

**ADMINISTRATIVE PROCEEDING
BEFORE THE
SECURITIES COMMISSIONER OF SOUTH CAROLINA**

IN THE MATTER OF:)	
)	ORDER TO CEASE AND DESIST
Ronald Larson, jfaadvisorsllc.com,)	Matter No. 20213125
Julieta Palacios, and)	
longterminvestorsllc.com;)	
)	
Respondents.)	
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I. PRELIMINARY STATEMENT

Pursuant to the authority granted to the Securities Commissioner of South Carolina (the “Securities Commissioner”) under the South Carolina Uniform Securities Act of 2005, S.C. Code Ann. §35-1-101, *et seq.* (the “Act”), and delegated to the Securities Division of the Office of the Attorney General (the “Division”) by the Securities Commissioner, the Division conducted an investigation into the securities-related activities of Ronald Larson (“Larson”), jfaadvisorsllc.com, Julieta Palacios (“Palacios”), and longterminvestorsllc.com (individually, a “Respondent,” and collectively, the “Respondents”), and in connection with its investigation, the Division has determined that the Respondents violated the Act.

II. JURISDICTION

1. The Securities Commissioner has jurisdiction over this matter pursuant to S.C. Code Ann. § 35-1-601(a).

III. RESPONDENTS

2. Larson is a person who contacted individual(s) claiming to hold securities licenses and to be associated with JFA Advisors, LLC (CRD# 144039). Larson claimed to have been associated with JFA Advisors, LLC (CRD# 144039) for six years. There is no evidence to suggest

Larson is in fact a licensed investment adviser representative, and he is not and has never been associated in any way with JFA Advisors, LLC (CRD#144039).

3. The Respondents operate at least two websites, jfaadvisorsllc.com and longterminvestorsllc.com, both of which appear to be a type of “spoof” website created to perpetuate a fraud by impersonating websites operated by the legitimate investment advisers, JFA Advisors, LLC (CRD#144039) and Long Term Investors, LLC (CRD# 169920).

4. Palacios is a person who contacted individual(s) claiming to be a broker working for Long Term Investors, LLC (CRD# 169920). In fact, Palacios has never been associated with Long Term Investors, LLC (CRD# 169920), and Palacios is not a licensed broker-dealer agent or investment adviser representative.

IV. FINDINGS OF FACT

5. On or about June 16, 2021, Larson contacted an individual (“Victim 1”) offering Victim 1 a “business opportunity.”

6. When Victim 1 became suspicious of Larson’s claims and identity, Larson emailed a link to the Securities and Exchange Commission (“SEC”) Investment Adviser Public Disclosure website. The link was in fact the SEC Investment Adviser Public Disclosure website page containing information about JFA Advisors, LLC (CRD#144039), which had nothing to do with Larson.

7. Larson told Victim 1 that his company had locations all over the country, including the primary address, 200 E. Broad Street, Greenville, South Carolina 29601. In fact, JFA Advisors, LLC (CRD#144039) has just one location at 8 Pelham Road, Greenville, South Carolina 29615.

8. The property manager of the 200 E. Broad Street has never heard of Larson, and it does not lease property to JFA Advisors, LLC.

9. Fortunately, Victim 1 did not fall victim to the fraudsters' attempts to defraud him.

10. On or about July 8, 2021, another individual ("Victim 2") was contacted by Larson, who claimed to be associated with JFA Advisors, LLC (CRD#144039). In the weeks following this initial contact, Victim 2 spoke with both Larson and Palacios. In fact, the Respondents were operating another fraud using the names of legitimate businesses.

11. Unfortunately, Victim 2 lost at least \$22,000, as result of the Respondents' fraudulent activity.

V. CONCLUSIONS OF LAW

12. As outlined above, in violation of S.C. Code Ann. § 35-1-501, the Respondents, in connection with the offer, sale, or purchase of a security, directly or indirectly, in this State: (1) employed a device, scheme, or artifice to defraud; (2) made untrue statements of material fact or omitted to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading; and (3) engaged in an act, practice, or course of business that operated or would operate as a fraud or deceit upon another person.

13. The Respondents' violations of the Act set forth above provide the basis for this Order, pursuant to S.C. Code Ann. § 35-1-604(a)(1).

14. This Order is appropriate and in the public interest, pursuant to the Act.

VI. ORDER

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

- a. Each Respondent and every successor, affiliate, control person, agent, servant, and employee of each of the Respondents, and every entity owned, operated, or indirectly or directly controlled by or on behalf of each of the Respondents shall

CEASE AND DESIST from transacting business in this State in violation of the Act; and

- b. The Respondents shall jointly and severally pay a civil penalty in the amount of thirty thousand dollars (\$30,000.00) if this Order becomes effective by operation of law, or, if a Respondent seeks a hearing and any legal authority resolves this matter, pay a civil penalty in an amount not to exceed ten thousand dollars (\$10,000.00) for each violation of the Act by the Respondent(s) and the actual cost of the investigation or proceeding.

IT IS FURTHER ORDERED that, pursuant to S.C. Code Ann. § 35-1-604(a)(2) and (3), any exemption from registration with the Division that the Respondents may claim to rely upon under the Act, has been and is **PERMANENTLY REVOKED**.

VII. NOTICE OF OPPORTUNITY FOR HEARING

Each of the Respondents is hereby notified that she/he/it has the right to a formal hearing on the matters contained herein. To schedule a hearing, a Respondent must file with the Division within thirty (30) days after the date of service of this Order, a written Answer specifically requesting a hearing. If any Respondent requests a hearing, the Division, within fifteen (15) days after receipt of a written request, will schedule the hearing for that Respondent. The written request shall be delivered to the Office of the Attorney General, 1000 Assembly Street, Columbia, South Carolina 29201, or mailed to the Office of the Attorney General, Attention: Securities Division, P.O. Box 11549, Columbia, South Carolina 29211-1549.

In the written Answer, a 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, the Respondent shall so state.

Failure by a Respondent to file a written request for a hearing in this matter within the thirty-day (30) period stated above shall be deemed a waiver by that Respondent of the right to such a hearing. Failure by a Respondent to file an Answer, including a request for a hearing, shall result in this Order's becoming final by operation of law. The regulations governing the hearing process can be found at S.C. Code of Regulations §13-604.

This Order does not prevent the Division or any law enforcement agency from seeking additional civil or criminal remedies as are available under the Act, including remedies related to the offers and sales of securities by the Respondents set forth above.

ENTERED, this the 23 day of August, 2021.

ALAN WILSON
SECURITIES COMMISSIONER

By: 
Jonathan B. Williams
Assistant Deputy Attorney General