

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

In the Matter of
CHARLES L. BURTON, JR.,

PETITION FOR ORDER

Respondents.

File No. S-99301(EX)

The staff of the State of Wisconsin, Department of Financial Institutions, Division of Securities, Bureau of Registration & Enforcement, has conducted an investigation in this matter pursuant to sec. 551.56, Wis. Stats., and as a result thereof alleges as follows:

1. Wild Creek Holding Company, Inc. ("Wild Creek Holding") is a business entity incorporated in the State of Nevada;
2. Upon information and belief, Charles L. Burton, Jr. ("Burton"); is an individual with a date of birth of June 16, 1949, with a CRD # of 836930, and a last known home address of 2903 South Uinta Street Denver, CO 80231;
3. According to a letter of Burton to staff of the Division of Securities, Burton was the President of Wild Creek Holding during the time period of "Prior to and after January 1, 1996 until May 30, 1996;
4. According to a letter of Burton to staff of the Division of Securities, Burton sold stock in 1997 and 1998 of Wild Creek Holding to at least five persons in Wisconsin;
5. The stock of Wild Creek Holding has never been registered for offer and sale in Wisconsin pursuant to Ch. 551, Wis. Stats.;
6. According to an investor questionnaire to staff of the Division of Securities of one of the persons in Wisconsin, referred to in Paragraph 4 above, who invested four times in the stock of Wild Creek Holding in 1996 and 1997, he received investment information from and paid his investment money to Burton for the stock of Wild Creek Holding;
7. According to the document entitled "STOCK PURCHASE AGREEMENT," signed by the persons referred to in Paragraph 6 and 7 above, "... STOCK PURCHASE: UPON receiving net amount listed above, the SELLER (Burton) agrees to issue to the PURCHASER (person in Wisconsin), a certificate of Freetrading Common Stock in the amount of _____ shares of Wild Creek Holding Company, Inc. prior to merger. ..."
8. According to the investor questionnaire referred to in Paragraph 6 above, before investing that person was told that Wild Creek Holding "would be closing a major deal, merging, and 'going public' in the near future. Initially, only restricted shares were available. Later, unrestricted shares were available from both (sic) Tom Kaddatz, Sharon Kaddatz, and Chuck Burton. ... I was told initially that my money would be going for investment in Wild Creek Holding Company. With my final purchase, I was told that it was for the purpose of 'keeping the deal going', so that it could ultimately be completed. ... There were assurances by both Burton and Kaddatz that a deal was impending, that the stock would be tradeable (sic) on a securities exchange. In particular, a merger was in the works. The time to invest was termed 'limited' and the ability to retrieve any said investment at a future date was not brought into question.";

9. According to a letter of Burton to staff of the Division of Securities, Burton sold his own stock of Wild Creek to the persons referred to in Paragraph 4 above; and

10. Upon information and belief, the stock of Wild Creek Holding did not “go public,” the anticipated “deal” did not occur, and Wild Creek Holding at all times material hereto has functioned only as a “shell corporation.”

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

 7-24-03

Mark E. Dorman Date
Examiner

 7/25/03

David A. Cohen Date
Supervising Attorney