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

IN THE MATTER OF DETERMINING) Order No.: S-11-0577-11-FO01
Whether there has been a violation of the)
Business Opportunity Fraud Act of)
Washington by:) ENTRY OF FINDINGS OF FACT AND CONCLUSIONS
) OF LAW AND FINAL ORDER TO CEASE AND DESIST
Visions Investment Group, LLC)
)
)
Respondents.

7 **THE STATE OF WASHINGTON TO:** **Visions Investment Group, LLC**

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9 On May 27, 2011, the Securities Administrator of the state of Washington issued Statement of
10 Charges and Notice of Intent to Enter Order to Cease and Desist, order number S-11-0577-11-SC01,
hereinafter referred to as Statement of Charges.

11 The Statement of Charges, together with a Notice of Opportunity to Defend and Opportunity for
12 Hearing, hereinafter referred to as "Notice of Opportunity for Hearing" and an Application for Adjudicative
13 Hearing, hereinafter referred to as "Application for Hearing," was served on the Respondent, Visions
14 Investment Group, LLC, on November 2, 2011. The Notice of Opportunity for Hearing advised the
15 Respondent, Visions Investment Group, LLC, that a written application for an administrative hearing on the
16 Statement of Charges must be received within twenty days from the date of receipt of the notice. The
17 Respondent, Visions Investment Group, LLC, failed to request an administrative hearing within twenty days
of receipt of the Statement of Charges and Notice of Opportunity for Hearing, either on the Application for
Hearing provided, or otherwise.

18 The Securities Administrator therefore will adopt as final the following Findings of Fact and
19 Conclusions of Law as set forth in the Statement of Charges:

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21 **FINDINGS OF FACT**

22 Respondent

23 1. Visions Investment Group, LLC ("VIG") is a Utah limited liability company. During the
24 period relevant to this Statement of Charges, VIG maintained a principal place of business at 814 East
Bamberger Drive, Suite C, American Fork, Utah 84003.

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3 Nature of the Offering

4 2. VIG offered and sold training entitled the Visions Institute to enable purchasers to “set up
5 and run a profitable real estate investment company from [the purchaser’s] home.” The training’s goal was to
6 “enable the novice or expert real estate investor to understand the paradigm and principles necessary for
7 success.”

8 3. The training consisted of classes, interaction with both a liaison to VIG, referred to as a
9 “Personal Student Advisor,” (“PSA”), and with a mentor assigned to each purchaser, referred to as the
10 “Personal Real Estate Investor,” (“PREI”) and access to password-protected sections of a website
11 maintained by VIG, www.visionsinvestmentgroup.com (the “website”).

12 4. The PSAs advised purchasers as to which classes to take and how to access the website.

13 5. After an initial consultation with a purchaser, the PREI prescribed a course of instruction and
14 gave purchasers assignments to complete. The PREIs made themselves available to assist with these
15 assignments and other aspects of VIG’s training process.

16 6. The website was a “major feature” of the Visions Institute, and was promoted as “the only
17 resource needed to become truly successful as a real estate investor.” Purchasers could access the following
18 on the website: full audio recording of the Institute’s classes; written training outlines; “custom” real estate
19 evaluation software; access to “over 3 million homes for sale nationwide;” real estate contracts; articles
20 concerning real estate investment; and a real estate glossary.

21 7. Purchasers were able to buy training on any of four aspects of real estate investing: “Real
22 Estate Acquisition Training;” “Private Lending Training;” “Qualified Investor Training;” and “Property
23 Liquidation Training.” Each of these trainings was offered for \$2,485. Alternatively, VIG offered training in
24 all of these aspects of real estate investment for \$7,385. VIG called this package the “Real Estate Investor’s
25 Summit.”

8. Purchasers of the individual courses were guaranteed to earn their purchase price back in
ninety days. Purchasers of the Summit combination were guaranteed to be able to “[r]eplace current income
with residual income in 12 months....”

Offer and sale to Washington residents

1 9. In or around the summer of 2007, representatives of VIG held a seminar to promote VIG and
2 the Visions Institute in the Vancouver, Washington area. Among roughly twenty attendees was a
3 Washington couple who attended this seminar after receiving a flyer in the mail.

4 10. At the seminar, the Washington couple received a two page flyer promoting VIG's training.
5 The flyer featured testimonials from purported purchasers of VIG's training. These testimonials included a
6 purchaser claiming to have "pocketed over \$100,000" in "just a few short months," a couple claiming to live
7 "in [their] 1.4 million dollar dream home for free...[after using VIG's training for] less than one year," and
8 another purchaser claiming to have earned \$7,000 after four hours of work.

9 11. The flyer also informed attendees that they could earn \$25,000 in ninety days, "invest with
10 complete certainty every time," "profit from any real estate transaction, under any circumstance," and "create
11 \$12,000 a month in passive income...." Furthermore, the flyer presented the options for purchasers
(individual aspects or the Summit combination) and the guarantees of income for each option discussed
above.

12 12. Based on this presentation, the Washington couple purchased VIG's Summit package. The
13 Washington couple and VIG entered into a "New Client Welcome and Support Agreement" (the "contract").
14 The contract obliged VIG to "[p]rovide top-quality, personal real estate investment training services," and to
15 "guide [the Washington couple] to true economic independence within 12 months with the Summit
16 training!" The Washington couple agreed to spend at least eight to twelve hours per week in building its
business while using VIG's "system."

17 13. The contract and the flyer distributed at the seminar were the only documents provided to the
18 Washington couple by VIG prior to their purchase.

19 14. The Washington couple did not experience the success guaranteed them by VIG.

Misrepresentations and Omissions

20 15. VIG failed to provide material information concerning its business opportunity including, but
21 not limited to, a written disclosure document including financial statements of the company.

22 16. VIG failed to provide information to substantiate its claims that purchasers of its business
23 opportunities would earn the incomes described in paragraph eight of the Findings of Fact.

24 17. VIG did not explain that there was no assurance that purchasers would experience the level of
25 success presented in the testimonials discussed in paragraph ten of the Findings of Fact.

1 18. VIG failed to provide information to substantiate its claims described in paragraph eleven of
the Findings of Fact.

2 19. VIG did not provide information concerning the risks inherent in purchasing a business
3 opportunity from VIG.

4 Registration Status

5 20. Respondent, Visions Investment Group, LLC is not currently registered to sell business
6 opportunities in the state of Washington and has not previously been so registered.

7 **CONCLUSIONS OF LAW**

8 Based upon the above Findings of Fact, the following Conclusions of Law are made:

9 1. The offer and/or sale of business opportunities as described above constitutes the offer and/or
10 sale of a business opportunity as defined in RCW 19.110.020.

11 2. The offer and/or sale of said business opportunities is in violation of RCW 19.110.050
12 because no registration for such offer or sale is on file with the Securities Administrator.

13 3. The offer and/or sale of said business opportunities were in violation of RCW 19.110.070
14 because Respondent failed to provide prospective purchasers with the required disclosure document.

15 4. The offer and/or sale of said business opportunities were made in violation of RCW
16 19.110.120 because, as set forth in the Findings of Fact, Respondent made misstatements of material facts
17 or omitted to state material facts necessary to make the statements made, in light of the circumstances under
which they were made, not misleading.

18 **FINAL ORDER**

19 Based upon the foregoing:

20 IT IS HEREBY ORDERED that the Respondent, Visions Investment Group, LLC, and its agents and
21 employees each shall cease and desist from offering or selling business opportunities in violation of RCW
22 19.110.050, the registration section of the Business Opportunity Fraud Act of the state of Washington.

23 IT IS HEREBY ORDERED that the Respondent, Visions Investment Group, LLC, and its agents and
24 employees each shall cease and desist from violating RCW 19.110.070, the disclosure document section of
the Business Opportunity Fraud Act of the state of Washington.

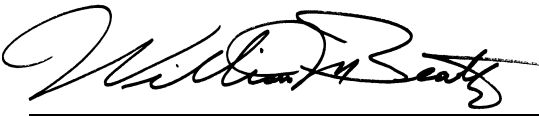
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IT IS FURTHER ORDERED that the Respondent, Visions Investment Group, LLC, and its agents and employees each shall cease and desist from violating RCW 19.110.120, the anti-fraud section of the Business Opportunity Fraud Act of the state of Washington.

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

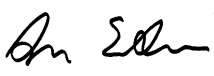
WILLFUL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE.

SIGNED and ENTERED this 29th day of November 2011.



William M. Beatty
Securities Administrator

Approved by:



Suzanne Sarason
Chief of Enforcement

Presented by:



Edward R. Thunen
Enforcement Attorney