

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

IN THE MATTER OF DETERMINING) Order No.: S-17-2328-18-FO01
Whether there has been a violation of the)
Business Opportunity Fraud Act of) ENTRY OF FINDINGS OF FACT AND
Washington by:) CONCLUSIONS OF LAW AND
) FINAL ORDER TO CEASE AND DESIST
Vincent Charles Palmer d/b/a carunlock.biz)
)
Respondent)
)

THE STATE OF WASHINGTON TO: Vincent Charles Palmer d/b/a carunlock.biz

On March 9, 2018, the Securities Administrator of the State of Washington issued Statement of Charges and Notice of Intent to Enter Order to Cease and Desist, Order No. S-17-2328-18-SC01 (hereinafter referred to as “Statement of Charges”). The Statement of Charges, together with a Notice of Opportunity to Defend and Opportunity for Hearing, hereinafter referred to as “Notice of Opportunity for Hearing” and an Application for Adjudicative Hearing, hereinafter referred to as “Application for Hearing,” was served on Respondent Vincent Charles Palmer on March 15, 2018. The Notice of Opportunity for Hearing advised Respondent Vincent Charles Palmer that a written application for an administrative hearing on the Statement of Charges must be received within twenty days from the date of receipt of the notice. Respondent Vincent Charles Palmer failed to request an administrative hearing within twenty days of receipt of the Statement of Charges and Notice of Opportunity for Hearing, either on the Application for Hearing provided, or otherwise.

The Securities Administrator therefore will adopt as final the following Findings of Fact and Conclusions of Law as set forth in the Statement of Charges and enter a Final Order against the Respondent to cease and desist from violations of the Business Opportunity Fraud Act.

1 The Securities Administrator makes the following Findings of Fact and Conclusions of Law:

2 **FINDINGS OF FACT**

3 **Respondent**

4 1. Vincent Charles Palmer (“Palmer”) is a resident of Houston, Texas. In November 2017,
5 Palmer sold an unregistered business opportunity to work as a “car unlock technician” to a Washington
6 resident.

7 **Nature of the Conduct**

8 2. In 2017, Palmer sold, for \$499, tools, training, website creation, search engine optimization
9 services (“SEO”), marketing assistance, and around-the-clock support to a Washington resident that would
10 have allowed him to begin a business opening locked cars. Palmer did not deliver any component of the
11 business opportunity to the Washington purchaser, nor did Palmer provide him a disclosure document.

12 Palmer offered this business opportunity through two advertisements on Craigslist, and through the website
13 carunlock.biz (the “website”). These unregistered offers included misleading statements concerning the
14 number of unlocking jobs that would be available, the income that a purchaser should expect, and the
15 absence of required licensure. The Washington purchaser viewed one of Palmer’s Craigslist advertisements
16 and visited the website prior to his purchase.

17 3. In late 2017, Palmer offered his business opportunity through advertisements that he placed in
18 Craigslist’s Bellingham and Seattle listings. The Seattle advertisement was captioned “Turnkey Service
19 Business For Sale Net 30k Per Year P/T-\$499.” The Seattle advertisement represented that “[purchasers]
20 will be...making \$50 [p]lus [p]er [j]ob!” The Seattle advertisement further stated that the business
21 opportunity was “legit,” and that it would produce “continuous solid income.”

22 4. In 2017, Palmer used the website carunlock.biz (the “website”) to offer his business
23 opportunity to the general public. The website represented that purchasers would be buying a complete
24 business for \$499. The website stated that purchasers would receive a professional tool kit, easy training,
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1 business cards, and “complete support.” The website further represented that purchasers would earn at least
2 \$700 per week, while working part time.

3 5. The website listed the components of the marketing assistance included in the business
4 opportunity: website design, website marketing, website hosting, placing an advertisement on Google, a
5 \$100 Google Adwords coupon, and SEO service to Google. The website represented that sixty days of
6 Palmer’s “[o]rganic SEO efforts” will result in a 50% increase in jobs per month.

7 6. Palmer made misleading statements about the number of jobs that potential purchasers could
8 expect to perform and the resulting income that they would earn. Palmer stated on the website that a
9 purchaser working part time who completed ten jobs each week could expect to earn \$21,000 per year, while
10 a purchaser, also working part time, who completed twenty-five jobs per week would earn \$50,000 per year.
11 Purchasers working full time and completing forty jobs per week would earn \$83,000. Palmer did not
12 disclose the factors that could significantly reduce the number of jobs that a potential purchaser could book,
13 and, consequently, the income that they would earn. Such factors include the population of the area in which
14 a potential purchaser would operate and the number of competitors already offering the service in that area.

15 7. Palmer made misleading statements concerning licensing requirements. In the Seattle
16 Craigslist advertisement and on the website, Palmer stated that there were no licensing requirements.
17 However, Palmer failed to disclose the risk that jurisdictions may require some licensure in the future.

18 **Securities Division’s Investigation**

19 8. On December 8, 2017, Palmer received a letter from the Securities Division that requested
20 information and documents related to Palmer’s activity in Washington. Palmer did not respond to this letter.

21 9. On January 17, 2018, Palmer received a subpoena from the Securities Division. The
22 subpoena commanded the production of documents related to Palmer’s activity in Washington. Palmer did
23 not respond to the subpoena.
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AUTHORITY AND PROCEDURE

This FINAL ORDER is entered pursuant to the provisions of RCW 19.110.150, and is subject to the provisions of Chapter 34.05 RCW. The Respondent has the right to petition the superior court for judicial review of this agency action under the provisions of RCW 34.05. For the requirements for Judicial Review, see RCW 34.05.510 and sections following.

WILLFUL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE.

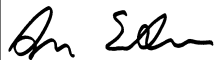
SIGNED and ENTERED this 9th day of May 2018.



William M. Beatty
Securities Administrator

Approved by:

Presented by:



Suzanne Sarason
Chief of Enforcement

Edward R. Thunen
Financial Legal Examiner

Reviewed by:



Robert Kondrat
Financial Legal Examiner Supervisor

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8 THE STATE OF WASHINGTON TO: Vincent Charles Palmer d/b/a carunlock.biz

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STATEMENT OF CHARGES

Please take notice that the Securities Administrator of the State of Washington has reason to believe that Respondent Vincent Charles Palmer d/b/a carunlock.biz has violated the Business Opportunity Fraud Act of Washington. The Securities Administrator believes those violations justify the entry of an order under RCW 19.110.150 against the Respondent to cease and desist from such violations. The Securities Administrator finds as follows:

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TENTATIVE FINDINGS OF FACT

Respondent

1. Vincent Charles Palmer ("Palmer") is a resident of Houston, Texas. In November 2017, Palmer sold an unregistered business opportunity to work as a "car unlock technician" to a Washington resident.

Nature of the Conduct

2. In 2017, Palmer sold, for \$499, tools, training, website creation, search engine optimization services ("SEO"), marketing assistance, and around-the-clock support to a Washington resident that would have allowed him to begin a business opening locked cars. Palmer did not deliver any component of the

1 business opportunity to the Washington purchaser, nor did Palmer provide him a disclosure document.
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13 9. On January 17, 2018, Palmer received a subpoena from the Securities Division. The
14 subpoena commanded the production of documents related to Palmer's activity in Washington. Palmer did
15 not respond to the subpoena.
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17 **Registration Status**

18 10. Palmer is not currently registered to sell his business opportunities in the State of
19 Washington, and has not previously been so registered.
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Based upon the above Tentative Findings of Fact, the following Conclusions of Law are made:

CONCLUSIONS OF LAW

1. The offer and/or sale of toolkits, training, and marketing assistance described above constitute the offer and/or sale of a business opportunity in Washington as defined in RCW 19.110.020 and RCW 19.110.030.

2. The offer and/or sale of said business opportunities violated RCW 19.110.050 because no registration for such offer is on file with the Securities Administrator.

3. The offer and/or sale of said business opportunities violated RCW 19.110.120 because Palmer made misstatements of material fact or omitted to state material facts in connection with the offer and/or sale of business opportunities.

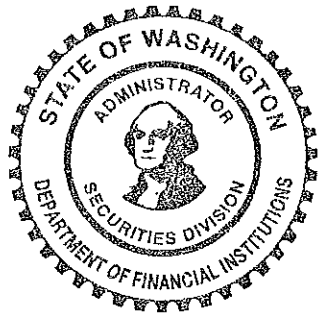
NOTICE OF INTENT TO ORDER THE RESPONDENT TO CEASE AND DESIST

Based upon the above Tentative Findings of Fact and Conclusions of Law, the Securities Administrator intends to order, pursuant to RCW 19.110.150, that Vincent Charles Palmer, and his agents and employees, each shall cease and desist from violations of RCW 19.110.050 and RCW 19.110.120.

AUTHORITY AND PROCEDURE

This Statement of Charges is entered pursuant to RCW 19.110.150, and is subject to the provisions of Chapter 34.05 RCW. The Respondent may 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 the 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 the Respondent.

Signed and Entered this 9th day of March 2018.



William M. Beatty

William M. Beatty
Securities Administrator

Approved by:

Suzanne Sarason

Suzanne Sarason
Chief of Enforcement

Presented by:

Edward R. Thunen

Edward R. Thunen
Financial Legal Examiner

Reviewed by:

Robert Kondrat

Robert Kondrat
Financial Legal Examiner Supervisor

