

State of Missouri
Office of Secretary of State

Case No. AP-09-14

IN THE MATTER OF:

JAMES STALEY, WEALTH FINANCIAL
INTERNATIONAL, LLC; B&B EQUITY GROUP, LLC
a/k/a, B\$B EQUITY GROUP, LLC a/k/a, B and B
EQUITY GROUP; ROBERT KOPPEL;
GLOBAL EQUITY RESOURCES, LLC; GLOBAL
EQUITY PRESERVATION, INC. a/k/a GLOBAL
EQUITY PRESERVATION TRUST, AND
ROBERT L. EBERLE,

Respondents.

**FINAL ORDER TO CEASE AND DESIST AND ORDER IMPOSING CIVIL
PENALTIES AND COSTS AS TO ALL RESPONDENTS, DISGORGEMENT AS TO
RESPONDENTS JAMES STALEY AND WEALTH FINANCIAL INTERNATIONAL,
LLC, AND RESTITUTION AS TO RESPONDENTS B&B EQUITY GROUP, LLC
A/K/A B\$B EQUITY GROUP, LLC A/K/A B AND B EQUITY GROUP, ROBERT
KOPPEL, GLOBAL EQUITY RESOURCES, LLC, GLOBAL EQUITY
PRESERVATION, INC. A/K/A GLOBAL EQUITY PRESERVATION TRUST, AND
ROBERT L. EBERLE**

On October 7, 2011, the Enforcement Section of the Securities Division of the Office of Secretary of State (the "Enforcement Section"), by and through Assistant Commissioner, Mary Hosmer, submitted a Petition for Final Order to Cease and Desist and Payment of Civil Penalties and Costs as to All Respondents Disgorgement as to Respondents James Staley and Wealth Financial International, LLC, and Restitution as to Respondents B&B Equity Group, LLC a/k/a B\$B Equity Group, LLC a/k/a B and B Equity Group, Robert Koppel, Global Equity Resources, LLC, Global Equity Preservation, Inc. a/k/a Global Equity Preservation Trust, and Robert L. Eberle (the "Petition"). After reviewing the Petition, the Commissioner issues the following findings of facts, conclusion of law and order:

PROCEDURAL BACKGROUND

1. On March 12, 2009, Lori J. Neidel, then Chief Enforcement Counsel for the Securities Division and on behalf of the Enforcement Section, submitted a Petition for Order to Cease and Desist and Order to Show Cause Why Civil Penalties and Costs Should Not Be Imposed (the "C&D Petition") in the above-styled matter.
2. On March 27, 2009, Ms. Neidel submitted an Amendment to the Petition for Order to Cease and Desist and Order to Show Cause Why Civil Penalties and Costs Should Not Be Imposed (the "Amendment to C&D Petition").
3. On March 31, 2009, the Commissioner issued an Order to Cease and Desist and Order to Show Cause Why Civil Penalties and Costs Should Not Be Imposed against Respondents (the "C&D Order").
4. On May 1, 2009, Respondents James Staley, Wealth Financial International, LLC, B&B Equity Group, LLC a/k/a B\$B Equity Group, LLC a/k/a B and B Equity Group, Robert Koppel, Global Equity Resources, LLC, Global Equity Preservation, Inc. a/k/a Global Equity Preservation Trust, and Robert L. Eberle, submitted a Request for Hearing through their then counsel, Jennifer Griffin.
5. On May 11, 2009, the Commissioner issued an order setting a hearing in this matter for August 14, 2009.
6. On June 5, 2009, Nathan Soendker, then Acting Chief Enforcement Counsel for the Missouri Securities Division and on behalf of the Enforcement Section, filed a Motion for Continuance of Pre-Hearing Conference.
7. On June 9, 2009, Ms. Griffin, on behalf of Respondents James Staley, Wealth Financial International, LLC, B&B Equity Group, LLC a/k/a B\$B Equity Group, LLC a/k/a B and B Equity Group, Robert Koppel, Global Equity Resources, LLC, Global Equity Preservation, Inc. a/k/a Global Equity Preservation Trust, and Robert L. Eberle, filed a Motion for Continuance of Hearing.
8. On June 10, 2009, the Commissioner continued the hearing in this matter to August 27, 2009.
9. On August 26, 2009, Mr. Soendker filed a Motion for Continuance of Hearing, and stated that discovery had not been

completed in this matter and that counsel for Respondents had no objection to a continuance.

10. On August 26, 2009, the Commissioner continued the hearing in this matter to November 5, 2009.
11. On November 4, 2009, Ms. Griffin, on behalf of Respondents James Staley, Wealth Financial International, LLC, B&B Equity Group, LLC a/k/a BSB Equity Group, LLC a/k/a B and B Equity Group, Robert Koppel, Global Equity Resources, LLC, Global Equity Preservation, Inc. a/k/a Global Equity Preservation Trust, and Robert L. Eberle, filed an Unopposed Motion for Continuance. That motion stated that the parties were trying to negotiate a settlement and that the Enforcement Section consented to a continuance.
12. On November 5, 2009, the Commissioner continued the hearing in this matter to January 15, 2010.
13. On January 8, 2010, Ms. Griffin, on behalf of Respondents James Staley, Wealth Financial International, LLC, B&B Equity Group, LLC a/k/a BSB Equity Group, LLC a/k/a B and B Equity Group, Robert Koppel, Global Equity Resources, LLC, Global Equity Preservation, Inc. a/k/a Global Equity Preservation Trust, and Robert L. Eberle, filed an Unopposed Motion for Continuance. That motion stated that the parties were continuing to try to negotiate a settlement and that the Enforcement Section consented to a continuance.
14. On January 14, 2010, the Commissioner continued the hearing in this matter to February 26, 2010.
15. On February 25, 2010, Ms. Griffin, on behalf of Respondents James Staley, Wealth Financial International, LLC, B&B Equity Group, LLC a/k/a BSB Equity Group, LLC a/k/a B and B Equity Group, Robert Koppel, Global Equity Resources, LLC, Global Equity Preservation, Inc. a/k/a Global Equity Preservation Trust, and Robert L. Eberle, and Mr. Soendker, on behalf of the Enforcement Section, filed a Joint Motion for Continuance. That motion stated that the parties were engaged in continuing settlement discussions.
16. On February 26, 2010, the Commissioner continued the hearing in this matter to May 27, 2010.
17. On May 27, 2010, Kristine Kauffin, as Deputy Enforcement Counsel for and on behalf of the Enforcement Section, filed a Motion for Continuance of Hearing, and stated that the parties were pursuing a settlement in the matter and had postponed discovery, and that counsel for Respondents has no objection to a continuance.
18. On May 27, 2010, the Commissioner continued the hearing in this matter to August 18, 2010.
19. On August 17, 2010, Mr. Soendker, on behalf of the Enforcement Section, filed a Motion for Continuance of Hearing, and stated that the parties were pursuing a settlement in the matter and had postponed discovery, and that counsel for Respondents has no objection to a continuance.
20. On August 18, 2010, the Commissioner continued the hearing in this matter to November 18, 2010.
21. On November 17, 2010, Mr. Soendker, on behalf of the Enforcement Section, filed a Motion for Continuance of Hearing, and stated that the parties were pursuing a settlement in the matter and were continuing to engage in discovery, and that counsel for Respondents had no objection to a continuance.
22. On November 18, 2010, the Commissioner continued the hearing in this matter to February 10, 2011.
23. On February 9, 2011, Mr. Soendker, on behalf of the Enforcement Section, filed a Motion for Continuance of Hearing, and stated that the parties were pursuing a settlement in the matter, that additional time was required to evaluate and address certain issues, and that counsel for Respondents had no objection to a continuance.
24. On February 14, 2011, the Commissioner continued the hearing in this matter to May 11, 2011.
25. On May 11, 2011, Mr. Soendker, on behalf of the Enforcement Section, filed a Motion for Continuance of the Hearing as to Respondents James Staley and Wealth Financial International, LLC (the "May 2011 Motion").
26. In the May 2011 Motion, Mr. Soendker stated that counsel for all Respondents withdrew on April 13, 2011, and that Respondents Staley and Wealth Financial International, LLC, had continued to work toward a settlement with the Enforcement Section. Mr. Soendker stated that the purpose of the May 2011 Motion was to allow for ongoing discussions with Respondents Staley and Wealth Financial International, LLC.
27. In the May 2011 Motion, Mr. Soendker stated that the remaining Respondents had not engaged in discovery or indicated an intent to seek a continuance of the hearing in this matter.
28. On May 11, 2011, the Commissioner held the hearing in this matter and noted that he would grant the May 2011 Motion continuing the hearing only as to Respondents Staley and Wealth Financial International, LLC. The Commissioner then conducted the hearing as to all other Respondents.
29. No Respondent appeared at the May 11 hearing, nor was any Respondent represented by counsel at the same.

30. During the hearing, Mr. Soendker stated that the Enforcement Section had requested the depositions of both Mr. Koppel and Mr. Eberle and that both Mr. Koppel and Mr. Eberle had failed to appear for these depositions.
31. During the hearing, Mr. Soendker presented the testimony of Securities Division Investigator Lea Crawford, who testified without objection. Ms. Crawford stated, among other things, that:
 - a. she was the investigator on this matter for the Enforcement Section;
 - b. the Enforcement Section received an investor complaint;
 - c. Ms. Crawford investigated this investor complaint;
 - d. Ms. Crawford's investigation revealed, among other things, that:
 - i. Respondents were engaged in an insurance funding program;
 - ii. through this funding program Respondents solicited investors to pay insurance premiums through a master premium funding agreement on the life of an insured person;
 - iii. this master premium funding agreement was sold by Respondent Staley as an agent for the other Respondents;
 - iv. there were eleven (11) Missouri investors in this premium funding investments;
 - v. each investor was a member of an LLC organized under a name that bore the insured person's name;
 - vi. at least forty percent of the investor funds were paid for commissions and fees to Respondents;
 - vii. the amount of these commissions and fees were not disclosed to the investors;
 - viii. the remaining investor funds went to various insurance companies to fund life insurance premiums for the insured;
 - ix. at the end of two years investors were told that the life insurance policy would be resold and the investor would be paid a profit of up to thirty percent (30%) on their investment;
 - x. investors were not informed of any risks;
 - xi. investors were not informed that they were investing in an LLC interest;
 - xii. no investor received a return on their investment; and
 - xiii. the Respondents were not registered to sell securities in Missouri.
32. In addition to Ms. Crawford's testimony, Mr. Soendker introduced fourteen (14) exhibits relating to these investments and asked the Commissioner to take judicial notice of the Commissioner's own records that the securities at issue were not registered in Missouri.
33. No Respondent filed any pleading with regard to the May 11, 2011 hearing.
34. On May 12, 2011, the Commissioner continued the hearing in this matter as to Respondents Staley and Wealth Financial International, LLC to August 10, 2011, further stating that the Order of Continuance did not apply to or in any manner delay, suspend or otherwise impact the hearing in this matter as to Respondents B&B Equity Group, LLC a/k/a BSB Equity Group, LLC a/k/a B and B Equity Group, Robert Koppel, Global Equity Resources, LLC, Global Equity Preservation, Inc. a/k/a Global Equity Preservation Trust, or Robert L. Eberle.
35. On July 8, 2011, Respondent James Staley sent an email to Mary S. Hosmer, Assistant Commissioner, stating that James Staley was withdrawing his request for a hearing on behalf of Mr. Staley and Wealth Financial International, LLC.
36. A copy of Respondent Staley's July 8 email was submitted to the Commissioner.
37. In the Petition, the Enforcement Section requested a Final Order to Cease and Desist as to all Respondents.
38. In the Petition, the Enforcement Section requested that the Commissioner issue an order imposing a civil penalty in the amount of ten thousand dollars (\$10,000) against each Respondent for multiple violations of Section 409.3-301, RSMo. (Cum. Supp. 2009).
39. In the Petition, the Enforcement Section requested that the Commissioner issue an order imposing a civil penalty in the amount of ten thousand dollars (\$10,000) against each Respondent for violations of Section 409.4-401(a), RSMo. (Cum. Supp. 2009).
40. In the Petition, the Enforcement Section requested that the Commissioner issue an order imposing a civil penalty in the amount

of ten thousand dollars (\$10,000) against each Respondent for violations of Section 409.4-402(a), RSMo. (Cum. Supp. 2009).

41. In the Petition, the Enforcement Section requested that the Commissioner issue an order imposing a civil penalty in the amount of ten thousand dollars (\$10,000) against each Respondent for violations of Section 409.5-501, RSMo. (Cum. Supp. 2009).
42. In the Petition, the Enforcement Section requested that the Commissioner issue an order requiring Respondent James Staley and Respondent Wealth Financial International, LLC, to disgorge commissions in the amount of three hundred fifty thousand dollars (\$350,000).
43. In the Petition, the Enforcement Section requested that the Commissioner issue an order requiring Respondents B&B Equity Group, LLC a/k/a B&B Equity Group, LLC a/k/a B and B Equity Group, Robert Koppel, Global Equity Resources, LLC, Global Equity Preservation, Inc. a/k/a Global Equity Preservation Trust, and Robert L. Eberle to pay restitution in the amount of two million five hundred seventy-four thousand seven hundred and seven dollars (\$2,574,707).
44. In the Petition, the Enforcement Section requested that the Commissioner issue an order requiring the Respondents to pay the costs of the investigation in this matter in the amount of seven thousand eight hundred eighty-five dollars (\$7,885).

FINDINGS OF FACT

45. The Commissioner adopts and incorporates the Findings of Fact, paragraphs 1 through 47, in the C&D Order.
46. The Commissioner adopts and incorporates, as additional and supplementary findings of fact, paragraphs 26 through 27, 29 through 30, and 33 through 36, above.

CONCLUSION OF LAW

47. The Commissioner adopts and incorporates the Conclusions of Law, paragraphs 63 through 85, in the C&D Order.
48. This Order is in the public interest and consistent with the purposes intended by the Missouri Securities Act of 2003.

ORDER

NOW, THEREFORE, it is hereby **ORDERED** that:

- A. The Cease and Desist Order entered in Case Number AP-09-14 on March 31, 2009, is **FINAL**.
- B. Pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), Respondent James Staley shall pay a civil penalty in the amount of five thousand dollars (\$5,000) to the State of Missouri for multiple violations of Section 409.3-301, RSMo. (Cum. Supp. 2009). This amount shall be made payable to the State of Missouri and paid within thirty (30) days of the date of this Order. The Secretary of State shall forward these funds to the state treasury for the benefit of county and township school funds as provided in Article IX, Section 7 of the Constitution of Missouri. Respondent James Staley shall deliver this payment to the Securities Division, at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.
- C. Pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), Respondent Wealth Financial International, LLC, shall pay a civil penalty in the amount of five thousand dollars (\$5,000) to the State of Missouri for multiple violations of Section 409.3-301, RSMo. (Cum. Supp. 2009). This amount shall be made payable to the State of Missouri and paid within thirty (30) days of the date of this Order. The Secretary of State shall forward these funds to the state treasury for the benefit of county and township school funds as provided in Article IX, Section 7 of the Constitution of Missouri. Respondent Wealth Financial International, LLC, shall deliver this payment to the Securities Division, at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.
- D. Pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), Respondent B&B Equity Group, LLC a/k/a B&B Equity Group, LLC a/k/a B and B Equity Group, shall pay a civil penalty in the amount of ten thousand dollars (\$10,000) to the State of Missouri for multiple violations of Section 409.3-301, RSMo. (Cum. Supp. 2009). This amount shall be made payable to the State of Missouri and paid within thirty (30) days of the date of this Order. The Secretary of State shall forward these funds to the state treasury for the benefit of county and township school funds as provided in Article IX, Section 7 of the Constitution of Missouri. Respondent B&B Equity Group, LLC a/k/a B&B Equity Group, LLC a/k/a B and B Equity Group, shall deliver this payment to the Securities Division, at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.
- E. Pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), Respondent Robert Koppel shall pay a civil penalty in the amount of ten thousand dollars (\$10,000) to the State of Missouri for multiple violations of Section 409.3-301, RSMo. (Cum. Supp. 2009). This amount shall be made payable to the State of Missouri and paid within thirty (30) days of the date of this Order. The Secretary of State shall forward these funds to the state treasury for the benefit of county and township school funds as provided in Article IX, Section 7 of the Constitution of Missouri. Respondent Robert Koppel shall deliver this payment to the Securities Division, at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.
- F. Pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), Respondent Global Equity Resources, LLC, shall pay a civil

penalty in the amount of ten thousand dollars (\$10,000) to the State of Missouri for multiple violations of Section 409.3-301, RSMo. (Cum. Supp. 2009). This amount shall be made payable to the State of Missouri and paid within thirty (30) days of the date of this Order. The Secretary of State shall forward these funds to the state treasury for the benefit of county and township school funds as provided in Article IX, Section 7 of the Constitution of Missouri. Respondent Global Equity Resources, LLC, shall deliver this payment to the Securities Division, at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.

- G. Pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), Respondent Global Equity Preservation, Inc. a/k/a Global Equity Preservation Trust, shall pay a civil penalty in the amount of ten thousand dollars (\$10,000) to the State of Missouri for multiple violations of Section 409.3-301, RSMo. (Cum. Supp. 2009). This amount shall be made payable to the State of Missouri and paid within thirty (30) days of the date of this Order. The Secretary of State shall forward these funds to the state treasury for the benefit of county and township school funds as provided in Article IX, Section 7 of the Constitution of Missouri. Respondent Global Equity Preservation, Inc. a/k/a Global Equity Preservation Trust, shall deliver this payment to the Securities Division, at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.
- H. Pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), Respondent Robert L. Eberle shall pay a civil penalty in the amount of ten thousand dollars (\$10,000) to the State of Missouri for multiple violations of Section 409.3-301, RSMo. (Cum. Supp. 2009). This amount shall be made payable to the State of Missouri and paid within thirty (30) days of the date of this Order. The Secretary of State shall forward these funds to the state treasury for the benefit of county and township school funds as provided in Article IX, Section 7 of the Constitution of Missouri. Respondent Robert L. Eberle shall deliver this payment to the Securities Division, at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.
- I. Pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), Respondent James Staley shall pay a civil penalty in the amount of two thousand dollars (\$2,000) to the State of Missouri for multiple violations of Section 409.4-401(a), RSMo. (Cum. Supp. 2009). This amount shall be made payable to the State of Missouri and paid within thirty (30) days of the date of this Order. The Secretary of State shall forward these funds to the state treasury for the benefit of county and township school funds as provided in Article IX, Section 7 of the Constitution of Missouri. Respondent James Staley shall deliver this payment to the Securities Division, at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.
- J. Pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), Respondent Wealth Financial International, LLC, shall pay a civil penalty in the amount of two thousand dollars (\$2,000) to the State of Missouri for multiple violations of Section 409.4-401(a), RSMo. (Cum. Supp. 2009). This amount shall be made payable to the State of Missouri and paid within thirty (30) days of the date of this Order. The Secretary of State shall forward these funds to the state treasury for the benefit of county and township school funds as provided in Article IX, Section 7 of the Constitution of Missouri. Respondent Wealth Financial International, LLC, shall deliver this payment to the Securities Division, at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.
- K. Pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), Respondent B&B Equity Group, LLC a/k/a B&B Equity Group, LLC a/k/a B and B Equity Group, shall pay a civil penalty in the amount of four thousand dollars (\$4,000) to the State of Missouri for multiple violations of Section 409.4-401(a), RSMo. (Cum. Supp. 2009). This amount shall be made payable to the State of Missouri and paid within thirty (30) days of the date of this Order. The Secretary of State shall forward these funds to the state treasury for the benefit of county and township school funds as provided in Article IX, Section 7 of the Constitution of Missouri. Respondent B&B Equity Group, LLC a/k/a B&B Equity Group, LLC a/k/a B and B Equity Group, shall deliver this payment to the Securities Division, at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.
- L. Pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), Respondent Robert Koppel shall pay a civil penalty in the amount of four thousand dollars (\$4,000) to the State of Missouri for multiple violations of Section 409.4-401(a), RSMo. (Cum. Supp. 2009). This amount shall be made payable to the State of Missouri and paid within thirty (30) days of the date of this Order. The Secretary of State shall forward these funds to the state treasury for the benefit of county and township school funds as provided in Article IX, Section 7 of the Constitution of Missouri. Respondent Robert Koppel shall deliver this payment to the Securities Division, at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.
- M. Pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), Respondent Global Equity Resources, LLC, shall pay a civil penalty in the amount of four thousand dollars (\$4,000) to the State of Missouri for multiple violations of Section 409.4-401(a), RSMo. (Cum. Supp. 2009). This amount shall be made payable to the State of Missouri and paid within thirty (30) days of the date of this Order. The Secretary of State shall forward these funds to the state treasury for the benefit of county and township school funds as provided in Article IX, Section 7 of the Constitution of Missouri. Respondent Global Equity Resources, LLC, shall deliver this payment to the Securities Division, at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.
- N. Pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), Respondent Global Equity Preservation, Inc., a/k/a Global Equity Preservation Trust, shall pay a civil penalty in the amount of four thousand dollars (\$4,000) to the State of Missouri for multiple violations of Section 409.4-401(a), RSMo. (Cum. Supp. 2009). This amount shall be made payable to the State of Missouri and paid within thirty (30) days of the date of this Order. The Secretary of State shall forward these funds to the state treasury for the benefit of county and township school funds as provided in Article IX, Section 7 of the Constitution of Missouri. Respondent Global Equity Preservation, Inc., a/k/a Global Equity Preservation Trust, shall deliver this payment to

the Securities Division, at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.

- O. Pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), Respondent Robert L. Eberle shall pay a civil penalty in the amount of four thousand dollars (\$4,000) to the State of Missouri for multiple violations of Section 409.4-401(a), RSMo. (Cum. Supp. 2009). This amount shall be made payable to the State of Missouri and paid within thirty (30) days of the date of this Order. The Secretary of State shall forward these funds to the state treasury for the benefit of county and township school funds as provided in Article IX, Section 7 of the Constitution of Missouri. Respondent Robert L. Eberle shall deliver this payment to the Securities Division, at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.
- P. Pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), Respondent James Staley shall pay a civil penalty in the amount of two thousand dollars (\$2,000) to the State of Missouri for multiple violations of Section 409.4-402(a), RSMo. (Cum. Supp. 2009). This amount shall be made payable to the State of Missouri and paid within thirty (30) days of the date of this Order. The Secretary of State shall forward these funds to the state treasury for the benefit of county and township school funds as provided in Article IX, Section 7 of the Constitution of Missouri. Respondent James Staley shall deliver this payment to the Securities Division, at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.
- Q. Pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), Respondent James Staley shall pay a civil penalty in the amount of five thousand dollars (\$5,000) to the State of Missouri for multiple violations of Section 409.5-501, RSMo. (Cum. Supp. 2009). This amount shall be made payable to the State of Missouri and paid within thirty (30) days of the date of this Order. The Secretary of State shall forward these funds to the state treasury for the benefit of county and township school funds as provided in Article IX, Section 7 of the Constitution of Missouri. Respondent James Staley shall deliver this payment to the Securities Division, at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.
- R. Pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), Respondent Wealth Financial International, LLC, shall pay a civil penalty in the amount of five thousand dollars (\$5,000) to the State of Missouri for multiple violations of Section 409.5-501, RSMo. (Cum. Supp. 2009). This amount shall be made payable to the State of Missouri and paid within thirty (30) days of the date of this Order. The Secretary of State shall forward these funds to the state treasury for the benefit of county and township school funds as provided in Article IX, Section 7 of the Constitution of Missouri. Respondent Wealth Financial International, LLC, shall deliver this payment to the Securities Division, at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.
- S. Pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), Respondent B&B Equity Group, LLC a/k/a B&B Equity Group, LLC a/k/a B and B Equity Group, shall pay a civil penalty in the amount of ten thousand dollars (\$10,000) to the State of Missouri for multiple violations of Section 409.5-501, RSMo. (Cum. Supp. 2009). This amount shall be made payable to the State of Missouri and paid within thirty (30) days of the date of this Order. The Secretary of State shall forward these funds to the state treasury for the benefit of county and township school funds as provided in Article IX, Section 7 of the Constitution of Missouri. Respondent B&B Equity Group, LLC a/k/a B&B Equity Group, LLC a/k/a B and B Equity Group, shall deliver this payment to the Securities Division, at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.
- T. Pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), Respondent Robert Koppel shall pay a civil penalty in the amount of ten thousand dollars (\$10,000) to the State of Missouri for multiple violations of Section 409.5-501, RSMo. (Cum. Supp. 2009). This amount shall be made payable to the State of Missouri and paid within thirty (30) days of the date of this Order. The Secretary of State shall forward these funds to the state treasury for the benefit of county and township school funds as provided in Article IX, Section 7 of the Constitution of Missouri. Respondent Robert Koppel shall deliver this payment to the Securities Division, at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.
- U. Pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), Respondent Global Equity Resources, LLC, shall pay a civil penalty in the amount of ten thousand dollars (\$10,000) to the State of Missouri for multiple violations of Section 409.5-501, RSMo. (Cum. Supp. 2009). This amount shall be made payable to the State of Missouri and paid within thirty (30) days of the date of this Order. The Secretary of State shall forward these funds to the state treasury for the benefit of county and township school funds as provided in Article IX, Section 7 of the Constitution of Missouri. Respondent Global Equity Resources, LLC, shall deliver this payment to the Securities Division, at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.
- V. Pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), Respondent Global Equity Preservation, Inc. a/k/a Global Equity Preservation Trust, shall pay a civil penalty in the amount of ten thousand dollars (\$10,000) to the State of Missouri for multiple violations of Section 409.5-501, RSMo. (Cum. Supp. 2009). This amount shall be made payable to the State of Missouri and paid within thirty (30) days of the date of this Order. The Secretary of State shall forward these funds to the state treasury for the benefit of county and township school funds as provided in Article IX, Section 7 of the Constitution of Missouri. Respondent Global Equity Preservation, Inc. a/k/a Global Equity Preservation Trust, shall deliver this payment to the Securities Division, at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.
- W. Pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), Respondent Robert Eberle shall pay a civil penalty in the amount of ten thousand dollars (\$10,000) to the State of Missouri for multiple violations of Section 409.5-501, RSMo. (Cum. Supp. 2009). This amount shall be made payable to the State of Missouri and paid within thirty (30) days of the date of this Order. The Secretary of State shall forward these funds to the state treasury for the benefit of county and township school

funds as provided in Article IX, Section 7 of the Constitution of Missouri. Respondent Robert Eberle shall deliver this payment to the Securities Division, at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.

- X. Pursuant to Section 409.6-604(d)(2), RSMo. (Cum. Supp. 2009), Respondent James Staley and Respondent Wealth Financial International, LLC, shall disgorge commissions in the amount of three hundred fifty thousand dollars (\$350,000) as profits arising from violations of Sections 409.3-301, 409.4-401(a), 409.4-402(a), and 409.5-501, RSMo. (Cum. Supp. 2009), by Respondent Staley and Wealth Financial International, LLC. Respondents Staley and Wealth Financial International, LLC, shall be jointly and severally liable for this amount. This amount shall be made payable to the Missouri Secretary of State's Investor Restitution Fund, and the Commissioner will take reasonable and necessary actions to distribute such funds to those persons referenced in Exhibit A. This amount shall be paid within thirty (30) days of the date of this Order. Respondent James Staley and Respondent Wealth Financial International, LLC, shall deliver this payment to the Securities Division at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.
- Y. Pursuant to Section 409.6-604(d)(2), RSMo. (Cum. Supp. 2009), Respondents B&B Equity Group, LLC a/k/a B&B Equity Group, LLC a/k/a B and B Equity Group, Robert Koppel, Global Equity Resources, LLC, Global Equity Preservation, Inc. a/k/a Global Equity Preservation Trust, and Robert L. Eberle, shall pay restitution in the amount of two million five hundred seventy-four thousand seven hundred and seven dollars (\$2,574,707) for the amount of actual damages caused by the conduct of Respondents B&B Equity Group, LLC a/k/a B&B Equity Group, LLC a/k/a B and B Equity Group, Robert Koppel, Global Equity Resources, LLC, Global Equity Preservation, Inc. a/k/a Global Equity Preservation Trust, and Robert L. Eberle, arising from violations of Sections 409.3-301, 409.4-401(a), and 409.5-501, RSMo. (Cum. Supp. 2009). Respondents B&B Equity Group, LLC a/k/a B&B Equity Group, LLC a/k/a B and B Equity Group, Robert Koppel, Global Equity Resources, LLC, Global Equity Preservation, Inc. a/k/a Global Equity Preservation Trust, and Robert L. Eberle shall be jointly and severally liable for this amount. This amount shall be made payable to the Missouri Secretary of State's Investor Restitution Fund, and the Commissioner will take reasonable and necessary actions to distribute such funds to those persons referenced in Exhibit A and injured by the acts and violations. This amount shall be paid within thirty (30) days of the date of this Order. Respondent shall deliver this payment to the Securities Division at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.
- Z. Pursuant to Section 409.6-604(e), RSMo. (Cum. Supp. 2009), Respondent James Staley, Respondent Wealth Financial International, LLC, Respondent B&B Equity Group, LLC a/k/a B&B Equity Group, LLC a/k/a B and B Equity Group, Respondent Robert Koppel, Respondent Global Equity Resources, LLC, Respondent Global Equity Preservation, Inc. a/k/a Global Equity Preservation Trust, and Respondent Robert Eberle shall pay the additional sum of seven thousand eight hundred eighty-five dollars (\$7,885) as reimbursement for costs of the investigation and administration of this matter. Respondent James Staley, Respondent Wealth Financial International, LLC, Respondent B&B Equity Group, LLC a/k/a B&B Equity Group, LLC a/k/a B and B Equity Group, Respondent Robert Koppel, Respondent Global Equity Resources, LLC, Respondent Global Equity Preservation, Inc. a/k/a Global Equity Preservation Trust, and Respondent Robert Eberle shall be jointly and severally liable for this amount. This amount shall be made payable to the Missouri Secretary of State's Investor Education and Protection Fund and paid within thirty (30) days of the date of this Order. Respondent James Staley, Respondent Wealth Financial International, LLC, Respondent B&B Equity Group, LLC a/k/a B&B Equity Group, LLC a/k/a B and B Equity Group, Respondent Robert Koppel, Respondent Global Equity Resources, LLC, Respondent Global Equity Preservation, Inc. a/k/a Global Equity Preservation Trust, and Respondent Robert Eberle shall deliver this payment to the Securities Division at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.

AA. Pursuant to Section 409.6-604(f), RSMo. (Cum. Supp. 2009), this matter shall be referred to the Missouri Attorney General's Office to collect the restitution, penalties and costs described in the Order, as necessary. In the event of such referral, priority in collection shall be given to recovery of monies for disgorgement and the restitution ordered under paragraphs X and Y, above. Once such collection efforts result in the full satisfaction of paragraphs X and Y, priority shall be given to recovery of monies for the civil penalties ordered under paragraphs B, C, D, E, F, G, H, I, J, K, L, M, N, O, P, Q, R, S, T, U, V, and W, above.

BB. Respondents shall pay their own costs and attorney's fees with respect to this matter.

SO ORDERED:

WITNESS MY HAND AND OFFICIAL SEAL OF MY OFFICE AT JEFFERSON CITY, MISSOURI THIS 25TH DAY OF OCTOBER, 2011.

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of October, 2011, copies of the foregoing Order and Notice in the above styled case was **mailed by certified U.S. Mail, postage prepaid, to:**

James Staley

33 Maple Creek Court
Wentzville, MO 63385-5022

Wealth Financial International, LLC
Attn: James Staley
17395 Chesterfield Airport Road, #200
Chesterfield, MO 63005

Robert L. Eberle
2485 Grassy Spring Place
Las Vegas, NV 89135

Robert Koppel
5073 Frontier Lane
Roseville, CA 95747

Global Equity Preservation, Inc.
a/k/a Global Equity Preservation Trust
Attn: Robert Eberle and Robert Koppel
2485 Grassy Spring Place
Las Vegas, NV 89135

B&B Equity Group, LLC
a/k/a BSB Equity Group, LLC
a/k/a B and B Equity Group
Attn: Robert Eberle and Robert Koppel
777 N. Rainbow
Suite 250
Las Vegas, NV 89107

Global Equity Resources, LLC
Attn: Robert Eberle and Robert Koppel
777 N. Rainbow
Suite 250
Las Vegas, NV 89107

And hand delivered to:
Mary S. Hosmer
Assistant Commissioner,
Securities Division

John Hale
Specialist