

STATE OF ALABAMA
ALABAMA SECURITIES COMMISSION

IN THE MATTER OF:

PETROLOGISTIKS LLC
RUDOLPH A. POLSON

RESPONDENTS

)
)
) ADMINISTRATIVE ORDER
) NO. CD-2007-0029
)
)

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. PETROLOGISTIKS LLC ("PETROLOGISTIKS") is a Delaware Limited Liability Company with a business address of 13008 Elm Tree Drive, Suite 303, Herndon, VA, 20171.

2. RUDOLPH A. POLSON ("POLSON") at all times relevant to the issuance of this order, was CEO of PETROLOGISTIKS, with a business address of 13008 Elm Tree Drive, Herndon, VA, 20171.

STATEMENT OF FACTS

3. The Commission is in receipt of information that in January of 2006, POLSON, contacted an Alabama resident and engaged in the offer and/or sale of unregistered securities, to wit: an investment contract entitled, "a private placement investment," involving the purchase of oil from Nigeria, to an Alabama resident in the amount of \$33,500.00.

4. This initial offering was terminated by POLSON due to an alleged attempt by a Nigerian third party who POLSON alleged had attempted to defraud the Alabama investor. However, it should be noted that safeguards built into the letter of credit by AmSouth Bank that

was utilized by the Alabama investor prohibited the acquisition of funds without prior proof of a legitimate investment.

5. On June 21, 2006, POLSON again contacted the Alabama resident and again engaged in the offer and/or sale of unregistered securities, to wit, an investment contract entitled, a private placement investment, to the Alabama resident in the amount of \$20,000.00.

6. On June 23, 2006, the Alabama resident dispatched a wire transfer from an AmSouth Bank account belonging to the Alabama resident in the amount of \$20,000.00, to the Citibank account of PETROLOGISTIKS, LLC.

7. On October 16, 2007, a review of the Registration files of the Commission revealed no registration for the RESPONDENTS as a Broker Dealer, Securities Agent, Investment Advisor (IA) or Investment Advisor Representative (IAR) in the state of Alabama.

8. On October 16, 2007, a review of the Registration files of the Commission also disclosed no Registration or Reg. D, 506 notice filing by the RESPONDENTS for the securities of PETROLOGISTIKS, LLC.

CONCLUSIONS OF LAW

9. Pursuant to Section 8-6-2 (10), Code of Alabama 1975, the definition of "security" includes any investment contract. The private placement investment offered and sold by the RESPONDENTS to the Alabama Resident are securities as defined by the Act.

10. Pursuant to Section 8-6-4, Code of Alabama 1975, it is unlawful for any person to offer or sell any security in this state unless it is registered under the Act; the security is exempt from registration under Section 8-6-10; or the transaction is exempt under Section 8-6-11. The securities offered and sold by the RESPONDENTS to the Alabama resident were neither registered nor exempt from registration in Alabama.

11. Pursuant to Section 8-6-3, Code of Alabama 1975, it is unlawful for any person to

transact business in this state as a dealer or agent for securities unless he is registered under the Act. RESPONDENTS offered and sold securities to an Alabama resident while not registered as a dealer or agent in violation of Section 8-6-3(a) of the Act.

This Order does not prevent the 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 RESPONDENTS, PETROLOGISTIKS, LLC and RUDOLPH A. POLSON 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 14th day of November, 2007.



ALABAMA SECURITIES COMMISSION
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BY:


J. Randall McNeill
Deputy Director