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

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IN THE MATTER OF DETERMINING
Whether there has been a violation
of the Business Opportunity Fraud Act of
Washington by:

WEALTH BUILDERS INTERNATIONAL, LLC;
JEFFREY CHARLTON; and their agents and
employees,

Respondents.

SDO - 48A - 00

SUMMARY ORDER TO CEASE AND DESIST

Case No. 00-01-012

THE STATE OF WASHINGTON TO: Wealth Builders International, LLC
 Jeffrey Charlton
 153 Chesterfield Industrial Blvd.
 Chesterfield, MO 63005-1219

STATEMENT OF CHARGES

Please take notice that the Securities Administrator of the State of Washington has reason to believe that Respondents, Wealth Builders International, LLC and Jeffrey Charlton, have violated the Business Opportunity Fraud Act of Washington and that their violations justify the entry of an order of the Securities Administrator under RCW 19.110.150 to cease and desist from such violations. The Securities Administrator finds that delay in ordering the Respondents to cease and desist from such violations 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:

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SUMMARY ORDER TO CEASE AND DESIST
WEALTH BUILDERS INTERNATIONAL, LLC

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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

1.2 WEALTH BUILDERS INTERNATIONAL, LLC (hereinafter “Wealth Builders”) is a Limited Liability Company organized in Missouri. Wealth Builders maintains a principal office at 115 Woods Mill Road, Manchester, Missouri, and has a business addresses at 153 Chesterfield Ind. Blvd., St. Louis, Missouri. Wealth Builders is the seller of an opportunity that involves payment for participating in a sales program described in the publication entitled the “The Ultimate International Wealth Building System.”

1.2 JEFFREY CHARLTON is the President and Chief Executive Officer (CEO) of Wealth Builders International, LLC.

II. NATURE OF OFFERING

2.1 From February of 1998 until at least February of 2000, Respondents Wealth Builders and Jeffrey Charlton mailed or caused to be mailed a promotional flyer describing their opportunity to at least four hundred and thirty-one residents of the state of Washington. The flyer stated, in part:

GET 10 PAYCHECKS EACH MONTH . . .

This program will be the last money making system you will ever need. The International Wealth Building System (IWBS) can put immediate cash in your hands while giving you the opportunity to build a phenomenal residual income the grows and grows, month after month . . .

With this system, a person can create **SHORT TERM FINANCIAL SUCCESS, and REAL LONG TERM WEALTH and FINANCIAL SECURITY.**

2.2 The Wealth Builders’ program is described in this eight page promotional flyer as a “specific, cash-generating, workable plan that you can operate from your kitchen table and never leave your home.” The flyer repeatedly emphasizes the potential to earn income by participating in the IWBS program, but how income will be made is not described with any specificity. The flyer merely states that “this is a direct mail (mail order) business,” and describes the business as “information publishing.”

1 2.3 The flyer requires that offerees send a fee of \$39.97 to enroll with Wealth Builders and to receive their
2 publication entitled the “The Ultimate International Wealth Building System” (IWBS). The flyer also provides the
3 following guarantee:

4 At any time, for any reason, or for no reason at all, I feel the International Wealth Building System is not the
5 greatest wealth building system I have ever seen, I can return the system, even if it is terrible condition, and I will
6 get a prompt refund of the purchase price less shipping and handling.

7 2.4 Wealth Builders also maintains a website, located at <http://www.iwbs.com>, making substantially the same
8 offer described above.

9 2.5 At least four hundred and thirty-one Washington residents sent an enrollment fee to Wealth Builders
10 between February 1998 and February 2000. Upon payment of this fee, these persons were sent a booklet in the
11 mail from Wealth Builders entitled “The Ultimate International Wealth Building System.”

12 2.6 Among other things, “The Ultimate International Wealth Building System” contains offers to invest in
13 several different “home based business opportunities” that are described in the booklet. One such offer involves an
14 opportunity referred to as the “International Wealth Building System Marketing Plan - Direct Mail Co-op,” and is
15 described as “the best business opportunity today . . .for most people.”

16 2.7 As part of the “International Wealth Building System Marketing Plan - Direct Mail Co-op,” offerees are
17 invited to participate in either the “\$25 program” or the “\$10 program.” These programs involve Wealth Builders
18 mailing sales letters selling the booklet “The Ultimate International Wealth Building System” to other persons on
19 behalf of offerees. To participate in the “\$25 program” offerees are required to purchase a minimum of 500 sales
20 letters at \$0.899 each from Wealth Builders. To participate in the “\$10 program” offerees are required to purchase
21 a minimum of 500 sales letters at \$0.628 each from Wealth Builders. Depending on whether the \$25 program or
22 the \$10 program is chosen, offerees are promised \$25 or \$10 for every booklet sold on their behalf.

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III. MISREPRESENTATIONS AND OMISSIONS

No other disclosure document containing material information regarding the opportunity and Wealth Builders International, LLC accompanied or was referenced in the flyer, including, but not limited to, a current financial statement of the Wealth Builders International, LLC.

IV. REGISTRATION STATUS

Wealth Builders International, LLC is not currently registered to sell its business opportunities in the state of Washington and has not previously been so registered.

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

CONCLUSIONS OF LAW

I.

The offer and/or sale of the opportunity as described above constitutes the offer and/or sale of a business opportunity as defined in RCW 19.110.020(1).

II.

The offer and/or sale of said business opportunity was made in violation of RCW 19.110.070 and RCW 19.110.120, the disclosure document and antifraud provisions of the Business Opportunity Fraud Act, respectively, because Respondents failed to provide prospective purchasers a complete disclosure document containing complete material information regarding the opportunity, including but not limited to a financial statement of the seller.

III.

The offer and/or sale of said income opportunity is in violation of RCW 19.110.050(1) because Wealth Builders International, LLC's business opportunity is not and has not been registered with the Administrator of Securities, prior to the advertising, soliciting, or making of any offer and/or sale of the business opportunity in this state.

IV.

The Securities Administrator finds that an emergency exists, that the continued violations of RCW 19.110.050(1), RCW 19.110.070 and RCW 19.110.120 constitute a threat to the investing public, and that a summary order to cease and desist from those violations are in the public interest and necessary for the protection of the investing public.

SUMMARY ORDER

Based on the foregoing, IT IS THEREFORE HEREBY SUMMARILY ORDERED That Wealth Builders International, LLC, Jeffrey Charlton, and their agents and employees, each cease and desist from offering and/or selling business opportunities in any manner in violation of RCW 19.110.050 (1), the section of the Business Opportunity Fraud Act requiring registration.

It is further SUMMARILY ORDERED that respondents, Wealth Builders International, LLC, Jeffrey Charlton, and their agents and employees each cease and desist from violation of RCW 19.110.170 and RCW 19.110.120, the disclosure document and antifraud provisions, respectively, of the Business Opportunity Fraud Act.

AUTHORITY AND PROCEDURE

This Order is entered pursuant to the provisions of RCW 19.110.150, 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. A request for a hearing should be in writing and sent to Deborah R. Bortner, Securities Administrator, Department of Financial Institutions, P.O. Box 9033, Olympia, Washington 98507-9033 to the attention of Chad Standifer.

1 If a respondent does not request a hearing, the Securities Administrator intends to adopt the above Tentative
2 Findings of Fact and Conclusions of Law as final and make the summary order to cease and desist permanent as to
3 that respondent.

4 WILLFUL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE.

5 DATED this _____ day of April, 2000.

6
7 _____
8 DEBORAH R. BORTNER
9 Securities Administrator

10 Approved By:

Presented by:

11 _____
12 Michael E. Stevenson
13 Chief of Compliance

14 _____
15 Chad Standifer
16 Securities Examiner

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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 by:

Jeffrey Charlton, WEALTH BUILDERS
INTERNATIONAL, LLC, LLC, and their agents
and employees,

Respondents.

SDO - 48B(1) - 00

NOTICE OF OPPORTUNITY TO DEFEND AND
OPPORTUNITY FOR HEARING

Case No. 00-01-0012

THE STATE OF WASHINGTON TO:

Attn: Wealth Builders International, LLC
153 Chesterfield Industrial Blvd.
Chesterfield, MO 63005-1219

YOU ARE HEREBY NOTIFIED that a SUMMARY ORDER TO CEASE AND DESIST (“the Order”), a true and correct copy of which is attached and made part hereof, has been entered against you by the Washington State Department of Financial Institutions, Securities Division.

YOU ARE HEREBY NOTIFIED that you may file an application for an adjudicative hearing before an administrative law judge as Presiding Officer, upon the allegations supporting and ground for the agency action as set forth in the Order. YOUR APPLICATION MUST BE RECEIVED BY THE SECURITIES DIVISION WITHIN TWENTY (20) DAYS FROM THE DATE THAT YOU RECEIVE THIS NOTICE. If you demand a hearing, you will be notified of the date, time, and hearing location will be mailed to you at least seven (7) days in advance.

At the hearing, you may appear personally, and by counsel, if you desire. The hearing will be recorded and will be conducted according to the Administrative Procedure Act, Ch. 34.05 RCW. The primary concern of the Administrative Law Judge, and, ultimately, the Director of the Department of Financial Institutions, will be to determine the truth of the matters asserted in the Order. Technical rules of evidence will not be binding at the hearing except for the rules of privilege recognized by law. You have the right to present evidence and witnesses

NOTICE OF OPPORTUNITY TO DEFEND AND
OPPORTUNITY FOR HEARING

WEALTH BUILDERS INTERNATIONAL, LLC

1

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

1 in your own behalf who will be subject to cross examination, to cross examine those witnesses presented in
2 support of the Order, to examine such documentary evidence as may be produced against you, and to conduct
3 discovery as is authorized in such proceedings. You may require the attendance of witnesses by subpoena,
4 pursuant to RCW 34.05.446. If you are limited English-speaking or hearing impaired, you have the right to have
5 an interpreter appointed at no cost to you, as discussed below.

6 INTERPRETER AVAILABILITY. If you or a witness for you is a person who, because of non-English-
7 speaking cultural background, cannot readily speak or understand the English language, or if you or a witness for
8 you is a person who, because of a hearing impairment or speech defect, cannot readily understand or communicate
9 in spoken language, including persons who are deaf, deaf and blind, or hard of hearing, AND YOU NEED AN
10 INTEPRETER, then a qualified interpreter will be appointed at not cost to you or to the witness. You may request
11 the appointment of a qualified interpreter by indicating your request on the attached Application for Adjudicative
12 Hearing form.

13 YOU ARE FURTHER NOTIFIED that if the Department of Financial Institutions does not RECEIVE the
14 Application for Adjudicative Hearing form within twenty (20) days from the date you receive this notice, this will
15 constitute a waiver of your right to a hearing in accordance with Ch. 34.05 RCW, and the director will find that
16 you do not contest the allegations of the Summary Order. Upon such a finding by the director, a final order will be
17 immediately entered disposing of this matter and ordering you to cease and desist as described in the Summary
18 Order. If you desire a hearing in this matter, please return the attached Application for Adjudicative Hearing to:

19 Washington State Department of Financial Institutions
20 Securities Division
21 Attn: Chad Standifer
22 P.O. Box 9033
23 Olympia, WA 98507-9033

24 DATED this _____ day of April, 2000.

25 _____
26 DEBORAH R. BORTNER
27 Securities Administrator

**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 by:

WEALTH BUILDERS INTERNATIONAL, LLC,
LLC, Jeffrey Charlton, and their agents and
employees,

Respondents.

SDO - 48B(2) - 00

NOTICE OF OPPORTUNITY TO DEFEND AND
OPPORTUNITY FOR HEARING

Case No. 00-01-0012

THE STATE OF WASHINGTON TO:

Attn: Jeffrey Charlton
Wealth Builders International, LLC
153 Chesterfield Industrial Blvd.
Chesterfield, MO 63005-1219

YOU ARE HEREBY NOTIFIED that a SUMMARY ORDER TO CEASE AND DESIST (“the Order”), a true and correct copy of which is attached and made part hereof, has been entered against you by the Washington State Department of Financial Institutions, Securities Division.

YOU ARE HEREBY NOTIFIED that you may file an application for an adjudicative hearing before an administrative law judge as Presiding Officer, upon the allegations supporting and ground for the agency action as set forth in the Order. YOUR APPLICATION MUST BE RECEIVED BY THE SECURITIES DIVISION WITHIN TWENTY (20) DAYS FROM THE DATE THAT YOU RECEIVE THIS NOTICE. If you demand a hearing, you will be notified of the date, time, and hearing location will be mailed to you at least seven (7) days in advance.

At the hearing, you may appear personally, and by counsel, if you desire. The hearing will be recorded and will be conducted according to the Administrative Procedure Act, Ch. 34.05 RCW. The primary concern of the Administrative Law Judge, and, ultimately, the Director of the Department of Financial Institutions, will be to determine the truth of the matters asserted in the Order. Technical rules of evidence will not be binding at the hearing except for the rules of privilege recognized by law. You have the right to present evidence and witnesses

NOTICE OF OPPORTUNITY TO DEFEND AND
OPPORTUNITY FOR HEARING

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

WEALTH BUILDERS INTERNATIONAL, LLC

1 in your own behalf who will be subject to cross examination, to cross examine those witnesses presented in
2 support of the Order, to examine such documentary evidence as may be produced against you, and to conduct
3 discovery as is authorized in such proceedings. You may require the attendance of witnesses by subpoena,
4 pursuant to RCW 34.05.446. If you are limited English-speaking or hearing impaired, you have the right to have
5 an interpreter appointed at no cost to you, as discussed below.

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7 speaking cultural background, cannot readily speak or understand the English language, or if you or a witness for
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9 in spoken language, including persons who are deaf, deaf and blind, or hard or hearing, AND YOU NEED AN
10 INTEPRETER, then a qualified interpreter will be appointed at not cost to you or to the witness. You may request
11 the appointment of a qualified interpreter by indicating your request on the attached Application for Adjudicative
12 Hearing form.

13 YOU ARE FURTHER NOTIFIED that if the Department of Financial Institutions does not RECEIVE the
14 Application for Adjudicative Hearing form within twenty (20) days from the date you receive this notice, this will
15 constitute a waiver of your right to a hearing in accordance with Ch. 34.05 RCW, and the director will find that
16 you do not contest the allegations of the Summary Order. Upon such a finding by the director, a final order will be
17 immediately entered disposing of this matter and ordering you to cease and desist as described in the Summary
18 Order. If you desire a hearing in this matter, please return the attached Application for Adjudicative Hearing to:

19 Washington State Department of Financial Institutions
20 Securities Division
21 Attn: Chad Standifer
22 P.O. Box 9033
23 Olympia, WA 98507-9033

24 DATED this _____ day of April, 2000.

25 _____
26 DEBORAH R. BORTNER
27 Securities Administrator

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

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IN THE MATTER OF DETERMINING
Whether there has been a violation
of the Business Opportunity Fraud Act by:

WEALTH BUILDERS INTERNATIONAL, LLC,
LLC, Jeffrey Charlton, and their agents and
employees,

Respondents.

SDO - 48C(1) - 00

APPLICATION FOR ADJUDICATIVE
HEARING

Case No. 00-01-0012

THE STATE OF WASHINGTON TO:

Attn: Wealth Builders International, LLC
153 Chesterfield Industrial Blvd.
Chesterfield, MO 63005-1219

If you wish to contest the Summary Order to Cease and Desist and have an adjudicative hearing, you must sign,
date, and return this form within twenty (20) days of the date you received it, to:

Washington State Department of Financial Institutions
Securities Division
Attn: Chad Standifer
P.O. Box 9033
Olympia, WA 98507-9033

FAILURE TO RETURN THIS FORM SO THAT IT IS RECEIVED BY THE DEPARTMENT OF
FINANCIAL INSTITUTIONS WITHIN TWENTY (20) DAYS OF THE DATE YOU RECEIVED IT WILL
CONSTITUTE A DEFAULT AND WILL RESULT IN THE LOSS OF YOUR RIGHT TO AN ADJUDICATIVE
HEARING. In that case, the Director of the Department of Financial Institutions will immediately enter an
appropriate order in disposition of the Summary Order.

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APPLICATION FOR ADJUDICATIVE HEARING
WEALTH BUILDERS INTERNATIONAL, LLC

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

1 INSTRUCTIONS: Check the box beside your desired response. Mail this document as set forth above.

2
3 I.

4 I request a hearing in this matter.

5 I do not request a hearing in this matter.

6 II.

7 I [WILL] [WILL NOT] be represented by an attorney. His/her name, address, and telephone number are:

8 _____
9 _____

10 III.

11 I [REQUEST] [DO NOT REQUEST] that a qualified interpreter be appointed at no cost to me to interpret
12 for (myself) or (my witness(es)). My, or my witness's(es'), primary language is _____
13 (identify language). My, or my witness's(es'), hearing impaired status is _____ (identify
14 hearing impaired status). I understand that a qualified interpreter will be appointed at no cost to me or to my
15 witness(es).

16 IV.

17 You have the right: To demand an adjudicative hearing, to be represented by an attorney at your own
18 expense; and to subpoena witnesses to the hearing or subpoena the production of books or documents, and to
19 otherwise defend against the Summary Order.

20 WARNING: FAILURE TO COMPLETE AND MAIL THIS DOCUMENT SO THAT IT IS RECEIVED
21 BY THE SECURITIES DIVISION WITHIN 20 DAYS AFTER YOUR RECEIPT OF THE SUMMARY ORDER
22 WILL RESULT IN THE DISPOSITION OF THIS CASE AS AUTHORIZED BY RCW 34.05.440.

23 //

24 //

Dated this _____ day of April, 2000.

**** Sign ****

Address:

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 by:

WEALTH BUILDERS INTERNATIONAL, LLC,
LLC, Jeffrey Charlton, and their agents and
employees,

Respondents.

SDO - 48C(2) - 00

APPLICATION FOR ADJUDICATIVE
HEARING

Case No. 00-01-0012

THE STATE OF WASHINGTON TO:

Attn: Jeffrey Charlton
Wealth Builders International, LLC
153 Chesterfield Industrial Blvd.
Chesterfield, MO 63005-1219

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Securities Division
Attn: Chad Standifer
P.O. Box 9033
Olympia, WA 98507-9033

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APPLICATION FOR ADJUDICATIVE HEARING
WEALTH BUILDERS INTERNATIONAL, LLC

1

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

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Dated this _____ day of April, 2000.

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**** Sign ****

Address:
