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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 Business Opportunity Fraud Act of the
State of Washington by:

Internext Idea, Inc., dba Travel Navigator™,
Phillip W. Moss, their employees and agents,

Respondents.

SDO - 51 - 99

CONSENT ORDER

Case No. 99-01-0015

THE STATE OF WASHINGTON TO:

Internext Idea, Inc., dba Travel Navigator™
Phillip W. Moss
3025 Lincoln Court
Garland, TX 75041

INTRODUCTION

The Securities Division, Department of Financial Institutions, State of Washington, and Respondents do hereby agree to this Consent Order in settlement of the matters alleged herein. Respondents neither admit nor deny the Tentative Findings of Fact and Conclusions of Law as set forth below.

TENTATIVE FINDINGS OF FACT

I.

Respondents Internext Idea, Inc., dba Travel Navigator™, and Phillip W. Moss maintain a principal business address at 3025 Lincoln Court, Garland, Texas. Respondent Internext Idea, Inc., dba Travel Navigator™, is the seller of an opportunity that enables purchasers to earn income by becoming travel consultants and providing Internet-based or online travel services for leisure travelers, including vacation packages, airline tickets, car rentals, hotels and cruises (the “travel consultant opportunity”). Phillip W. Moss is the President of Internext Idea, Inc., dba Travel Navigator™.

II.

CONSENT ORDER

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

Internext Idea, Inc., dba Travel Navigator™

1 On or about May 11, 1998, Internext Idea, Inc., dba Travel Navigator™, conducted or caused to be
2 conducted a seminar in Seattle, Washington, which was billed as an “Internet Success Seminar.” At the
3 seminar, representatives of Respondent Internext Idea, Inc., dba Travel Navigator™, promoted the travel
4 consultant opportunity as a means of earning additional income. Respondents did not provide a written
5 disclosure document containing complete material information regarding the travel consultant opportunity
6 and Internext Idea, Inc., dba Travel Navigator™, including but not limited to a financial statement of the
7 seller, to prospective purchasers of the travel consultant opportunity attending the seminar.

8 A Renton, Washington couple was induced to purchase the travel consultant opportunity for \$495
9 plus tax. at the May 11, 1998 Seattle, Washington “Internet Success Seminar.” The purchase order form
10 executed in connection with the transaction contained, in part, the following language:

11 You may request a refund or cancel this transaction up to a maximum of twelve (12) month from the
12 date of this transaction, minus a 10% restocking fee. Sales Tax, shipping and handling charges are
not included in the twelve month policy...

13 The Renton, Washington couple subsequently became dissatisfied with the travel consultant opportunity and
14 submitted a complaint in December, 1998, to the Office of the Attorney General of Washington, a copy of
15 which was forwarded to the Securities Division.

16 On January 26, 1999, an investigator with the Securities Division sent a letter via the United States
17 Mail to Phillip Moss of Internet Success Seminar (Travel Navigator) at the Garland, Texas, address noted
18 above advising Mr. Moss of the existence of Washington’s Business Opportunity Fraud Act and warning that
19 “any person who proposes to sell or lease a business opportunity must register unless exempt prior to
20 advertising, soliciting, or making any offer, sale or lease in this state.” The January 26, 1999 letter concluded
21 with the following language:

22 It would appear from the seminars that you conducted, that you may inadvertently be offering an
23 unregistered business opportunity. If this is the case, you must immediately cease and desist
24 activities in the State of Washington until registration is effective. If you have any sales or leases
with respect to your offering, you are directed to furnish the Securities Division with the names
addresses and telephone numbers of the vendees...

1 No response was received by the Securities Division concerning the investigator's January 26, 1999 letter.
2 However, notwithstanding the letter, Phillip W. Moss of Internext Idea, Inc., dba Travel Navigator™,
3 continues to solicit Washington purchasers. In late March, 1999, an analyst with the Securities Division
4 received via United States Mail at her Maple Valley, Washington residence an unsolicited invitation from
5 Phillip Moss as "President - Travel Navigator™" to attend one of three Travel Navigator™ "Internet Success
6 Workshops" being held in Tacoma, Bellevue, and Tukwila, Washington, in early April, 1999.

7 III.

8 Internext Idea, Inc., dba Travel Navigator™, is not currently registered with the Washington
9 Securities Division to offer or sell business opportunities in the state of Washington and has not
10 previously been so registered.

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

12 CONCLUSIONS OF LAW

13 I.

14 The offer and/or sale of the travel consultant opportunity described in Tentative Findings of Fact I
15 and II constitutes the offer and/or sale of a business opportunity as defined in RCW 19.110.020(1).

16 II.

17 The offer and/or sale of the travel consultant opportunity described in Tentative Findings of Fact I
18 and II was made in violation of RCW 19.110.070 and RCW 19.110.120 because Respondents failed to
19 provide prospective purchasers, including at least the Renton, Washington couple, with a complete
20 disclosure document containing material information regarding the travel consultant opportunity and
21 Internext Idea, Inc., dba Travel Navigator™, including, but not limited to, a financial statement for the
22 seller.

23 III.

24 The offer and/or sale of the travel consultant opportunity as described in Tentative Findings of
Fact I through III was made in violation of RCW 19.110.050(1) because no business opportunity

1 registration has been made nor a permit issued to Respondent for the offer and/or sale of the business
2 opportunity in this state.

3 ORDER AND CONSENT

4 Based on the premised of the foregoing,
5 IT IS THEREFORE AGREED AND ORDERED That Respondents Internext Idea, Inc., dba Travel
6 Navigator™, Phillip W. Moss, and their agents and employees shall each cease and desist from offering
7 and/or selling business opportunities in violation of RCW 19.110.070 and RCW 19.110.120, the
8 disclosure document and antifraud provisions of the Business Opportunity Fraud Act, respectively.

9 IT IS THEREFORE AGREED AND ORDERED That Internext Idea, Inc., dba Travel Navigator™,
10 Phillip W. Moss, and their agents and employees shall each cease and desist from offering and/or selling
11 business opportunities in violation of RCW 19.110.050(1), the registration requirement provision of the
12 Business Opportunity Fraud Act.

13 IT IS THEREFORE AGREED AND ORDERED That Respondent Internext Idea, Inc., dba Travel
14 Navigator™, shall disclose the existence and contents of this Order in any business opportunity registration
15 disclosure document approved for use in the state of Washington, such requirement commencing from the
16 date of entry of this Order.

17 IT IS THEREFORE AGREED AND ORDERED That Respondent Internext Idea, Inc., dba Travel
18 Navigator™, shall inform all of its agents and employees who offer business opportunities in the state of
19 Washington of the existence and contents of this Order for a period of three years from the date of entry of
20 this Order.

21
22 IT IS THEREFORE AGREED AND ORDERED That Respondent Internext Idea, Inc., dba Travel
23 Navigator™, shall reimburse the Securities Division \$300 for its costs of investigation of this matter, payable
24 prior to the Division's entry of this Order.

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IT IS THEREFORE AGREED That Respondents Internext Idea, Inc., dba Travel Navigator™, and Phillip W. Moss each waive their rights to hearings in this matter.

IT IS THEREFORE ORDERED That upon entry of this Order by the Securities Division, Summary Order to Cease and Desist SDO-24A-99, entered April 23, 1999, is vacated.

Phillip W. Moss, as President of Internext Idea, Inc., dba Travel Navigator™, and individually:

Signed this _____ day of _____, 1999.

(Signature)

This Order entered by the Securities Division this _____ day of _____, 1999.

Deborah R. Bortner
Securities Administrator

Presented by: _____
Brad Ferber
Securities Examiner

Approved by: _____
Michael E. Stevenson
Chief of Compliance

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