

STATE OF ALABAMA  
ALABAMA SECURITIES COMMISSION

IN THE MATTER OF: )  
MICHAEL SULLIVAN )  
NATIONAL VIATICAL, INC. )  
RESPONDENTS )  
ADMINISTRATIVE ORDER  
NO. CD-2001-0038

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/or sale of securities into, within, or from the State of Alabama, has determined as follows:

RESPONDENTS

1. MICHAEL SULLIVAN ("RESPONDENT SULLIVAN") is the Chief Financial Officer of National Viatical, Inc., with a business address of 9940 Highway 92, Woodstock, Georgia, 30188-4617. At all times relevant to violations set forth herein, RESPONDENT SULLIVAN acted as an agent of National Viatical, Inc. ("RESPONDENT NATIONAL VIATICAL, INC.").
2. RESPONDENT NATIONAL VIATICAL, INC. is a viatical settlement company with a business address, of 9940 Highway 92, Woodstock, Ga. 30118-4617.

STATEMENT OF FACTS

3. The Commission is in receipt of information that RESPONDENT SULLIVAN engaged in the offer and/or sale of unregistered securities, to wit:

investment contracts involving fractionalized Viatical Settlements, of RESPONDENT NATIONAL VIATICAL, INC., to Alabama residents.

4. A review of the Registration files of the Alabama Securities Commission, disclosed no record of registration of RESPONDENTS SULLIVAN, and NATIONAL VIATICAL, INC., as a securities agent/dealer in the state of Alabama

5. A review of the files of the Alabama Securities Commission, disclosed no record of registration, nor exemption from registration, of the securities of RESPONDENT NATIONAL VIATICAL, INC.

#### CONCLUSIONS OF LAW

6. RESPONDENT MICHAEL SULLIVAN, is not registered as a securities agent in the state of Alabama.

7. 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.

8. RESPONDENT NATIONAL VIATICAL, INC., is not registered as, a securities dealer in the State of Alabama.

9. 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. The securities of RESPONDENT NATIONAL VIATICAL, INC., being solicited for sale by RESPONDENT SULLIVAN, as set forth in paragraph 5, above, are not registered, nor exempt from registration in the state of Alabama.

11. The sale or attempted 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, RESPONDENTS MICHAEL SULLIVAN and NATIONAL VIATICAL, INC., 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 24 day of July, 2001.

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

BY:

JOSEPH P. BORG  
Director

