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

TO: David Crosby
Richard Trefflich
First Legacy Financial Group, Inc.
First Legacy Financial, Inc.
4565 Ruffner Street, Suite 101
San Diego, CA 92111
and
3609 W. MacArthur Blvd. #810
Santa Ana, CA 92704
and
www.flfinc.com

DESIST AND REFRAIN ORDER
(For violations of section 25110 of the Corporations Code)

The California Corporations Commissioner finds that:

1. First Legacy Financial Group, Inc. (“First Legacy Financial Group”) was incorporated under the laws of California on August 18, 2008. Its principal place of business is 4565 Ruffner Street, Suite 101, San Diego, CA 92111.
2. First Legacy Financial, Inc. (“First Legacy Financial”) was incorporated under the laws of California on May 13, 2003. Its principal place of business is also 4565 Ruffner Street, Suite 101, San Diego, CA 92111. It maintains a website at www.flfinc.com.
3. First Legacy Financial Group and First Legacy Financial also maintain a place of business at 3609 W. MacArthur Blvd. #810, Santa Ana, CA 92704.

1 4. Richard H. Trefflich (“Trefflich”) is the co-founder and director of First Legacy
2 Financial Group and First Legacy Financial.

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4 5. David Crosby (“Crosby”) is the founder and CEO of First Legacy Financial Group and
5 First Legacy Financial.

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7 6. First Legacy Financial’s website features a presentation called “How Money Works.”
8 In that presentation, First Legacy Financial states that it provides clients with a “worthy asset” that
9 will “cash flow monthly,” and that the company does this by “buying distressed properties” and
10 “transform[ing] them into desirable homes.”

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12 7. Beginning in January 2008 or earlier, First Legacy Financial, First Legacy Financial
13 Group, Crosby, and Trefflich offered and sold securities in the form of an investment contract to
14 residents of California. The investment contract was memorialized by a document labeled
15 “Agreement to Invest/Note.” The document states: “First Legacy Financial Group agrees to locate
16 and negotiate the purchase of a [sic] various properties in Ogden UT. These properties will be
17 purchased and sold and investor will receive interest.”

18
19 8. These securities were offered and sold in this state in issuer transactions. The
20 Department of Corporations has not issued a permit or other form of qualification authorizing any
21 person to offer or sell these securities in this state.

22
23 Based upon the foregoing findings, the California Corporations Commissioner is of the opinion
24 that the investment contracts that are being or have been offered or sold by First Legacy Financial
25 Group, Inc.; First Legacy Financial, Inc.; David Crosby; and Richard Trefflich are securities subject to
26 qualification under the California Corporate Securities Law of 1968 and are being or have been
27 offered or sold without being qualified in violation of Corporations Code section 25110. Pursuant to
28 section 25532 of the Corporate Securities Law of 1968, First Legacy Financial Group, Inc.; First

1 Legacy Financial, Inc.; David Crosby; and Richard Trefflich are hereby ordered to desist and refrain
2 from the further offer or sale in the State of California of securities, including but not limited to
3 investment contracts, unless and until qualification has been made under the law or unless exempt.
4

5 This Order is necessary, in the public interest, for the protection of investors and consistent
6 with the purposes, policies, and provisions of the Corporate Securities Law of 1968.
7

8 Dated: August 5, 2010
9 Los Angeles, California

PRESTON DuFAUCHARD
California Corporations Commissioner

11 By: _____
12 ALAN S. WEINGER
13 Deputy Commissioner
14 Enforcement Division
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