

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

In the Matter of
ANDY VANG a/k/a SENG VANG,

Respondent.

PETITION FOR ORDER
(SUMMARY)

File No. S-08154 (EX)

The staff of the Bureau of 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. Andy Vang, a/k/a Seng Vang (“Vang”) is an individual with a last known business and home address of 1611 Ginger Lane, Wausau, Wisconsin 54403.

2. Harbour Investments, Inc. (“Harbour”) is a licensed broker-dealer (CRD#19258) whose principal place of business is located at 575 D’Onofrio Drive, Ste. 300, Madison, Wisconsin 53715. During approximately June of 2008, Vang represented himself as “Financial Investments Representative” of Harbour.

3. During approximately June of 2008, Vang produced a business card representing himself as “Dr. Andy Vang, MD, Medical Director” of the Neurology Department at Saint Clare’s Hospital in Weston, Wisconsin for the purpose of gaining the trust and respect of potential investors. Division staff found no evidence of any doctor by that name affiliated with St. Claire’s Hospital. No doctors of medicine or osteopathy by that name were listed in a search of the Wisconsin Department of Regulation and Licensing data files.

4. During approximately June, 2008, Vang copied forms and brochures from the website of Harbour and reproduced these documents, including business cards and contracts, for use in offering stock of Google in Wisconsin.

5. Vang portrayed himself as an “agent” for Harbour when he had no affiliation with the Harbour, without the permission or knowledge of Harbour, and without the knowledge of the investors. Representatives at Harbour told Division staff that Vang has never been an agent for that company.

6. During approximately June, 2008, Vang contacted persons by telephone from his residence in Wisconsin purporting to be an agent of Harbour, and made offers to sell Google stock to investors and arranged for the signing of contracts and payment of investment money.

7. In connection with the offers of the securities described above, Vang transacted business in Wisconsin as an “agent,” as that term is defined by §551.02(2), Wis. Stats.

8. At no time has Vang been licensed as a securities agent pursuant to Ch. 551, Wis. Stats.

9. Vang has violated §551.31(1), Wis. Stats., by transacting business in Wisconsin as a securities agent without a license.

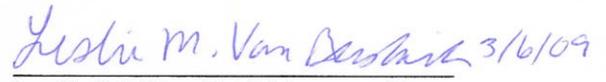
10. Vang portrayed himself as an "agent" for Harbour when he had no affiliation with the Harbour, without the permission or knowledge of Harbour, and without the knowledge of the investors, for the purpose of persuading investors to buy securities from him.

11. Upon information and belief, Vang did not invest the money given to him by the investors in the stocks he had promised to purchase for their investment.

12. Vang has violated §551.41(2), Wis. Stats., by making an untrue statement of material facts and omitting to state material facts necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading in connection with the offer and sale of securities to persons from his residence in Wisconsin.

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


Kathryn L. Denton 3/6/09
Senior Examiner Date
Bureau of Enforcement


Leslie M. Van Buskirk 3/6/09
Attorney Supervisor Date
Bureau of Enforcement