
IN THE MATTER OF:

GROWTHPOINT TECHNOLOGY
PARTNERS, LLC
CRD NO. 137438

**NOTICE OF INTENT TO REVOKE
REGISTRATION AS A
BROKER-DEALER**

AND

NOTICE OF RIGHT TO HEARING

MATTER NO. NR-25-14-S

I. PRELIMINARY STATEMENT

1. The Banking Commissioner (“Commissioner”) is charged with the administration of Chapter 672a of the General Statutes of Connecticut, the Connecticut Uniform Securities Act (“Act”), and Sections 36b-31-2 to 36b-31-33, inclusive, of the Regulations of Connecticut State Agencies (“Regulations”) promulgated under the Act.

2. Pursuant to Section 36b-26(a) of the Act, the Commissioner, through the Securities and Business Investments Division (“Division”) of the Department of Banking (“Department”), has conducted an investigation into the activities of Growthpoint Technology Partners, LLC (“Respondent”) to determine if Respondent has violated, is violating or is about to violate provisions of the Act or Regulations (“Investigation”).

3. As a result of the Investigation by the Division, the Commissioner brings this administrative action pursuant to Section 4-182(c) of the General Statutes of Connecticut and subsection (a) of Section 36b-15 of the Act to revoke Respondent’s registration as a broker-dealer in Connecticut.

II. RESPONDENT

4. Respondent is a limited liability company, which according to Delaware records, was formed on August 2, 2005. Respondent maintains or has maintained its principal office at 601 California Street, Suite 1250, San Francisco, California 94108. Respondent also has a mailing address at 2208 Seminole Court, Santa Rosa, California 95405.

5. Respondent has been registered as a broker-dealer under the Act since September 2, 2011.

III. FACTUAL ALLEGATIONS

6. Central Registration Depository (“CRD”) records indicate that none of Respondent’s direct owners and executive officers are currently registered in Connecticut as an agent of Respondent under the Act.

7. According to CRD records, Respondent no longer has any broker-dealer agents registered under the Act. Section 36b-31-6a(a) of the Regulations provides that “[n]o corporation or partnership shall be registered as a broker-dealer without the registration of at least one agent.” The Division has interpreted Section 36b-31-6a(a) of the Regulations to extend to limited liability companies.

8. On January 6, 2025, the Division notified Respondent via email that the firm needed an agent registered in Connecticut in order to maintain its registration. The Division did not receive a response from Respondent.

9. On January 22, 2025, acting pursuant to Section 4-182(c) of the General Statutes of Connecticut, the Division provided Respondent with an opportunity to show compliance with the provisions of the Act and to demonstrate why Respondent’s registration as a broker-dealer should not be suspended or revoked based on failure to have a broker-dealer agent registered in Connecticut. The Division’s January 22, 2025, correspondence (“Compliance Letter”), which was directed to Respondent’s main address, requested that Respondent respond in writing by February 6, 2025. The Compliance Letter was sent via certified mail (Certified Mail No. 9589071052701542922642). United States Postal Service records indicate that the Compliance Letter was delivered to an individual at the address on January 29, 2025.

10. Not having received a response, either orally or in writing, the Division sent follow-up e-mails to Respondent on February 13, 2025, and March 3, 2025, together with a follow-up phone call.

11. To date, the Respondent has not responded to the Division's Compliance Letter (orally or in writing) or to the Division's e-mails or phone communication attempts. In addition, Respondent has not requested an extension of time within which to respond.

IV. STATUTORY AND REGULATORY BASIS FOR NOTICE OF INTENT TO REVOKE REGISTRATION AS A BROKER-DEALER

Failure to Maintain the Registration of at least One Agent

12. Paragraphs 1 through 11, inclusive, are incorporated and made a part hereof as if more fully set forth herein.

13. Respondent's failure to register at least one broker-dealer agent under the Act, as more fully described in paragraphs 6 and 7, constitutes a violation of Section 36b-31-6a(a) of the Regulations. Such violation was wilful and forms the basis for the revocation of Respondent's broker-dealer registration in Connecticut under Section 36b-15(a)(2)(B) of the Act.

V. NOTICE OF INTENT TO REVOKE REGISTRATION AS A BROKER-DEALER AND NOTICE OF RIGHT TO HEARING

WHEREAS, the Commissioner has reason to believe that grounds exist to revoke Respondent's registration as a broker-dealer in Connecticut pursuant to Section 36b-15(a) of the Act;

WHEREAS, Section 36b-15(f) of the Act provides, in pertinent part, that "[n]o order may be entered under this section except as provided in subsection (c) of this section without (1) appropriate prior notice to the . . . registrant . . . (2) opportunity for hearing, and (3) written findings of fact and conclusions of law";

AND WHEREAS, the Commissioner believes that the issuance of an order revoking Respondent's registration as a broker-dealer in Connecticut would be in the public interest and consistent with the purposes fairly intended by the policy and provisions of the Act.

NOW THEREFORE, notice is hereby given to Respondent that Respondent's registration as a broker-dealer shall be revoked, subject to Respondent's right to request a hearing on the allegations set forth above.

THE COMMISSIONER FURTHER ORDERS THAT, pursuant to Section 36b-15 of the Act, Respondent will be afforded an opportunity for a hearing on the allegations set forth above if a written request for a hearing is received by the Department of Banking, Securities and Business Investments Division, 260 Constitution Plaza, Hartford, Connecticut 06103-1800 or submitted by e-mail to DOB.hearingsupport@ct.gov within fourteen (14) days following Respondent's receipt of this Notice. To request a hearing, complete and return the enclosed Appearance and Request for Hearing Form to one of the above-referenced addresses. If Respondent will not be represented by an attorney at the hearing, please complete the Appearance and Request for Hearing Form as "pro se".

If a hearing is requested, it will be held in person at the Department's offices. Once a written request for a hearing is received, the Commissioner may issue a notification of hearing and designation of hearing officer that acknowledges receipt of a request for a hearing, designates a hearing officer and sets the date of the hearing in accordance with Section 4-177 of the General Statutes of Connecticut and Section 36a-1-21 of the Regulations of Connecticut State Agencies. At the discretion of the Hearing Officer, for good cause shown, the Hearing Officer may approve requests for remote participation in the hearing by a Respondent, witness, or attorney. If such requests are approved by the Hearing Officer, such remote participation will be conducted via videoconference. If a hearing is requested, the hearing will be held on July 17, 2025, at 10 a.m.

If a hearing is requested, it will be held in accordance with the provisions of Chapter 54 of the General Statutes of Connecticut, unless Respondent fails to appear at the requested hearing. At such hearing, Respondent will have the right to appear and present evidence, rebuttal evidence and argument on all issues of fact and law to be considered by the Commissioner. Remote participation in a hearing will be held in accordance with Section 1-225a of the General Statutes of Connecticut, and the Remote Hearing Guidelines available on the Department's website at <https://portal.ct.gov/dob>.

If Respondent does not request a hearing within the time period prescribed or fails to appear at any such hearing, the allegations herein against Respondent will be deemed admitted and the Commissioner shall issue an order revoking Respondent's registration as a broker-dealer in Connecticut.

Dated at Hartford, Connecticut,
this 15 day of May 2025.

_____/s/
Jorge L. Perez
Banking Commissioner

CERTIFICATION

I hereby certify that on this 16 day of May 2025, I caused to be mailed by certified mail, return receipt requested, the foregoing Notice of Intent to Revoke Registration as a Broker-dealer and Notice of Right to Hearing to Growthpoint Technology Partners, LLC at: 601 California Street, Suite 1250, San Francisco, California 94108, certified mail no. 71022 2410 0000 9598 0834; and 2208 Seminole Court, Santa Rosa, California 95405, certified mail no. 7022 2410 0000 9598 0841.

 /s/
Jackie D. Wilkey
Administrative Assistant