

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

In the Matter of

PETITION FOR ORDER

LEONARD BENSON,
d/b/a LEONARD BENSON COMPANY, Respondent.

File No. S-226903(EX)

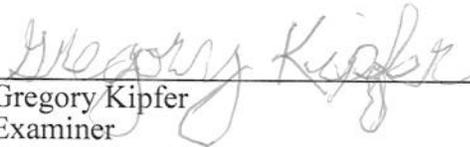
The staff of the Bureau of Enforcement of the Division of Securities, Department of Financial Institutions, State of Wisconsin has conducted an investigation in this matter pursuant to Wis. Stat. § 551.602, and as a result thereof alleges as follows:

1. Leonard Benson ("Benson") is an individual who at all times material hereto has been doing business as Leonard Benson Company ("LBC") selling instructional material on how to win money in casino gambling. The last known address of LBC is 3540 W. Sahara Avenue, #441, Las Vegas, Nevada 89102.
2. Upon information and belief, in June, 2011, Benson offered and sold investment contracts in the form of "Memberships" in the Leonard Benson Private Gaming Fund to at least one person in Wisconsin.
3. Pursuant to the offering materials and information provided to a Wisconsin investor, the Leonard Benson Private Gaming Fund will make money through Benson using his 32 years of gambling experience to direct a long-time team of casino players that will play mostly baccarat, blackjack, and craps in casinos.
4. Page (5) of the offering materials provided to a Wisconsin investor states "Question: If there are losses, will my money be at risk? My Answer: No. Your principal, as well as your 36 to 100% annual interest, is guaranteed. My team and I have made excellent money as professional gamblers and have never had a losing month."
5. Upon information and belief, Respondent provided untruthful material facts to the Wisconsin investor by representing that investor money was not at risk, and that investor profits were in fact "guaranteed."
6. As represented on page (4) of the offering documents, investors in LBC played a passive role with no duties and responsibilities in the day-to-day management of the company. Pursuant to page (2) of the offering materials provided to a Wisconsin investor, "What I am offering you is an opportunity to receive a 36 to 100% return on your money in one year without doing anything."
7. Since the investor would be involved in a common enterprise with the expectation of profit to be derived from the essential managerial efforts of others, the investments offered by Benson and LBC are investment contract securities as defined by Wis. Stat. § 551.102(28)(d).
8. Respondent violated Wis. Stat. § 551.501(2), when he made an untrue statement of a material fact in connection with the offer and sale of a security to a person in Wisconsin.

9. On August 12, 2011, the State of Nevada, Office of the Secretary of State, Securities Division issued a permanent Order to Cease and Desist against Benson and LBC based on the offer and sale of unregistered securities.

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 Wis. Stats. Ch. 551.

Dated this 1st day of March, 2013.



Gregory Kipfer
Examiner
Bureau of Enforcement



Leslie M. Van Buskirk
Attorney Supervisor
Bureau of Enforcement