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**STATE OF CALIFORNIA  
BUSINESS, TRANSPORTATION AND HOUSING AGENCY  
DEPARTMENT OF CORPORATIONS**

**TO:** Marc Victor  
Cordova Realty Advisors, Inc.  
3380 Cordova Drive  
Calabasas, CA 91302

Pride Investments, Inc.  
311 W. Third Street  
Carson City, NV 89703

Cordova Capital Holdings, Inc.  
108 W. 13<sup>th</sup> Street  
Wilmington, DE 19801

**DESIST AND REFRAIN ORDER**  
**(For violations of sections 25210, 25230 and 25401 of the California Corporations Code)**

The California Corporations Commissioner finds that:

1. During relevant times Marc Victor (“Victor”), through entities he owned, managed or controlled acting in concert and in participation with others, violated the Corporate Securities Law (“CSL”) in California.

2. Victor is the owner of Pride Investments, Inc., a corporation located in Nevada whose corporate status was revoked by the Nevada Secretary of State.

3. Victor is the president of Cordova Realty Advisors, Inc., a California corporation and Cordova Capital Holdings, Inc., a corporation located at 108 W. 13<sup>th</sup> Street, Wilmington, DE 19801.

4. Neither the California Department of Corporations nor the Securities and Exchange Commission have ever issued a license or certificate to Victor, Pride Investments, Inc., Cordova Realty Advisors, Inc., and Cordova Capital Holdings, Inc. authorizing them to act as either a securities broker-dealer or an investment adviser.

5. On August 23, 2008, the salesperson license the California Department of Real Estate (“DRE”) issued to Victor expired. At no time was Victor licensed as either a securities broker or investment adviser by the Department of Corporations or the Securities and Exchange Commission.

1           6. Victor represented himself to unsophisticated and unaccredited individuals as an  
2 investment broker. Victor suggested to individuals who were homeowners that they take a second  
3 mortgage on their homes to obtain money to invest with him. Victor guaranteed his investment  
4 opportunity claiming that he and the securities firm had hot tips on short trades. Victor promised  
5 15% per annum payable monthly to investors.

6           7. Victor traded for himself through his company, Pride Investments, Inc. Initially, Victor  
7 established accounts at Wedbush Morgan Securities. Victor obtained a limited power of attorney  
8 from each of his investors to enable him to trade securities in their accounts. Victor also created  
9 Cordova Capital Holdings, Inc. as a shell corporation designed to enable him to trade individual  
10 investors' funds through Shoreline Trading Group, LLC. The clearing broker for Shoreline Trading  
11 Group, LLC was Goldman Sachs Execution & Clearing. Victor obtained a limited power of attorney  
12 from each of his investors to enable him to trade securities in their accounts at Shoreline Trading  
13 Group, LLC. Victor was able to transfer funds from investors' Cordova Capital Holdings, Inc.  
14 accounts to his Pride Investments, Inc. account at Shoreline Trading Group, LLC. Victor was also  
15 able to allocate the trading losses and transfer trading losses from his Pride Investments, Inc. account  
16 to investors' Cordova Capital Holdings, Inc. accounts. During relevant times investors were not  
17 given accurate account statements or information from Victor.

18           8. Victor provided investors with account statements from Cordova Capital Holdings, Inc.  
19 reflecting 15% growth or profit on the amount of principal investment. In reality, investors' funds  
20 were lost.

21           9. Victor also filed IRS Forms 1099-INT and 1099-B ("1099s") showing some investors  
22 received interest income or proceeds from a securities broker when in reality the investors lost their  
23 funds. Victor's filing of false 1099s resulted in IRS liens against the investors for unpaid taxes.

24           10. When Victor was advising investors acquire a second mortgage to obtain funds to invest,  
25 he failed to disclose to investors that Victor's real estate license had expired and he had no license to  
26 conduct activities as a broker-dealer or investment adviser.

27           11. Victor and companies he controlled routinely engaged in the business of effecting  
28 transactions in securities for the accounts of others or its accounts without a certificate to do so.

1 Victor and his companies violated Corporations Code section 25210 by conducting business as a  
2 broker-dealer in California without having first obtained a certificate from the Commissioner.  
3 Corporations Code section 25210 prohibits a broker-dealer from effecting any transaction in, or  
4 inducing or attempting to induce the purchase or sale of any security unless the Commissioner  
5 authorized the person to act as a broker-dealer.

6 12. Victor advised investors to sell their investments or rollover their IRA, Simplified  
7 Employee Pension Plan (“SEP”) or retirement funds to invest in his companies. Victor obtained  
8 compensation in the form of a 40% share of the profits made from the funds invested with him.  
9 Victor provided advice to others but lacked the requisite investment adviser certificate. Corporations  
10 Code section 25230 prohibits an investment adviser from conducting business as an investment  
11 adviser in this state unless the investment adviser has first applied for and secured a certificate from  
12 the California Corporations Commissioner.

13 13. Victor directly and indirectly through his companies made misrepresentations or  
14 omissions of material facts that violated Corporations Code section 25401.

15 Based upon the foregoing findings, the California Corporations Commissioner is of the  
16 opinion that the activities of Marc Victor, Pride Investments, Inc., Cordova Realty Advisors, Inc. and  
17 Cordova Capital Holdings, Inc., involve offers or sales of securities in California made by means of  
18 written or oral communications which included an untrue statement of a material fact or omitted to  
19 state a material fact necessary in order to make the statements made, in the light of the circumstances  
20 under which they were made, not misleading, in violation of Corporations Code section 25401.

21 Further, the California Corporations Commissioner is of the opinion that Marc Victor, Pride  
22 Investments, Inc., Cordova Realty Advisors, Inc. and Cordova Capital Holdings, Inc. conducted  
23 business as a broker-dealer and an investment adviser in California without having first obtained a  
24 certificate from the Commissioner authorizing such activities, in violation of sections 25210 and  
25 25230 of the Corporations Code.

26 Pursuant to Corporations Code section 25532 Marc Victor, Pride Investments, Inc., Cordova  
27 Realty Advisors, Inc. and Cordova Capital Holdings, Inc. are hereby ordered to:

- 28 (1) Desist and refrain from offering or selling or buying or offering  
to buy any security in the State of California by means of any

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written or oral communication which includes an untrue statement of a material fact or omits to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading;

(2) Desist and refrain from conducting business as a broker-dealer in the State of California, unless and until granted a certificate by the California Corporations Commissioner under said law or unless exempt; and,

(3) Desist and refrain from conducting business as an investment adviser in the State of California, unless and until granted a certificate by the California Corporations Commissioner under said law or unless exempt.

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.

Dated: May 27, 2011  
Los Angeles, California

PRESTON DuFAUCHARD  
California Corporations Commissioner

By \_\_\_\_\_  
ALAN S. WEINGER  
Deputy Commissioner  
Enforcement Division