STATE OF ALABAMA
ALABAMA SECURITIES COMMISSION

IN THE MATTER OF:	)	
	)	
BUFFALO EXTENSION LLP	)	
BUFFALO EXCHANGE LLP	)	
RICHARD REYNOLDS, aka; RICK ADKINS	)	**ADMINISTRATIVE ORDER**
CHARLES DOUGLAS "CHUCK" HAMMETT	)	**NO. CO-2012-0022**
HAROLD CHRISTOPHER POOLE	)	
	)	
RESPONDENTS	)	

LIMITED CONSENT ORDER
AS IT PERTAINS TO HAROLD CHRISTOPHER POOLE ONLY

The Alabama Securities Commission ("Commission"), having authority to administer and provide for the enforcement of all provisions of Title 8, Chapter 6, Code of Alabama 1975, the Alabama Securities Act ("Act"), upon due consideration of the subject matter hereof, and having confirmed information of the offers for sale and/or sale of securities, into, within or from the state of Alabama, has determined as follows:

RESPONDENTS

1. **BUFFALO EXTENSION, LLP, ("BUFFALO EXTENSION")**, was previously registered as a limited liability company with the Montana Secretary of State's office since March, 5, 2010, having a commercial business address and mailing address of 1627 West Main Street, Suite 301, Bozeman, Montana, 59715.

2. **BUFFALO EXCHANGE, LLP, ("BUFFALO EXCHANGE")**, was a previous Montana partnership registered with the Montana Secretary of State's office on September 2, 2009, having a commercial business address of 1425 West Main Street, Suite E, Bozeman, Montana, 59715 and a mailing address listed as 1627 West Main Street, Suite 301, Bozeman, Montana, 59715.

3. **RICHARD F. REYNOLDS, aka RICK ADKINS ("REYNOLDS")**, CRD# 11028747, at all times relevant, acted as the Chief Executive Officer of BUFFALO, with a

business address of 1425 West Main Street, Suite E, Bozeman, MT 59715.

4. **CHARLES DOUGLAS "CHUCK" HAMMETT ("HAMMETT")**, at all times relevant, functioned as an agent for BUFFALO EXTENSTION and BUFFALO EXCHANGE, having an address of 159 Azalea Lane, Franklin, Tennessee, 37064.

5. **HAROLD CHRISTOPHER POOLE ("POOLE")**, at all times relevant, functioned as an agent for BUFFALO EXTENSION and BUFFALO EXCHANGE, having an address of 486 Forrest Park Circle, Franklin, Tennessee, 37064.

STATEMENT OF FACTS

6. An online search of the Montana Secretary of State's website disclosed BUFFALO EXTENSION was during the relevant time an active partnership (#P175816) formed on March 5, 2010, by Lori Reynolds as the firm's President, with REYNOLDS as manager. The formation documents list the primary purpose as a "trading company", having a business address of 1425 W. Main Street, Suite 301, Bozeman, Montana, 59715.

7. According to the Montana Secretary of State's office, BUFFALO EXCHANGE was during the relevant time an active partnership (#P170357) formed by REYNOLDS, the general principal, on September 2, 2009, having a commercial address of 1425 West Main Street, Suite E Bozeman, Montana, 59715. The formation documents list a primary purpose of "Investments/Placements/Acquisitions".

8. In documents obtained by the Commission BUFFALO EXTENSION's private placement memorandum offered up to 900,000 "units" of the Company's investor units at a price of $1.00 per unit.

9. In their private placement documents, BUFFALO EXCHANGE claimed to have acquired a trading platform package with a historical performance that will allow them to meet or exceed their goal of 100% ROI (return on investment) for investors each quarter.

10. The Commission is in receipt of information that on or about May 14, 2010,

POOLE solicited an investment in BUFFALO EXTENSION from an Alabama resident, whose invested funds were to be managed in the FOREX market by REYNOLDS. As a result of the solicitation, the Alabama resident issued $80,000.00 in the form of two wire transfers to BUFFALO EXTENSION.

11. Documents obtained by the Commission revealed agent POOLE was remunerated by BUFFALO EXTENSION based partially on the number of investor referrals.

12. The Alabama resident received quarterly statements issued by BUFFALO EXCHANGE identifying Rick Adkins as CEO/President of Buffalo Investment Corporation, and General Partner of the BUFFALO EXCHANGE.

13. The BUFFALO EXCHANGE quarterly statements issued to the Alabama residents indicated a gradual increase in the total units purchased and the total value of units within the accounts.

14. Documents made available to the Commission disclosed Rick Adkins as an alias name for Richard F. Reynolds of Bozeman, Montana. REYNOLDS was at the time subject to a state of Missouri Final Order to Cease and Desist issued on May 19, 2001.

15. A financial analysis on the BUFFALO EXTENSION bank accounts made available to the Commission disclosed the Alabama investors funds given to BUFFALO EXTENSION were misappropriated for personal use by REYNOLDS or issued to investors as ponzi payments.

16. Respondent POOLE made no disclosure of the Administrative Order mentioned in paragraph 14 to the Alabama investors during the solicitation of investment with BUFFALO EXTENSION.

17. A review of the Commission files conducted on March 15, 2012, revealed that respondents, BUFFALO EXTENSION and REYNOLDS, were neither registered nor subject to a perfected exemption from registration to offer and sell securities in Alabama.

18. A review of the Commission files conducted on June 8, 2012, revealed

respondent POOLE was not registered to offer and sell securities in Alabama.

19. At the request of POOLE, an informal meeting was held at the Commission on August 21, 2012. During that meeting, POOLE admitted to acting as an agent for BUFFALO EXTENSION and REYNOLDS from October 2009 to June 2010. POOLE was compensated approximately $10,000.00 per month to refer potential investors to REYNOLDS who would solicit FOREX investments. POOLE claims he readily accepted REYNOLDS' representations the RESPONDENTS were properly registered to offer and sell securities. During that period POOLE referred only one Alabama investor, a family friend, to REYNOLDS.

20. During a follow up interview, the Alabama investor confirmed that POOLE was a family friend and requests that POOLE not be held responsible for the financial loss and that the Commission cease any further action against RESPONDENT POOLE.

CONCLUSIONS OF LAW

21. Pursuant to Section 8-6-2(10), Code of Alabama 1975, the definition of a security includes any "unit". The "Investor Units" offered and/or sold by RESPONDENTS are units representing evidence of investment and are securities under the Alabama Securities Act.

22. The definition of agent under Section 8-6-2(2), Code of Alabama 1975, includes any individual who represents a dealer or an issuer in effecting or attempting to effect sales of securities. POOLE represented BUFFALO effecting transactions in securities in Alabama and is an Agent under the Act.

23. Pursuant to Section 8-6-3(a), Code of Alabama 1975, it is unlawful for any person to transact business in this state as a dealer or agent for securities unless he is registered under the act. Poole acted as an agent of BUFFALO and effected transactions in securities in Alabama without benefit of registration in violation of the Act.

24. Pursuant to Section 8-6-3(a), Code of Alabama 1975, it is unlawful for any dealer or issuer to employ an agent unless the agent is registered. REYNOLDS and

BUFFALO employed POOLE as an agent, while said agent was not properly registered with the Commission in violation of the Act.

25. Pursuant to Section 8-6-4, Code of Alabama 1975, it is unlawful to offer or sell any security in this state unless it is registered under the Act, the security is exempt from registration pursuant to Section 8-6-10, or the transaction is exempt under Section 8-6-11. The securities issued by BUFFALO EXCHANGE and BUFFALO EXTENSION, offered by REYNOLDS and POOLE to the Alabama resident, to wit: "investor units" were neither registered nor exempt from registration in violation of the Act.

26. Pursuant to Section 8-6-4, Code of Alabama 1975, it is unlawful to offer or sell any security in this state unless it is registered under the Act, the security is exempt from registration pursuant to Section 8-6-10, or the transaction is exempt under Section 8-6-11. The securities offered by RESPONDENTS to the Alabama residents, to wit: "Investor units", were neither registered nor exempt from registration in violation of the Act.

WHEREAS, POOLE has fully cooperated with the Commission's investigation, and provided all the information requested by the Commission, and

WHEREAS, POOLE conveyed to the Commission staff reliance upon the representations and disclosures made by REYNOLDS regarding the registrations of the securities offered by BUFFALO EXTENSION and BUFFALO EXCHANGE to the Alabama resident.

WHEREAS, POOLE admits the Statement of Facts set out hereinabove are true and correct; POOLE represents to the Commission that the offer disclosed herein is the only offer of a security that have been made into, within or from the state of Alabama; POOLE represents he has disclosed all known offers and/or sales of any investments in BUFFALO EXTENSION, BUFFALO EXCHANGE including its affiliates, made into, within or from the State of Alabama; that POOLE understands that the Commission relied upon the facts as set forth in the Statement of Facts above, in entering into this Consent Order;

WHEREAS, the Commission may seek further civil or criminal remedies, available to it under the provisions of the Act, against POOLE, if it determines that the assertions or

representations relied upon by the Commission in entering this Consent Order prove to be incorrect;

WHEREAS, POOLE has voluntarily agreed to waive all rights to a hearing upon entry of this Order and have consented to the entry of this Order; and

WHEREAS, the Commission finds this Order necessary and appropriate in the public interest for the protection of investors and consistent with the purposes fairly intended by the policy and provisions of the Act; and

WHEREAS, the Commission, POOLE is desirous of settling this matter as hereafter set forth and agree to the entry of this Order.

ACCORDINGLY, IT IS HEREBY ORDERED:

1. That POOLE shall, until such time as the securities are properly registered, or an appropriate exemption from registration has been perfected, refrain from making any offers or sales of securities into, within or from the state of Alabama.

2. That in accordance with Section 8-6-19(j)(1), Code of Alabama 1975, POOLE shall pay to the State of Alabama an administrative assessment of One-Thousand, Five Hundred dollars ($1,500), said funds to be tendered in certified funds contemporaneously with the entry of this Order.

3. That in accordance with Section 8-6-19(k)(1), Code of Alabama 1975, POOLE shall pay to the Alabama Securities Commission, as partial reimbursement for the Commission's cost of investigating this matter, the sum of One-Thousand, Five Hundred dollars ($1,500), said funds to be tendered in certified funds contemporaneously with the entry of this Order.

4. That the entry of this Order resolves the Cease and Desist Order, Administrative Order No. CD-2012-0022-A, issued June 20, 2012, as it pertained to POOLE only.

AGREED AND CONSENTED to on date indicated:

RESPONDENT:

HAROLD CHRISTOPHER POOLE

Harold Christopher Poole

DATE: May 22, 2013, 2013

* *

APPROVED AND AGREED this 29th day of May, 2013.

ALABAMA SECURITIES COMMISSION
401 Adams Avenue, Suite 280
Montgomery, AL 36104
(334) 242-2984

BY:

JOSEPH BORG
DIRECTOR