



1 invest the funds into various real estate opportunities. At least one California resident gave money to  
2 Inclusive Realty and Blaylock to invest in real estate.

3 Under California Corporations Code section 25230, it is unlawful to conduct business as an  
4 investment adviser in this state unless the investment adviser has first applied for and secured from  
5 the Commissioner a certificate authorizing the investment adviser to do so, or unless the investment  
6 adviser is exempt. Inclusive Realty and Blaylock do not have a valid investment adviser certificate  
7 issued by the Commissioner nor have been registered as an investment adviser with the U.S.  
8 Securities & Exchange Commission. Inclusive Realty and Blaylock are not exempt from the  
9 certification requirement of California Corporations Code section 25230.

10 Based upon the foregoing findings, the Commissioner is of the opinion that Inclusive Realty  
11 Services Inc. and James Brian Blaylock conducted business as an investment adviser in this state  
12 without first applying for and securing from the Commissioner a certificate, then in effect,  
13 authorizing them to do so, in violation of section 25230 of the Corporate Securities Law of 1968.

14 Pursuant to section 25532 of the Corporate Securities Law of 1968, Inclusive Realty Services  
15 Inc. and James Brian Blaylock are hereby ordered to desist and refrain from conducting business as  
16 an investment adviser in the State of California, unless and until he has first applied for and secured  
17 from the Commissioner a certificate, then in effect, authorizing him to act as an investment advisor or  
18 unless exempt.

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

21  
22 Dated: January 2, 2018  
23 Los Angeles, CA

JAN LYNN OWEN  
Commissioner of Business Oversight

24  
25 By: \_\_\_\_\_  
26 MARY ANN SMITH  
27 Deputy Commissioner  
28 Enforcement Division