

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

In the Matter of
VISTA CONSULTING and C. STEVEN
BOLEN,

PETITION FOR ORDER

Respondents.

File No. S-99242(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. Vista Consulting ("Vista") is a foreign business entity with a last known business address of 17176 Escalon Dr., Ste. 400, Encino, CA 91436.
2. C. Steven Bolen ("Bolen") is an individual who at all times material hereto has been an owner and controlling person of Vista, with a last known business address at that of Vista.
3. During the period of at least 1998 and 1999, agents on behalf of Vista and Bolen offered and sold to numerous persons in Wisconsin the promissory notes of various companies, including, but not limited to, those of Corlogic Corporation, Technical Support Services, Inc., and Pacific Air Transport, Inc. (together, "the Notes").
4. The Notes are securities as defined by sec. 551.02(13), Wis. Stats.
5. The Notes have never been registered for offer and sale in Wisconsin pursuant to Ch. 551, Wis. Stats.
6. Respondents have violated sec. 551.21(1), Wis. Stats., by offering unregistered securities in Wisconsin.
7. In connection with the offers of the securities described above, Vista transacted business in Wisconsin as a "broker-dealer," as that term is defined by sec. 551.02(3), Wis. Stats.
8. At no time has Vista been licensed as a securities broker-dealer pursuant to Ch. 551, Wis. Stats.
9. Respondents have violated sec. 551.31(1), Wis. Stats., by transacting business in Wisconsin as a broker-dealer without a license.
10. In connection with the offers and sales of the securities described above, Respondents employed "agents" to transact business in Wisconsin, as that term is defined by sec. 551.02(2), Wis. Stats.
11. At no time were the agents licensed as securities agents pursuant to Ch. 551, Wis. Stats.

