

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

In the Matter of
CASHIER INC. and
TOM GRAVES,

PETITION FOR ORDER

Respondents.

File No. S-03132(EX)

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. Cashier Inc. ("Cashier") is/was an Ontario, Canada corporation with last known business addresses of 95 College Street, Bellville, Ontario, Canada K8P2G3. Cashier was/is involved in business as a check cashing business offering payday advance loans to borrowers.
2. Tom Graves ("Graves") is/was the president and chief executive officer of Cashier. Graves resides in Bellville, Ontario.
3. In October 2001, Corporate Funding Group, Inc., ("Corporate") an independent sales office for Cashier, offered and sold to at least one individual in Wisconsin interests in Cashier.
4. Pursuant to offering materials received by at least one person in Wisconsin, Corporate was seeking investors for Cashier's check cashing business. Cashier was offering investors a 36% annual return on "fully secured accounts receivable acquisitions."
5. Since the investors will be involved in a common enterprise with the expectation of profit to be derived from the essential managerial efforts of others, the "fully secured accounts receivable acquisitions" of Cashier 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.
6. The "fully secured accounts receivable acquisitions" of Cashier are "securities" as defined in sec. 551.02(13)(a), Wis. Stats., and have never been registered for offer and sale in Wisconsin pursuant to Ch. 551, Wis. Stats.
7. Respondents have violated sec. 551.21, Wis. Stats., by offering and selling unregistered securities in Wisconsin.
8. In connection with the offers and sales described above, Corporate transacted business as an "agent" of Cashier and Graves, as that term is defined by sec.551.02(2), Wis. Stats.
9. At no time has Corporate been licensed as a securities agent pursuant to Ch. 551, Wis. Stats.
10. Respondents have violated sec.551.31(2), Wis. Stats., by employing an unlicensed agent to represent them in Wisconsin.
11. On November 5, 2001, the Securities Division of the State of Washington issued a Summary Order To Cease And Desist against Cashier and Graves.

