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**STATE OF WASHINGTON  
DEPARTMENT OF FINANCIAL INSTITUTIONS  
SECURITIES DIVISION**

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IN THE MATTER OF DETERMINING  
Whether there has been a violation  
of the Business Opportunity Fraud Act of the  
State of Washington by:

AIG Promotions, LLC; Davidan  
Corporation, d/b/a Bankcard Empire

Respondents.

Order Number S-09-450-10-FO01

ENTRY OF FINDINGS OF FACT AND  
CONCLUSIONS OF LAW AND FINAL ORDER  
TO CEASE AND DESIST, AS TO DAVIDAN  
CORPORATION, D/B/A BANKCARD EMPIRE

THE STATE OF WASHINGTON TO:

Davidan Corporation, d/b/a Bankcard Empire

On February 2, 2010, the Securities Administrator of the State of Washington issued Statement of Charges and Notice of Intent to Enter Order to Cease and Desist, S-09-450-09-SC01, hereinafter referred to as "Statement of Charges," against AIG Promotions, LLC and Davidan Corporation, d/b/a Bankcard Empire.

The Statement of Charges, together with a Notice of Opportunity to Defend and Opportunity for Hearing, hereinafter referred to as "Notice of Opportunity for Hearing" and an Application for Adjudicative Hearing, hereinafter referred to as "Application for Hearing", were served on Davidan Corporation, d/b/a Bankcard Empire, on February 8, 2010 and February 16, 2010.

On March 5, 2010, the Securities Division received an Application for Adjudicative Hearing from Davidan Corporation, d/b/a Bankcard Empire. Respondent Davidan Corporation, d/b/a Bankcard Empire, waived the right to a hearing in this matter, and in lieu thereof, submitted a written statement for consideration by the Securities Administrator.

ENTRY OF FINDINGS OF FACT AND  
CONCLUSIONS OF LAW AND FINAL  
ORDER TO CEASE AND DESIST

1 After considering the written statement, the Securities Administrator makes the following findings of  
2 fact and conclusions of law:

3 **FINDINGS OF FACT**

4 Respondents

5 1. AIG Promotions, LLC (“AIG Promotions”) is an Arizona limited liability company with its principal  
6 place of business at 5025 North Central Avenue # 492, Phoenix, Arizona, 85012.

7 2. Davidan Corporation, d/b/a Bankcard Empire (“Bankcard Empire”) is a Delaware corporation with  
8 its principal place of business at 2701 East Osborn Road Suite 100, Phoenix, Arizona, 85016.

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10 Nature of the Offering

11 3. AIG Promotions and Bankcard Empire (“Respondents”) are the sellers of a business opportunity that  
12 involves the leasing of merchant credit card processing machines. Purchasers of this business opportunity  
13 are referred to as “Affiliate Marketing Partners” (“Affiliates”).

14 4. According to the “Bankcard Empire Affiliate Marketing Partner Program Information,” Affiliates  
15 can earn income by referring merchants to Bankcard Empire, who then sign up with Bankcard Empire for  
16 credit card processing services. According to “Schedule A Affiliate Compensation,” Affiliates would earn a  
17 commission for “all equipment leased to a new or existing merchant,” along with “50% of all monthly credit  
18 card processing revenues received by Bankcard Empire” for the Affiliate’s merchants. The “Bankcard  
19 Empire Affiliate Marketing Partner Program Information” further states that “there is no limit on the amount  
20 of income [an Affiliate] can earn.”

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22 5. On or about January 19, 2009, a Washington resident received an unsolicited telephone call from an  
23 AIG Promotions representative. The representative informed the resident that she could earn additional

24 ENTRY OF FINDINGS OF FACT AND  
25 CONCLUSIONS OF LAW AND FINAL  
26 ORDER TO CEASE AND DESIST

1 income by purchasing this business opportunity for \$495. According to the representative, the resident  
2 would provide merchant contacts to Respondents. The representative told the resident that she would  
3 receive a \$500 commission for each merchant referral that resulted in a credit card terminal lease, plus a  
4 percentage of the credit card processing fees Respondents would receive.

5 6. Based on these representations, the resident, a 73-year-old retired woman, purchased this business  
6 opportunity during this telephone call. The resident received an invoice which indicated that she had  
7 purchased the following products: Full Affiliate Training Manual, Marketing Assistance, Merchant Sales  
8 Force, Customized BankCard Merchant Login, and Hosting.

9 7. On or about January 27, 2009, the resident received another phone call from an AIG Promotions  
10 representative. During this phone call, which lasted approximately four hours, the resident was told about  
11 additional marketing tools to help promote her business. The resident orally agreed to purchase these  
12 additional tools for \$9,990.

13 8. On or about January 28, 2009, the resident contacted AIG Promotions and attempted to cancel her  
14 previous purchase of \$9,990, made on or about January 27, 2009.

15 9. On or about February 2, 2009, the resident received an invoice which indicated that she had  
16 purchased "Call blast" and "E-Mail Blasts" for \$9,990. The resident did not sign or return this invoice;  
17 however, a copy of an invoice she later received from her credit card company, which had been provided by  
18 Respondents, appears to bear her signature.

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20 Misrepresentations and Omissions

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24 ENTRY OF FINDINGS OF FACT AND  
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26 ORDER TO CEASE AND DESIST

1 10. The Respondents failed to provide material information regarding its business opportunity, including  
2 but not limited to, the total number of business opportunities sold or leased, the total number of failures of  
3 business opportunities sold or leased, and financial statements.

4 11. The Respondents failed to disclose that Bankcard Empire was subject to a Summary Order to Cease  
5 and Desist issued by the State of Illinois, Secretary of State, Securities Division, on October 9, 2008.

6 Registration Status

7 12. Neither AIG Promotions nor Bankcard Empire is registered to sell its business opportunities in the  
8 state of Washington and neither has been previously so registered.

9 Other Actions

10 13. On October 9, 2008, the State of Illinois, Secretary of State, Securities Department, issued a  
11 Summary Order to Cease and Desist against Bankcard Empire, Ultimate Business Solutions, and Epic  
12 Commerce, LLC for the offer and sale of unregistered business opportunities. On February 3, 2009, an  
13 Order to Cease and Desist was entered against Bankcard Empire.

14 14. On February 10, 2009, the State of Minnesota, Department of Commerce, issued a Cease and Desist  
15 Order and Notice of Right to Hearing against Bankcard Empire and AIG Promotions for the offer and/or  
16 sale of unregistered and non-exempt franchises, and for violation of the Order for Written Statement,  
17 Production of Documents, and Report of Sales.

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20 Based upon the Findings of Fact, the following Conclusions of Law are made:  
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22 **CONCLUSIONS OF LAW**

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24 ENTRY OF FINDINGS OF FACT AND  
25 CONCLUSIONS OF LAW AND FINAL  
26 ORDER TO CEASE AND DESIST

1 1. The offer or sale of the business opportunity described above in Paragraph 5 constitutes the offer or  
2 sale of a business opportunity as defined in RCW 19.110.020.

3 2. The offer or sale of said business opportunity is in violation of RCW 19.110.050 because no  
4 registration for such offer or sale is on file with the Securities Administrator.

5 3. The offer or sale of said business opportunity was made in violation of RCW 19.110.070 because  
6 Respondents failed to provide the prospective purchaser the required Disclosure Document.

7 4. The offer or sale of said business opportunity was made in violation of RCW 19.110.120 because  
8 Respondents made misstatements of material facts and/or omitted to state material facts necessary in order  
9 to make the statements made, in light of the circumstances under which they were made, not misleading  
10 and/or engaged in acts and practices that operated as fraud or deceit.  
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12 Based on the foregoing, and finding it in the public interest:  
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15 **FINAL ORDER**

16 It is hereby ORDERED that the Respondent Davidan Corporation, d/b/a Bankcard Empire, their  
17 agents, and employees each cease and desist from offering and/or selling business opportunities in any  
18 manner in violation of RCW 19.110.050, the section of the Business Opportunity Fraud Act requiring  
19 registration.

20 It is hereby ORDERED that the Respondent Davidan Corporation, d/b/a Bankcard Empire, their  
21 agents, and employees each cease and desist from offering and/or selling business opportunities in any  
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1 manner in violation of RCW 19.110.070, the section of the Business Opportunity Fraud Act requiring a  
2 disclosure document to be provided.

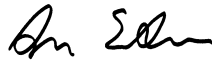
3 It is further ORDERED that Respondent Davidan Corporation, d/b/a Bankcard Empire, their agents,  
4 and employees each cease and desist from violation of RCW 19.110.120, the anti-fraud section of the  
5 Business Opportunity Fraud Act.

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7 This Order is entered pursuant to RCW 19.110.150 and is subject to the provisions of ch. 34.05 RCW.

8 **WILLFUL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE.**

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10 DATED this 23<sup>rd</sup> day of April, 2010.

11 Approved by:

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15 SUZANNE SARASON  
16 Chief of Enforcement

17 Presented by:

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20 Jiyoung Kwon  
21 Financial Legal Examiner

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