

**STATE OF ALABAMA
ALABAMA SECURITIES COMMISSION**

IN THE MATTER OF:)
)
LIFE TIME CAPITAL, INC)
ROBERT COMSTOCK)
LLOYD RODGERS)
LINDA G. RODGERS)
WILLIAM MATTOX, JR)
)
RESPONDENTS)

**ADMINISTRATIVE ORDER
NO. CD-2003-0017**

CEASE AND DESIST ORDER

The Alabama Securities Commission ("Commission"), having the power 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. LIFE TIME CAPITAL, INC, ("LTC") is an unregistered investment firm, with a business address of 350 Fairway Drive, Suite 110, Deerfield Beach, FL 33441.
2. ROBERT H. COMSTOCK, ("COMSTOCK") is an unregistered securities agent for LTC, with an address of 214 Iris Drive, Gardendale, AL 35071. At all times relevant to the violations set forth herein, COMSTOCK acted as an agent of LTC.
3. LLOYD RODGERS, ("RODGERS") is an unregistered securities agent for LTC, with a business address of 350 Fairway Drive, Suite 110, Deerfield Beach, FL 33441.
4. LINDA G. RODGERS, ("LG RODGERS") is an unregistered securities agent for LTC, with a business address of 350 Fairway Drive, Suite 110, Deerfield Beach, FL 33441.

5. WILLIAM MATTOX, JR., ("MATTOX") is an unregistered securities agent for LTC, with a business address of 350 Fairway Drive, Suite 110, Deerfield Beach, FL 33441.

STATEMENT OF FACTS

6. The Commission is in receipt of information that COMSTOCK, RODGERS, LG RODGERS, and MATTOX engaged in the offer and/or sale of securities, to wit: Viatical contracts of LTC, to an Alabama resident, that were neither registered nor exempt from registration in the State of Alabama.

7. A review of the files of the Commission disclosed no record of registration of COMSTOCK, RODGERS, LG RODGERS, MATTOX, and LTC as a securities agents/dealer in the state of Alabama.

8. A review of the files of the Commission disclosed no record of registration, or exemption from registration, of the securities of LTC.

CONCLUSIONS OF LAW

9. LTC is not registered as a securities dealer in the state of Alabama. Transacting business in the State of Alabama as a securities dealer while unregistered is a violation of § 8-6-3(a), Code of Alabama, 1975.

10. COMSTOCK, RODGERS, LG RODGERS, and MATTOX are not registered as securities agents in the state of Alabama. Transacting business in the State of Alabama as a securities agent while unregistered is a violation of § 8-6-3(a), Code of Alabama, 1975.

11. The securities of LTC, being sold by COMSTOCK, RODGERS, LG RODGERS, and MATTOX as set forth in paragraph 6 above, are not registered, nor exempt from registration in the state of Alabama. The sale of unregistered, non-exempt securities into, within, or from the state of Alabama is a violation of § 8-6-4, Code of Alabama, 1975.

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

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

ACCORDINGLY, IT IS HEREBY ORDERED that LTC, COMSTOCK, RODGERS, LG RODGERS, and MATTOX, CEASE AND DESIST from further offers or sales of any security into, within, or from the State of Alabama.

Entered at Montgomery, Alabama, this 20th day of August, 2003.



ALABAMA SECURITIES COMMISSION
770 Washington Street, Suite 570
Montgomery, Alabama 36130-4700

BY:

A handwritten signature in black ink, appearing to read "Joseph P. Borg", is written over a horizontal line. A large, sweeping flourish extends from the bottom left of the signature.

JOSEPH P. BORG
Director