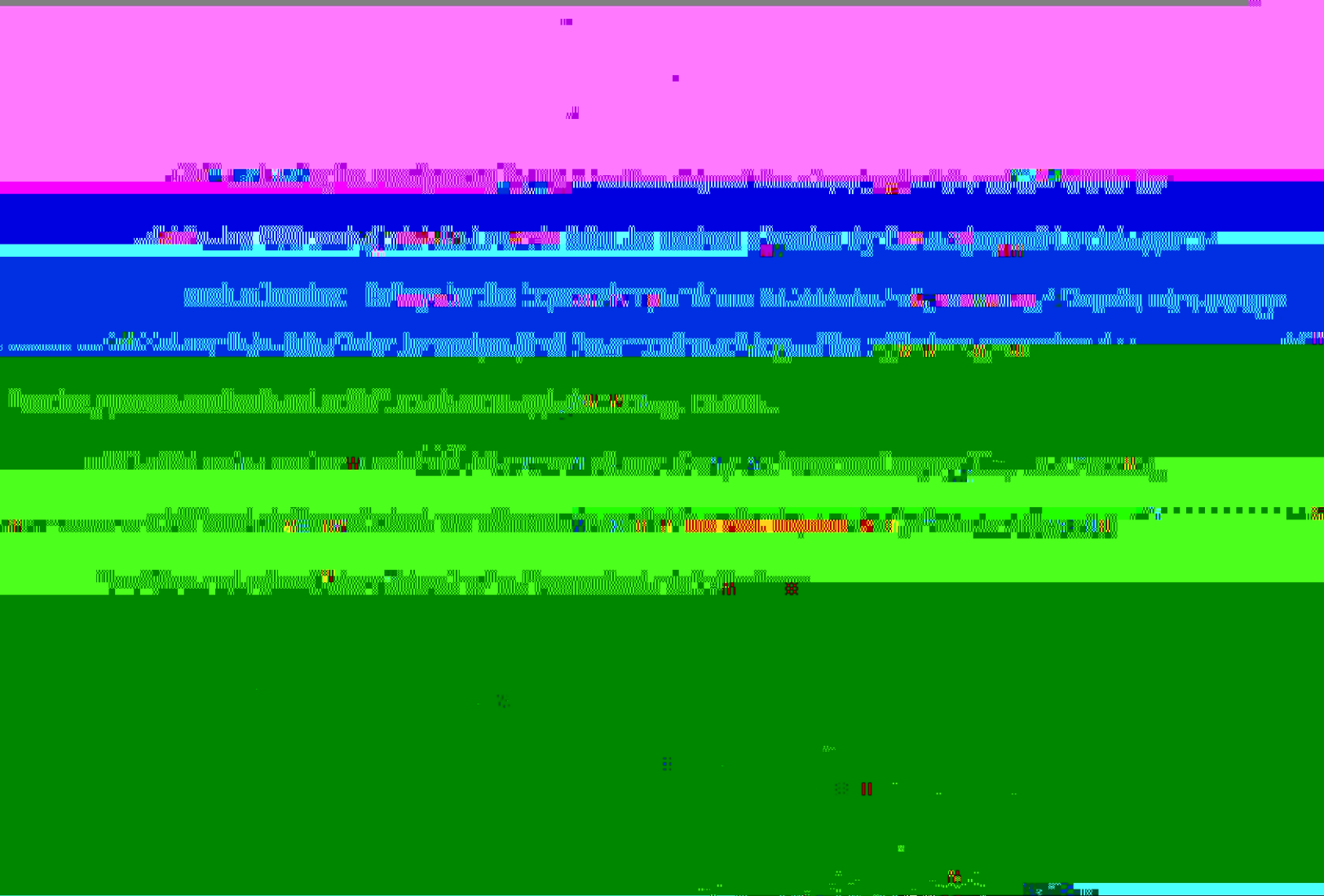
NOW THEREFORE, pursuant to S.C. Code Ann. § 35-1-604(a)(1), it is hereby **ORDERED** that:

- a. The Respondent and every successor, affiliate, control person, agent, servant, and employee of the Respondent, and every entity owned, operated, or indirectly or directly controlled by or on behalf of the Respondent **CEASE AND DESIST** from transacting business in this State in violation of the Act, and, in particular, §§ 35-1-301 and 35-1-402 thereof; and

contained herein. To schedule a hearing, the Respondent must file with the Division, Post Office Box 11549, Rembert C. Dennis Building, Columbia, South Carolina, 29211-1549, attention:

Securities Division, within thirty (30) days after the date of service of this Order, a written Answer specifically requesting a hearing. If the Respondent requests a hearing, the Division, within fifteen (15) days after receipt of a written request, will schedule the hearing for the Respondent.

In the written Answer, the Respondent, in addition to requesting a hearing, shall admit or deny each factual allegation in this Order, shall set forth specific facts on which the Respondent relies, and shall set forth concisely the matters of law and affirmative defenses upon which the Respondent relies. If the Respondent is without knowledge or information sufficient to form a belief as to the truth of an allegation, he shall so state.



Williams
Assistant Deputy Attorney General