

IN THE MATTER OF: )  
 )  
PRO SYSTEMS MARKETING INC )  
JOEL DUNCAN )  
 )  
RESPONDENTS )

4. A review of the files of the Commission disclosed no record of registration of DUNCAN or PSMI as a securities agent/dealer in the state of Alabama.

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

#### CONCLUSIONS OF LAW

6. PSMI 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.

7. DUNCAN is not registered as a securities agent 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.

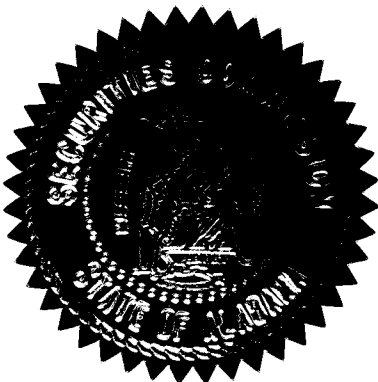
8. The securities of PSMI, being sold by DUNCAN as set forth in paragraph 3 above, are not registered, nor exempt from registration in the state of Alabama. The sale of unregistered, non-exempt securities into, within, or from the state of Alabama is a violation of § 8-6-4, Code of Alabama, 1975.

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, PSMI and DUNCAN, CEASE AND DESIST from further offers or sales of any security into, within, or from the State of Alabama.

Entered at Montgomery, Alabama, this 18<sup>th</sup> day of January, 2006



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

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