

STATE OF ALABAMA  
ALABAMA SECURITIES COMMISSION

## 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, upon due consideration of the subject matter hereof, and having confirmed information of the offer and sale of securities into, within, or from the State of Alabama, has determined as follows:

## RESPONDENTS

1. TRI-WEST INVESTMENT CLUB ("RESPONDENT TRI-WEST") is an unregistered securities dealer soliciting in the State of Alabama, with a business address of 160 North Front Street, PO Box 354, Belize City, Belize and 1605B Pacific Rim Ct., Suite MX 78-204 San Diego, CA 92154

2. HAARLEM UNIVERSAL CORPORATION ("RESPONDENT HAARLEM UNIVERSAL CORP") is an unregistered securities dealer soliciting in the State of Alabama. RESPONDENT HAARLEM UNIVERSAL CORP is purported to be a Panamanian investment company, but is not registered as a foreign corporation within the State of Alabama. Information contained in RESPONDENT TRI-WEST solicitation

material indicates that contact with RESPONDENT HAARLEM UNIVERSAL CORP is made through them at 160 North Front Street, PO Box 354, Belize City, Belize and 1605B Pacific Rim Ct., Suite MX 78-204 San Diego, CA 92154 addresses.

3. JASON KINGSLEY ("RESPONDENT KINGSLEY") is currently an unregistered securities agent soliciting in the State of Alabama, with a business address of 160 North Front Street, PO Box 354, Belize City, Belize and 1605B Pacific Rim Ct., Suite MX 78-204 San Diego, CA 92154. At all times relevant to violations set forth herein, RESPONDENT KINGSLEY was an unregistered securities agent soliciting in the State of Alabama for RESPONDENT TRI-WEST.

4. MARK GOLDMAN ("RESPONDENT GOLDMAN") is currently an unregistered securities agent soliciting in the State of Alabama, with a business address of 160 North Front Street, PO Box 354, Belize City, Belize and 1605B Pacific Rim Ct., Suite MX 78-204 San Diego, CA 92154. At all times relevant to violations set forth herein, RESPONDENT GOLDMAN was an unregistered securities agent soliciting in the State of Alabama for RESPONDENT TRI-WEST.

5. ALAN RICHARDS ("RESPONDENT RICHARDS") is currently an unregistered securities agent soliciting in the State of Alabama, with a business address of 160 North Front Street, PO Box 354, Belize City, Belize and 1605B Pacific Rim Ct., Suite MX 78-204 San Diego, CA 92154. At all times relevant to violations set forth herein, RESPONDENT RICHARDS was an unregistered securities agent soliciting in the State of Alabama for RESPONDENT TRI-WEST.

6. ALAN WAAGES ("RESPONDENT WAAGES") is currently an unregistered securities agent soliciting in the State of Alabama, with a business address of 160 North Front Street, PO Box 354, Belize City, Belize and 1605B Pacific Rim Ct., Suite MX 78-204 San Diego, CA 92154. At all times relevant to violations set forth herein, RESPONDENT WAAGES was an unregistered securities agent soliciting in the State of Alabama for RESPONDENT TRI-WEST.

7. ALEX HAARLEM ("RESPONDENT HAARLEM") is the founder and Chairman of RESPONDENT HAARLEM UNIVERSAL CORP with a business address of 160 North Front Street, PO Box 354, Belize City, Belize and 1605B Pacific Rim Ct., Suite MX 78-204 San Diego, CA 92154 addresses. At all times relevant to violations set forth herein, RESPONDENT HAARLEM was an unregistered securities agent soliciting in the State of Alabama for RESPONDENT HAARLEM UNIVERSAL CORP.

STATEMENT OF FACTS

8. The Commission is in receipt of information that RESPONDENT TRI-WEST has engaged in the offer and/or sale of investment contracts involving bank debenture trading in Prime Bank Notes, to Alabama residents. The investment contracts offered and /or sold by RESPONDENT TRI-WEST were neither registered nor exempt from registration in the State of Alabama.

9. The Commission is also in receipt of information that RESPONDENTS KINGSLEY, GOLDMAN, RICHARDS, and WAAGE, in their capacities as agents or officers of RESPONDENT TRI-WEST, engaged in the offer and/or sale of investment contracts involving bank debenture trading in Prime Bank Notes to Alabama residents.

10. The above referenced information also disclosed that RESPONDENT TRI-WEST utilized the services of RESPONDENT HAARLEM UNIVERSAL CORP exclusively to execute trading of the Prime Bank Notes sold by RESPONDENT TRI-WEST and to execute the transfer of funds from and to investors

11. Review of the files of the Commission disclosed no record of the registrations of RESPONDENTS TRI-WEST and HAARLEM UNIVERSAL CORP as securities dealers in the State of Alabama

12. Review of the files of the Commission, disclosed no record of registration, nor exemption from registration, of the Prime Bank Notes securities offered and /or sold by RESPONDENTS TRI-WEST and HAARLEM UNIVERSAL CORP.

#### CONCLUSIONS OF LAW

13. RESPONDENTS TRI-WEST and HAARLEM UNIVERSAL CORP, are not registered as securities dealers in the state of Alabama.

14. 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.

15. The securities of RESPONDENTS TRI-WEST and HAARLEM UNIVERSAL CORP, sold by RESPONDENTS KINGSLEY, GOLDMAN, RICHARDS, and WAAGE, as set forth in paragraph 5 above, are not registered nor exempt from registration in the state of Alabama.

16. 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.

17. RESPONDENT HAARLEM, by allowing RESPONDENT HAARLEM UNIVERSAL CORP to participate in the sell the unregistered, non-exempt securities of RESPONDENTS TRI-WEST failed to adequately supervise the activities of RESPONDENT HAARLEM UNIVERSAL CORP.

18. Failure to adequately supervise an associated person is a violation of Commission Rule 830-X-3-.13.

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 RESPONDENTS TRI-WEST, HAARLEM UNIVERSAL CORP., HAARLEM, KINGSLEY, GOLDMAN, RICHARDS, and WAAGE, 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 30 day of May, 2001.



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

BY:

JOSEPH P. BORG  
Director