

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

In the Matter of
CASH LINK SYSTEMS, INC.,
ALAN LEVINE, and
LELAND BALBER,

PETITION FOR ORDER

Respondents.

File No. S-04207(EX)

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

1. Cash Link Systems, Inc. ("Cash Link") is a Florida corporation with a last known business address of 4651 Sheridan Street, Suite 410, Hollywood, FL 33021;
2. Upon information and belief, Alan Levine ("Levine") is an adult individual who at all times material hereto was the president, owner and a controlling person of Cash Link, with a last known business address at that of Cash Link;
3. Leland J. Balber ("Balber") is an adult individual with CRD# 1652222 and a date of birth of December 13, 1947, with a last known business address at that of Cash Link and a last known residence address of 1865 NE 124th Street, North Miami, Florida 33181;
4. Upon information and belief, during the period of at least April, 2004, Balber, on behalf of Cash Link and Levine, offered and sold to at least one person in Wisconsin investments involving "cashless" automated teller machines with service contracts;
5. Upon information and belief, the transaction referred to in Paragraph 4 above consists of the purchase of automated teller machines at a certain price, based on the quantity purchased, with a service contract for an additional amount, with the investor doing nothing except to receive monthly commission checks, and the automated teller machines are located, installed, maintained, and relocated – if necessary - by Cash Link;
6. The "cashless" automated teller machines with service contracts of Cash Link are investment-contract securities as defined by sec. 551.02(13), Wis. Stats., and have never been registered for offer and sale in Wisconsin pursuant to Ch. 551, Wis. Stats.;
7. Cash Link, Levine, and Balber have violated sec. 551.21(1), Wis. Stats., by offering and selling unregistered securities to a person in Wisconsin;

8. In connection with the offer and sale of the securities described above, Balber transacted business in Wisconsin as an "agent" for Cash Link and Levine, as that term is defined by sec. 551.02(2), Wis. Stats.;
9. At no time has Balber been licensed as a securities agent pursuant to Ch. 551, Wis. Stats.;
10. Balber has violated sec. 551.31(1), Wis. Stats., by transacting business in Wisconsin as a securities agent without a license;
11. Cash Link and Levine have violated sec. 551.31(2), Wis. Stats., by employing an unlicensed agent to represent them in Wisconsin;
12. Upon information and belief, on December 22, 2003, the State of South Dakota, issued a cease order against Cash Link and Levine;
13. Upon information and belief, on February 9, 2004, the State of Texas issued a cease and desist order against Cash Link, Levine, Balber and others;
14. On July 20, 2004, the US Securities & Exchange Commission ("the SEC") obtained a temporary restraining order in US District Court in Dallas, Texas, against Cash Link and Levine "... to halt a fraudulent investment scheme and freeze assets for the benefit of investors. ..."
15. According to the complaint of the SEC, in the matter of Cash Link and Levine, "... Cash Link agrees to place the machines in 'high traffic' business locations, service the machines after placement, and collect and distribute the transaction fees, which are supposedly shared with investors. The Commission (the SEC) contends that these and other claims are false and misleading in that Cash Link has failed to deliver ATMs to certain investors and has consistently failed to place investor-owned ATMs in 'high traffic' locations as represented. The defendants (Cash Link and Levine) have also failed to disclose that the few machines, which have been placed, have generated very little return for investors. Moreover, even in the few cases, in which there is some return, Cash Link has failed to distribute most of the funds to investors. Further, investors are not being advised that the company and Levine are the subjects of two state-issued cease-and-desist orders related to this ATM scheme, and a federal criminal investigation in which company records were recently seized. ..."
16. Cash Link, Levine, and Balber 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;
17. Staff of the State of Wisconsin, Department of Financial Institutions, Division of Securities, wrote to Cash Link to request information and documents concerning their securities-related transactions with persons in Wisconsin, but to date have received no response.

Therefore, the staff of the State of Wisconsin, Department of Financial Institutions, Division of Securities, petitions for the issuance of the attached Order pursuant to Ch. 551, Wis. Stats.

Mark Dorman 11-12-04

Mark Dorman, Examiner Date
Bureau of Registration & Enforcement

David A. Cohen 11/12/04

David A. Cohen, Supervising Attorney Date
Bureau of Registration & Enforcement