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**STATE OF WASHINGTON  
DEPARTMENT OF FINANCIAL INSTITUTIONS  
SECURITIES DIVISION**

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IN THE MATTER OF DETERMINING Whether there has been a violation of the Securities Act of Washington by:	)	Order No.: S-13-1167-13-SC01
Envision Retirement, LLC;	)	STATEMENT OF CHARGES AND NOTICE OF INTENT
Cirrus Partners, Inc.;	)	TO ENTER ORDER TO CEASE AND DESIST, TO
MRG International, Inc.;	)	IMPOSE FINES, TO CHARGE COSTS, AND TO REVOKE
Stephen J. Barrett,	)	REGISTRATIONS
Respondents.	)	

THE STATE OF WASHINGTON TO:

Envision Retirement, LLC (IARD No. 117337)  
Cirrus Partners, Inc.  
MRG International, Inc.  
Stephen J. Barrett (CRD No. 2575118)

**STATEMENT OF CHARGES**

Please take notice that the Securities Administrator of the State of Washington has reason to believe that Respondents, Envision Retirement, LLC, Cirrus Partners, Inc., MRG International, Inc., and Stephen J. Barrett have each violated the Securities Act of Washington and that their violations justify the entry of an order of the Securities Administrator under RCW 21.20.390 against each to cease and desist from such violations and to charge costs, and under RCW 21.20.395 to impose a fine, and to revoke registrations pursuant to RCW 21.20.110. The Securities Administrator finds as follow:

**TENTATIVE FINDINGS OF FACT**

Respondents

1. Envision Retirement, LLC (“Envision”) (IARD no. 117337) is an inactive Washington limited liability company formed on June 26, 2006 and administratively dissolved on October 3, 2011. Envision is registered in Washington as an investment adviser. Envision previously maintained a principal place of business in Kingston, Washington. Envision is the successor of Stephen Barrett’s original advisory business,

1 Redmond Investment Group, Inc., which Barrett first registered in the State of Washington as an investment  
2 adviser in November 1999.

3 2. Stephen J. Barrett (“Barrett”) (CRD no. 2575118) is a Washington resident who has been registered  
4 as an investment adviser representative in Washington since 1999. Barrett is president, the sole member,  
5 and sole owner, of Envision.

6 3. MRG International, Inc. (“MRG”) is a Nevada corporation formed on or around October 10, 2006  
7 that previously maintained a principal place of business in Reno, Nevada. In or around 2007, MRG  
8 acquired a Nevada company named Marketing Results Group, LLC that was in the business of email  
9 marketing systems. Beginning in late 2007, MRG compensated Barrett for developing business plans for  
10 MRG. Between October 2008 and June 2010, Barrett was the Chief Financial Officer of MRG. In or around  
11 June 2010, MRG merged into Cirrus.

12 4. Cirrus Partners, Inc. (“Cirrus”) is an inactive Washington corporation formed on June 4, 2010 and  
13 administratively dissolved on October 1, 2012. Cirrus previously maintained a principal place of business  
14 in Kingston, Washington. Between approximately June 2010 and February 2013, Barrett was the Chief  
15 Executive Officer of Cirrus.  
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#### 17 Offer and Sale of MRG Promissory Notes

18 5. Between approximately June 2007 and April 2010, Barrett sold approximately \$3 million worth of  
19 MRG subordinated convertible promissory notes to at least twenty-seven Washington investors, including at  
20 least twenty-six clients of Envision, Barrett’s investment advisory firm. Barrett sold these promissory notes  
21 to at least five non-accredited investors. Prior to Barrett’s sales, MRG had raised at least \$3.5 million  
22 through the offer and sale of notes to investors outside of Washington.

23 6. The subordinated convertible promissory notes provided interest rates ranging from ten to eighteen  
24 percent and had terms ranging from one month to two years. The notes were convertible to shares of MRG  
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1 stock and provided that the debt owed by the note holder was “expressly subordinate in right of payment to  
2 ...all of the [c]ompany’s [s]enior indebtedness whether currently outstanding or incurred in the future.”

3 7. In or around 2007, Barrett participated in a series of conference calls with executives at Marketing  
4 Results Group, LLC after receiving an email promoting its marketing system. Barrett then purchased a  
5 marketing system from the company. At or around that time, MRG acquired Marketing Results Group, LLC  
6 as MRG was developing cloud computing and file-sharing software, including software known as Jamuse,  
7 MuseWorx, and ShareFilesEZ. In May 2007, Barrett purchased \$10,000 worth of MRG common stock.  
8 Barrett next began discussions with MRG executives regarding raising funds for the company through the  
9 sale of convertible promissory notes. At the time of MRG’s offering in Washington, MRG had a very  
10 limited operating history and had not finalized its business plan.

11 8. Beginning in or around June 2007, Barrett began soliciting his advisory clients by telephone and  
12 during meetings at his office. Barrett also solicited one investor who worked in his office building. Barrett  
13 met several investors at their homes to solicit additional investments. Several of Barrett’s clients referred  
14 their family members to Barrett as potential investors. In the summer of 2009, Barrett and other MRG  
15 personnel held a meeting at a restaurant in Kingston, Washington attended by local businesspeople. At the  
16 meeting, MRG personnel discussed the offering in general terms and stated that MRG might locate a  
17 customer support center in Kingston.

18 9. In some of his solicitations, Barrett conveyed a sense of urgency regarding the investment. For  
19 example, in the summer of 2007, Barrett solicited one advisory client by telephone while the client was on  
20 vacation. On another occasion, Barrett told an investor that MRG had an immediate need for cash to keep  
21 MRG’s servers running while soliciting an additional note purchase.  
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1 10. Barrett represented to some investors that MRG would be sold to a large company in the near future.  
2 Barrett represented to at least one investor that such negotiations were underway, and stated that Microsoft  
3 was one of the companies to which MRG could potentially be sold.

4 11. Barrett told investors that the sale of the MRG would yield very high returns for investors. Barrett  
5 told one investor that the sale of MRG would deliver a “conservative target” of three to five times the  
6 investor’s principal investment. Barrett told at least one investor that he could earn a return of 800 to  
7 1000%, and later revised this figure down to 500 to 600% when soliciting a second investment from the  
8 investor. Barrett told another investor that an MRG note offered the highest return of any product on the  
9 market. Barrett told an investor that a doubling or tripling of his principal investment was possible. Barrett  
10 told another investor to expect a minimum return of 400 to 600% on his investment. Barrett called an  
11 advisory client and told him that investing in MRG would generate profits that would enable the client to  
12 purchase a yacht. After hearing this, the client allowed Barrett to withdraw \$40,000 from an IRA and to  
13 invest in MRG with that money.

14 12. At least nine investors, including at least five non-accredited investors, did not receive any  
15 documents prior to their investment in MRG. Barrett provided other investors with a document entitled  
16 “MuseWorx Business Plan 2010” (the “business plan”) and a private placement memorandum (“PPM”)  
17 regarding shares of convertible preferred stock of MRG.  
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19 13. The business plan provided information on the market place in which MRG intended its products to  
20 compete, the MuseWorx software product, reasons why MuseWorx software would dominate its market,  
21 and details regarding MRG’s key personnel and its goals. The business plan predicted that MuseWorx  
22 would have over 70,000 subscribers within two years and 120,000 subscribers and revenues of \$200 million  
23 within four years. Barrett failed to provide the basis for these forecasts in the business plan. The business  
24 plan also discussed MRG’s marketing plan and the company’s anticipated expansion. The business plan also  
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1 presented financial information which represented that MRG had assets worth approximately \$42 million,  
2 including approximately \$39 million that was attributed to "Marketing Automation." However, no  
3 explanation was provided concerning what "Marketing Automation" entailed or how its value had been  
4 determined.

5 14. MRG notes were convertible to MRG stock at the noteholders' option and the PPM provided  
6 information concerning MRG stock. However, no Washington investor exercised these conversion rights.  
7 The PPM addressed two classes of stock. The first class was preferred stock offered to existing noteholders  
8 in order to retire the debt evidenced by their notes, which the PPM represented to be in excess of \$2.5  
9 million. The second class consisted of new or additional shares of MRG preferred stock. The PPM discussed  
10 the offering, risk factors, use of proceeds, dilution, and MRG's plan of distribution, among other subjects.

11 15. Most investors paid by checks payable to MRG, while others transferred funds by wire. Several  
12 advisory clients paid by checks made payable to Barrett or to Envision. At least one advisory client agreed  
13 to allow Barrett to liquidate a portion of an IRA and to transfer the proceeds to MRG.  
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15 Misrepresentations and Omissions in the Offer and Sale of MRG Notes

16 16. In the offer and sale of MRG notes, Barrett minimized or failed to disclose certain risks. Barrett told  
17 multiple investors that an MRG note was a safe, "low risk" investment. Barrett told one investor that, in the  
18 worst case scenario, the investor would receive complete repayment of principal and payment of interest.

19 Barrett made no disclosures about the risks of investing in MRG to at least four investors.

20 17. Barrett failed to provide at least nine investors with any information about MRG's financial status,  
21 including, but not limited to, outstanding debts and the fact that MRG had defaulted on certain notes, prior  
22 to their note purchases. Barrett failed to provide multiple investors with any information regarding how  
23 MRG would use their investment funds.  
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1 18. Barrett and MRG did not provide any basis for the predicted returns or revenue projections included  
2 in the business plan discussed above, nor did Barrett and MRG disclose the assumptions underlying such  
3 predicted returns and revenue projections.

4 19. Barrett and MRG did not disclose to at least three investors information about the source of funds  
5 that MRG would use to repay investors.

6 20. Barrett and MRG did not disclose to at least three investors information about MRG's key personnel,  
7 including, not limited to, any relevant business experience.

8 21. At least four investors did not receive the information about MRG stock contained in the PPM.

9 Offer and Sale of Cirrus Promissory Notes

10 22. On June 24, 2010, MRG merged with Cirrus in an effort to address MRG's inability to bring its  
11 products to market on the scale MRG had anticipated and to provide a fresh start for a new management  
12 team assembled in response to the deterioration in communication between Barrett and MRG's other  
13 executives. After the merger, Cirrus had no assets and there was no formal plan in place to transfer MRG's  
14 assets to Cirrus so that Cirrus could pursue the launch of the software products originally developed by  
15 MRG.  
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17 23. Shortly after this merger, Cirrus began issuing "Amended and Restated Promissory Notes" (the  
18 "restated notes") to investors who had previously purchased notes from MRG. Barrett approached investors  
19 to whom he had previously sold MRG promissory notes and attempted to persuade them to accept the Cirrus  
20 notes to replace their MRG notes. Between approximately July 2010 and September 2012, Cirrus and  
21 Barrett persuaded at least thirty-one Washington investors to accept Cirrus's restated notes. At least six of  
22 these investors were not accredited investors as defined by Rule 501 of Regulation D.

23 24. According to the terms of the restated notes, Cirrus promised to pay the sum that the investor had  
24 originally provided to MRG, stating that the restated notes would supersede and replace the original MRG  
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1 note. The restated notes compounded unpaid interest from the MRG note, adding it to the principal of the  
2 restated note. The restated notes provided terms ranging from four months to three years. Many of the  
3 restated notes provided for a bonus payment if the holder agreed to extend the note's term. These notes  
4 provided interest rates ranging from ten to eighteen percent.

5 25. The restated notes also granted investors the right to convert the debt owed them into common stock  
6 of Cirrus. Noteholders could convert the aggregate unpaid principal plus accrued interest to stock at \$0.99  
7 per share.

8 26. In addition to the restated notes, Barrett also sold at least \$80,000 worth of new Cirrus promissory  
9 notes to at least three Washington investors. These notes had terms ranging from nine to thirty six months  
10 and provided for interest rates of ten and eighteen percent.

11 27. Barrett solicited investors by phone or email in an effort to have them accept Cirrus's restated notes.  
12 In one instance, Barrett arrived unannounced at an investor's workplace and asked the investor to sign two  
13 of Cirrus's restated notes. In an email asking an investor to accept a restated note, Barrett disclosed that  
14 MRG and Cirrus were merging but did not disclose MRG's failure to roll out its products as it had  
15 anticipated and the deterioration in communication that precipitated the merger. In his solicitation, Barrett  
16 led some investors to believe they had no choice but to accept the restated notes from Cirrus. For example,  
17 Barrett misleadingly told one investor that his MRG note was no longer valid and that he had to sign Cirrus  
18 notes within three months in order to preserve his investment.

19 28. Barrett provided at least one investor with a brochure that he had created concerning Cirrus. The  
20 brochure outlined Cirrus' business and target market, but provided no information concerning the risks of  
21 accepting a Cirrus note to replace an MRG note, such as Cirrus's lack of assets and the absence of a formal  
22 plan to transfer MRG's assets to Cirrus. Further, the brochure did not discuss Cirrus's financial status, or  
23 explain why MRG and Cirrus had merged.  
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1 29. To date, Cirrus has not made any payments on its notes and its operations generally ceased in late  
2 2012.

3 Misrepresentations and Omissions in the Offer and Sale of Cirrus Notes

4 30. In the offer and sale of the Cirrus notes, Barrett and Cirrus failed to disclose material information to  
5 investors regarding the merger of MRG and Cirrus, including the reasons for the merger: MRG's inability to  
6 bring its products to market on the scale it had anticipated and the deterioration in communication among  
7 MRG's executives.

8 31. Barrett failed to disclose the risks of purchasing a Cirrus note to at least one investor. Such risks  
9 included those arising from Cirrus's lack of assets and the absence of an agreement to transfer MRG's assets  
10 to Cirrus. Barrett failed to provide at least one investor with any information concerning Cirrus's financial  
11 status, including, but not limited to, information regarding the debts evidenced by the restated notes. Barrett  
12 and Cirrus did not disclose information regarding the source of funds that Cirrus would use to repay its  
13 investors to at least one investor. Barrett and Cirrus failed to disclose information about Cirrus's key  
14 personnel, including, but not limited to, their names and relevant prior business experience, to at least one  
15 investor.  
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17 Unsuitable Investment Recommendations

18 32. Given the illiquidity of the MRG and Cirrus notes, MRG's status as a pre-revenue business, and  
19 Cirrus's lack of assets and assumption of MRG's debts, MRG and Cirrus notes were both high risk  
20 investments. Notwithstanding this, Barrett recommended to at least three clients who had low risk  
21 tolerances that they purchase MRG notes. Barrett failed to maintain records reflecting this preference for at  
22 least one of these conservative investors. Furthermore, each of these clients regularly reminded Barrett of  
23 their low risk tolerance.  
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1 33. One of these conservative investors had only invested in CDs and mutual funds prior to working  
2 with Barrett and Envision. Barrett emphasized that investing in MRG was consistent with this client's  
3 conservative investment objectives. Moreover, this client was very near retirement when Barrett  
4 recommended MRG notes, prompting Barrett to emphasize that investing in MRG was appropriate because  
5 the note would "turn over quickly." Another conservative investor had only invested in annuities, bonds,  
6 and mutual funds prior to Barrett's recommendation of MRG notes. Each of these clients purchased MRG  
7 notes upon Barrett's recommendation.

8 34. Barrett also recommended that clients invest substantial portions of their portfolios in MRG and  
9 Cirrus. Barrett did not establish a maximum percentage of a client's portfolio that could be suitably  
10 invested in MRG and Cirrus notes. Barrett recommended to one client that he invest thirty-one percent of  
11 his assets in MRG notes. The client used money from an IRA to make this investment after Barrett assured  
12 him that he would not incur a tax penalty for doing so. The client incurred a substantial tax penalty by  
13 following Barrett's advice. Barrett recommended to at least three other clients that they invest over twenty  
14 percent of their assets in MRG notes. One of these clients was a retired couple and has since had to rent  
15 space out of their home to meet their financial obligations.

17 Failure to Disclose Conflicts of Interest

18 35. Barrett did not disclose his roles as a paid consultant and then chief financial officer of MRG, or his  
19 role as Cirrus's chief executive officer, or any resulting conflicts of interest to at least four clients when  
20 recommending MRG and Cirrus notes. Furthermore, Barrett did not disclose his status as an MRG and  
21 Cirrus shareholder, nor any resulting conflicts of interest, to at least four clients when recommending MRG  
22 and Cirrus notes.

False Filings with the Director

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2 36. Item 6 of Form ADV, Part 1 requires investment advisers to disclose and describe any business in  
3 which the adviser is actively engaged outside of his advisory business. On March 31, 2008, Envision made  
4 a filing with the Investment Advisers Registration Depository (“IARD”) that failed to disclose that Barrett  
5 was providing consulting services to MRG on Item 6 of Form, ADV, Part 1. On April 17, 2009 and March  
6 31, 2010, Envision made filings with the IARD that failed to disclose that Barrett was serving as the Chief  
7 Financial Officer of MRG on Item 6 of Form ADV, Part 1.

8 37. Item 11 of Form ADV, Part 2 requires the adviser to identify and address potential conflicts of  
9 interest arising from the adviser’s business. In March 30, 2011, Envision made a filing with IARD that did  
10 not disclose the conflicts of interest resulting from Barrett’s sales of Cirrus’s securities to Envision’s  
11 advisory clients in Item 11 of Form ADV, Part 2.

Registration Status

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13 38. In or around January 2009, MRG filed a Notice of Exempt Offering of Securities pursuant to  
14 Regulation D, Rule 506 of the Securities Act of 1933 with the Securities and Exchange Commission. The  
15 Notice indicated that MRG was offering equity securities. MRG did not file such an exemption claim with  
16 the Securities Administrator in the State of Washington. By relying on Regulation D, Rule 506, MRG was  
17 required to comply with all applicable terms, conditions, and requirements of Regulation D. MRG failed to  
18 comply with Rule 502(b) of Regulation D because it failed to provide certain non-financial statement  
19 information (such as the use of proceeds) and financial statements meeting the requirements of Regulation  
20 S-X of the Securities Act of 1933 to non-accredited investors prior to their purchase of MRG notes.  
21 Therefore, MRG failed to meet the requirements to claim the exemption available under Regulation D, Rule  
22 506.  
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1 39. Cirrus is not currently and has not previously been registered to sell its securities in the State of  
2 Washington and has not filed a claim of exemption.

3 40. Barrett was not registered as a securities salesperson or broker-dealer in the State of Washington  
4 during the period relevant to this Statement of Charges.

### 5 CONCLUSIONS OF LAW

6 Based upon the above Findings of Fact, the following Conclusions of Law are made:

7 1. The offer and/or sale of promissory notes, conversion rights, and stock described above constitute  
8 the offer or sale of a security as defined at RCW 21.20.005(14) and (17).

9 2. MRG violated RCW 21.20.140 because no registration for the offer or sale of its securities is on file  
10 with the Securities Administrator and no valid claim of exemption for such offers and sales existed.

11 3. Cirrus violated RCW 21.20.140 because no registration for the offer or sale of its securities is on file  
12 with the Securities Administrator.

13 4. Barrett violated RCW 21.20.040 by offering or selling said securities while not registered as a  
14 securities salesperson or broker-dealer in the State of Washington.

15 5. Barrett, MRG, and Cirrus each violated RCW 21.20.010 because, as set forth above, Barrett,  
16 MRG, and Cirrus, in connection with the offer or sale of securities, made untrue statements of material  
17 fact or omitted to state material facts necessary to make the statements made, in light of the  
18 circumstances under which they were made, not misleading. Such violation by Barrett is a ground for  
19 revocation of his investment adviser representative registration pursuant to RCW 21.20.110(1)(b).  
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21 6. Envision violated RCW 21.20.702 because, as set forth in paragraphs thirty-six through thirty-  
22 eight of the Tentative Findings of Fact, Envision recommended the purchase of securities without  
23 reasonable grounds to believe that the recommendation was suitable. Such conduct is a ground for  
24 revocation of Envision's investment adviser registration pursuant to RCW 21.20.110(1)(b). Such conduct  
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1 is also a ground to impose a fine against Envision pursuant to RCW 21.20.110(1)(b). Barrett, as  
2 Envision's sole member and president is the person who controls Envision for purposes of RCW  
3 21.20.110(6). The conduct described in this Conclusion of Law is a ground, pursuant to 21.20.110(6), for  
4 revocation of Barrett's investment adviser representative registration. The conduct is also a ground to  
5 impose a fine against Barrett pursuant to RCW 21.20.110(6).

6 7. Envision engaged in a dishonest or unethical practice, as defined by WAC 460-24A-220(1) and  
7 prohibited by RCW 21.20.020, and as set forth in paragraphs thirty-six through thirty-eight of the  
8 Tentative Findings of Fact, by recommending the purchase of securities without reasonable grounds to  
9 believe that the recommendation was suitable. Such conduct is a ground for revocation of Envision's  
10 investment adviser registration pursuant to RCW 21.20.110(1)(b) and 21.20.110(1)(g). Such conduct is  
11 also a ground to impose a fine against Envision pursuant to RCW 21.20.110(1)(b) and 21.20.110(1)(g).  
12 Such conduct is a ground, pursuant to 21.20.110(6), for revocation of Barrett's investment adviser  
13 representative registration. Such conduct is also a ground to impose a fine against Barrett pursuant to  
14 RCW 21.20.110(6).

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16 8. Envision engaged in a dishonest or unethical practice, as defined by WAC 460-24A-220(11) and  
17 prohibited by 21.20.020, by failing to disclose conflicts of interest to clients in writing as described in  
18 paragraph thirty-nine of the Tentative Findings of Fact. Such conduct is a ground for revocation of  
19 Envision's investment adviser registration pursuant to RCW 21.20.110(1)(b) and 21.20.110(1)(g). Such  
20 conduct is also a ground to impose a fine against Envision pursuant to RCW 21.20.110(b) and  
21 21.20.110(1)(g). Such conduct is a ground for revocation of Barrett's investment adviser representative  
22 registration pursuant to RCW 21.20.110(6). Such conduct is also a ground to impose a fine against  
23 Barrett pursuant to RCW 21.20.110(6).  
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1 9. Pursuant to RCW 21.20.050, 21.20.450, and WAC 460-24A-047, the Form ADV filings made by  
2 Envision with IARD on March 31, 2008, April 17, 2009, March 31, 2010, and March 30, 2011 constitute  
3 filings with the director for purposes of RCW 21.20.350.

4 10. Envision violated RCW 21.20.350 by making four filings with IARD that did not reflect Barrett's  
5 involvement with MRG and Cirrus or the conflicts of interest of arising therefrom as described in  
6 paragraphs forty and forty-one of the Tentative Findings of Fact. Such conduct is a ground for  
7 revocation of Envision's investment adviser registration pursuant to RCW 21.20.110(1)(b). Such conduct  
8 is also a ground to impose a fine against Envision pursuant to RCW 21.20.110(1)(b). Such conduct is a  
9 ground for revocation of Barrett's investment adviser representative registration pursuant to RCW  
10 21.20.110(6). Such conduct is also a ground to impose a fine against Barrett pursuant to RCW  
11 21.20.110(6).

### 12 **NOTICE OF INTENT TO ORDER THE RESPONDENTS TO CEASE AND DESIST**

13 Pursuant to RCW 21.20.390(1) and based upon the above Tentative Findings of Fact and  
14 Conclusions of Law, the Securities Administrator intends to order that MRG International, Inc. cease and  
15 desist from violations of RCW 21.20.140 and 21.20.010, that Cirrus Partners, Inc. cease and desist from  
16 violations of RCW 21.20.140 and 21.20.010, that Envision Retirement, LLC cease and desist from  
17 violations of RCW 21.20.020, 21.20.702 and 21.20.350, and that Stephen J. Barrett cease and desist from  
18 violations of RCW 21.20.140, 21.20.010., and 21.20.040.

### 19 **NOTICE OF INTENT TO IMPOSE FINES**

20 Pursuant to RCW 21.20.395 and 21.20.110, and based upon the above Tentative Findings of Fact  
21 and Conclusions of Law, the Securities Administrator intends to order that Respondents Envision  
22 Retirement, LLC, Stephen J. Barrett, MRG International, Inc., and Cirrus Partners, Inc. shall each be liable  
23 for and shall each pay a separate fine of \$10,000.  
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**NOTICE OF INTENT TO CHARGE COSTS**

Pursuant to RCW 21.20.390, and based upon the Tentative Findings of Fact and Conclusions of Law, the Securities Administrator intends to order that Respondents Envision Retirement, LLC, Stephen J. Barrett, MRG International, Inc., and Cirrus Partners, Inc. shall be jointly and severally liable for and shall pay investigative costs of \$10,000.

**NOTICE OF INTENT TO REVOKE REGISTRATIONS**

Pursuant to RCW 21.20.110, and based upon the Tentative Findings of Fact and Conclusions of Law, the Securities Administrator intends to revoke Envision Retirement, LLC's investment adviser registration and Stephen J. Barrett's investment adviser representative registration.

**AUTHORITY AND PROCEDURE**

This Statement of Charges is entered pursuant to the provisions of Chapter 21.20 RCW and is subject to the provisions of Chapter 34.05 RCW. The Respondents Envision Retirement, LLC, Stephen J. Barrett, MRG International, Inc., and Cirrus Partners, Inc. may each make a written request for a hearing as set forth in the NOTICE OF OPPORTUNITY TO DEFEND AND OPPORTUNITY FOR HEARING accompanying this Order. If a respondent does not make a hearing request in the time allowed, the Securities Administrator intends to adopt the above Tentative Findings of Fact and Conclusions of Law as final and to enter a permanent order to cease and desist as to that respondent, to impose any fines sought against that respondent, and to charge any costs sought against that respondent.

Signed and Entered this 25th day of October 2013.

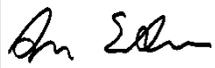


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William M. Beatty  
Securities Administrator

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Approved by:



Suzanne Sarason  
Chief of Enforcement

Presented by:



Edward R. Thunen  
Enforcement Attorney

Reviewed by:



Robert Kondrat  
Financial Legal Examiner Supervisor