

**STATE OF ALABAMA
ALABAMA SECURITIES COMMISSION**

IN THE MATTER OF:

STERLING TRUST COMPANY)	ADMINISTRATIVE ORDER
CENTER FOR SENIOR PLANNING)	NO. OY-2007-0025
LIFE PARTNERS HOLDING INC.)	
d/b/a LIFE PARTNERS INC.)	
DAN BELBECK)	
ROGER OWENS)	
JERRY POSS)	
RESPONDENT)	

ORDER TO VACATE

AS IT PERTAINS EXCLUSIVELY TO STERLING TRUST COMPANY

The Alabama Securities Commission ("Commission"), having the 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, has determined as follows:

RESPONDENT

1. STERLING TRUST COMPANY ("STERLING") is a self described escrow service with a business address of 7901 Fish Pond Road, Waco, Texas 76710. Sterling represents that it acts only as an escrow agent for LIFE PARTNERS HOLDING, INC.

STATEMENT OF FACTS

2. The Alabama Securities Commission was in receipt of information that indicated DAN BELBECK, ROGER OWENS, and JERRY POSS while acting as Agents of the CENTER FOR SENIOR PLANNING, LIFE PARTNERS HOLDING INC. d/b/a LIFE PARTNERS INC., and STERLING TRUST COMPANY engaged in the offer and/or sale of securities, to wit: investment contracts involving fractionalized Life Settlement Agreements into, within, or from the state of Alabama.

3. Life Settlement policies, to which the agreements are attached, are insurance policies purchased at a discount to their face value, generally from the elderly, but mainly based on the life expectancy of the insured. Upon the death of the insured, proceeds are distributed based upon the distinct share of the policy which each investor owns.

4. On September 18, 2007, an investment seminar was held in Huntsville, Alabama at which ROGER OWENS was one of the presenters on Life Settlement Agreements and based on the presentation it appeared that ROGER OWENS was a representative of STERLING.

5. On October 12, 2007, an Administrative Order, Cease and Desist Order #2007-0025 was issued to CENTER FOR SENIOR PLANNING, LIFE PARTNERS HOLDING INC. d/b/a LIFE PARTNERS INC., DAN BELBECK, ROGER OWENS, JERRY POSS, and STERLING for offering for sale securities, as described in paragraph 2, in the State of Alabama without benefit of registration as a securities dealer or agent.

6. On November 14, 2007, the Commission received a letter from Matthew P. Boshier, legal counsel for STERLING, in response to the issued Cease and Desist Order. Mr. Boshier represented that STERLING is a non-bank trust company chartered under the laws of the state of Texas and regulated by the Texas Department of Banking. STERLING'S primary business purpose is providing record keeping and asset custody for self-directed individual retirement accounts.

7. Mr. Boshier also provided information to the Commission that RESPONDENT, ROGER OWENS, was not and has never been an employee or agent of STERLING. Mr. Owens allegedly acted as an agent of LIFE PARTNERS in the solicitation of Alabama residents to purchase Life Settlement Agreements.

8. Pursuant to Section 8-6-2(3), Code of Alabama 1975, a dealer shall be any person engaged in the business of effecting transactions in securities for the account of others or for his own account, but such term does not include a trust company. Thus, based on STERLING'S representation that it acts only as an escrow agent, STERLING is not subject to registration as a broker-dealer pursuant to Section 8-6-3(a), Code of Alabama 1975.

9. Based upon good cause shown, the Cease and Desist Order, Administrative Order #CD-2007-0025, issued October 12, 2007, is hereby vacated as it pertains to RESPONDENT, STERLING TRUST COMPANY only.

Entered at Montgomery, Alabama, this 19th day of May, 2008.



ALABAMA SECURITIES COMMISSION
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BY:


JOSEPH P. BORG
Director