

ADMINISTRATIVE PROCEEDING
BEFORE THE
SECURITIES COMMISSIONER OF SOUTH CAROLINA

IN THE MATTER OF

)

ORDER OF CEASE AND DESIST

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED

File No. 14068

WHEREAS, the Securities Division of the Office of the Attorney General of the State of

10. In exchange for investing his funds with the Respondents, the Investor was

received a return of \$10,000,000 by the Respondents once the "bank instrument" had been

11. Rather than being used to "monetize" a "bank instrument" the money was used by Respondent Leavell on various personal expenses, including food; movie tickets; travel expenses, including at least one trip to the Cayman Islands; and payments to unrelated third parties.

12. In connection with the offer and sale of the Investment Opportunity to the

14. Pursuant to S.C. Code Ann. § 35-1-102(29), investment contracts, *inter alia*, constitute securities.

15. Pursuant to S.C. Code Ann. § 35-1-301, it is unlawful for a person to offer or sell a security in this State unless that security is registered, a federal covered security, or exempt from registration.

16. Pursuant to S.C. Code Ann. § 35-1-402(a), it is unlawful for an individual to transact business as an agent in this State unless that individual is registered or exempt from

from engaging in the act, practice, or course of business or to take other action necessary or appropriate to comply with the Act.

20. Pursuant to S.C. Code Ann. § 35-1-604(b), an order issued under § 35-1-604(a) is effective on the date of issuance and must include a statement of any civil penalty or costs of investigation sought, a statement of the reasons for the order, and notice that, within 60 days (15

days after the receipt of a request in a record from a Dependent, the matter will be scheduled for

above enumerated practices which constitute violations of the Act and pay an appropriate civil penalty for their wrongdoing.

IT IS ORDERED

NOW THEREFORE, pursuant to S.C. Code Ann. § 35-1-604(a)(1), it is hereby

ORDERED that:

- a. The Respondents and every successor, affiliate, control person, agent, servant, and employee of each Respondent, and every entity owned, operated, or indirectly or directly controlled by or on behalf of any Respondent **CEASE AND DESIST** from transacting business in this State in violation of the Act, and, in particular, §§ 35-1-301, 35-1-402, and 35-1-501 thereof; and
- b. The Respondents shall jointly and severally pay a civil penalty in the amount of \$30,000.00 if this Order becomes effective by operation of law, or, if a Respondent seeks a hearing and any legal authority resolves this matter, pay a civil penalty in an amount not to exceed \$10,000.00 for each violation of the Act by that Respondent, and the actual cost of the investigation or proceeding.

IT IS FURTHER ORDERED that, pursuant to S.C. Code Ann. § 35-1-604(a)(2) and

VI. REQUIREMENT OF ANSWER AND NOTICE OF OPPORTUNITY FOR HEARING

The Respondents are hereby notified that they each have the right to a hearing on the matter contained herein. To schedule such a hearing, Respondent must file with the Court:

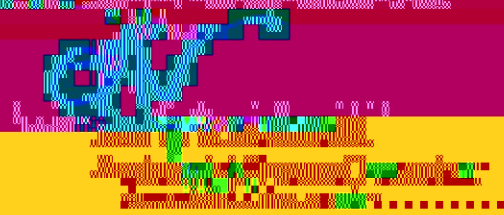
[REDACTED]

ENTERED, this the 10th day of October, 2014.

ALAN WILSON
SECURITIES COMMISSIONER

RECEIVED
OCT 10 2014

STATE OF SOUTH CAROLINA



COMMISSIONER
1000 Assembly House
Columbia, South Carolina 29243

CERTIFICATE OF COMPLETION

1911-1912

Whereas the following named persons have been admitted to the practice of law in this State...

WALTER W. WILSON, JR.
WALTER W. WILSON, JR.
WALTER W. WILSON, JR.

Witness my hand and the seal of the Registrar's Division at Raleigh, North Carolina, this 1st day of January, 1912.

WALTER W. WILSON, JR., Registrar

WALTER W. WILSON, JR., Registrar

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STATE OF SOUTH CAROLINA
OFFICE OF THE ATTORNEY GENERAL

STATE OF SOUTH CAROLINA
OFFICE OF THE ATTORNEY GENERAL
COLUMBIA, SOUTH CAROLINA 29201

STATE OF SOUTH CAROLINA
OFFICE OF THE ATTORNEY GENERAL
Lansing, MI 48917

Document(s): Order to Cease and Desist

Mailed October 10, 2014 for profit defendant, South Carolina

is in compliance with

in order hereby certify and affirm to be a service of a legal entity
Section 35-1-611, Code of Laws of South Carolina

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