

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

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In the Matter of  
JAMES T. O'CONNOR,

PETITION FOR ORDER

Respondent.

File No. S-01037(EX)

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The staff of the Bureau of Registration & Enforcement, 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. James T. O'Connor (O'Connor) is an individual with a date of birth of April 12, 1946 and CRD number of 1030002, and a last known business address of Dover Communications, Inc., 794 Penllyn Pike, Suite 210, Blue Bell, Pennsylvania 19422;
2. O'Connor has been an insurance agent licensed with the Wisconsin Office of the Commissioner of Insurance at all times material hereto;
3. According to information provided in a letter by O'Connor to staff of the Division of Securities, during 1998, O'Connor offered and sold viatical settlement contracts to at least four persons in Wisconsin;
4. The viatical settlement contracts offered and sold by O'Connor are investment contracts as defined by section DFI-Sec. 1.02(6)(a), Wis. Adm. Code, and are therefore securities as defined by sec. 551.02(13), Wis. Stats.;
5. At no time have the viatical settlement contracts been registered for offer and sale in Wisconsin pursuant to Ch. 551, Wis. Stats.;
6. O'Connor has violated sec. 551.21(1), Wis. Stats., by offering and selling unregistered securities in Wisconsin;
7. In connection with the offers of the securities described above, O'Connor transacted business in Wisconsin as a securities "agent" as that term is defined by sec. 551.02(2), Wis. Stats.;
8. O'Connor was not licensed as a securities agent pursuant to Ch. 551, Wis. Stats. for the sale of the securities described above; and
9. O'Connor has violated sec. 551.31(1), Wis. Stats. by transacting business in Wisconsin as a securities agent without a license.

