State of Missouri Office of Secretary of State

Case No. AP-07-46

IN THE MATTER OF:

INTEGRITY SOLUTIONS FINANCIAL SERVICES, LLC; INTEGRITY SOLUTIONS TAX CONSULTANTS, INC.; EVERETT BIAS a/k/a EVERETT SANCHEZ BIAS; JOHN CAMPBELL a/k/a JOHN CAMPBELL-BEY; and PETER HALL,

Respondents.

Serve Integrity Solutions Financial Services, LLC; Integrity Solutions Tax Consultants, Inc., and Everett Bias a/k/a Everett Sanchez Bias, at:

> 11645 South Walnut Street Olathe, Kansas 66061-8302

Serve John Campbell a/k/a/ John Campbell-Bey at: 2901 W. Coast Highway, Suite 200 Newport Beach, California 92633

Serve Peter Hall at: 318 W. 90th Street Apt. 3 New York, New York 10024-1618

ORDER IMPOSING CIVIL PENALTIES AND CHARGING COSTS

On September 4, 2008, the Commissioner of Securities Matt Kitzi issued a Final Order to Cease and Desist as to all Respondents in this matter (the 'Final Order'). On September 4, 2008, the Commissioner, upon the request of the parties, also issued a Notice of Hearing as to Petition for Civil Penalties and Costs Against All Respondents, setting a hearing for October 8, 2008. Prior to the October 8 hearing, coursel for various parties requested that the matter be submitted via affidavit. On October 28, 2008, Respondents Integrity Solutions Financial Services, LLC, Integrity Solutions Tax Consultants, Inc., and Everett Bias aka Everett Sanchez Bias, individually and as representative of Integrity Solutions Financial Services, LLC, Integrity Solutions Tax Consultants, Inc., and Everett Bias aka Everett Sanchez Bias, individually and as representative of Integrity Solutions Financial Services, LLC, Integrity Solutions Tax Consultants, Inc., and Everett Bias aka Everett Sanchez Bias, filed an affidavit with the Commissioner, as well as a supplemental memorandum. On November 18, 2008, coursel for various parties filed a Joint Petition for Payment of Civil Penalties and Costs as to Respondents Integrity Solutions Financial Services, LLC, Integrity Solutions Tax Consultants, Inc., and Everett Bias aka Everett Bias aka Everett Sanchez Bias (the "Joint Petition"). After reviewing the filings and affidavits, the Commissioner issues the following findings and order:

- 1. In the Final Order, the Commissioner found and concluded that:
 - All Respondents committed multiple violations of Section 409.3-301, RSMo., and multiple violations of Section 409.5-501, RSMo; and
 - b. Respondent Bias committed multiple violations of Section 409.4-402, RSMo.
- 2. In the Joint Petition, the filing parties agreed that Respondents Integrity Solutions Financial Services, LLC, Integrity Solutions Tax Consultants, Inc., and Everett Bias aka Everett Sanchez Bias would pay, jointly and severally, a total penalty in the amount of \$46,000 for the multiple violations of Sections 409.3-301, 409.4-402 and 409.5-501, RSMo., with \$45,000 of such penalty suspended conditioned on such Respondents' compliance with the stipulations in the Joint Petition and compliance with the Final Order.
- 3. In the Joint Petition, the filing parties agreed that Respondents Integrity Solutions Financial Services, LLC, Integrity Solutions Tax Consultants, Inc., and Everett Bias aka Everett Sanchez Bias would pay, jointly and severally, a portion of the costs of the investigation in this matter in the amount of \$4,000, the entirety of such charge to be suspended conditioned on such Respondents' compliance with the stipulations in the Joint Petition and compliance with the Final Order.
- 4. In the Joint Petition, the filing parties agreed that upon the failure of Respondents Integrity Solutions Financial Services, LLC, Integrity Solutions Tax Consultants, Inc., and Everett Bias aka Everett Sanchez Bias to comply with any terms of the Final

Order, the suspended penalties and costs would become immediately payable under operation of law.

5. No filing has been made by, appearance entered on behalf of, nor any communication had by the Commissioner with, Respondents John Campbell a/k/a John Campbell-Bey or Peter Hall.

ORDER

NOW THEREFORE, it is hereby ORDERED that:

- A. Pursuant to Section 409.6-604(d), RSMo., Respondents Integrity Solutions Financial Services, LLC, Integrity Solutions Tax Consultants, Inc., and Everett Bias a/k/a Everett Sanchez Bias, shall pay within sixty (60) days from the date this Order, the total amount of six thousand dollars (\$6,000) to the State of Missouri as civil penalties for multiple violations of Sections 409.3-301, RSMo. This amount shall be sent to the Secretary of State and made payable to the State of Missouri, and the Secretary of State shall forward these funds to the state treasury for the benefit of county and township school funds as provided in Article IX, Section 7 of the Constitution of Missouri. Respondents shall deliver this payment to the Securities Division, 600 W. Main Street, PO Box 1276, Jefferson City, Missouri 65102. Respondents Integrity Solutions Financial Services, LLC, Integrity Solutions Tax Consultants, Inc., and Everett Bias a/k/a Everett Sanchez Bias shall be jointly and severally liable for the payment of the amount in this paragraph A.
- B. Pursuant to Section 409.6-604(d), RSMo., Respondents Integrity Solutions Financial Services, LLC, Integrity Solutions Tax Consultants, Inc., and Everett Bias a/k/a Everett Sanchez Bias, shall pay within sixty (60) days from the date this Order, the total amount of twenty thousand dollars (\$20,000) to the State of Missouri as civil penalties for multiple violations of Sections 409.4-402, RSMo. This amount shall be sent to the Secretary of State and made payable to the State of Missouri, and the Secretary of State shall forward these funds to the state treasury for the benefit of county and township school funds as provided in Article IX, Section 7 of the Constitution of Missouri. Respondents shall deliver this payment to the Securities Division, 600 W. Main Street, PO Box 1276, Jefferson City, Missouri 65102. Respondents Integrity Solutions Financial Services, LLC, Integrity Solutions Tax Consultants, Inc., and Everett Bias a/k/a Everett Sanchez Bias shall be jointly and severally liable for the payment of the amount in this paragraph B.
- C. Pursuant to Section 409.6-604(d), RSMo., Respondents Integrity Solutions Financial Services, LLC, Integrity Solutions Tax Consultants, Inc., and Everett Bias a/k/a Everett Sanchez Bias, shall pay within sixty (60) days from the date this Order, the total amount of twenty thousand dollars (\$20,000) to the State of Missouri as civil penalties for multiple violations of Sections 409.5-501, RSMo. This amount shall be sent to the Secretary of State and made payable to the State of Missouri, and the Secretary of State shall forward these funds to the state treasury for the benefit of county and township school funds as provided in Article IX, Section 7 of the Constitution of Missouri. Respondents shall deliver this payment to the Securities Division, 600 W. Main Street, PO Box 1276, Jefferson City, Missouri 65102. Respondents Integrity Solutions Financial Services, LLC, Integrity Solutions Tax Consultants, Inc., and Everett Bias a/k/a Everett Sanchez Bias shall be jointly and severally liable for the payment of the amount in this paragraph C.
- D. Pursuant to Section 409.6-604(e), RSMo., Respondents Integrity Solutions Financial Services, LLC, Integrity Solutions Tax Consultants, Inc., and Everett Bias a/k/a Everett Sanchez Bias shall pay, within sixty (60) days from the date of this Order, the amount of four thousand dollars (\$4,000) as reimbursement for the costs of the investigation of this matter. This amount shall be sent to the Secretary of State and made payable to the Missouri Secretary of State's Investor Education and Protection Fund. Respondents shall deliver this payment to the Securities Division, 600 W. Main Street, PO Box 1276, Jefferson City, Missouri 65102. Respondents Integrity Solutions Financial Services, LLC, Integrity Solutions Tax Consultants, Inc., and Everett Bias a/k/a Everett Sanchez Bias shall be jointly and severally liable for the payment of the amount in this paragraph D.
- E. Provided that Respondents Integrity Solutions Financial Services, LLC, Integrity Solutions Tax Consultants, Inc., and Everett Bias a/k/a Everett Sanchez Bias comply in full with all terms of this Order, each of the civil penalties described in paragraphs A and B, above, and the costs in paragraph D, above, shall be suspended. In addition, provided that Respondents Integrity Solutions Financial Services, LLC, Integrity Solutions Tax Consultants, Inc., and Everett Bias a/k/a Everett Sanchez Bias comply in full with all terms of this Order, the penalties described in paragraph C, above, shall be suspended in the amount of nineteen thousand dollars (\$19,000). These suspensions leave Respondents Integrity Solutions Financial Services, LLC, Integrity Solutions Tax Consultants, Inc., and Everett Sanchez Bias jointly and several liable for and subject to an immediate civil penalty of one thousand dollars (\$1,000). If Respondents fail to make any payment described in this paragraph, the full amount remaining, together with all suspended amounts, shall be immediately due and payable, under operation of law, after five (5) days notice to cure. If any amount remains unpaid after such five-day cure period, the Commissioner will refer this matter for enforcement as provided in Sections 409.6-603 and 409-6-604, RSMo. (Curn Supp. 2007). Such immediately due payments shall be in addition to all other penalties then available under the law.
- F. Pursuant to Section 409.6-604(d), RSMo., Respondent John Campbell a/k/a John Campbell-Bey shall pay, within sixty (60) days from the date this Order, the total amount of four thousand dollars (\$4,000) to the State of Missouri as civil penalties for multiple violations of Sections 409.3-301, RSMo. This amount shall be sent to the Secretary of State and made payable to the State of Missouri, and the Secretary of State shall forward these funds to the state treasury for the benefit of county and township school funds as provided in Article IX, Section 7 of the Constitution of Missouri. Respondent shall deliver this payment to the Securities Division, 600 W. Main Street, PO Box 1276, Jefferson City, Missouri 65102.

- G. Pursuant to Section 409.6-604(d), RSMo., Respondent John Campbell a/k/a John Campbell-Bey shall pay, within sixty (60) days from the date this Order, the total amount of ten thousand dollars (\$10,000) to the State of Missouri as civil penalties for multiple violations of Sections 409.5-501, RSMo. This amount shall be sent to the Secretary of State and made payable to the State of Missouri, and the Secretary of State shall forward these funds to the state treasury for the benefit of county and township school funds as provided in Article IX, Section 7 of the Constitution of Missouri. Respondent shall deliver this payment to the Securities Division, 600 W. Main Street, PO Box 1276, Jefferson City, Missouri 65102.
- H. Pursuant to Section 409.6-604(d), RSMo., Respondent Peter Hall shall pay, within sixty (60) days from the date this Order, the total amount of four thousand dollars (\$4,000) to the State of Missouri as civil penalties for multiple violations of Sections 409.3-301, RSMo. This amount shall be sent to the Secretary of State and made payable to the State of Missouri, and the Secretary of State shall forward these funds to the state treasury for the benefit of county and township school funds as provided in Article IX, Section 7 of the Constitution of Missouri. Respondent shall deliver this payment to the Securities Division, 600 W. Main Street, PO Box 1276, Jefferson City, Missouri 65102.
- I. Pursuant to Section 409.6-604(d), RSMo., Respondent Peter Hall shall pay, within sixty (60) days from the date this Order, the total amount of ten thousand dollars (\$10,000) to the State of Missouri as civil penalties for multiple violations of Sections 409.5-501, RSMo. This amount shall be sent to the Secretary of State and made payable to the State of Missouri, and the Secretary of State shall forward these funds to the state treasury for the benefit of county and township school funds as provided in Article IX, Section 7 of the Constitution of Missouri. Respondent shall deliver this payment to the Securities Division, 600 W. Main Street, PO Box 1276, Jefferson City, Missouri 65102.
- J. The Final Order issued September 4, 2008, remains final and in effect, and is in no manner altered or amended by this order other than as is necessary to give effect to the imposition of civil penalties and charging of costs herein.
- K. All Respondents shall pay their own costs and attorney's fees with respect to this matter.

SO ORDERED.

WITNESS MY HAND AND OFFICIAL SEAL OF MY OFFICE AT JEFFERSON CITY, MISSOURI THIS 1ST DAY OF DECEMBER, 2008.

ROBIN CARNAHAN SECRETARY OF STATE

(Signed/Sealed) MATTHEW D. KITZI COMMISSIONER OF SECURITIES

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of December, 2008, copies of the foregoing ORDER IMPOSING CIVIL PENALTIES AND CHARGING COSTS in the above styled case was **mailed by regular U.S. Mail to:**

John Harl Campbell 4075 Highway 54, #101A Osage Beach, Missouri 65065 ATTORNEY FOR RESPONDENTS INTEGRITY SOLUTIONS FINANCIAL SERVICES, LLC, INTERGRITY SOLUTIONS TAX CONSULTANTS, INC., AND EVERETT BIAS A/K/A EVERETT SANCHEZ BIAS

and mailed by certified U.S. Mail, postage prepaid, to:

John Campbell a/k/a John Campbell-Bey 2901 W. Coast Highway, Suite 200 Newport Beach, California 92633

Peter Hall 318 W. 90th Street, Apt. 3 New York, New York 10024-1618 and hand delivered to:

Mary Hosmer Assistant Commissioner

> John Hale Specialist