



STATE OF MISSOURI
OFFICE OF SECRETARY OF STATE

IN THE MATTER OF:)
)
JEFFREY JAMES MEJIA,) Case No. AP-13-16
)
 Respondent.)

**FINAL ORDER TO CEASE AND DESIST AND TO PAY RESTITUTION,
DISGORGEMENT, CIVIL PENALTIES, AND COSTS**

On August 22, 2013, Mary Hosmer, Assistant Commissioner for the Missouri Securities Division and on behalf of its Enforcement Section, submitted a Petition for Order to Cease and Desist and Order to Show Cause why Restitution, Civil Penalties and Costs Should not be Imposed (the “Petition”) to the Commissioner. After reviewing the Petition, this matter’s procedural history, and the evidence produced at the August 28, 2014 hearing, the Commissioner now issues the following final order.

I. RESPONDENT MEJIA

1. Jeffrey James Mejia (“Mejia”) is a 53-year-old Florida resident with a mailing address of 1339 Gardenia Drive, Sebastian, Florida 32976. Prior to 2012, Mejia resided in Columbia, Missouri.
2. Mejia is registered with the Missouri Department of Insurance Financial Institutions & Professional Registration with a license number of 0187459.
3. A check of the Central Registration Depository (“CRD”) records reveals that at all times relevant to this matter, Mejia was not registered as a broker-dealer, broker-dealer agent, investment adviser, or investment adviser representative in the State of Missouri.
4. As used herein, the term “Respondent” refers to Mejia.

II. PROCEDURAL HISTORY

5. On August 22, 2013, the Enforcement Section submitted its Petition to the Commissioner for a cease and desist order to be issued against Respondent Mejia.
6. On September 3, 2013, the Commissioner issued an Order to Cease and Desist and Order to Show Cause why Restitution, Disgorgement, Civil Penalties, and Costs Should not be Imposed (the “C&D Order”) against Mejia.

7. On October 7, 2013, the Commissioner received Respondent Mejia's hearing request in this matter.
8. Over the course of several months in late 2013 and early 2014, Respondent's counsel—who later withdrew in March 2014—and the Enforcement Section attempted to settle the case.
9. Settlement discussions broke down, and Respondent filed a Motion to Dismiss and/or Motion for Summary Judgment on February 20.
10. In a March 7 Order, Respondent's Motion to Dismiss and/or Motion for Summary Judgment was denied.
11. In a separate Order dated March 7, a pre-hearing conference was set and the hearing was continued to April 22, 2014.
12. The pre-hearing conference was moved several times and occurred on April 28, 2014.
13. At the pre-hearing conference on April 28, 2014, Mr. Mejia appeared on his own behalf and stated that he was choosing not to hire counsel "until the appeal." Assistant Commissioner Mary Hosmer, Enforcement Counsel Jennifer Martin, and Enforcement Counsel Tyler McCormick appeared on behalf of the Enforcement Section.
14. Mr. Mejia stated that he did not understand why various Orders in the case suggested that settlement was possible because he had never been close to settlement.
15. Ms. Hosmer stated that Mr. Mejia had yet to file an answer and asked that he be required to file an answer.
16. Respondents are required to file Answers within 30 days of receiving the hearing order. 15 CSR 30-55.030(1)(A).
17. Because the hearing Order was issued October 21, Respondent Mejia's Answer was due sometime in late November.
18. At the April 28, 2014 pre-hearing conference, the Commissioner informed Mr. Mejia that the rules governing hearings before the Commissioner do require the filing of an answer to narrow the scope of the factual disputes.
19. Mr. Mejia indicated that he did not want to file an answer and repeated that he was waiting to hire an attorney until this litigation was appealed to Court.
20. The Commissioner noted that Respondent Mejia had requested a hearing and that, while he could withdraw that request, unless he did, an answer would be required to proceed.
21. The Commissioner further warned Mr. Mejia that failure to file an answer might well result in adverse consequences.
22. Two days later, another Order issued by the Commissioner (the "April 30 Order") did two things:

- a. required Respondent to file an Answer no later than May 19, 2014; and
 - b. set a pre-hearing conference for June 26, 2014.
23. No Answer was filed by May 19.
 24. On May 30, 2014, the Enforcement Section filed a Motion to Have Allegations with Respect to Jeffrey James Mejia Deemed Admitted.
 25. Respondent Mejia submitted no response to the Enforcement Section's motion.
 26. Neither Respondent nor anyone on Respondent's behalf appeared for the June 26, 2014 pre-hearing conference.
 27. Accordingly, on July 21, 2014, the Commissioner issued an Order that again did two things:
 - a. deemed Respondent to have admitted all allegations made against him in the Petition for Order to Cease and Desist and Order to Show Cause Why Restitution, Civil Penalties, and Costs Should Not Be Imposed; and
 - b. set a hearing to be convened on August 28, 2014, at the office of the Commissioner.
 28. Although he was served with a copy of the July 21, 2014 Order, Respondent Mejia submitted no response to the Order.
 29. On August 28, 2014, a hearing was convened at the Commissioner's office, with members of the Enforcement Section in attendance.
 30. Neither Respondent nor his representative attended the hearing in person or telephonically.
 31. At the August 28, 2014 hearing, the Enforcement Section introduced evidence regarding the losses of MR1, MR2, MR3, KR1, and KR2 due to Respondent Mejia's activities.
 32. This evidence was received without objection.
 33. Based on the allegations made against Respondent Mejia in the C&D Order, Respondent Mejia's admission of those allegations, and the unchallenged evidence presented at the August 28, 2014 hearing, the Commissioner finds as follows:

III. FINDINGS OF FACT

A. Missouri Residents 1 and 2

34. In March 2006, a 70-year-old Sedalia, Missouri resident ("MR1") and MR1's 70-year-old spouse ("MR2") attended an investment seminar that was conducted by Mejia.
35. MR1 and MR2 believed Mejia was an "independent" investment advisor/stock trader.

36. At subsequent meetings Mejia presented MR1 and MR2 with a proposal for MR1 and MR2 to purchase an equity-indexed annuity from EquiTrust Life Insurance Company (“EquiTrust”) that Mejia explained would enable MR1 and MR2 to receive a 10% bonus on their investment.¹
37. In June 2006, MR1 transferred \$103,055 from other annuities to an EquiTrust equity-indexed annuity (“EquiTrust Annuity”), incurring a surrender charge.
38. In or around June 2006, MR2 transferred \$31,445 from another annuity to an EquiTrust Annuity.
39. In or around November 2009, Mejia called MR1 and MR2 and stated that EquiTrust was being “downgraded” and that Mejia was concerned with the safety of MR1’s and MR2’s money at EquiTrust.
40. Mejia told MR1 and MR2 that Mejia had made money for other clients by buying and selling stock through accounts at T.D. Ameritrade, Inc. (“Ameritrade”), a Missouri-registered broker-dealer with a home office address of 200 South 108th Avenue, Omaha, Nebraska 68154.
41. Mejia told MR1 and MR2 that Mejia had turned a retirement account with \$140,000 into \$250,000 in two years. (Hrg. Exs. 2 and 3.)
42. Mejia stated that Mejia would do all the buying and selling within the Ameritrade accounts for MR1 and MR2. (Hrg. Exs. 2 and 3.)
43. Mejia told MR1 and MR2 that they should not let Ameritrade know Mejia was trading in MR1’s and MR2’s accounts. (Hrg. Exs. 2 and 3.)
44. Mejia would discuss his compensation with MR1 and MR2 after Mejia made money in MR1’s and MR2’s Ameritrade accounts. (Hrg. Ex. 3.)
45. On September 24, 2009, MR1 and MR2 each signed an Ameritrade account application that Mejia had completed. (Hrg. Exs. 2 and 3.)

B. MR1’s Ameritrade Account

46. On November 12, 2009, MR1 transferred \$81,968 from MR1’s EquiTrust annuity to MR1’s Ameritrade account and incurred a surrender charge of \$19,586. (Hrg. Ex. 2.)
47. On November 17, 2009, MR1’s Ameritrade account had a balance of \$81,968. (Hrg. Exs. 2 and 3.)

¹ The EquiTrust annuity has a 14-year vesting period, and MR1 and MR2 could incur surrender penalties for withdrawals over 10% of the annuity value within that 14-year period.

48. Between November 2009 and November 2011, MR1's Ameritrade account and an Ameritrade account in the name of Jeff J. Mejia SEP IRA ("Mejia's Account") were repeatedly accessed by the same Internet Protocol ("IP") addresses.²
49. On some of the dates that Mejia's Account and MR1's Ameritrade account were accessed by the same IP address, trades took place in MR1's Ameritrade account.
50. Between November 17, 2009, and September 30, 2012, at least 20 stock transactions took place in MR1's Ameritrade account including 19 transactions involving the purchase or sale of stock in foreign, speculative, volatile, and/or penny stock companies. (Hrg. Ex. 3.)
51. On September 30, 2012, MR1's Ameritrade account had a balance of \$12,950. (Hrg. Exs. 2 and 3.)
52. MR1 never purchased or sold, nor directed Mejia to purchase or sell any stock, within MR1's Ameritrade account. (Hrg. Ex. 3.)
53. Adding MR1's investment losses due to Respondent's impermissible trading to MR1's surrender fees results in a total loss of \$88,604. (Hrg. Exs. 1 and 3.)
54. Given an interest rate of 8% per year from the date of the September 3, 2013 C&D Order to the date of the August 28, 2014 hearing, interest on that \$88,604 total loss results in interest of \$6,971.80.

C. MR2's Ameritrade Account

55. On November 10, 2009, MR2 transferred \$25,010 from MR2's EquiTrust annuity to MR2's Ameritrade account and incurred a surrender charge of \$5,976. (Hrg. Exs. 2 and 4.)
56. On December 11, 2009, MR2's Ameritrade account had a balance of \$25,010.
57. Between November 2009 and November 2011, MR2's Ameritrade account and Mejia's Account were repeatedly accessed by the same IP addresses.
58. On some of the dates that Mejia's Account and MR2's Ameritrade account were accessed by the same IP address, trades took place in MR2's Ameritrade account.
59. Between December 31, 2009, and September 30, 2012, all seven stock transactions that took place in MR2's Ameritrade account involved the purchase or sale of stock in foreign, speculative, volatile and/or penny stock companies.
60. On September 30, 2012, MR2's Ameritrade account had a balance \$6,472.
61. MR2 never purchased or sold any stock, nor directed Mejia to purchase or sell any stock, within MR2's Ameritrade account.

² An Internet Protocol address is a numerical label assigned to a computer device when that device connects to the internet.

62. Adding MR2's investment losses due to Respondent's impermissible trading to MR2's \$5,976 surrender fees results in a total loss of \$24,514. (Hrg. Exs. 1 and 4.)
63. Given an interest rate of 8% per year from the date of September 3, 2013 C&D Order to the date of the restitution hearing, interest on that \$24,514 total loss results in interest of \$1,928.88.

D. Missouri Residents 3 and 4

64. In 2003, a 73-year-old Belton, Missouri resident ("MR3") and MR3's 71-year-old spouse ("MR4") attended a "free lunch" seminar conducted by Mejia.
65. In or around March 2010, Mejia met with MR3 and MR4 and suggested that MR3 and MR4 invest money with Mejia at Ameritrade.
66. Mejia told MR3 and MR4 that Mejia would make up for any losses MR3 and MR4 might incur in the Ameritrade account.
67. Mejia telephoned Ameritrade and established the Ameritrade account for MR3 and MR4. Mejia assigned a password to MR3 and MR4's Ameritrade account that was not known to MR3 or MR4.
68. On March 3, 2010, MR3 and MR4 deposited \$16,000 in their Ameritrade account.
69. In early 2010, a margin loan was taken out in MR3 and MR4's Ameritrade account.
70. MR3 and MR4 did not request any margin loans or give Mejia permission to take any margin loans out in MR3 and MR4's Ameritrade account.
71. Between March 2010 and November 2011, MR3 and MR4's Ameritrade account and Mejia's Account were repeatedly accessed by the same IP addresses.
72. On one of the dates that Mejia's Account and MR3 and MR4's Ameritrade account were accessed by the same IP address, a trade took place in MR3 and MR4's Ameritrade account.
73. Between March 2010 and November 2012, at least 28 stock transactions took place in MR3 and MR4's Ameritrade account.
74. Of these transactions, 22 were purchases or sales of stock in a foreign, speculative, and penny stock company and two were transactions involving the purchase and sale of a leveraged inverse exchange-traded fund.
75. During this time, MR3 and MR4 never purchased or sold, nor directed Mejia to purchase or sell any stock, within MR3 and MR4's Ameritrade account.
76. MR3 and MR4 did not have access to their Ameritrade account, nor did they receive statements regarding MR3 and MR4's Ameritrade account.

77. On December 3, 2012 (and after not being able to reach Mejia for approximately three weeks), MR3 called Ameritrade to inquire about the balance of MR3 and MR4's account.
78. MR3 did not know the password to the account and had to establish MR3's identity before Ameritrade personnel told MR3 that the account had a balance of approximately \$1,200.
79. On or around December 2012, Mejia met with MR3 and MR4 and Mejia stated he would make up for the losses that MR3 and MR4 had incurred in their Ameritrade account.
80. Mejia claimed that Mejia had paid MR3 and MR4 back \$11,000 of their losses by rolling over MR4's EquiTrust annuity into a new annuity that provided a bonus.³
81. Mejia told MR3 and MR4 that Mejia would write a check to MR4 for the remainder of the losses in the Ameritrade account.
82. In or around April 2013, Mejia paid approximately \$3,000 in cash to MR3 and MR4 to make up for the over \$14,000 in losses in MR3 and MR4's Ameritrade account. (Hrg. Exs. 1 and 2.)
83. The payment of \$3,000 resulted in a net loss of \$11,780 due to Respondent's unauthorized trading. (Hrg. Exs. 1 and 2.)
84. Given an interest rate of 8% per year from the date of September 3, 2013 C&D Order to the date of the August 28, 2014 hearing, interest on that \$11,780 total loss results in interest of \$926.91.

E. Kansas Residents 1 and 2

85. In or around April 2009, a 73-year-old Louisburg, Kansas resident ("KR1") and KR1's 72-year-old spouse ("KR2") met with Mejia at their home.
86. At this meeting Mejia stated that Mejia was knowledgeable about the stock market and had made money for other clients by investing funds for these investors.
87. Mejia claimed he could turn KR1 and KR2's \$40,000 into \$100,000 through investments.
88. KR1 and KR2 made an agreement with Mejia that if KR1's Ameritrade account went up by a certain percentage that KR1 and KR2 would pay Mejia a commission.
89. On April 14, 2009, Mejia completed an Ameritrade account application for KR1.
90. In or around April 2009, KR1 placed \$40,000 in KR1's Ameritrade account. (Hrg. Ex. 1.)
91. In the spring of 2009, Mejia took out a margin loan in KR1's Ameritrade account.

³ Typically, annuity bonuses are conditional on the fulfillment of a lengthy surrender period. If the policy is surrendered before the expiration of that surrender period, the investor will pay a surrender penalty. In addition, if an annuity is surrendered prior to the end of that period, all or a portion of the bonus may not be considered as part of the surrender value of the policy.

92. Neither KR1 nor KR2 took out a margin loan in KR1's Ameritrade account nor gave Mejia permission to take out a margin loan.
93. In September 2009, KR1's Ameritrade account had:
 - a. stock positions of \$84,327;
 - b. a margin loan of \$42,537; and
 - c. a total balance of \$41,789.
94. In September 2009, Mejia told KR1 and KR2 that they owed Mejia \$4,957 because KR1's Ameritrade account had increased from the initial investment to over \$65,000.
95. On September 19, 2009, KR1 and KR2 gave Mejia a check for \$4,957 to pay Mejia for his trading activities. (Hrg. Ex. 2.)
96. Between April 2009 and April 2010, over 62 transactions were made in KR1's Ameritrade account involving the purchase or sale of stock in foreign, speculative, and/or penny stock companies.
97. Between November 2009 and May 2010, KR1's Ameritrade account and Mejia's Account were repeatedly accessed by the same IP addresses.
98. During this time, KR1 never purchased or sold, nor directed Mejia to purchase or sell, any stock within KR1's Ameritrade account.
99. On some of the same dates that Mejia's Account and KR1's Ameritrade account were accessed by the same IP address, trades took place in KR1's account.
100. A review of a website that determines a geographic location from an IP address revealed that the user that transacted business in KR1's Ameritrade account and accessed and/or transacted business in Mejia's Account was located in Missouri.
101. KR1 and KR2 received statements from Ameritrade in the mail and were also able to check the account's performance online after Mejia explained how to set up a username and password.
102. In or around May 2010, KR1 and KR2 saw that the value of KR1's Ameritrade account had dropped to approximately \$19,000. KR1 called Ameritrade and directed them to sell the securities in the account and send KR1 the balance of the Ameritrade account.
103. KR1's investment losses due to Respondent's impermissible trading amounted to \$20,962. (Hrg. Exs. 1 and 2.)
104. Given an interest rate of 8% per year from the date of September 3, 2013 C&D Order to the date of the August 28, 2014 hearing, interest on that \$20,962 total loss results in interest of \$1,649.39.
105. The total costs of the investigation into, and the proceedings associated with, this matter amount to \$7,087.31. (Hrg. Ex. 1.)

IV. COMMISSIONER'S CONCLUSIONS OF LAW

106. The **COMMISSIONER CONCLUDES** that Respondent Mejia violated Section 409.4-401(a), RSMo (Supp. 2013),⁴ by transacting business as a broker-dealer in the State of Missouri when Respondent was not registered as a broker-dealer when he:
- a. set up Ameritrade accounts for MR1, MR2, MR3, MR4, and KR1;
 - b. purchased and/or sold securities in these customer accounts;
 - c. received compensation from at least one of these customers; and
 - d. made arrangements with other customers to be paid from the profits in their Ameritrade accounts.
107. The **COMMISSIONER FURTHER CONCLUDES** that Respondent Mejia violated Section 409.4-403(a) when Respondent transacted business in the State of Missouri as an investment adviser when Respondent was not registered as an investment adviser when he:
- a. conducted investment seminars in this State;
 - b. recommended the purchase or the sale of securities in the Ameritrade accounts of MR1, MR2, MR3, MR4, and KR1;
 - c. received compensation for advising at least one of these customers; and
 - d. made arrangements with other customers to be paid from the profits in their Ameritrade accounts.
108. The **COMMISSIONER FURTHER CONCLUDES** that Respondent Mejia violated Section 409.5-501(2) in the State of Missouri when, in connection with the offer, sale or purchase of a security to MR1, MR2, MR3, MR4, or KR1, Respondent omitted to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading, including, but not limited to, the following:
- a. that Mejia was not registered to transact business as a broker-dealer in Missouri;
 - b. that Mejia was not registered to transact business as an investment adviser in Missouri;
 - c. that Mejia had “made money for other clients” by buying and selling stock through Ameritrade, but did not disclose how Mejia could trade securities without being registered in Missouri or provide any financial information about Mejia’s past business dealings with these other clients;

⁴ Unless otherwise specified, all statutory references in this Final Order are to the 2013 Supplement to the Revised Statutes of Missouri.

- d. that Mejia had turned a retirement account with \$140,000 into \$250,000 in two years, but did not disclose what Mejia had invested in or provide financial information to substantiate this claim;
 - e. that Mejia had made “a lot of clients money [sic] by investing their money in the stock market,” and that Mejia was knowledgeable about the stock market without disclosing that Mejia had never been registered as a broker-dealer or investment adviser;
 - f. omitting to state that Mejia traded on margin in the Ameritrade accounts Mejia controlled;
 - g. omitting to state the risks associated with trading on margin in the Ameritrade accounts Mejia controlled;
 - h. omitting to state the risks associated with investing in speculative and/or penny stocks; or
 - i. omitting to state the risks associated with investing in speculative and/or penny stocks in margin accounts.
109. The **COMMISSIONER FURTHER CONCLUDES** that Respondent Mejia violated section 409.5-501(3) in the State of Missouri when, in connection with the offer, sale or purchase of a security to MR1, MR2, MR3, MR4, or KR1, Respondent engaged in an act, practice, or course of business that would operate as a fraud or deceit upon MR1, MR2, MR3, MR4, or KR1 by:
- a. completing the applications to open accounts for others at Ameritrade;
 - b. setting up passwords and user names for these Ameritrade account holders;
 - c. retaining these user names and passwords to electronically access the account holder’s Ameritrade account;
 - d. recommending to some account holders that they liquidate long-term annuity products and incur surrender fees to fund Mejia’s trading activity in the account holders Ameritrade account;
 - e. advising account holders not to tell Ameritrade representatives about Mejia’s trading activity in the account holder’s Ameritrade account;
 - f. conducting the buying and selling within the Ameritrade account under the account holder’s user name and password;
 - g. taking out margin loans at Ameritrade without the account holder’s authorization;
 - h. buying securities on margin at Ameritrade without the account holder’s authorization;
 - i. requesting compensation from an account holder based on the inflated value of an Ameritrade account; or

- j. claiming that Mejia would make up for losses incurred by the account holder at Ameritrade, but failing to provide Mejia's personal financial information to support this claim or failing to tell the account holder how these losses would be determined.
110. The **COMMISSIONER FURTHER CONCLUDES** that at the time Respondent Mejia engaged in the above conduct, MR1, MR2, MR3, MR4, and KR1 were over the age of 60 years old and were elderly persons as that term is defined under Section 409.6-604(d)(3)(B).
111. The **COMMISSIONER FURTHER CONCLUDES** that, by violating Sections 409.4-401(a), 409.4-403(a), and 409.5-501 in the State of Missouri, Respondent Mejia engaged in an illegal act, practice, or course of business in this State, and such conduct is, therefore, subject to the Commissioner's authority under Section 409.6-604.
112. The **COMMISSIONER FURTHER CONCLUDES** that, pursuant to Section 409.6-605(b), that the following order is necessary or appropriate in the public interest or for the protection of investors and is consistent with the purposes of the Missouri Securities Act of 2003.

V. ORDER

NOW THEREFORE, it is hereby ordered that Respondent, his agents, employees and servants, and all other persons participating in or about to participate in the above-described violations with knowledge of this Order are prohibited from violating or materially aiding in any violation of Section 409.4-401(a), 409.4-403(a), and 409.5-501.

IT IS FURTHER ORDERED that, pursuant to Section 409.6-604(d), Respondent Mejia pay a \$10,000 civil penalty for multiple violations of Section 409.4-401(a). This amount shall be made payable to the State of Missouri and paid within 30 days of the date of this final order. 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 send or deliver these payments to the Securities Division, at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.

IT IS FURTHER ORDERED that, pursuant to Section 409.6-604(d), Respondent Mejia pay a \$10,000 civil penalty for multiple violations of Section 409.4-403(a). This amount shall be made payable to the State of Missouri and paid within 30 days of the date of this final order. 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 send or deliver these payments to the Securities Division, at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.

IT IS FURTHER ORDERED that, pursuant to Section 409.6-604(d), Respondent Mejia pay a \$10,000 civil penalty for multiple violations of Section 409.5-501. This amount shall be made payable to the State of Missouri and paid within 30 days of the date of this final order. 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 send or deliver these payments to the Securities Division, at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.

IT IS FURTHER ORDERED that, pursuant to Section 409.6-604(d), Respondent Mejia pay a \$25,000 civil penalty for violating Section 409.5-501 against MR1, MR2, MR3, MR4, and KR1. This amount shall be made payable to the State of Missouri and paid within 30 days of the date of this final order. 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 send or deliver these payments to the Securities Division, at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.

IT IS FURTHER ORDERED that, pursuant to Section 409.6-604(d), Respondent Mejia pay restitution to MR1 in the amount of \$95,575.80. This amount shall be made payable to the Missouri Secretary of State's Investor Restitution Fund, and the Commissioner will take reasonable and necessary actions to distribute such funds to MR1. This amount shall be sent to the Missouri Securities Division at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102, within 30 days from the date of this Final Order.

IT IS FURTHER ORDERED that, pursuant to Section 409.6-604(d), Respondent Mejia pay restitution to MR2 in the amount of \$26,442.88. This amount shall be made payable to the Missouri Secretary of State's Investor Restitution Fund, and the Commissioner will take reasonable and necessary actions to distribute such funds to MR2. This amount shall be sent to the Missouri Securities Division at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102, within 30 days from the date of this Final Order.

IT IS FURTHER ORDERED that, pursuant to Section 409.6-604(d), Respondent Mejia pay restitution to MR3 and MR4 in the amount of \$12,706.91. This amount shall be made payable to the Missouri Secretary of State's Investor Restitution Fund, and the Commissioner will take reasonable and necessary actions to distribute such funds to MR3 and MR4. This amount shall be sent to the Missouri Securities Division at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102, within 30 days from the date of this Final Order.

IT IS FURTHER ORDERED that, pursuant to Section 409.6-604(d), Respondent Mejia pay restitution to KR1 in the amount of \$22,611.39. This amount shall be made payable to the Missouri Secretary of State's Investor Restitution Fund, and the Commissioner will take reasonable and necessary actions to distribute such funds to KR1. This amount shall be sent to the Missouri Securities Division at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102, within 30 days from the date of this Final Order.

IT IS FURTHER ORDERED that, pursuant to Section 409.6-604(d), Respondent Mejia disgorge to KR1 the \$4,957 KR1 paid to Mejia. This amount shall be made payable to the Missouri Secretary of State's Investor Restitution Fund, and the Commissioner will take reasonable and necessary actions to distribute such funds to KR1. This amount shall be sent to the Missouri Securities Division at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102, within 30 days from the date of this Final Order.

IT IS FURTHER ORDERED that, pursuant to Section 409.6-604(e), Respondent Mejia pay a \$7,087.31 in actual costs for investigation into, and the proceedings associated with, this matter. This amount shall be made payable to the Investor Education and Protection Fund and paid within 30 days of the date of this final order. Respondent shall send or deliver these payments to the Securities Division, at 600 West Main Street, P.O. Box 1276, Jefferson City, Missouri 65102.

SO ORDERED:

WITNESS MY HAND AND OFFICIAL SEAL OF MY OFFICE AT JEFFERSON CITY,
MISSOURI THIS TWENTY-FOURTH DAY OF APRIL 2015.



JASON KANDER
SECRETARY OF STATE

A handwritten signature in blue ink that reads "Andrew M. Hartnett".

Andrew M. Hartnett
Commissioner of Securities

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of April 2015, a copy of the foregoing Final Order to Cease and Desist and to Pay Restitution, Disgorgement, Civil Penalties, and Costs, issued in the above-styled case, **was emailed and mailed by certified U.S. Mail to:**

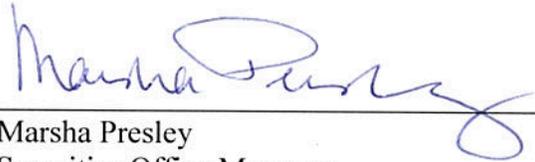
Mr. Jeffrey James Mejia
1339 Gardenia Drive
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And by hand-delivery to:

Mary S. Hosmer
Assistant Commissioner
Missouri Securities Division

Tyler B. McCormick
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Missouri Securities Division



Marsha Presley
Securities Office Manager