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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 the State
of Washington by:

WILFRED KENT; WILFRED KENT &
ASSOCIATES; WILFRED KENT &
ASSOCIATES, LLC; JOSHUA PATTEN;
CHRISTIAN WOODHOUSE-KENT; their
employees and agents

Respondents.

SDO -018-02

SUMMARY ORDER TO CEASE AND DESIST

Case No. 01-07-0251

11 THE STATE OF WASHINGTON TO: Wilfred Kent
12 a.k.a. Wilfred Woodhouse-Kent
13 Wilfred Kent & Associates;
14 Wilfred Kent & Associates, LLC;
15 4920 S 107th St.
16 Tukwila, WA 98178

17 Joshua Patten
18 3990 129th Pl SE #C-304
19 Bellevue, WA 98006

20 Christian Woodhouse-Kent
21 4926 S 107th St.
22 Tukwila, WA 98178

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STATEMENT OF CHARGES

Please take notice that the Securities Administrator of the State of Washington has reason to believe that Respondents, Wilfred Kent (Kent), Wilfred Kent & Associates (WKA), Wilfred Kent & Associates, LLC (WKALLC), Joshua Patten (Patten) and Christian Woodhouse-Kent (Woodhouse-Kent) 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

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1 against each of them to cease and desist from such violations. The Securities Administrator finds that delay in ordering
2 the Respondents to cease and desist from such violations would be hazardous to the investors and to the public and that
3 a Summary Order to Cease and Desist should be entered immediately. The Securities Administrator finds as follows:

4 **TENTATIVE FINDINGS OF FACT**

5 **I. Respondents**

6 1. Wilfred Kent & Associates, LLC, a Washington Limited Liability Company, maintains business
7 addresses at 2100 Westlake Avenue North, #107, Seattle, Washington; 12819 SE 38th St. #237, Bellevue, Washington;
8 4920 S 107th St., Tukwila, Washington; and 8306 Wilshire Blvd. #92, Beverly Hills, California. WKALLC represents
9 itself as an international finance company that assists customers in making offshore investments.

10 2. Wilfred Kent & Associates, an unregistered business entity, maintains business addresses at 4920 S
11 107th St., Tukwila, Washington and 8306 Wilshire Blvd. #92, Beverly Hills, California.

12 3. Wilfred Kent is a principal in Wilfred Kent & Associates, LLC and Wilfred Kent & Associates.

13 4. Joshua Patten is a principal in Wilfred Kent & Associates, LLC and a representative of Wilfred Kent &
14 Associates.

15 5. Christian Woodhouse-Kent is a principal in Wilfred Kent & Associates, LLC.

16 **II. Offering**

17 6. Currently, the Respondents are offering high yield investments and private placement investments in the
18 state of Washington. The website www.wkallc.com, registered to WKALLC, states that WKALLC is “capable of
19 facilitating large scale project financing and the substantial placement of private funds” and “has formulated creative
20 investment solutions for clients”. Additionally, the website states that WKALLC specializes in structuring
21 specialized arrangements for investments of high net worth individuals, private and public corporations, governments
22 and non-profits throughout the world. The website states that Kent, Patten and Woodhouse-Kent are principals in
23 WKALLC. The Respondents also claim, based upon current contractual agreements with existing clients beginning
24 no later than January 1999, to be able to arrange financing for business ventures. The contracts between the
25 Respondents and the clients additionally state that once the financing is completed the Respondents will be able to

1 place a portion of the financing in high yield investments where the clients can receive a greater amount of money
2 through the profits of the high yield investment.

3 7. Beginning no later than June 2000 and continuing through at least November of 2000, Kent, Patten and
4 WKA, while in the state of Washington, caused an offer of an investment opportunity to be distributed to at least one
5 individual (the "investor").

6 8. The investor first met Kent, through Patten, in 1999. Kent told the investor that he was an "International
7 Financier" who has been in business since 1963. Kent stated that he had the ability to place investor funds in exclusive
8 "high-yield investment programs" through his years of experience in international finance. Kent explained that
9 extraordinarily high rates of return could be obtained through the "inter-bank" trading system used by large European
10 banks. Kent further explained that this system is not open to the general public and that to enter the trading system,
11 investors are required to have very large sums of money ready to invest.

12 9. The investor was told by Kent that the investment consisted of two parts, placing the investor funds into
13 a trust account controlled by WKA, and the subsequent placement of the funds in the trust account into a high yield
14 investment. In addition to the investor's funds, the trust account would include the funds of additional investors, brought
15 in by WKA, with the intention of reaching an account balance of \$10,000,000. Once the trust account reached a balance
16 of \$10,000,000 the entire balance would be placed into a "regular high-yield investment program". According to the
17 offering material provided by Kent and Patten, and statements by Kent, until the \$10,000,000 balance was achieved the
18 investor would receive a guaranteed 20% annual return, paid monthly, that it usually takes between two months to five
19 months to aggregate the required \$10,000,000 and that WKA is currently placing other investors funds in high yield
20 investments and had done so in the past. The offering material entitled "\$10M Aggregated Funds Program Outline" (the
21 "Outline") signed by both the investor and Kent states that the investor would receive 350% return on her investment
22 over a twelve-month period if \$1,000,000 were invested with WKA. The investor was told that this particular
23 investment required a minimum investment of \$25,000, and that the annual return on the investment varied from 100%
24 to 350%, depending on the amount of money invested. Based upon these representations the investor deposited or
25 caused to be deposited \$1,000,000 in offshore accounts controlled by Kent.

1 IV. Scheme to Defraud

2 14. Notwithstanding the Respondents' representations regarding the investment opportunity, the
3 Securities and Exchange Commission and other federal regulatory agencies such as the Federal Reserve Board, the
4 Federal Deposit Insurance Corp., the National Credit Union Administration, the Office of the Comptroller of the
5 Currency, and the Office of Thrift Supervision have indicated that financial investments denominated as "high-yield
6 investment programs" that bear high yields obtained through inter-bank trading by banks are not bona fide financial
7 investments and that the purported existence of such investments have been advanced for the purpose of defrauding
8 investors.

9 V. Registration Status

10 15. The offer and/or sale of securities issued by or held by WKA or WKALLC is not registered under the
11 Securities Act of Washington nor has the offer and/or sale previously been so registered.

12 16. Kent, Patten and Woodhouse-Kent are not currently registered as securities salespersons, investment
13 advisers or broker-dealers in the state of Washington and neither have previously been so registered.

14 Based upon the foregoing Tentative Findings of Fact the following Conclusions of Law are made.

15 **CONCLUSIONS OF LAW**

16 I. Securities

17 17. The offer and/or sale of the investment opportunities described above constitutes the offer and/or sale of
18 a security as defined in RCW 21.20.005 (10) and (12).

19 II. Anti-Fraud Provision

20 18. The offer and/or sale of said securities was made in violation of RCW 21.20.010 because the
21 Respondents made misstatements of material fact or omitted to state material facts necessary in order to make the
22 statements made, in the light of the circumstances under which they were made, not misleading.
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1 III. Registration of Securities

2 19. The offer and/or sale of said securities is in violation of RCW 21.20.140, the registration section of the
3 Securities Act, because no registration for such offer and/or sale is on file with the Securities Administrator of the state of
4 Washington.

5 IV. Registration of Broker-Dealer and Salespersons

6 20. Respondents, Wilfred Kent, Wilfred Kent & Associates, Wilfred Kent & Associates, LLC, Joshua
7 Patten and Christian Woodhouse-Kent have each violated RCW 21.20.040 by offering and/or selling said securities
8 while not being registered as a broker-dealer or securities salesperson in the state of Washington.

9 **EMERGENCY**

10 The Securities Administration finds that an emergency exists and that the continued offers or sales of said
11 purported investment opportunities in violation of RCW 21.20.010, RCW 21.20.140, and RCW 21.20.040, constitute a
12 threat to the investing public. Accordingly, a Summary Order to Cease and Desist from those violations is in the public
13 interest and necessary for the protection of the investing public.

14 **SUMMARY ORDER**

15 Based upon the foregoing, IT IS THEREFORE HEREBY SUMMARILY ORDERED that Respondents,
16 Wilfred Kent, Wilfred Kent & Associates, Wilfred Kent & Associates, LLC, Joshua Patten, Christian Woodhouse-Kent,
17 their agents, and employees shall each cease and desist from violating RCW 21.20.010, the anti-fraud section of the
18 Securities Act.

19 It is further SUMMARILY ORDERED that Respondent, Wilfred Kent & Associates, Wilfred Kent &
20 Associates, LLC, their agents, and employees shall each cease and desist from violating RCW 21.20.140, the securities
21 registration section of the Securities Act.

22 It is further SUMMARILY ORDERED that Respondents, Wilfred Kent, Joshua Patten, Christian Woodhouse-
23 Kent, their agents, and employees shall each cease and desist from violating RCW 21.20.040, the securities broker-
24 dealer, securities salesperson registration section of the Securities Act.

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1 **AUTHORITY AND PROCEDURE**

2 This Order is entered pursuant to the provisions of RCW 21.20.390, and is subject to the provisions of Chapter
3 34.05 RCW. The Respondents, Wilfred Kent, Wilfred Kent & Associates, Wilfred Kent & Associates, LLC, Joshua
4 Patten and Christian Woodhouse-Kent may each make a written request for a hearing as set forth in the NOTICE OF
5 OPPORTUNITY TO DEFEND AND OPPORTUNITY FOR HEARING accompanying this Order. A request for a
6 hearing should be in writing and sent to Deborah R. Bortner, Securities Administrator, Department of Financial
7 Institutions, P.O. Box 9033, Olympia, Washington 98507-9033.

8 If a respondent does not request a hearing, the Securities Administrator intends to adopt the above Tentative
9 Findings of Fact and Conclusions of Law as final and make the Summary Order to Cease and Desist permanent as to that
10 Respondent.

11 **CONTINUING INVESTIGATION**

12 The Securities Division is continuing to investigate the practices of the Respondents, Kent, WKA, WKALLC,
13 Patten and Woodhouse-Kent to determine the full extent of the violations of the Securities Act that have occurred in this
14 matter.

15 WILLFUL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE.

16 DATED this 27th day of March, 2002

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19 _____
20 DEBORAH R. BORTNER
21 Securities Administrator

22 Approved by:

23 Presented by:

24 _____
25 Michael E. Stevenson
26 Chief of Enforcement

27 _____
Tyler Letey
Staff Attorney

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