

BEFORE THE
DIVISION OF SECURITIES
DEPARTMENT OF FINANCIAL INSTITUTIONS
STATE OF WISCONSIN

In the Matter of
SAFERATE FINANCIAL SERVICES a/k/a
MILLER & ASSOCIATES a/k/a
CAPITAL BRANCH PROCESSING SERVICES INC.
CONSOLIDATE CAPITAL, LLC
ALICE M. MILLER, LOU RAMIREZ,
SETH MILLER and BOB RYAN

PETITION FOR ORDER

Respondents.

File No.S-98177(EX)

The staff of the Enforcement Unit, Registration & Enforcement Section, of the Division of Securities, Department of Financial Institutions, State of Wisconsin has conducted an investigation in this matter pursuant to sec. 551.56, Wis. Stats. and as a result thereof alleges as follows:

1. Saferate Financial Services a/k/a Miller & Associates a/k/a Capital Branch Processing Services, Inc. ("Saferate") is a foreign business entity with a last known business address at 63 Calle De Industria, Suite 524, San Clemente, CA 92672;
2. Consolidate Capital, LLC ("Consolidate") is a foreign business entity with a last known business address of 31878 Del Obispo, Suite 118-510, San Juan Capistrano, CA 92627;
3. Alice M. Miller ("A. Miller") is an adult individual with a last known business address at that of Saferate;
4. Lou Ramirez ("Ramirez") is an adult individual with a last known business address at that of Saferate;
5. Seth Miller ("S. Miller") is an adult individual with a last known business address at that of Saferate;
6. Bob Ryan ("Ryan") is an adult individual with a last known business address at that of Consolidate;
7. Upon information and belief, from at least late spring 1998 until the present, A. Miller was a control person of Saferate;

8. Upon information and belief, from at least late spring 1998 until the present, Ramierz was Marketing Director of Saferate;

9. Upon information and belief, from at least late spring 1998 until the present, S. Miller was a control person of Saferate;

10. Upon information and belief, Ryan was control person of Saferate until at least late spring 1998 and of Consolidate from late spring 1998 until the present;

11. During at least February 1998 until the present, Saferate entered into contracts with various persons in Wisconsin to offer and sell products and services provided by Saferate (the "Agents");

12. Those "products and services" have included "commercial paper" or "promissory notes" issued by World Vision Entertainment ("World Vision"), Sebastian International Enterprises, Inc. ("Sebastian"), LifeBlood Biomedical, Inc., and AmeriTech Petroleum, Inc. ("AmreiTech") and other entities (together the "Notes");

13. The Notes are securities as defined by sec. 551.02(13), Wis. Stats.,

14. The securities have never been registered for offer or sale in Wisconsin pursuant to Ch. 551, Wis. Stats.,

15. Respondents have violated sec. 551.21(1), Wis. Stats., by offering unregistered securities in Wisconsin;

16. At all times material hereto, the Agents were not licensed, pursuant to Ch. 551, Wis. Stats., to offer and sell securities in Wisconsin;

17. Respondents have violated sec. 551.31(2), Wis. Stats., by employing unregistered agents to represent them in Wisconsin;

18. Saferate and Consolidate are not registered as broker-dealers in Wisconsin pursuant to Ch. 551, Wis. Stats.,

19. Saferate and Consolidate have violated sec. 551.31(1), Wis. Stats., by acting as broker-dealers in Wisconsin without being licensed;

20. On August 22, 1997, the Pennsylvania Securities Commission issued an order against Sebastian for the offer and sale of unregistered securities in connection with Sebastian's offer and sale of 9-month promissory notes;

21. On October 27, 1997 the Pennsylvania Securities Commission issued an order against World Vision for the offer and sale of unregistered securities in connection with World Vision's offer and sale of 9 month promissory notes;

22. In April 1998, the Maryland Securities Division issued an order against AmeriTech for the offer and sale of unregistered securities in connection with Ameritech's offer and sale of 9 month promissory notes;

23. Pursuant to the offering materials provided to persons in Wisconsin, the 9-month promissory notes of World Vision are "commercial paper under exempt security status;"

24. Respondents failed to disclose to investors the existence of the orders and that they had failed to register or obtain exemptions for the Notes prior to their offer and sale in Wisconsin;

25. Respondents' actions, as described above, constitute, under the circumstances, the making of a material misstatement or the omission to state a material fact necessary to make the statements made, in light of the circumstances under which they were made, not misleading, as proscribed by sec. 551.41(2), Wis. Stats.,

26. On June 3, 1999, the U.S. Securities & Exchange Commission obtained a TRO against AmeriTech for fraud in the offer and sale of its 9 month promissory notes

27. On July 14, 1998, the staff wrote a letter to Saferate asking it to provide the staff with information about its securities activities here, including names of all officers and representatives of the firm that have transacted business in Wisconsin and the names of all persons in Wisconsin who have been contacted to transact business;

28. On August 6, 1998, in response to the staff's letter of July 14, Ramirez, on behalf of Saferate, filed a letter with the Division that stated, in part, that Saferate, "does not sell any product nor have any clients" and that it "has no clients in Wisconsin, and ... are not actively soliciting clients in Wisconsin."

29. The August 6 letter was, in light of the facts and circumstances stated above, a false or misleading filing with the Division;

30. The actions of Saferate, A. Miller, Ramirez, and S. Miller, as described above constitute, under the circumstances, the making, in a document filed with the Division, a statement which was, at the time and in the light of the circumstances under which it was made, false or misleading in a material respect, or omitted to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, as proscribed by sec. 551.54, Wis. Stats.,

THEREFORE, the staff of the Enforcement Unit petitions the Administrator for the issuance of the attached Order.

Mark E. Dorman 7-29-99

Mark E. Dorman
Examiner
Enforcement Unit

Date

David A. Cohen

David A. Cohen
Supervising Attorney
Enforcement Unit

7/29/99

Date

BEFORE THE
DEPARTMENT OF FINANCIAL INSTITUTIONS
DIVISION OF SECURITIES
STATE OF WISCONSIN

In the Matter of
SAFERATE FINANCIAL SERVICES a/k/a
MILLER & ASSOCIATES a/k/a
CAPITAL BRANCH PROCESSING SERVICES, INC,

ORDER OF PROHIBITION
AND REVOCATION
(SUMMARY)

Respondent.

File No. S-98177(EX)

Based upon the attached Petition for Order I have reason to believe that a security has been offered or sold in Wisconsin by an unlicensed person in violation of Ch. 551, Wis. Stats., and that any further offer or sale of unregistered securities by or on behalf of the Respondent would be fraudulent to purchasers and I find that this action is necessary and appropriate in the public interest and for the protection of investors;

Therefore, pursuant to secs. 551.24(2), 551.60(2)(a) and (b) and 551.63, Wis. Stats.,

IT IS ORDERED THAT:

- a. Saferate Financial Services a/k/a Miller & Associates a/k/a Capital Branch Processing Services, Inc., its successors, affiliates, controlling persons, officers, agents, servants, employees, and every entity and person directly or indirectly controlled or organized by or on its behalf, are prohibited from making or causing to be made to any person or entity in Wisconsin any further offers or sales of securities unless and until such securities are registered under Ch. 551, Wis. Stats., or successor statute.
- b. All exemptions from registration set forth at Ch. 551, Wis. Stats., or successor statute, that might otherwise apply to any offer or sale of any security of or by Saferate Financial Services a/k/a Miller & Associates a/k/a Capital Branch Processing Services, Inc., its successors, affiliates, controlling persons, and every entity and person directly or indirectly controlled or organized by or on its behalf, are hereby revoked.
- c. Saferate Financial Services a/k/a Miller & Associates a/k/a Capital Branch Processing Services, Inc., its successors, affiliates, controlling persons, officers, agents, servants, employees, and every entity and person directly or indirectly controlled or hereafter organized by or on its behalf, are prohibited from violating sec. 551.41, Wis. Stats., or successor statute.
- d. Saferate Financial Services a/k/a Miller & Associates a/k/a Capital Branch Processing Services, Inc., its successors, affiliates, controlling persons, officers, agents, servants, employees, and every entity and person directly or indirectly controlled or hereafter organized by or on its behalf, are prohibited from transacting business as a broker-dealer in Wisconsin unless licensed under Ch. 551, Wis. Stats., or successor statute, or excepted from the licensing requirement.

- e. Saferate Financial Services a/k/a Miller & Associates a/k/a Capital Branch Processing Services, Inc., its successors, affiliates, controlling persons, officers, agents, servants, employees, and every entity and person directly or indirectly controlled or hereafter organized by or on its behalf, are prohibited from employing an agent to represent them in Wisconsin unless the agent is licensed under Ch. 551, Wis. Stats., or successor statute, or excepted from the licensing requirement.
- f. Saferate Financial Services a/k/a Miller & Associates a/k/a Capital Branch Processing Services, Inc., its successors, affiliates, controlling persons, officers, agents, servants, employees, and every entity and person directly or indirectly controlled or hereafter organized by or on its behalf, are prohibited from violating sec. 551.54, Wis. Stats., or successor statute.
- g. Saferate Financial Services a/k/a Miller & Associates a/k/a Capital Branch Processing Services, Inc. shall resolve its civil liability under sec. 551.59, Wis. Stats., resulting from the unlawful sales of securities described in the Petition for Order prior to filing an application for a broker-dealer license in Wisconsin.

EXECUTED at Madison, Wisconsin, this 3d day of August, 1999.

(SEAL)



Patricia D. Struck
Administrator
Division of Securities

NOTICE:

Under sec. 551.61(2), Wis. Stats., within thirty (30) days after any Order has become effective without a hearing, any interested party may file a written request with the Administrator of the Division of Securities for a hearing in respect to any matters determined by the Order. A request for hearing shall be in the form of a petition for hearing and shall, under section SEC 8.01, Wis. Adm. Code, plainly admit or deny each specific allegation, finding, or conclusion in the Order and incorporated papers (unless the petitioner lacks sufficient knowledge or information to permit an admission or denial, in which case the petition shall so state, and such statement shall have the effect of a denial), and shall state all affirmative defenses.

You are advised that any wilful violation of an Order issued by the Administrator of the Division of Securities of the State of Wisconsin Department of Financial Institutions under Ch. 551, Wis. Stats., is a criminal offense punishable under the provisions of sec. 551.58, Wis. Stats.

BEFORE THE
DEPARTMENT OF FINANCIAL INSTITUTIONS
DIVISION OF SECURITIES
STATE OF WISCONSIN

In the Matter of
CONSOLIDATE CAPITAL, LLC.

ORDER OF PROHIBITION
AND REVOCATION
(SUMMARY)

Respondent.

File No. S- 98177(EX)

Based upon the attached Petition for Order I have reason to believe that a security has been offered or sold in Wisconsin by an unlicensed person in violation of Ch. 551, Wis. Stats., and that any further offer or sale of unregistered securities by or on behalf of the Respondent would be fraudulent to purchasers and I find that this action is necessary and appropriate in the public interest and for the protection of investors;

Therefore, pursuant to secs. 551.24(2), 551.60(2)(a) and (b) and 551.63, Wis. Stats.,

IT IS ORDERED THAT:

- a. Consolidate Capital, LLC, its successors, affiliates, controlling persons, officers, agents, servants, employees, and every entity and person directly or indirectly controlled or organized by or on its behalf, are prohibited from making or causing to be made to any person or entity in Wisconsin any further offers or sales of securities unless and until such securities are registered under Ch. 551, Wis. Stats., or successor statute.
- b. All exemptions from registration set forth at Ch. 551, Wis. Stats., or successor statute, that might otherwise apply to any offer or sale of any security of or by Consolidate Capital, LLC, its successors, affiliates, controlling persons, and every entity and person directly or indirectly controlled or organized by or on its behalf, are hereby revoked.
- c. Consolidate Capital, LLC, its successors, affiliates, controlling persons, officers, agents, servants, employees, and every entity and person directly or indirectly controlled or hereafter organized by or on its behalf, are prohibited from violating sec. 551.41, Wis. Stats., or successor statute.
- d. Consolidate Capital, LLC, its successors, affiliates, controlling persons, officers, agents, servants, employees, and every entity and person directly or indirectly controlled or hereafter organized by or on its behalf, are prohibited from transacting business as a broker-dealer in Wisconsin unless licensed under Ch. 551, Wis. Stats., or successor statute, or excepted from the licensing requirement.
- e. Consolidate Capital, LLC, its successors, affiliates, controlling persons, officers, agents, servants, employees, and every entity and person directly or indirectly controlled or hereafter organized by or on its behalf, are prohibited from employing an agent to represent them in

Wisconsin unless the agent is licensed under Ch. 551, Wis. Stats., or successor statute, or excepted from the licensing requirement.

- f. Consolidate Capital, LLC shall resolve its civil liability under sec. 551.59, Wis. Stats., resulting from the unlawful sales of securities described in the Petition for Order prior to filing an application for a broker-dealer license in Wisconsin.

EXECUTED at Madison, Wisconsin, this 3d day of August, 1999.

(SEAL)



Patricia D. Struck
Administrator
Division of Securities

NOTICE:

Under sec. 551.61(2), Wis. Stats., within thirty (30) days after any Order has become effective without a hearing, any interested party may file a written request with the Administrator of the Division of Securities for a hearing in respect to any matters determined by the Order. A request for hearing shall be in the form of a petition for hearing and shall, under section SEC 8.01, Wis. Adm. Code, plainly admit or deny each specific allegation, finding, or conclusion in the Order and incorporated papers (unless the petitioner lacks sufficient knowledge or information to permit an admission or denial, in which case the petition shall so state, and such statement shall have the effect of a denial), and shall state all affirmative defenses.

You are advised that any wilful violation of an Order issued by the Administrator of the Division of Securities of the State of Wisconsin Department of Financial Institutions under Ch. 551, Wis. Stats., is a criminal offense punishable under the provisions of sec. 551.58, Wis. Stats.

BEFORE THE
DEPARTMENT OF FINANCIAL INSTITUTIONS
DIVISION OF SECURITIES
STATE OF WISCONSIN

In the Matter of
ALICE M. MILLER

ORDER OF PROHIBITION
AND REVOCATION
(SUMMARY)

Respondent.

File No. S-98177(EX)

Based upon the attached Petition for Order I have reason to believe that a security has been offered or sold in Wisconsin by an unlicensed person in violation of Ch. 551, Wis. Stats., and that any further offer or sale of unregistered securities by or on behalf of the Respondent would be fraudulent to purchasers and I find that this action is necessary and appropriate in the public interest and for the protection of investors;

Therefore, pursuant to secs. 551.24(2), 551.60(2)(a) and (b) and 551.63, Wis. Stats.,

IT IS ORDERED THAT:

- a. Alice M. Miller, her agents, servants, employees, and every entity and person directly or indirectly controlled or organized by or on her behalf, are prohibited from making or causing to be made to any person or entity in Wisconsin any further offers or sales of securities unless and until such securities are registered under Ch. 551, Wis. Stats., or successor statute.
- b. All exemptions from registration set forth at Ch. 551, Wis. Stats., or successor statute, that might otherwise apply to any offer or sale of any security of or by Alice M. Miller, her agents, servants, employees, and every entity and person directly or indirectly controlled or organized by or on her behalf, are hereby revoked.
- c. Alice M. Miller, her agents, servants, employees, and every entity and person directly or indirectly controlled or organized by or on her behalf, are prohibited from violating sec. 551.41, Wis. Stats., or successor statute.
- d. Alice M. Miller, her agents, servants, employees, and every entity and person directly or indirectly controlled or organized by or on her behalf, are prohibited from employing an agent to represent them in Wisconsin unless the agent is licensed under Ch. 551, Wis. Stats., or successor statute, or excepted from the licensing requirement.
- e. Alice M. Miller, her agents, servants, employees, and every entity and person directly or indirectly controlled or organized by or on her behalf, are prohibited from violating sec. 551.54, Wis. Stats., or successor statute.

EXECUTED at Madison, Wisconsin, this 30 day of August, 1999.

(SEAL)



Patricia D. Struck
Administrator
Division of Securities

NOTICE:

Under sec. 551.61(2), Wis. Stats., within thirty (30) days after any Order has become effective without a hearing, any interested party may file a written request with the Administrator of the Division of Securities for a hearing in respect to any matters determined by the Order. A request for hearing shall be in the form of a petition for hearing and shall, under section SEC 8.01, Wis. Adm. Code, plainly admit or deny each specific allegation, finding, or conclusion in the Order and incorporated papers (unless the petitioner lacks sufficient knowledge or information to permit an admission or denial, in which case the petition shall so state, and such statement shall have the effect of a denial), and shall state all affirmative defenses.

You are advised that any wilful violation of an Order issued by the Administrator of the Division of Securities of the State of Wisconsin Department of Financial Institutions under Ch. 551, Wis. Stats., is a criminal offense punishable under the provisions of sec. 551.58, Wis. Stats.

BEFORE THE
DEPARTMENT OF FINANCIAL INSTITUTIONS
DIVISION OF SECURITIES
STATE OF WISCONSIN

In the Matter of
LOU RAMIREZ

ORDER OF PROHIBITION
AND REVOCATION
(SUMMARY)

Respondent.

File No. S-98177(EX)

Based upon the attached Petition for Order I have reason to believe that a security has been offered or sold in Wisconsin by an unlicensed person in violation of Ch. 551, Wis. Stats., and that any further offer or sale of unregistered securities by or on behalf of the Respondent would be fraudulent to purchasers and I find that this action is necessary and appropriate in the public interest and for the protection of investors;

Therefore, pursuant to secs. 551.24(2), 551.60(2)(a) and (b) and 551.63, Wis. Stats.,

IT IS ORDERED THAT:

- a. Lou Ramirez, his agents, servants, employees, and every entity and person directly or indirectly controlled or organized by or on his behalf, are prohibited from making or causing to be made to any person or entity in Wisconsin any further offers or sales of securities unless and until such securities are registered under Ch. 551, Wis. Stats., or successor statute.
- b. All exemptions from registration set forth at Ch. 551, Wis. Stats., or successor statute, that might otherwise apply to any offer or sale of any security of or by Lou Ramirez, his agents, servants, employees, and every entity and person directly or indirectly controlled or organized by or on his behalf, are hereby revoked.
- c. Lou Ramirez, his agents, servants, employees, and every entity and person directly or indirectly controlled or organized by or on his behalf, are prohibited from violating sec. 551.41, Wis. Stats., or successor statute.
- d. Lou Ramirez, his agents, servants, employees, and every entity and person directly or indirectly controlled or organized by or on his behalf, are prohibited from employing an agent to represent them in Wisconsin unless the agent is licensed under Ch. 551, Wis. Stats., or successor statute, or excepted from the licensing requirement.
- e. Lou Ramirez, his agents, servants, employees, and every entity and person directly or indirectly controlled or organized by or on his behalf, are prohibited from violating sec. 551.54, Wis. Stats., or successor statute.

EXECUTED at Madison, Wisconsin, this 30 day of August, 1999.

(SEAL)



Patricia D. Struck
Administrator
Division of Securities

NOTICE:

Under sec. 551.61(2), Wis. Stats., within thirty (30) days after any Order has become effective without a hearing, any interested party may file a written request with the Administrator of the Division of Securities for a hearing in respect to any matters determined by the Order. A request for hearing shall be in the form of a petition for hearing and shall, under section SEC 8.01, Wis. Adm. Code, plainly admit or deny each specific allegation, finding, or conclusion in the Order and incorporated papers (unless the petitioner lacks sufficient knowledge or information to permit an admission or denial, in which case the petition shall so state, and such statement shall have the effect of a denial), and shall state all affirmative defenses.

You are advised that any wilful violation of an Order issued by the Administrator of the Division of Securities of the State of Wisconsin Department of Financial Institutions under Ch. 551, Wis. Stats., is a criminal offense punishable under the provisions of sec. 551.58, Wis. Stats.

BEFORE THE
DEPARTMENT OF FINANCIAL INSTITUTIONS
DIVISION OF SECURITIES
STATE OF WISCONSIN

In the Matter of
SETH MILLER

ORDER OF PROHIBITION
AND REVOCATION
(SUMMARY)

Respondent.

File No. S-98177(EX)

Based upon the attached Petition for Order I have reason to believe that a security has been offered or sold in Wisconsin by an unlicensed person in violation of Ch. 551, Wis. Stats., and that any further offer or sale of unregistered securities by or on behalf of the Respondent would be fraudulent to purchasers and I find that this action is necessary and appropriate in the public interest and for the protection of investors;

Therefore, pursuant to secs. 551.24(2), 551.60(2)(a) and (b) and 551.63, Wis. Stats.,

IT IS ORDERED THAT:

- a. Seth Miller, his agents, servants, employees, and every entity and person directly or indirectly controlled or organized by or on his behalf, are prohibited from making or causing to be made to any person or entity in Wisconsin any further offers or sales of securities unless and until such securities are registered under Ch. 551, Wis. Stats., or successor statute.
- b. All exemptions from registration set forth at Ch. 551, Wis. Stats., or successor statute, that might otherwise apply to any offer or sale of any security of or by Seth Miller, his agents, servants, employees, and every entity and person directly or indirectly controlled or organized by or on his behalf, are hereby revoked.
- c. Seth Miller, his agents, servants, employees, and every entity and person directly or indirectly controlled or organized by or on his behalf, are prohibited from violating sec. 551.41, Wis. Stats., or successor statute.
- d. Seth Miller, his agents, servants, employees, and every entity and person directly or indirectly controlled or organized by or on his behalf, are prohibited from employing an agent to represent them in Wisconsin unless the agent is licensed under Ch. 551, Wis. Stats., or successor statute, or excepted from the licensing requirement.
- e. Seth Miller, his agents, servants, employees, and every entity and person directly or indirectly controlled or organized by or on his behalf, are prohibited from violating sec. 551.54, Wis. Stats., or successor statute.

EXECUTED at Madison, Wisconsin, this 30 day of August, 1999.

(SEAL)



Patricia D. Struck
Administrator
Division of Securities

NOTICE:

Under sec. 551.61(2), Wis. Stats., within thirty (30) days after any Order has become effective without a hearing, any interested party may file a written request with the Administrator of the Division of Securities for a hearing in respect to any matters determined by the Order. A request for hearing shall be in the form of a petition for hearing and shall, under section SEC 8.01, Wis. Adm. Code, plainly admit or deny each specific allegation, finding, or conclusion in the Order and incorporated papers (unless the petitioner lacks sufficient knowledge or information to permit an admission or denial, in which case the petition shall so state, and such statement shall have the effect of a denial), and shall state all affirmative defenses.

You are advised that any wilful violation of an Order issued by the Administrator of the Division of Securities of the State of Wisconsin Department of Financial Institutions under Ch. 551, Wis. Stats., is a criminal offense punishable under the provisions of sec. 551.58, Wis. Stats.

BEFORE THE
DEPARTMENT OF FINANCIAL INSTITUTIONS
DIVISION OF SECURITIES
STATE OF WISCONSIN

In the Matter of
BOB RYAN

ORDER OF PROHIBITION
AND REVOCATION
(SUMMARY)

Respondent.

File No. S-98177(EX)

Based upon the attached Petition for Order I have reason to believe that a security has been offered or sold in Wisconsin by an unlicensed person in violation of Ch. 551, Wis. Stats., and that any further offer or sale of unregistered securities by or on behalf of the Respondent would be fraudulent to purchasers and I find that this action is necessary and appropriate in the public interest and for the protection of investors;

Therefore, pursuant to secs. 551.24(2), 551.60(2)(a) and (b) and 551.63, Wis. Stats.,

IT IS ORDERED THAT:

- a. Bob Ryan, his agents, servants, employees, and every entity and person directly or indirectly controlled or organized by or on his behalf, are prohibited from making or causing to be made to any person or entity in Wisconsin any further offers or sales of securities unless and until such securities are registered under Ch. 551, Wis. Stats., or successor statute.
- b. All exemptions from registration set forth at Ch. 551, Wis. Stats., or successor statute, that might otherwise apply to any offer or sale of any security of or by Bob Ryan, his agents, servants, employees, and every entity and person directly or indirectly controlled or organized by or on his behalf, are hereby revoked.
- c. Bob Ryan, his agents, servants, employees, and every entity and person directly or indirectly controlled or organized by or on his behalf, are prohibited from violating sec. 551.41, Wis. Stats., or successor statute.
- d. Bob Ryan, his agents, servants, employees, and every entity and person directly or indirectly controlled or organized by or on his behalf, are prohibited from employing an agent to represent them in Wisconsin unless the agent is licensed under Ch. 551, Wis. Stats., or successor statute, or excepted from the licensing requirement.

EXECUTED at Madison, Wisconsin, this 3rd day of August, 1999.

(SEAL)



Patricia D. Struck
Administrator
Division of Securities

NOTICE:

Under sec. 551.61(2), Wis. Stats., within thirty (30) days after any Order has become effective without a hearing, any interested party may file a written request with the Administrator of the Division of Securities for a hearing in respect to any matters determined by the Order. A request for hearing shall be in the form of a petition for hearing and shall, under section SEC 8.01, Wis. Adm. Code, plainly admit or deny each specific allegation, finding, or conclusion in the Order and incorporated papers (unless the petitioner lacks sufficient knowledge or information to permit an admission or denial, in which case the petition shall so state, and such statement shall have the effect of a denial), and shall state all affirmative defenses.

You are advised that any wilful violation of an Order issued by the Administrator of the Division of Securities of the State of Wisconsin Department of Financial Institutions under Ch. 551, Wis. Stats., is a criminal offense punishable under the provisions of sec. 551.58, Wis. Stats.