

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

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In the Matter of  
ROMAN H. CLAAS,

PETITION FOR ORDER

Respondent.

File No. S-08019(EX)

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The staff of the State of Wisconsin, Department of Financial Institutions, 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. Roman H. Claas ("Claas") is an individual born in 1943, with a last known home address of 6776 Claas Road, Menomonee Falls, Wisconsin 53051;
2. Mutual Benefits Corporation ("Mutual Benefits") is a Florida corporation with its corporate headquarters at 2881 East Oakland Park Boulevard, Suite 200, Fort Lauderdale, Florida 33306;
3. Upon information and belief, at all times material hereto the business of Mutual Benefits was the sale of viatical settlement contracts;
4. At all times material hereto, Claas was an insurance agent licensed by the State of Wisconsin, Office of the Commissioner of Insurance;
5. According to information provided by Claas to the staff of the Division, during the period of at least 1997 to 2000, Claas, on behalf of Mutual Benefits, offered and sold to at least 35 persons in Wisconsin viatical settlement contracts of Mutual Benefits;
6. The viatical settlement contracts of Mutual Benefits 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. Claas has violated sec. 551.21(1), Wis. Stats., by offering and selling unregistered securities to persons in Wisconsin;
9. In connection with the offers and sales of the securities described above, Claas transacted business in Wisconsin as an "agent" for Mutual Benefits as that term is defined by sec. 551.02(2), Wis. Stats.;

