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**STATE OF WASHINGTON  
DEPARTMENT OF FINANCIAL INSTITUTIONS  
SECURITIES DIVISION**

IN THE MATTER OF DETERMINING  
whether there has been a violation of the  
Securities Act of Washington by:

Creative Legal Fundings in CA;  
Maria Dickerson;

Respondents.

Order Number: S-23-3544-23-FO01

ENTRY OF FINDINGS OF FACT AND  
CONCLUSIONS OF LAW AND FINAL  
ORDER TO CEASE AND DESIST, TO  
IMPOST FINES, AND TO CHARGE COSTS

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**THE STATE OF WASHINGTON TO:**

Creative Legal Fundings in CA  
Maria Dickerson  
a/k/a Maria Dulce Pino Dickerson  
a/k/a Dulce Pino

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Please take notice that the Securities Administrator of the state of Washington has reason to believe that Respondents Creative Legal Fundings in CA and Maria Dickerson have each violated the Securities Act of Washington. The Securities Administrator believes those violations justify the entry of an order against the Respondents to cease and desist from such violations, to impose fines, and to charge costs, pursuant to RCW 21.20.390 and RCW 21.20.395. The Securities Administrator finds as follows:

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On October 8, 2024, the Securities Administrator of the state of Washington issued Statement of Charges and Notice of Intent to Enter Order to Cease and Desist, To Impose Fines, and to Charge Costs, Order No. S-23-3544-23-SC01 (hereinafter referred to as “Statement of Charges”). The Statement of Charges, together with a Notice of Opportunity to Defend and Opportunity for Hearing, hereinafter referred to as “Notice of Opportunity for Hearing” and an Application for Adjudicative Hearing, hereinafter referred to as “Application for Hearing,” were served on Respondents Creative Legal Fundings in CA and Maria Dickerson on November 18, 2024. The Notice of Opportunity for Hearing advised Respondents Creative Legal Fundings in CA and Maria Dickerson that a written application for an administrative hearing on the

1 Statement of Charges must be received within twenty days from the date of receipt of the notice. Respondent  
2 Creative Legal Fundings in CA and Maria Dickerson failed to request an administrative hearing within twenty  
3 days of receipt of the Statement of Charges and Notice of Opportunity for Hearing, either on the Application  
4 for Hearing provided, or otherwise.

5 The Securities Administrator therefore will adopt as final the following Findings of Fact and  
6 Conclusions of Law as set forth in the Statement of Charges and enter a final order against the Respondent  
7 to cease and desist from violations of the Securities Act, and to impose the fines and costs sought in the  
8 Statement of Charges. The Securities Administrator makes the following Findings of Fact and Conclusions  
9 of Law:

## 10 **FINDINGS OF FACT**

### 11 **Respondents**

12 1. Creative Legal Fundings in CA (Creating Legal Fundings) is a California corporation formed  
13 on December 17, 2020. Creative Legal Fundings used a business address in Sacramento, California.

14 2. Maria Dickerson, also known as (a/k/a) Maria Dulce Pino Dickerson, a/k/a Dulce Pino  
15 (Dickerson), resided in Sacramento, California during the relevant time period. Dickerson was the founder  
16 of Creative Legal Fundings.

### 17 **Other Securities Enforcement Actions**

18 3. On September 18, 2023, the Alabama Securities Commission issued a Cease and Desist Order  
19 against Creative Legal Fundings and Dickerson for alleged violations of the Alabama securities laws.

20 4. On November 17, 2023, the California Department of Financial Protection and Innovation  
21 issued a Desist and Refrain Order against Creative Legal Fundings and Dickerson for alleged violations of  
22 the California securities laws.



1 investment, some Washington investors received small monthly payments from Creative Legal Fundings  
2 through Zelle or other bank transfers. These monthly payments largely ceased around the end of 2022.

3 8. In the offer and sale of the investments, the Respondents failed to disclose material facts  
4 regarding Dickerson, including the fact that she previously filed for bankruptcy in 2008, 2014, and 2019.  
5 The Respondents failed to provide investors with a written disclosure document with material information  
6 regarding the investment, including the operating history of Creative Legal Fundings and the risks of the  
7 investment. The Respondents failed to disclose material information regarding the use of investor funds,  
8 including the fact that investor funds would be used for payments to prior investors and for other purposes  
9 such as numerous transactions at casinos.

10 9. In April 2023, the Securities Division issued a subpoena to Creative Legal Fundings and  
11 Dickerson. The Respondents failed to produce any documents in response to the subpoena.

12 10. In September 2024, a federal grand jury in the Eastern District of California returned a 32-  
13 count indictment against Dickerson, charging her with twenty-four counts of wire fraud, one count of  
14 securities fraud, and seven counts of money laundering. The indictment alleged that Dickerson used new  
15 investor funds to pay off prior investors, to fund a lavish lifestyle, and to purchase luxury vehicles and a  
16 home in Sacramento, California.

17 Based upon the above Findings of Fact, the following Conclusions of Law are made:

18 **CONCLUSIONS OF LAW**

19 1. The offer and/or sale of the investments described above constitutes the offer and/or sale of  
20 a security as defined in RCW 21.20.005(14) and (17).

21 2. Creative Legal Fundings in CA and Maria Dickerson violated RCW 21.20.140 by offering  
22 and/or selling securities for which no registration is on file with the Securities Administrator.



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2 **AUTHORITY AND PROCEDURE**

3 This FINAL ORDER is entered pursuant to the provisions of RCW 21.20.390 and is subject to the  
4 provisions of RCW 21.20.440 and Chapter 34.05 RCW. Respondents have the right to petition the superior  
5 court for judicial review of this agency action under the provisions of RCW 34.05. For the requirements for  
6 Judicial Review, see RCW 34.05.510 and sections following. Pursuant to RCW 21.20.395, a certified copy  
7 of this Order may be filed in Superior Court. If so filed, the clerk shall treat the Order in the same manner as  
8 a Superior Court judgment as to the fine, and the fine may be recorded, enforced, or satisfied in like manner.

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10 **WILLFUL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE.**

11 SIGNED and ENTERED this 11th day of December, 2024.

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13 /s/

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15 William M. Beatty  
16 Securities Administrator

16 Approved by:

16 Presented by:

17 /s/

17 /s/

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19 Brian J. Guerard  
20 Chief of Enforcement

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19 Robert Kondrat  
20 Financial Legal Examiner

