



**STATE OF MISSOURI  
OFFICE OF SECRETARY OF STATE**

IN THE MATTER OF:

GLOBAL DEVELOPMENT HOLDINGS,  
PAUL TUCKER,  
LARRY SOBOL,

Case No: AP 04-28

Serve all at: 1835 E. Hallandale Beach Blvd.  
Suite 313  
Hallandale, Florida 33009

and

PURCHASEACASINO.COM, LLP

Serve at: 1250 S. Bumham, Suite 212  
Las Vegas, Nevada 89104, and

L. Van Stillman, P.A.  
1177 George Bush Boulevard  
Suite 308  
Delray Beach, Florida 33483

Respondents.

**CONSENT ORDER**

WHEREAS, the Missouri Securities Division has alleged that Respondents offered unregistered securities in the State of Missouri; Respondent transacted business as an unregistered securities agent in the State of Missouri; Respondents employed or associated with an unregistered agent who transacted business in this state on Respondent's behalf; all in violation of §§409.3-301, 409.4-402(a), and 409.4-402(d), RSMo Cumulative Supp. 2003.

1. Respondents and the Securities Division desire to settle the allegations and the matters raised by the staff of the Securities Division relating to the alleged activities of Respondents.

2. Respondents and the Securities Division consent to the issuance of this Consent Order.
3. Respondents stipulate and agree to the issuance of this Consent Order without further proceedings in this matter, agreeing to be fully bound by the terms and conditions specified herein.
4. Respondents waive their right to a hearing with respect to this matter.
5. Respondents stipulate and agree that Respondents waive any rights Respondents may have to seek judicial review or otherwise challenge or contest the terms and conditions of this Order and, further, Respondents specifically forever releases and holds harmless the Missouri Office of Secretary of State, Secretary of State, Commissioner of Securities and their respective representatives and agents from any and all liability and claims arising out of, pertaining to or relating to this matter.
6. The Securities Division and Respondents, without admitting or denying the below Stipulations of Fact, stipulate and agree to the following:

**STIPULATIONS OF FACT**

7. Global Development Holdings, Inc., ("Global"), is a Nevada corporation engaged as the gaming network initial managing partner of PurchaseACasino.com, LLP and has an address of 1835 E. Hallandale Beach Blvd., Suite 313, Hallandale, Florida 33009.
8. Paul Tucker ("Tucker") is the Initial Managing Partner of Global Development Holdings, Inc., with a business address of 1835 E. Hallandale Beach Blvd., Suite 313, Hallandale, Florida 33009.
9. Larry Sobol ("Sobol") is a manager for Global Development Holdings, Inc., with a business address of 1835 E. Hallandale Beach Blvd., Suite 313, Hallandale, Florida 33009.
10. PurchaseACasino.com, LLC, ("Purchase") is a Nevada limited liability partnership in the business of selling Internet gambling partnerships located offshore and has a principal business address of 1250 S. Burnham, Suite 212, Las Vegas, Nevada 89104.
11. As used in this Consent Order, the term "Respondents" refers to Global, Tucker, Sobol and Purchase.
12. In early September 2003, a Missouri resident ("MR1") heard a radio commercial advertising an investment in an offshore Internet casino. The advertisement included a telephone number whereby interested investors could receive

additional information.

13. In mid September, MR telephoned the number that was included in the radio Internet casino commercial. The person that spoke to MR1 requested an investment of \$20,600 in PurchaseACasino.com. The investment would allow MR1 to become a partner in a gambling Internet site; MR1 would receive a percentage of half of the profits on MR1's investment; MR1 would receive 100% return on principal in 6-9 months; the risk with this investment was minimal.
14. MR1 did not invest in Purchase.
15. On September 27, 2003, a second Missouri resident ("MR2") received a Purchase packet of information from Tucker, which included, a business card, a PurchaseACasino.com, LLP Limited Liability Partnership Agreement; and a Subscription Agreement.
16. On September 29, 2003 and on October 1, 2003 MR2 telephoned the same telephone number identified in the radio commercial and spoke with Sobol. MR2 told Sobol among other things, the following:
  - a. MR2 and spouse did not have any business or investment experience and MR2 and spouse did not believe they qualified due to their small income. Sobol responded that this investment in Purchase would make MR2 very, very, very rich and the return on the investment would help pay for the children's college education;
  - b. MR2 did not believe that the combined income of MR2 and spouse, which is \$60,000 a year, and MR2 and spouse's limited assets, would qualify them for the investment. To this Sobol responded to MR2 that the only people that could not invest are those over 70, those on Social Security and those only making minimum wage; and
  - c. MR did not want to initial one page of the Subscription Agreement because MR2 believed initialing the page would not be truthful. To this statement, Sobol responded that MR2 should just write outside the initial box "I have read the above page".
17. MR2 did not invest in Purchase.
18. On September 11, 2003, the Missouri Securities Division received information that indicated that the Respondents offered unregistered securities in the State of Missouri.
19. A check of the records maintained by the Missouri Commissioner of Securities confirmed no registration, granted exemption or notice filing indicating status as

a "federal covered security" for any of the securities offered by the Respondents in the State of Missouri.

- 20. A check of the records maintained by the Commissioner confirmed no registration for Respondents to sell securities in the State of Missouri.
- 21. Respondents were not registered to offer and sell securities in the State of Missouri.
- 22. Respondents offered unregistered, non-exempt securities to Missouri residents.
- 23. This Order is in the public interest.

**JURISDICTIONAL BASIS**

- 24. Respondents and the Securities Division stipulate and agree that the Commissioner has jurisdiction over these matters pursuant to §409.6-601, RSMo Cumulative Supp. 2003.
- 25. Respondents and the Securities Division stipulate and agree that the Commissioner has authority to enter this Consent Order pursuant to §409.6-604(a), RSMo Cumulative Supp. 2003, which provides:

If the commissioner determines that a person has engaged, is engaging, or is about to engage in an act, practice or course of business constituting a violation of this act or a rule adopted or order issued under this act or that a person has materially aided, is materially aiding, or is about to materially aid an act, practice, or course of business constituting a violation of this act or a rule adopted or order issued under this act, the commissioner may:

- (1) Issue an order directing the person to cease and desist from engaging in the act, practice, or course of business or to take other action necessary and appropriate to comply with this act.

**ORDER**

**WHEREAS**, the Commissioner, after consideration of the stipulations set forth above and on the consent of Respondents and the Securities Division, finds the following Order to be in the public interest, necessary for the protection of public investors and consistent with the provisions of Chapter 409, RSMo Cumulative Supp. 2003.

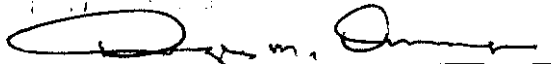
**NOW, THEREFORE**, it is hereby Ordered that:

1. Respondents, their agents, employees and servants are prohibited from:
  - A. Offering or selling investments in PurchaseACasino.com in the State of Missouri.
  - B. Offering or selling any other security in violation of Sections 409.3-301, 409.4-402(a), and 409.4-402(d), RSMo Cumulative Supp. 2003,
2. Respondents will pay their own costs and attorneys fees with respect to this matter.
3. Before the execution of this Order, Respondents shall pay \$2,500 to the Secretary of State's Investor Education Fund.

**SO ORDERED:**

WITNESS MY HAND AND OFFICIAL SEAL OF MY OFFICE AT JEFFERSON CITY, MISSOURI THIS 26<sup>th</sup> DAY OF March, 2004.

**MATT BLUNT  
SECRETARY OF STATE**



**DOUGLAS M. OMMEN  
COMMISSIONER OF SECURITIES**

Consented to by:  
**MISSOURI SECURITIES DIVISION**



**Omar D. Davis  
Securities Enforcement Counsel**

**Respondents**

By: \_\_\_\_\_

\* *Paul Tucker*  
Paul Tucker

\* *Larry Sobal* 3-23-04  
Larry Sobal

\* *PurchaseACasino, LLP* 3-23-04  
Paul Tucker, Initialing Partner

