

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

In the Matter of

SPAMAN WHOLESALE, INC.,
DBA MASTER SPAS OF WISCONSIN,
and
CRAIG HUEFFNER,

PETITION FOR ORDER

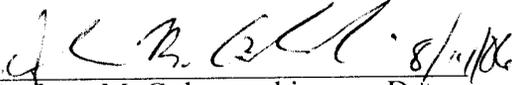
File No. S-03123 (EX)

Respondents.

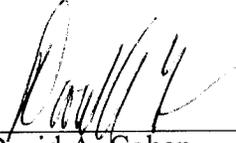
The staff of the Bureau of Registration & Enforcement of the Division of Securities, Department of Financial Institutions, State of Wisconsin has conducted an investigation in this matter pursuant to § 551.56, Wis. Stats., and as a result thereof alleges as follows:

1. Spaman Wholesale, Inc., DBA Master Spas of Wisconsin ("Master Spas") is a domestic business entity with a last known business address of 1332 East Main Street, Waukesha, Wisconsin.
2. Craig Hueffner ("Hueffner") is an individual who at all times material hereto has been a control person of Master Spas, with a last known business address at 1332 East Main Street, Waukesha, Wisconsin.
3. During August 7, 2002, Tom Gillin ("Gillin"), a salesperson, on behalf of Master Spas, offered to at least one person in Wisconsin a participation in a Consumer Promotions, Inc. Cashable Voucher Program ("Cashable Voucher").
4. The person in Wisconsin referred to above had no pre-existing relationship with any of the Respondents.
5. Upon information and belief, in at least one sale, the Cashable Voucher was not used exclusively to promote the sale or lease of consumer goods, but was paid for with consideration in addition to the purchase price of the consumer goods offered for sale without the Cashable Voucher.
6. Since the Cashable Vouchers are not used exclusively to promote the sale or lease of consumer goods by nature of additional consideration being paid for the Cashable Voucher, the Cashable Vouchers sold by Respondent constitute evidences of indebtedness and are therefore securities as defined by § 551.02(13), Wis. Stats.
7. The Cashable Vouchers have never been registered for offer and sale in Wisconsin pursuant to Ch. 551, Wis. Stats.
8. In connection with at least one offer of the securities described above, Master Spas transacted business in Wisconsin as a "broker-dealer," as that term is defined by § 551.02(3), Wis. Stats.
9. At no time has Master Spas been licensed as a securities broker-dealer pursuant to Ch. 551, Wis. Stats.
10. Respondent Master Spas has violated § 551.31(1), Wis. Stats., by transacting business in Wisconsin as a broker-dealer without a license.

Therefore, the staff of the Bureau of Registration & Enforcement petitions the Administrator of the Division of Securities for the issuance of the attached Order pursuant to Chapter 551, Wis. Stats.



Andrew M. Golanowski Date
Law Clerk
Bureau of Registration and Enforcement



David A. Cohen Date
Supervising Attorney
Bureau of Registration and Enforcement