

**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:

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

Respondents.

SDO - 32 - 02

ENTRY OF FINDINGS OF FACT AND
CONCLUSIONS OF LAW AND FINAL ORDER
TO CEASE AND DESIST AND IMPOSING FINES

Case No. 01-10-408

THE STATE OF WASHINGTON TO:

Synergy Alliance Group, LLC
Larry W. Tanner

On February 4, 2002, the Securities Administrator of the State of Washington issued Summary Order to Cease and Desist and Notice of Intent to Impose Fines SDO-11-02 hereinafter referred to as the "Summary Order." The Summary Order provided notice, pursuant to RCW 21.20.395, of the Division's intent to impose a \$5,000 fine jointly and severally against Respondents Synergy Alliance Group, LLC and Larry W. Tanner.

The Summary Order, 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"), were personally served on Respondents Synergy Alliance Group, LLC and Larry W. Tanner on March 13, 2002. Affidavits of service are on file with the Division. The Notice of Opportunity for Hearing advised Respondents that they had twenty days from the date they received the notice to file a written application for an administrative hearing on the Summary Order. The Order further advised that if any Respondent did not request a hearing, as to that Respondent, the Securities Administrator intended to adopt the Tentative Findings of Fact and Conclusions of Law set forth in the Order as final and impose the fines sought.

ENTRY OF FINDINGS OF FACT AND CONCLUSIONS OF
LAW AND FINAL ORDER TO CEASE AND DESIST AND
IMPOSING FINES

1

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

1 Respondents Synergy Alliance Group, LLC and Larry W. Tanner each failed to request an administrative
2 hearing within twenty days of its receipt of the Summary Order and Notice of Opportunity for Hearing, either on the
3 Application for Hearing provided or otherwise.

4 The Securities Administrator therefore adopts as final the findings of fact and conclusions of law as set forth in
5 the Summary Order.

6 The Securities Administrator makes the following findings of fact and conclusions of law:

7 **FINDINGS OF FACT**

8 **I. Respondents**

9 1. **SYNERGY ALLIANCE GROUP, LLC** (“SAG”) is a Florida for-profit limited liability company.
10 SAG maintains a primary place of business at 1025 Semoran Blvd., Suite 1093, Winter Park, Florida, 32792. SAG
11 is purportedly a venture capital company, and maintains an Internet website at www.synergyalliancegroup.com.
12

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

15 **II. Nature of the Offering**

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

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

1 Administrator, Department of Financial Institutions, PO Box 9033, Olympia, Washington 98507-9033; and (d)
2 submitted with a cover letter that identifies Synergy Alliance Group, LLC and Larry W. Tanner as Respondents
3 under these proceedings, and the Order and case number of these proceedings.

4 **AUTHORITY AND PROCEDURE**

5 This Order is entered pursuant to the provisions of RCW 21.20.390 and RCW 21.20.395, and is subject to
6 the provisions of Chapter 34.05 RCW. A certified copy of this order filed in Superior Court shall be treated in the
7 same manner as a Superior Court judgment, and may be recorded, enforced, or satisfied in like manner.
8 Accordingly, if filed, Respondents will be liable for costs and interest on the amount of judgment at a rate of 12% per
9 annum, and may be liable for attorney fees.

10
11
12 **WILLFUL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE.**

13
14 DATED this 17th day of April, 2002.

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16 

17 _____
18 DEBORAH R. BORTNER
19 Securities Administrator

20 Approved by:

20 Presented by:

21
22 _____
23 Rex Staples
24 Senior Enforcement Attorney for
25 Michael E. Stevenson
26 Chief of Enforcement

21
22 _____
23 Chad Standifer
24 Staff Attorney