

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

In the Matter of
GERALD W. BRADFORD,

PETITION FOR ORDER

Respondent.

File No. S-05176(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 § 551.56, Wis. Stats.; and as a result thereof alleges as follows:

1. Gerald W. Bradford ("Bradford") is an individual with a date of birth of May 23, 1944, and a CRD number of 1020472, who was President of Bradford & Associates, with a last known home address of 4962 Hononegah Road, Roscoe, Illinois 61073-7778 and business address of 751 Adams Street, Rockton, Illinois 61072;
2. PCO, Inc., aka Personal Choice Opportunities ("PCO"), is a Nevada corporation with its address at all times material hereto at 931 North La Cienega Boulevard, Los Angeles, California 90069;
3. Upon information and belief, at all times material hereto the business of PCO was the sale of viatical settlement contracts;
4. At all times material hereto, Bradford was an insurance agent licensed by the Office of the Wisconsin Commissioner of Insurance;
5. According to information provided by the court-appointed Receiver of PCO to the Department, during the period of at least 1996, Bradford, on behalf of Mutual Benefits, offered and sold to at least one person in Wisconsin the viatical settlement contracts of PCO;
6. The viatical settlement contracts of PCO are investment contract securities as defined by DFI-Sec 1.02(6)(a), Wis. Adm. Code and sec. 551.02(13), Wis. Stats.;
7. The viatical settlement contracts have never been registered for offer and sale in Wisconsin pursuant to Ch. 551, Wis. Stats.;
8. Bradford has violated sec. 551.21(1), Wis. Stats., by offering and selling unregistered securities to persons in Wisconsin;

