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

IN THE MATTER OF DETERMINING
whether there has been a violation
of the Securities Act of Washington by:

SDO - 11 - 02

SYNERGY ALLIANCE GROUP, LLC; LARRY W.
TANNER; their agents and employees,

SUMMARY ORDER TO CEASE AND DESIST AND
NOTICE OF INTENT TO IMPOSE FINES

Respondents.

Case No. 01-10-408

THE STATE OF WASHINGTON TO:

Synergy Alliance Group, LLC
Larry W. Tanner

STATEMENT OF CHARGES

Please take notice that the Securities Administrator of the State of Washington has reason to believe that the Respondents, Synergy Alliance Group, LLC and Larry W. Tanner, 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 to cease and desist from such violations. The Securities Administrator finds that delay in ordering the Respondents to cease and desist from such violations and imposing fines pursuant to RCW 21.20.390 and RCW 21.20.395 would be hazardous to the investors and to the public and that a Summary Order to Cease and Desist should be entered immediately. The Securities Administrator finds as follows:

SUMMARY ORDER TO CEASE AND DESIST
AND NOTICE OF INTENT TO IMPOSE FINES

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

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TENTATIVE FINDINGS OF FACT

I. Respondents

1. **SYNERGY ALLIANCE GROUP, LLC** (“SAG”) is a Florida for-profit limited liability company. SAG maintains a primary place of business at 1025 Semoran Blvd., Suite 1093, Winter Park, Florida, 32792. SAG is purportedly a venture capital company, and maintains an Internet website at www.synergyalliancegroup.com.

2. **LARRY W. TANNER** (“Tanner”) is the founder, Manager, and resident agent of SAG. Tanner maintains an office at 688 St. Johns Court, Winter Park, Florida, 32792.

II. Nature of the Offering

3. On or about Wednesday, October 24, 2001, a Securities Division investigator received an inquiry about SAG’s internet website via e-mail from a securities investigator in another state.

4. The Securities Division investigator reviewed the Internet website. During the review, the investigator found that the website contained an offer to sell securities. According to the website, SAG provides loans of up to \$250,000 to early stage companies. In order to raise money to make the loans, SAG offers “equity shares” to investors (called “Founding Members”) for \$ 0.05 per share. When a company repays a loan to SAG, SAG then purportedly buys back the equity shares from investors for as much as \$ 0.30 per share.

5. On or about October 26, 2001, the investigator sent a warning letter via certified mail to SAG and Tanner. The letter required a reply on or before November 5, 2001. To date, the Securities Division as not received a reply.

6. On or about November 14, 2001, the State of Pennsylvania issued a Cease & Desist Order (“the Pennsylvania Order”) against Respondents SAG and Tanner. The Pennsylvania Order required Respondents to immediately halt the offer and/or sale of securities to residents of Pennsylvania.

7. As of the date of entry of this summary order, Respondents were continuing to offer their investment opportunity at www.synergyalliancegroup.com.

1 8. The offering on Respondents' website failed to disclose material facts relating to the offering,
2 including but not limited to: the Pennsylvania Order against Respondents SAG and Tanner; information about the
3 use of investor proceeds; financial information, including financial statements, about SAG; and the risk factors
4 involved in the investment.

5 **III. Registration Status**

6 9. SAG and Tanner are not currently registered to offer or sell its securities in the State of Washington,
7 and have not previously been so registered.

8 10. SAG and Tanner are not currently registered as securities salespersons or broker/dealers in the State
9 of Washington, and none of them have previously been so registered.

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

11 **CONCLUSIONS OF LAW**

12 1. The offer and/or sale of equity shares by Respondents as set forth in the above Tentative Findings of
13 Fact, Section II, Paragraph 3 through 7, constitutes the offer and/or sale of a security as defined in RCW
14 21.20.005(10) and (12).

15 2. The offer and/or sale of said securities was made in violation of RCW 21.20.010, because, as set
16 forth in the above Tentative Findings of Fact, Section II, Paragraph 8, Respondents made untrue statements of
17 material fact and/or omitted to state material facts necessary in order to make the statements made, in light of the
18 circumstances under which they were made, not misleading.

19 3. The offer and/or sale of said securities by Respondents was made in violation of RCW 21.20.140
20 because no registration for such offer and/or sale is on file with the Securities Administrator of the state of
21 Washington.

22 4. Respondents SAG and Tanner have each violated RCW 21.20.040 by offering and/or selling said
23 securities while not being registered as broker-dealers or securities salespersons in the state of Washington.

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EMERGENCY

The Securities Administrator finds that an emergency exists and that the continued violations of RCW 21.20.010, RCW 21.20.140, and RCW 21.20.040 constitutes a threat to the investing public. Accordingly, a Summary Order to Cease and Desist from those violations is in the public interest and necessary for the protection of the investing public.

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SUMMARY ORDER

Based on the foregoing, NOW, THEREFORE, IT IS HEREBY SUMMARILY ORDERED that Synergy Alliance Group, LLC, Larry W. Tanner, and their agents and employees each cease and desist from violation of RCW 21.20.010, the anti-fraud section of the Securities Act.

It is further SUMMARILY ORDERED that Synergy Alliance Group, LLC, Larry W. Tanner, and their agents and employees each cease and desist from offering and/or selling securities in any manner in violation of RCW 21.20.140, by offering and/or selling unregistered securities.

It is further SUMMARILY ORDERED that Synergy Alliance Group, LLC, Larry W. Tanner, and their agents and employees, each cease and desist from violating RCW 21.20.040 by acting as acting as a securities broker-dealer or securities salesperson without being so registered.

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NOTICE OF INTENT TO IMPOSE FINES

Based upon the offer of unregistered securities to at least one Washington resident, by unregistered broker-dealers and/or salespersons, the misrepresentations and omissions contained in that offer, and upon the above Tentative Findings of Fact and Conclusions of Law, the Securities Administrator finds that one or more knowing or reckless violations of the Securities Act have occurred such that the imposition of fines is appropriate pursuant to RCW 21.20.395. Therefore, the Securities Administrator intends to order that Respondents shall be jointly and severally liable for and pay a fine in an amount not to exceed Five Thousand Dollars (\$5,000).

AUTHORITY AND PROCEDURE

This Order is entered pursuant to the provisions of RCW 21.20.390 and RCW 21.20.395, and is subject to the provisions of Chapter 34.05 RCW. The Respondents 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 request a hearing, the Securities Administrator intends to adopt the above Tentative Findings of Fact and Conclusions of Law as final, impose the fines sought, and make the Summary Order to Cease and Desist permanent as to that Respondent.

WILLFUL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE.

DATED this 4th day of February, 2002.



DEBORAH R. BORTNER
Securities Administrator

Approved by:

Presented by:

Michael E. Stevenson
Chief of Enforcement

Chad Standifer
Staff Attorney