

1 STATE OF WASHINGTON  
2 DEPARTMENT OF FINANCIAL INSTITUTIONS  
3 SECURITIES DIVISION

4 IN THE MATTER OF DETERMINING ) Order Number S-05-233-06-SC01  
5 Whether there has been a violation of the )  
6 Securities Act of Washington by: ) STATEMENT OF CHARGES AND NOTICE  
7 Exchange Growth League; Results Home ) OF INTENT TO ENTER ORDER TO CEASE  
8 Buyers LLC dba Exchange Growth League; ) AND DESIST, TO IMPOSE FINES, AND TO  
9 Travis Leudke, ) CHARGE COSTS  
10 Respondents. )

11 THE STATE OF WASHINGTON TO: Exchange Growth League; Results Home  
12 Buyers LLC dba Exchange Growth League;  
13 Travis Leudke

14 **STATEMENT OF CHARGES**

15 Please take notice that the Securities Administrator of the State of Washington has reason  
16 to believe that Respondents, Exchange Growth League, Results Home Buyers LLC dba  
17 Exchange Growth League, and Travis Leudke have each violated the Securities Act of  
18 Washington and that their violations justify the entry of an order of the Securities Administrator  
19 under RCW 21.20.390 against each to cease and desist from such violations. The Securities  
20 Administrator finds as follows:

21 **TENTATIVE FINDINGS OF FACT**

22 **PARTIES**

23 **I.**

24 Results Home Buyers LLC dba Exchange Growth League (“EGL”) is a Washington  
limited liability company organized on April 16, 2003 with its principal place of business at 601  
S Pioneer Way, Moses Lake, WA 98837.

STATEMENT OF CHARGES AND NOTICE OF INTENT TO ENTER ORDER TO CEASE AND DESIST, TO IMPOSE FINES, AND TO CHARGE COSTS

1

DEPARTMENT OF FINANCIAL INSTITUTIONS  
Securities Division  
PO Box 9033  
Olympia, WA 98507-9033  
360-902-8760

1 II.

2 Exchange Growth League (“EGL”) is purportedly a Washington limited liability  
3 company organized on April 1, 2004 with its principal place of business at 601 S Pioneer Way,  
4 Moses Lake, WA 98837.

5 III.

6 Travis Leudke (“Leudke”), formerly a Moses Lake, WA resident, is the registered agent  
7 and sole manager/member of Results Home Buyers LLC dba Exchange Growth League and  
8 Exchange Growth League.

9 NATURE OF THE OFFERING

10 IV.

11 During the summer of 2004, Leudke offered investments and sold to one Washington  
12 resident in EGL. Leudke told investors that the money would be used to establish a line of credit  
13 for the purchase of real estate by EGL in Nevada. Leudke also stated he had done these types of  
14 transactions before, but in smaller dollar amounts. The funds would be returned to investors  
15 after 45 business days. Leudke told investors that this was a low risk investment because the  
16 principal would be returned after 45 banking days. Leudke further explained that the property  
17 purchased would be leveraged to purchase additional property, which would be sold for a profit  
18 in the rising real estate market. The Washington resident who invested did not have control over  
19 her investment, the line of credit, the real estate or real estate transactions. According to Leudke,  
20 the resulting profits would be paid out monthly in \$10,000 to \$25,000 or more increments for 12  
21 to 18 months after the initial 45 days had elapsed.

1 V.

2 Based on Leudke's statements and the wiring instructions Leudke provided, the  
3 Washington resident wired \$50,000 on September 15, 2004 to an EGL account at Bank of  
4 America. Leudke provided the Washington resident with a document indicating that starting on  
5 October 1, 2004, 45 business days would be completed on December 13, 2004. To date, the  
6 Washington resident has not received any principal or profits on her investment.

7 MISREPRESENTATIONS AND OMISSIONS

8 VI.

9 Leudke failed to provide material information regarding the investment and companies,  
10 including, but not limited to: financial statements, use of proceeds, and risk factors related to real  
11 estate investments.

12 REGISTRATION STATUS

13 VII.

14 Results Home Buyers LLC dba Exchange Growth League and Exchange Growth League  
15 are not currently registered to sell their securities in the state of Washington and have not  
16 previously been so registered.

17 VIII.

18 Travis Leudke is not currently registered as a securities salesperson or broker-dealer in  
19 the state of Washington and has not previously been so registered.

1 Based upon the Tentative Findings of Fact, and finding it in the public interest, the  
2 following Conclusions of Law are made:

3  
4 **CONCLUSIONS OF LAW**

5 **I.**

6 The offer or sale of the investment described above constitutes the offer or sale of a  
7 security as defined in RCW 21.20.005(10) and (12).

8 **II.**

9 The offer or sale of said securities is in violation of RCW 21.20.140 because no  
10 registration or notification of claim of exemption for such offer or sale is on file with the  
11 Securities Administrator.

12 **III.**

13 Travis Leudke, Results Home Buyers LLC dba Exchange Growth League, and Exchange  
14 Growth League violated RCW 21.20.040 by offering or selling said securities while not  
15 registered as a securities salesperson or broker-dealer in the state of Washington and/or  
16 employing an unregistered salesperson or broker-dealer.

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18  
19 **IV.**

20 The offer or sale of said securities was made in violation of RCW 21.20.010 because  
21 Travis Leudke, Results Home Buyers LLC dba Exchange Growth League, and Exchange Growth  
22 League failed to provide material information regarding the investment and the companies,  
23 including financial statements, use of proceeds, and risk factors related to real estate.

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2 **NOTICE OF INTENT TO ORDER THE RESPONDENT TO CEASE AND DESIST**

3 Pursuant to RCW 21.20.390, and based on the above Tentative Findings of Fact and  
4 Conclusions of Law, the Securities Administrator intends to order that Exchange Growth  
5 League, Results Home Buyers LLC dba Exchange Growth League, and Travis Leudke, their  
6 agents and employees each cease and desist from violations of RCW 21.20.010, RCW  
7 21.20.040, and RCW 21.20.140.

8

9 **NOTICE OF INTENT TO IMPOSE FINES**

10 Pursuant to RCW 21.20.395, and based upon the Tentative Findings of Fact and  
11 Conclusions of Law, the Securities Administrator intends to order that Exchange Growth  
12 League, Results Home Buyers LLC dba Exchange Growth League, and Travis Leudke shall be  
13 liable for and pay a fine of \$30,000.

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15 **NOTICE OF INTENT TO CHARGE COSTS**

16 Pursuant to RCW 21.20.390, and based upon the Tentative Findings of Fact and  
17 Conclusions of Law, the Securities Administrator intends to order that Exchange Growth  
18 League, Results Home Buyers LLC dba Exchange Growth League, and Travis Leudke shall be  
19 jointly and severally liable for and pay administrative investigative and hearing costs of at least  
20 \$6,000.

1 **AUTHORITY AND PROCEDURE**

2 This Statement of Charges is entered pursuant to the provisions of the Securities Act of  
3 Washington and is subject to the provisions of RCW 34.05. The respondents, Exchange Growth  
4 League, Results Home Buyers LLC dba Exchange Growth League, and Travis Leudke, may each  
5 make a written request for a hearing as set forth in the NOTICE OF OPPORTUNITY TO  
6 DEFEND AND OPPORTUNITY FOR HEARING accompanying this order.

7 If a respondent does not request a hearing, the Securities Administrator intends to adopt  
8 the above Tentative Findings of Fact and Conclusions of Law as final and enter an order to cease  
9 and desist permanent as to that respondent.

10 Dated and Entered this 5th day of March, 2007.

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13 \_\_\_\_\_  
14 MICHAEL E. STEVENSON  
15 Securities Administrator

16 Approved by:

17 

18 \_\_\_\_\_  
19 Martin Cordell  
20 Chief of Enforcement

21 Presented by:

22 

23 \_\_\_\_\_  
24 Dylan Waits  
Financial Legal Examiner