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

TO: Sam Croce Financial Management
Sam Croce, also known as Sam J. Croce, Samuel J. Croce, Samuel John Croce,
and Sam John Croce
Kristyne Croce

400 S. Jones Blvd., Suite 302
Las Vegas, NV 89107

7235 Hollywood Park Avenue
Las Vegas, NV 89129

6820 Emerald Tree Court
Las Vegas, NV 89130

DESIST AND REFRAIN ORDER

(For violations of sections 29520 and 29536 of the Corporations Code)

The California Corporations Commissioner finds that:

1. At all relevant times, Sam Croce Financial Management (“SCFM”) is a business of unknown formation with a principal place of business located at 400 S. Jones Blvd., Suite 302, Las Vegas, Nevada, 89107. SCFM does business in the State of California by way of telephone number (702) 309-0600; facsimile number (702) 314-1445; and internet website address www.stellarhomeloans.net. SCFM is purportedly in the business of investing or trading consumer funds in commodities in the form of commodities contracts (herein “Commodities”) for a profit.

2. At all relevant times, Sam Croce, also known as Sam J. Croce, Samuel J. Croce, Samuel John Croce, and Sam John Croce (“SC”), is an individual representing himself to California consumers as “owner” or principal representative of SCFM, or as an individual “personal professional trader”. SC purportedly does business in California as an investor account representative, trader, broker or manager of Commodities investments. SC's principal place of business is located at 400 S. Jones Blvd., Suite 302, Las Vegas, Nevada, 89107 and at 7235

1 Hollywood Park Avenue, Las Vegas, Nevada, 89129. SC does business in the State of California by
2 way of telephone number (702) 250-6533; facsimile number (702) 255-8804; and electronic email at
3 samcroce@cox.net or samcroce@mgci.com. SC is a former registered financial representative,
4 CRD#2551708, employed by over ten (10) different firms from 1994 to 2006. At all relevant times
5 herein, SC is not a registered financial representative.

6 3. At all relevant times, Kristyne Croce (“KC”) is an individual with a principal place of
7 business located at 7235 Hollywood Park Avenue, Las Vegas, Nevada, 89129, doing business in the
8 State of California. KC is married to SC. KC represents herself to California consumers as SC’s wife
9 and as a representative or associate of SC or SCFM. KC is purportedly in the business of
10 Commodities investments.

11 4. Beginning in at least 2009, SCFM, SC, or KC sold or purchased, or offered to sell or
12 purchase Commodities, or offered to enter into, or entered into, as sellers or purchasers, any
13 Commodities in the State of California.

14 5. The Commodities SCFM, SC, or KC offered and sold, or offered to enter into or
15 entered into as sellers or purchasers on behalf of investors, were primarily for speculative, profit, or
16 investment purposes, in that, the contracts were purchased, sold, and entered into based on interests in
17 metals or quoted price changes and fluctuations in particular commodities such as precious metals,
18 rather than as a means of acquiring the physical commodities. Specifically, SCFM, SC, or KC
19 “borrowed” investment funds from California investors by way of Commodities investment
20 subscription agreements and Commodities investment promissory notes under the assertion that all
21 funds would be invested in Commodities by way of purchasing interests rather than acquiring the
22 physical commodities.

23 6. The interests purchased or sold, or offered to be purchased or sold under commodity
24 contracts were commodities within the meaning of section 29504 of the California Commodity Law
25 of 1990.

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1 7. Beginning in or about 2009, SCFM, SC, or KC misrepresented to California investors
2 that they would receive their full principal in return, upon request, at any time and they would receive
3 an extremely profitable return on their Commodities investment.

4 Based upon the foregoing findings, the California Corporations Commissioner is of the
5 opinion that Sam Croce Financial Management, Sam Croce, also known as Sam J. Croce, Samuel J.
6 Croce, Samuel John Croce, and Sam John Croce, and Kristyne Croce purchased, or offered to sell or
7 purchase commodities under commodities contracts, or offered to enter into, or entered into, as sellers
8 or purchasers any commodity contracts.

9 Pursuant to California Corporations Code section 29542, Sam Croce Financial Management,
10 Sam Croce, also known as Sam J. Croce, Samuel J. Croce, Samuel John Croce, and Sam John Croce,
11 and Kristyne Croce are hereby ordered to desist and refrain from the further offer or sale of
12 commodities or commodity contracts, including but not limited to precious metals contracts, in the
13 State of California, unless and until such activity is not in violation of Corporations Code section
14 29520.

15 Further, the California Corporations Commissioner is of the opinion that the commodities in
16 the form of commodities contracts were offered or sold in the State of California by means of a
17 written or oral communication which included an untrue statement of material fact or omitted to a
18 state material fact necessary to make the statement made, in the light of the circumstances under
19 which they were made, not misleading, in violation of California Corporations Code section 29536.

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1 Pursuant to California Corporations Code section 29542, Sam Croce Financial Management,
2 Sam Croce, also known as Sam J. Croce, Samuel J. Croce, Samuel John Croce, and Sam John Croce,
3 and Kristyne Croce are hereby ordered to desist and refrain from offering or selling or buying or
4 offering to buy any commodity or commodity contracts in the State of California, including but not
5 limited to precious metals contracts, by means of any written or oral communication which includes
6 an untrue statement of material fact or omits to state a material fact necessary in order to make the
7 statements made, in the light of circumstances under which they were made, not misleading.

8 This Order is necessary, in the public interest, for the protection of investors and consistent
9 with the purposes, policies, and provisions of the California Commodity Law of 1990.

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11 Dated: October 26, 2011
12 Sacramento, California

13 PRESTON DUFAUCHARD
14 California Corporations Commissioner

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16 By _____

17 ALAN S. WEINGER
18 Deputy Commissioner
19 Enforcement Division
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