

**STATE OF ALABAMA
ALABAMA SECURITIES COMMISSION**

IN THE MATTER OF:

**WILSON BOWLING LLC
WOODROW WILSON BOWLING JR**

RESPONDENTS

**ADMINISTRATIVE ORDER
NO. CD-2014-0019**

CEASE AND DESIST ORDER

The Alabama Securities Commission ("Commission"), having the 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. **WILSON BOWLING LLC ("WB LLC")** is an Alabama domestic limited liability company with a principal business address of 403 E. Pershing Avenue, #C, Muscle Shoals, Alabama 35661-3822.

2. **WOODROW WILSON BOWLING JR ("BOWLING")** is the owner of **WB LLC** with a principal business address of 403 E. Pershing Avenue, #C, Muscle Shoals, Alabama 35661-3822.

STATEMENT OF FACTS

3. On July 28, 2014, an Alabama resident received an unsolicited e-mail message through the Alabama resident's work place e-mail account. The message was from "Woodrow Bowling infor@wilsonbowlingllc.com". The message represented that **BOWLING** planned to raise funds to purchase a cancer treatment product from another

country and import the product into the United States for sale. The message stated, "...I would ask some of you if you want to come in with me on this deal. Your investment return should be about 70% the first year on top of the return of your principle. After the first year, about 35% a year. And your shares should be worth 400% more within two years...if you simply want to make a huge return on something that is a safe investment...then you should get in touch with me. Tell me how much you are able to invest, \$100, \$1000, \$5000, \$10,000, up to \$100,000...Woodrow Wilson Bowling Jr., General Partner." The Alabama resident forwarded the unsolicited e-mail message from **BOWLING** to the Commission.

4. On August 12, 2014, an Agent ("**AGENT**") of the Commission sent an e-mail to **BOWLING** feigning interest in the cancer treatment product investment.

5. On August 13, 2014, **BOWLING** sent an e-mail response to the **AGENT** describing the product. Concerning the investment, **BOWLING** stated, "The product costs \$550/kg and sells for \$200/gram. Out of that we have sales cost, bottling and shipping. My call center owners guarantee that we will sell minimum 2 bottles per day, per agent, 6 days a week. 30 agents running, means \$360 bottles a week. So roughly, call it a net profit of \$50,000/wk...I only need \$20,000 more but if you want to come in with less or whatever; I will do the balance on credit under my name. I will warrant a return on investment of 25% per month for the first 12 months, beginning in at the end of the 3rd month. And I will grant you 5% equity for each \$10,000 investment. If you want in, I will send you the agreement, you sign and wire the funds. I will be initiating the investment through my US company for everyone's protection with our laws instead of Columbia which can be somewhat cumbersome."

6. According to the online records of the Office of Alabama Secretary of State, **WB LLC** was formed on March 7, 2012 by **BOWLING**. **BOWLING** is listed as the only "member" of **WB LLC**.

7. On August 18, 2014, a review of the Commission's registration files disclosed no record of registration for **WB LLC** or **BOWLING** as a broker dealer, broker dealer agent, investment advisor, or investment advisor representative in the state of Alabama.

CONCLUSIONS OF LAW

8. Pursuant to Section 8-6-2(10), Code of Alabama 1975, the definition of security includes any "investment contract." **RESPONDENT BOWLING** solicited an investment of money in **RESPONDENT WB LLC** while promising an investment return to be derived from **RESPONDENTS'** efforts. The solicited investment is an "investment contract" and is a security under the ACT.

9. Section 8-6-2(2) Code of Alabama 1975, defines an agent as any individual other than a dealer who represents a dealer or Issuer in effecting or attempting to effect sales of securities. A partner, officer or director of a dealer or issuer is an agent if he otherwise comes within the definition. **BOWLING** by soliciting an Alabama investor to purchase an investment contract in **WB LLC** acted as a securities Agent of **WB LLC** and is an Agent under the Act.

10. Pursuant to Section 8-6-3(a), Code of Alabama 1975, it is unlawful for any person to transact business in the state as a dealer or agent for securities unless they are registered under the ACT. By soliciting sales of the investment contracts of **WB LLC** to Alabama residents, **BOWLING** acted as an agent of **WB LLC** while not being registered with the Commission in violation of the Act.

11. Pursuant to Section 8-6-4, Code of Alabama, 1975, it is unlawful for any person to offer or sell any security in this state unless said security: (1) is registered under the Act; (2) the security is exempt from registration under section 8-6-10; or (3) the transaction is exempt under section 8-6-11. The security offered by **RESPONDENTS**; to wit: the investment contract, was neither registered nor subject to a perfected exemption from registration in Alabama and was offered in violation of the Act.

12. Pursuant to Section 8-6-17(a)(2), Code of Alabama, 1975, it is unlawful to make any untrue statement of material fact or to omit to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they are made, not misleading. **BOWLING** made representations of guaranteed sales and investment return without any factual basis upon which to base such representations in violation of the ACT.

This Order is appropriate in the public interest for the protection of investors and consistent with the purposes of the Alabama Securities Act.

This Order does not prevent the Commission from seeking such other civil or criminal remedies that may be available to it under the Alabama Securities Act.

Additionally, if the allegations set forth herein are found to be true, through either administrative adjudication, failure of the **RESPONDENTS** to make a timely request for hearing, or default of the **RESPONDENTS**, it is the intention of the Commission to impose sanctions upon the **RESPONDENTS**. Such sanctions may include, inter alia, an administrative assessment imposed on **RESPONDENTS**, an additional administrative assessment for investigative costs arising from the investigation of the violation(s) described herein against **RESPONDENTS**, and a permanent order to bar **RESPONDENTS** from participation in any securities related industry in the state of Alabama.

ACCORDINGLY, IT IS HEREBY ORDERED that **RESPONDENTS** immediately **CEASE AND DESIST** from further offers or sales of any security into, within or from the state of Alabama.

Entered at Montgomery, AL, this 10th day of September, 2014.

ALABAMA SECURITIES COMMISSION
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BY:



Joseph P. Borg
Director