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

IN THE MATTER OF DETERMINING
whether there has been a violation
of the Securities Act of Washington by:

ADV Solutions, d/b/a PrimeCash.net,

Respondent.

Order Number S-14-1599-16-FO01

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

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INTRODUCTION

On July 30, 2015, the Securities Administrator of the State of Washington issued Statement of Charges and Notice of Intent to Enter Order to Cease and Desist, S-14-1599-15-SC01, ("Statement of Charges"), against the Respondent ADV Solutions, d/b/a PrimeCash.net. The Statement of Charges, together with a Notice of Opportunity to Defend and Opportunity for Hearing ("Notice of Opportunity for Hearing"), and an Application for Adjudicative Hearing ("Application for Hearing"), was served on the Respondent on December 17, 2015.

The Notice of Opportunity for Hearing advised the Respondent that a written application for an administrative hearing on the Statement of Charges must be received within twenty days from the date of receipt of the notice. The Statement of Charges advised the Respondent that if a hearing was not requested, the Securities Administrator intends to adopt the "Tentative Findings of Fact" and "Conclusions of Law," as set forth in the Statement of Charges, as final, and enter a final order against the Respondent to cease and desist from violation of the Business Opportunity Fraud Act of Washington.

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

1 The Respondent ADV Solutions, d/b/a PrimeCash.net failed to request an administrative hearing
2 within twenty days of receipt of the Statement of Charges and Notice of Opportunity for Hearing, either on
3 the Application for Hearing provided or otherwise. The Securities Administrator therefore will adopt as
4 final the findings of fact and conclusions of law as set forth in the Statement of Charges and enter a final
5 order against the Respondent to cease and desist from violation of the Business Opportunity Fraud Act of
6 Washington.

7 **FINDINGS OF FACT**

8 **Respondent**

9 1. ADV Solutions d/b/a PrimeCash.net is a business entity with a business address of 3651
10 Lindell Rd., Suite #D752, in Las Vegas, Nevada. ADV Solutions also uses a business address of 8565 S.
11 Eastern Ave. #150, in Las Vegas, Nevada. The website for PrimeCash.net indicates that the company is
12 an Arizona “limited liability corporation,” but the Securities Division is unable to verify this information
13 with the Arizona Corporation Commission.

14 **Nature of the Offering**

15 2. PrimeCash.net has “affiliate programs” for sale that enable the purchaser to start a
16 business and earn money from home. PrimeCash.net offers a program for affiliates to use websites to
17 generate new customers for PrimeCash.net, with affiliates receiving income for every new customer
18 generated from the affiliate’s website. PrimeCash.net also offers a program for affiliates to generate
19 income from an online shopping mall, with affiliates receiving a percentage of every dollar spent in their
20 online shopping mall. In addition, PrimeCash.net also offers services to assist affiliates with their new
21 business.

1 3. PrimeCash.net maintains a website that is accessible to the general public at
2 <http://www.primecash.net>. The website does not include specific details about the affiliate program, but
3 invites members of the public to call a toll-free number or to submit an online form to request further
4 information. The PrimeCash.net website also includes links to two other affiliated websites that are
5 associated with PrimeCash.net: PremierShoppers.net and PrimeMerchant.net. The PremierShoppers.net
6 website (<http://99-shop.premiershoppers.net>) offers online shopping that links to Amazon.com. The
7 PrimeMerchant.net website (<http://99-merch.primemerchant.net>) offers services to make running a
8 business easier, including credit card processing and cash advances.

9 4. Between approximately August and September 2014, Primecash.net sold an affiliate
10 program to an 89-year old Washington resident who lives alone, and suffered a stroke approximately one
11 and a half years earlier. After the Washington resident sent in a response to a sweepstakes solicitation, he
12 began receiving numerous solicitations daily via telephone and mail for various products and services,
13 including from PrimeCash.net.

14 5. The Washington resident received advertising materials regarding the affiliate program
15 associated with the PrimeCash.net website. The materials explained that an email or phone call generated
16 from the affiliate's website is forwarded to PrimeCash.net's top sales associates. As part of the program,
17 an affiliate can receive up to \$150 for every new customer generated from the affiliate's program.
18 PrimeCash.net represents that it provides affiliates with advertising coaches.

19 6. The Washington resident also received advertising materials regarding the "online
20 shopping mall" program associated with the PremierShoppers.net website. The materials state the
21 following: "YOU RECEIVE UP TO 22% OF EVERY DOLLAR SPENT IN YOUR ONLINE
22

1 SHOPPING MALL!” According to the materials, purchasers do not have to create their own products or
2 services, devise websites, stock inventory, sell products or services, or have contact with customers.

3 7. The Washington resident received a letter dated August 20, 2014 from PrimeCash.net,
4 which congratulated him on the purchase of his new program. The letter stated that there was a 100%
5 money back guarantee: “We guarantee you’ll make a minimum of 100% of the cost of your websites
6 back within 12 months from the day you’re set-up in this program by following our simple advertising
7 model.” The letter explained that the advertising model consisted of doing at least two of the following
8 tasks: work directly with an advertising coach on a monthly basis, place 12 newspaper advertisements
9 over a one year period, and/or participate in PrimeCash.net’s customized direct mailer program.

10 8. The Washington resident received a second letter dated August 20, 2014, which stated that
11 he purchased three websites (www.2533-site.primecash.net, www.2533-site.primemerchant.net, and
12 www.2533-site.premiershoppers.net). These websites purchased by the Washington resident merely
13 route the user to the main PrimeCash.net, PrimeMerchant.net and PremierShoppers.net websites. The
14 letter also provided the Washington resident with a user name and password to access his “back office.”
15 The letter stated that PrimeCash.net is “committed to helping you with your new business” and that
16 advertising is the key to the success of the program. The letter advised the Washington resident to call
17 the advertising coaches right away.

18 9. The Washington resident received two invoices from ADV Solutions. An invoice dated
19 August 19, 2014 referenced the three websites purchased by the Washington resident and indicated that
20 each website cost \$500. The invoice included \$15 for “shipping and handling,” for a total of \$1,515. A
21 second invoice from ADV Solutions, dated August 26, 2014, represented that the Washington resident
22

1 purchased a “VIP Advertising Campaign” for \$5,000. On September 9, 2014, ADV Solutions charged
2 \$5,000 on the Washington resident’s credit card.

3 10. The Respondent failed to provide material information regarding the business opportunity,
4 including but not limited to business opportunity disclosure documents and the information required
5 therein, namely identification of officers and related companies, identification of other persons
6 responsible for Respondent’s business opportunity activities, litigation and bankruptcy history of the
7 officers and companies, the total number of business opportunities sold, the number of failures of
8 business opportunities sold, and financial statements.

9 **Registration Status**

10 11. Respondent ADV Solutions d/b/a PrimeCash.net is not currently registered to sell business
11 opportunities in the State of Washington and has not previously been so registered.

12
13 Based upon the above Findings of Fact, the following Conclusions of Law are made:

14 **CONCLUSIONS OF LAW**

15 1. The offer or sale of the program described above constitutes the offer and/or sale of a
16 business opportunity as defined in RCW 19.110.020.

17 2. The offer or sale of said business opportunity is in violation of RCW 19.110.050 because
18 no registration for such offer and/or sale by Respondent ADV Solutions d/b/a PrimeCash.net is on file
19 with the Securities Administrator.

1 3. The offer and/or sale of said business opportunity was in violation of RCW 19.110.070
2 because Respondent ADV Solutions d/b/a PrimeCash.net failed to provide prospective purchasers with a
3 disclosure document.

4 **FINAL ORDER**

5 Based upon the foregoing and finding it in the public interest:

6
7 IT IS HEREBY ORDERED that the Respondent ADV Solutions d/b/a PrimeCash.net shall cease
8 and desist from violation of RCW 19.110.050, the registration section of the Business Opportunity Fraud
9 Act of Washington.

10 IT IS FURTHER ORDERED that the Respondent ADV Solutions d/b/a PrimeCash.net shall
11 cease and desist from violation of RCW 19.110.070, the disclosure document section of the Business
12 Opportunity Fraud Act of Washington.

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14 This Order is entered pursuant to RCW 19.110.150 and is subject to the provisions of Chapter
15 34.05 RCW.

16 **WILLFUL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE**

17 DATED AND ENTERED this 25th day of January, 2016.

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21 _____
22 William M. Beatty
23 Securities Administrator

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Approved by:

Presented by:



Suzanne Sarason
Chief of Enforcement

Bridgett Fisher
Financial Legal Examiner

Reviewed by:



Robert Kondrat
Financial Legal Examiner Supervisor