STATE OF ALABAMA
ALABAMA SECURITIES COMMISSION

IN THE MATTER OF: )
THOMAS WASHINGTON CAMPBELL, III )
TCA INVESTMENT GROUP, LTD )
RESPONDENTS )

ADMINISTRATIVE ORDER NO. CD-2010-0042

CEASE AND DESIST ORDER

The Alabama Securities Commission ("Commission"), having the authority to adminster and provide for the enforcement of all provisions of Title 8, Chapter 6, Code of Alabama 1975, the Alabama Securities Act, upon due consideration of the subject matter hereof, has determined as follows:

RESPONDENT

1. THOMAS WASHINGTON CAMPBELL, III ("CAMPBELL") is listed as the President and CEO of TCA Investment Group, LTD with a business address of 129 Lee Road 2015, Salem, Alabama 36874.

2. TCA INVESTMENT GROUP, LTD ("TCA") is an unregistered/fictitious Alabama company with a business address of 129 Lee Road 2015, Salem, Alabama 36874.

STATEMENT OF FACTS

3. In November 2009, the Commission opened an investigation based on a complaint submitted by a TCA client. The complaint contained information that indicated CAMPBELL, in his capacity as President/CEO of TCA, solicited and sold securities in the form of advance fee loan agreements to individuals in several states.

4. Information made available to the Commission indicates that CAMPBELL made untrue statements of material fact in the solicitation and sale of the above mentioned
securities. Specifically, CAMPBELL represented that he and TCA could arrange financing/loans for clients, in exchange for an upfront fee paid by the client.

5. CAMPBELL and TCA made representations to clients, both verbally and in writing, that the company had a pool of investors willing to loan monies to TCA clients. The investigation determined that this statement is unfounded and baseless.

6. On April 21, 2010, CAMPBELL met with Commission staff to discuss his business activities. During this meeting, CAMPBELL answered questions regarding the process of obtaining financing for his clients. At the conclusion of this meeting, it was agreed by all parties that neither CAMPBELL, nor TCA, possessed the qualifications, or resources to secure funding for the clients. Neither CAMPBELL, nor TCA, has ever secured funding for any client, and had no reason to expect the contractual obligations set forth in the security agreements would ever be fulfilled.

7. A diligent search of the files of the Commission’s Registration Division revealed no registration, or application for exemption, for CAMPBELL or TCA as a securities agent or dealer in the state of Alabama.

8. A diligent search of the files of the Commission’s Registration Division revealed no registration, or application for exemption, for the security contracts offered by CAMPBELL and TCA, in the state of Alabama.

CONCLUSIONS OF LAW

9. Pursuant to section 8-6-2(10), Code of Alabama 1975, Alabama’s statutory definition of a security includes any investment contract, and any participation in a profit sharing agreement. The Letter of Commitment issued by RESPONDENTS constitutes an investment contract and/or participation in a profit sharing agreement. The investment offered by CAMPBELL and TCA, in the form of a Letter of Commitment, is a security under the Act.

10. Pursuant to section 8-6-2(2), Code of Alabama 1975, the definition of “Agent” includes any individual who represents a dealer or issuer in effecting or attempting
to effect sales of securities. CAMPBELL, by soliciting securities, to wit: Letters of
Commitment to individuals, is a security "Agent" as defined by the Act.

11. Neither CAMPBELL, nor TCA, are registered, or exempt from registration as
a Securities Dealer or Agent in the state of Alabama. The sale of securities by an
unregistered Securities Dealer or Agent in the state of Alabama is a violation of Section 8-
6-3(a), Code of Alabama 1975.

12. The security agreements offered and sold by CAMPBELL and TCA are
neither registered, nor exempt from registration in the state of Alabama. The sale of
unregistered securities, in the state of Alabama is a violation of Section 8-6-4, Code of
Alabama 1975.

13. Under Section 8-6-17(a)(2), Code of Alabama 1975, it is unlawful for any
person, in connection with the offer, sale, or purchase of a security, directly or indirectly to:
make any untrue statement of a 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; to wit: CAMPBELL fraudulently claimed to have the ability and
resources to secure funding/loans for clients.

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 CAMPBELL and TCA immediately CEASE AND DESIST from conducting business as an unregistered Investment Adviser or Investment Adviser Representative, within or from the state of Alabama.

Entered at Montgomery, AL, this 16th day of August, 2010.

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

BY:

[Signature]
J. Randall McNeill
DEPUTY DIRECTOR