

**STATE OF ILLINOIS  
SECRETARY OF STATE  
SECURITIES DEPARTMENT**

\_\_\_\_\_)  
INDEPENDENT WEALTH SOLUTIONS, LLC., , its partners, )  
officers, directors, employees, affiliates, successors and assigns )  
\_\_\_\_\_)

FILE NO. 0700421

**SUMMARY ORDER  
TO CEASE AND DESIST**

TO THE RESPONDENT: Independent Wealth Solutions, LLC.  
405 W. Southern Ave., Ste. #3  
Tempe, Arizona 85282

On information and belief, I, Jesse White, Secretary of State, for the State of Illinois, through my designated representative, having been fully advised in the premises by the staff of the Securities Department, Office of the Secretary of State, herein find:

1. That Independent Wealth Solutions, LLC, Respondent (the "Respondent") is a business entity maintaining its principal offices at 405 W. Southern Ave., Ste #3, Tempe, Arizona 85282.
2. That during April, May and June of 2007 the Respondent cold called at least one Illinois Resident at her home in Chicago, Illinois.
3. That said Illinois resident after several telephone conversations with Respondents representatives ordered and purchased the exclusive distributorship program (the "Program") which Respondent offered to the Illinois resident as the opportunity to start their own website from which they would generate a profit for every sale that is made by Respondents sales staff for every lead the Purchaser has purchased.
4. That the Respondent represented to the Purchasers that the Program Respondent would provide to the Purchaser coaching which included a referral program, distributorship rights, GPS products, an advertising and tax expert and Purchaser's very own website with a name chosen by Purchaser with one years free website hosting.
5. That the Invoice and terms of agreement of the Program set forth the payment structure as follows: "Independent Wealth Solutions LLC wants to congratulate you on joining our distributorship program...you will be paid monthly commission checks every time a customer signs up for our distributorship, or purchases a GPS product using your distributor ID# on your website."

Summary Order  
to Cease and Desist

-2-

6. Respondent sold a Package to a least one Illinois resident in the State of Illinois on June 27, 2007 for a one-time payment for the life of the business of one thousand and no cents (\$1,000.00) dollars.
7. That Section 5-5.10(a)(6) of Business Opportunity Sales Law of 1995, [815 ILCS 602 ET seq.] (The "Act") provides, inter alia, that a business opportunity is a contract or agreement, between a seller and purchaser, express or implied, orally or in writing, wherein it is agreed that the seller or a person recommended by the seller shall provide to the purchaser any product, equipment, supplies or services enabling the purchaser to start a business when the purchaser is required to make a payment to the seller or a person recommended by the seller of more than \$500 and the seller represents directly or indirectly, orally or in writing, that the seller or a person recommended by the seller will provide a marketing plan.
8. That the Respondent Program, described in paragraphs three through five (3-5), constitutes a business opportunity as that term is defined in Section 5-5.10 of the Act.
9. That the activities described in paragraphs two, three and six (2, 3 and 6) constitute an offer and sale as those terms are defined under Section 5-5.20 and Section 5-5.40 of the Act.
10. That the activities described in paragraph four (4) constitute a marketing plan as that term is defined under Section 5-5.15 of the Act.
11. That Section 5-25 of the Act provides, inter alia, that it is unlawful for any person to offer or sell any business opportunity in this State unless the business opportunity is registered under the Act or is exempt under Section 5-10 of the Act.
12. That at all relevant times, Respondent, Independent Wealth Solutions, LLC, their officers and directors, agents, employees, affiliates, successors and assigns, failed to register the business opportunity described in paragraphs three through five (3-5) as required pursuant to Section 5-25 of the Act.
13. That Section 5-60(2) of the Act provides, inter alias, that the Secretary of State may require any person to file a statement, under oath, as to all the facts and circumstances concerning a matter to be investigated.
14. That on January 28, 2008, pursuant to the authority granted in Section 5-60 of the Act, the Department sent a letter (the "5-60 Letter") to the Respondent by certified mail, return receipt requested. The 5-60 Letter requested certain information which the Department deemed necessary for its use to determine whether the Respondent had violated the Act in offering for sale the Distributorship without registration as a business opportunity, within ten (10) business days.

Summary Order  
to Cease and Desist

-3-

15. That the certified mail receipt was returned to the Department signed by addressee's agent on about January 31, 2008.
16. That the Respondent failed and refused to respond to the 5-60 Letter.
17. That as of this date, the Respondent continues to fail to respond to the 5-60 Letter.
18. That Section 5-60(d) of the Act provides, inter alia, that it shall be a violation of the provisions of the Act for any person to fail to file with the Secretary of State any document required to be filed under the provisions of Section 5-60.
19. That, by virtue of the foregoing, the Respondent violated Section 5-60 of the Act.
20. That, by virtue of the foregoing, the Respondent violated Section 5-25 of the Act.

That Section 5-65 of the Act provides, inter alia, that whenever it appears to the Secretary of State that any person has engaged in or is about to engage in any act or practice constituting a violation of any provision of this Law or any rule, regulation, or order under this Law, the Secretary of State may issue an order directing the person to CEASE and DESIST from continuing the act or practice.

NOW THEREFORE IT IS HEREBY ORDERED THAT: Pursuant to the authority granted by Section 5-65 of the Act, Respondent Independent Wealth Solutions, LLC.its officers and directors, agents, employees, affiliates, successors and assigns are ordered to CEASE and DESIST from offering or selling any business opportunity in the State of Illinois until the further order of the Secretary of State.

Summary Order  
to Cease and Desist

-4-

NOTICE is hereby given that the Respondent may request a hearing on this matter by transmitting a written request to the attorney of record Samuel F. Freiman, Illinois Securities Department, 69 West Washington Street, Suite 1220, Chicago, Illinois 60602. Such request must be made within thirty (30) days after entry of this Summary Order to Cease and Desist. Upon receipt of a request for a hearing, a hearing will be scheduled as soon as reasonably practicable. Request for hearing will not stop the effectiveness of this Summary Order to Cease and Desist.

FAILURE BY ANY PERSON NAMED IN THIS ORDER TO REQUEST A HEARING WITHIN THIRTY (30) DAYS AFTER ENTRY OF THIS SUMMARY ORDER TO CEASE AND DESIST SHALL BE DEEMED TO CONSTITUTE A WAIVER OF ALL RIGHTS BY SUCH PERSON TO A HEARING AND THE ORDER TO CEASE AND DESIST AS TO SUCH PERSON WILL BECOME PERMANENT.

DATED: This 4<sup>th</sup> day of April, 2008.

A handwritten signature in black ink that reads "Jesse White" followed by a stylized flourish or initials.

Jesse White  
Secretary of State  
State of Illinois

Attorney for the Secretary of State:

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