

STATE OF ALABAMA
ALABAMA SECURITIES COMMISSION

IN THE MATTER OF:)
)
THE SILVER CLUB)
MARY THOMSON)
)
 RESPONDENTS)

ADMINISTRATIVE ORDER
NO.CD-2001-0044

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. THE SILVER CLUB ("RESPONDENT CLUB") is a company with a business address of 190 County Road 41, Heflin, Alabama 36264.

2. MARY THOMSON ("RESPONDENT THOMSON") is a principal and agent of Respondent Club with a business address of 190 County Road 41, Heflin, Alabama 36264.

STATEMENT OF FACTS

3. The Commission is in receipt of information that RESPONDENTS CLUB AND THOMSON offered for sale in the State of Alabama and worldwide, investment contracts in a profit-sharing venture via a website on the Internet.

4. Review of the files of the Commission, disclosed no record of the registrations of RESPONDENTS CLUB or THOMSON.

5. Review of the files of the Commission, disclosed no record of registration, nor exemption from registration, of the securities of RESPONDENTS CLUB or THOMSON.

CONCLUSIONS OF LAW

6. RESPONDENTS CLUB and THOMSON are not registered as securities dealers in the state of Alabama.

7. 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.

8. The securities sold by RESPONDENTS CLUB and THOMSON, as set forth in paragraph 5, above, are not registered, nor exempt from registration in the state of Alabama.

9. 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, RESPONDENTS CLUB and THOMSON 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 22nd day of August, 2001.



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

A handwritten signature in black ink, appearing to read "Joseph P. Borg", is written over a horizontal line. A long, sweeping flourish extends from the bottom left of the signature.

JOSEPH P. BORG
Director