

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

In the Matter of
MED-LINK INTERNATIONAL, INC.
MICHAEL F. DIGIACCO, DOMINICK A. ROSSILLO,
ERIK ULVIK, CHRIS MUNCY, BRENT ALLEN,

PETITION FOR ORDER

Respondents.

File No. S-02050(EX)

The staff of the Enforcement Unit, Bureau of Registration & Enforcement, 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. Med-Link International, Inc ("Med-Link") is a foreign business entity with last known business addresses of 124 Tustin Ave., Newport Beach, CA 92663-4743 and 8700 Reseda Blvd., Ste. 201, Northridge, CA 91324.
2. Michael F. DiGiacco (DOB 7/11/50; CRD #1780407) ("DiGiacco") is an individual who at all times material hereto has been President & CEO of Med-Link, with a last known business address at that of Med-Link.
3. Dominick A. Rossillo (DOB 4/16/67; CRD #3045250) ("Rossillo") is an individual who at all times material hereto has been a Vice President of Med-Link, with a last known business address at that of Med-Link.
4. Erik Ulvik ("Ulvik") is an individual who at all times material hereto has been a Vice President of Med-Link, with a last known business address at that of Med-Link in Newport Beach.
5. Chris Muncy ("Muncy") is an individual who at all times material hereto has been a Vice President of Med-Link, with a last known business address at that of Med-Link in Newport Beach.
6. Brent Allen ("Allen") is an individual who at all times material hereto has been an agent of Med-Link, Digiacco, Rossillo, Ulvik, and Muncy, with a last known business address at that of Med-Link in Northridge.
7. During the period of February 2002, Allen, on behalf of Med-Link, Digiacco, Rossillo, Ulvik, and Muncy, offered the stock of Med-Link to at least one person in Wisconsin who had no pre-existing relationship with any of the Respondents.
8. The stock offered by the respondents is a security as defined by sec. 551.02(13), Wis. Stats., and has never been registered for offer and sale in Wisconsin pursuant to Ch. 551, Wis. Stats.
9. On May 3, 2002, the Division of Securities received a notice filing pursuant to Rule 506 of Regulation D promulgated pursuant to Section 4(2) of the Securities Act of 1933, as amended by adoption of the National Securities Markets Improvement Act of 1996.
10. Upon information and belief, the offeree was cold-called by a person with whom they had no pre-existing relationship, in violation of the ban on general solicitation found in Section 4(2).

11. All Respondents have violated sec. 551.21(1), Wis. Stats., by offering unregistered securities in Wisconsin.
12. The notice filing referred to in Paragraph 9 above lists DiGiacco as the sole executive officer of Medlink and was signed by DiGiacco as President of Medlink on April 5, 2002.
13. In a letter to staff dated May 10, 2002, Ulvik lists himself as the sole officer and director of Medlink.
14. Page 25 of a copy of the private placement memorandum of Medlink enclosed with the letter states: "The Company depends to a considerable degree on the continued services of its principals Michael DiGiacco and Dominick Rossillo."
15. Page 35 of a copy of the private placement memorandum of Medlink enclosed with the letter referred to in paragraph 13 states: "Several of the officers and directors of the Company are, or also will be, employees of the Company, who shall receive annual compensation and other executive perquisites further [sic] services rendered."
16. Medlink, DiGiacco, and Ulvik have violated sec. 551.54, Wis. Stats., by making or causing to be made a false or misleading filing with the Division of Securities.
17. In connection with the offers of the securities described above, Allen transacted business in Wisconsin as an "agent" for Medlink, DiGiacco, Rossillo, Ulvik, and Muncy, as that term is defined by sec. 551.02(2), Wis. Stats.
18. At no time has Allen been licensed as a securities agent pursuant to Ch. 551, Wis. Stats.
19. Allen has violated sec. 551.31(1), Wis. Stats., by transacting business in Wisconsin as a securities agent without a license.
20. Medlink, DiGiacco, Rossillo, Ulvik, and Muncy have violated sec. 551.31(2), Wis. Stats., by employing an unlicensed agent to represent them in Wisconsin.
21. On May 30, 2001, the State of Missouri issued an Administrative Order against DiGiacco, in the matter of Cherry Avenue, Inc., Fortune on Wheels Unit Investment Trust, Harvey Tabb, Joel King, Michael DiGiacco, et al., based on allegations of securities law violations, including fraud.
22. In connection with the offer of the securities described in Paragraphs 7, the Respondents omitted to disclose the issuance of the Order referred to in Paragraph 21.
23. All Respondents have violated sec. 551.41(2), Wis. Stats., by omitting to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they are made, not misleading, in connection with the offer and sale of securities to persons in Wisconsin.
24. Offering materials of Medlink received by a person in Wisconsin state that "from 1995 to 1999, Mr. DiGiacco was Senior Vice President of American Ticketing Systems."
25. On May 17, 1995, the State of Wisconsin issued Orders of Prohibition against American Ticketing Systems, Inc.d/b/a Ameritix, Donald R. Golan, and Harvey P. Tabb, in which their successors, affiliates, controlling persons, officers, agents, servants, employees, and any entity or person directly or indirectly controlled or organized by or on their behalf, were prohibited from further offers or sales of unregistered, non-exempt securities and from employing an unlicensed agent in Wisconsin.

26. On October 4, 1995, American Ticketing Systems, Inc., Donald R. Golan, and Harvey P. Tabb consented to the entry of an Order of Permanent Injunction, based on the alleged fraudulent offer and sale of a series of unregistered limited and general partnership interests by the defendants. (Securities and Exchange Commission v. Harvey P. Tabb, et al., Civil Action No. C-95-03459-CW (U.S. Dist Ct. N.D. Cal.))

Therefore, the staff of the Enforcement Unit petitions the Administrator of the Division of Securities for the issuance of the attached Order pursuant to Ch. 551, Wis. Stats.

Susan A. Kittel Moore 10/1/02
Date
Susan A. Kittel Moore
Legal Assistant
Enforcement Unit

David A. Cohen 10/15/02
Date
David A. Cohen
Supervising Attorney
Enforcement Unit