

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

In the Matter of
OASIS CLUB,

PETITION FOR ORDER

Respondent.

File No. S-01244(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. Upon information and belief, Oasis Club is a foreign business entity with a last known business address of PO Box 183, Vilnius 2000, Lithuania;
2. Upon information and belief, Oasis Club has previously operated under the name of The Oxford Savings Club, Manumit Unlimited, and/or Total Return on Investment;
3. Upon information and belief, during the period of 1999 and 2000 an unknown person on behalf of Oasis Club, offered and sold to at least one person in Wisconsin a "Turbo Growth Certificate" that guaranteed that "INVEST \$1,000 TODAY AND BE A MILLIONAIRE IN 5 YEARS";
4. Pursuant to the offering materials of Oasis, "All funds OSC received for Turbo Growth Certificates are jointly invested in High Yield Trading Programs";
5. Upon information and belief, investors can play a passive role in the company with no duties and responsibilities;
6. Upon information and belief, each investor will not be involved in the day-to-day management of Oasis Club, since they simply send their money to Oasis and receive a return based on Oasis' involvement in High Yield Trading Programs;
7. Since the investors will be involved in a common enterprise with the expectation of profits to be derived from the essential managerial efforts of others, the "memberships" offered by the Oasis Club 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.;
8. The Oasis Club investment contracts have never been registered for offer and sale in Wisconsin pursuant to Ch. 551, Wis. Stats.;
9. The Oasis Club has violated sec. 551.21(1), Wis. Stats., by offering and selling unregistered securities in Wisconsin; and
10. The Staff of the Division of Securities sent an inquiry letter to Oasis Club dated December 3, 2001, for information and documents concerning its securities-related transactions with persons in Wisconsin, but to date has received no response.

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.

