

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

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In the Matter of  
AVALON & ASSOCIATES,  
LINK-1 COMMUNICATIONS, INC.,  
LINCOLN A. BERRIDGE, and TODD GROOVER  
Respondents

PETITION FOR ORDER

File No. S-03073(EX)

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The staff of the 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 § 551.56, Wis. Stats., and as a result thereof alleges as follows:

1. Avalon & Associates (“Avalon”) is a business entity with a last known business address of 1048 Irvine Ave., Ste. 199, Newport Beach, CA 92660-4602.
2. Link-1 Communications, Inc. (“Link-1”) is a Nevada Corporation with a last known address of 7465 W. Lake Mead Blvd., Suite 200, Las Vegas, Nevada 89128.
3. Lincoln Berridge (“Berridge”) is an individual who at all times material hereto has been President/CEO of Link-1 with a last known business address at 7465 W. Lake Mead Blvd., Suite 200, Las Vegas, Nevada 89128.
4. Todd Groover (“Groover”) is an individual who at all times material hereto has been an agent of Avalon, Link-1, and Berridge with a last known address at that of Avalon.
5. During at least March 2002, Groover, on behalf of Avalon, Berridge & Link-1, offered to at least one person in Wisconsin 1000 shares of Common Stock in Link-1.
6. The person in Wisconsin referred to above had no pre-existing relationship with any of the Respondents.
7. The Link-1 stock has never been registered for offer and sale in Wisconsin pursuant to Ch. 551, Wis. Stats.
8. All Respondents have violated § 551.21(1), Wis. Stats., by offering unregistered securities in Wisconsin.
9. In connection with the offers of the securities described above, Avalon transacted business in Wisconsin as a “broker-dealer,” as that term is defined by § 51.02(3), Wis. Stats.
10. At no time has Avalon been licensed as a securities broker-dealer pursuant to Ch. 551, Wis. Stats.
11. Respondent Avalon has violated § 551.31(1), Wis. Stats., by transacting business in Wisconsin as a broker-dealer without a license.
12. In connection with the offers of the securities described above, Groover transacted business in Wisconsin as an “agent” for Link-1, Avalon and Berridge as that term is defined by § 551.02(2), Wis. Stats.

