

STATE OF ALABAMA  
ALABAMA SECURITIES COMMISSION

IN THE MATTER OF:

CENTER FOR SENIOR PLANNING	)	ADMINISTRATIVE ORDER
LIFE PARTNERS HOLDING INC.	)	
Dbas LIFE PARTNERS INC.	)	NO. CD-2007-0025
STERLING TRUST COMPANY	)	
DAN BELBECK	)	
ROGER OWENS	)	
JERRY POSS	)	
	)	
<u>RESPONDENTS</u>	)	

CEASE AND DESIST ORDER

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. CENTER FOR SENIOR PLANNING, ("CSP") is a purported Viatical settlement company with a business address of 5115 Maryland Way Fmt, Brentwood TN., 37027.

2. LIFE PARTNERS HOLDING INC., ("LPHI") dba LIFE PARTHNERS INC., is a Life Settlement company with a business address of 204 Woodhew Drive, Waco TX. 76712.

3. STERLING TRUST COMPANY, ("STC") is a self described asset holding service, with a business address of 7901 Fish Pond Road, Waco, TX 76710. STC acts as the escrow agent for LPHI.

4. DAN BELBECK ("BELBECK") is the President of Internal Operations for the Center for Senior Planning with a business address of 5115 Maryland Way Brentwood, TN. 37027.

5. ROGERS OWENS ("OWENS") is an agent of Sterling Trust Company with a business address of 7901 Fish Pond Road, Waco, TX. 76710. During all times relevant to this Order, Owens also acted as an agent of LPHI.

6. JERRY POSS ("POSS") is an agent of the Center for Senior Planning with a business address of 5115 Maryland Way Brentwood TN 37027.

#### STATEMENT OF FACTS

7. The Alabama Securities Commission is in receipt of information that indicates DAN BELBECK, ROGER OWENS, and JERRY POSS while acting as Agents of the CENTER FOR SENIOR PLANNING and LIFE PARTNERS HOLDING INC., dba LIFE PARTNERS INC, and STERLING TRUST COMPANY engaged in the offer and/or sale of securities, to wit: investment contracts involving fractionalized Life Settlement Agreements into, within, or from, the state of Alabama. Life Settlement policies to which the agreements are attached, are insurance policies which are purchased at a discount to their face value, primarily from the elderly, but mainly according to the life expectancy of the insured. Upon the death of the insured, proceeds are distributed based upon the distinct share of the policy which each investor owns.

8. On September 17, 2007, a review of the files of the Alabama Securities Commission's Registration Division, revealed no record of registration as an agent or dealer for BELBECK, OWENS, POSS, CSP, STC or LPHI.

9. On September 17, 2007, a review of the files of the Alabama Securities Commission revealed no record of registration or exemption from registration of the securities referenced in item (7) of this Order.

## CONCLUSIONS OF LAW

10. The fractionalized life settlement agreements offered by respondents involve the investment of money, in a common enterprise, with expectation of profits derived from the significant managerial efforts of others constituting "investment contracts". Section 8-6-2(10) Code of Alabama 1975, includes investment contract in the definition of a security. Therefore the fractionalized life settlement agreements offered by respondents are securities under the Act.

11. The securities offered and sold by RESPONDENTS, to wit: the fractionalized life settlement agreements were not registered in the state of Alabama. Pursuant to Section 8-6-4, Code of Alabama 1975, it is unlawful to offer or sell any security 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. RESPONDENTS unlawfully offered and sold securities which were neither registered nor subject to any perfected exemption.

12. RESPONDENTS were not registered as broker dealers or broker dealer agents in the state of Alabama. Pursuant to Section 8-6-3(a), Code of Alabama, 1975, it is unlawful for a person to transact business in this state as a dealer or agent for securities unless such person is registered under the Act. RESPONDENTS unlawfully acted in the capacity of a broker dealer while not registered under the Act.

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

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

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

Entered at Montgomery, Alabama, this 12<sup>th</sup> day of October, 2007.



ALABAMA SECURITIES COMMISSION  
770 Washington Avenue, Suite 570  
Montgomery, AL 36130-4700  
(334) 242-2984  
BY:

A handwritten signature in black ink, appearing to read "J. Randall McNeill", is written over the printed name and title.

J. RANDALL MCNEILL  
Deputy Director