

ORIGINAL

NEW APPLICATION



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BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS

MIKE GLEASON, Chairman
WILLIAM A. MUNDELL
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GARY PIERCE

AZ CORP COMMISSION
DOCKET CONTROL

Arizona Corporation Commission
DOCKETED

JUL 23 2008

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In the matter of:

ROBERT PRESTON INGRAM and JANE
DOE INGRAM, husband and wife,

Respondents.

DOCKET NO. S-20604A-08-0371

**NOTICE OF OPPORTUNITY FOR HEARING
REGARDING PROPOSED ORDER TO
CEASE AND DESIST, FOR RESTITUTION,
FOR ADMINISTRATIVE PENALTIES AND
FOR OTHER AFFIRMATIVE ACTION**

**NOTICE: EACH RESPONDENT HAS 10 DAYS TO REQUEST A HEARING
EACH RESPONDENT HAS 30 DAYS TO FILE AN ANSWER**

The Securities Division ("Division") of the Arizona Corporation Commission ("Commission") alleges that respondent ROBERT PRESTON INGRAM has engaged in acts, practices, and transactions that constitute violations of the Securities Act of Arizona, A.R.S. § 44-1801 *et seq.* ("Securities Act").

**I.
JURISDICTION**

1. The Commission has jurisdiction over this matter pursuant to Article XV of the Arizona Constitution and the Securities Act.

**II.
RESPONDENTS**

2. ROBERT PRESTON INGRAM ("INGRAM") is a married man who at all times relevant resided in Scottsdale, Arizona.

1 10. INGRAM failed to provide his investors with any disclosures about the PWB
2 Project prior to their Investments, including which "Prime World Bank" would be involved, or the
3 bank's financial status, assets and liabilities. INGRAM failed to disclose to investors any risks
4 associated with the Investments.

5 11. Unbeknownst to his investors, INGRAM deposited investor funds into his personal
6 bank account and, in some instances, used investor funds for his personal use.

7 12. To date, INGRAM's investors have not received the return of their principal
8 Investments or any of their promised profits.

9 IV.

10 **VIOLATION OF A.R.S. § 44-1841**

11 **(Offer or Sale of Unregistered Securities)**

12 13. From on or about August 2005 to approximately November 2006, INGRAM offered
13 or sold securities in the form of investment contracts within or from Arizona.

14 14. The securities referred to above were not registered pursuant to Articles 6 or 7 of the
15 Securities Act.

16 15. This conduct violates A.R.S. § 44-1841.

17 V.

18 **VIOLATION OF A.R.S. § 44-1842**

19 **(Transactions by Unregistered Dealers or Salesmen)**

20 16. INGRAM offered or sold securities within or from Arizona while not registered as a
21 dealer or salesman pursuant to Article 9 of the Securities Act.

22 17. This conduct violates A.R.S. § 44-1842.

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VI.

VIOLATION OF A.R.S. § 44-1991

(Fraud in Connection with the Offer or Sale of Securities)

18. In connection with the offer or sale of securities within or from Arizona, INGRAM directly or indirectly: (i) employed a device, scheme, or artifice to defraud; (ii) made untrue statements of material fact or omitted to state material facts that were necessary in order to make the statements made not misleading in light of the circumstances under which they were made; or (iii) engaged in transactions, practices, or courses of business that operated or would operate as a fraud or deceit upon offerees and investors. INGRAM's conduct includes, but is not limited to, the following:

- A. Misrepresenting to investors that they would earn 500% to 1,000% profit on their Investments within 60 days.
- B. Failing to disclose to investors that INGRAM deposited investor funds into his personal bank account and, in some instances, used investor funds to pay for personal expenditures.
- C. Failing to disclose to investors any risks associated with the PWB Project Investments.

19. This conduct violates A.R.S. § 44-1991.

VII.

REQUESTED RELIEF

The Division requests that the Commission grant the following relief:

- 1. Order INGRAM to permanently cease and desist from violating the Securities Act pursuant to A.R.S. § 44-2032;
- 2. Order INGRAM to take affirmative action to correct the conditions resulting from INGRAM's acts, practices, or transactions, including a requirement to make restitution pursuant to A.R.S. § 44-2032;
- 3. Order INGRAM to pay the state of Arizona administrative penalties of up to five thousand dollars (\$5,000) for each violation of the Securities Act, pursuant to A.R.S. § 44-2036;

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XIV.

ANSWER REQUIREMENT

Pursuant to A.A.C. R14-4-305, if RESPONDENT INGRAM or RESPONDENT SPOUSE requests a hearing, the requesting respondent must deliver or mail an Answer to this Notice of Opportunity for Hearing to Docket Control, Arizona Corporation Commission, 1200 W. Washington, Phoenix, Arizona 85007, within 30 calendar days after the date of service of this Notice. Filing instructions may be obtained from Docket Control by calling (602) 542-3477 or on the Commission's Internet web site at <http://www.azcc.gov/divisions/hearings/docket.asp>.

Additionally, the answering respondent must serve the Answer upon the Division. Pursuant to A.A.C. R14-4-303, service upon the Division may be made by mailing or by hand-delivering a copy of the Answer to the Division at 1300 West Washington, 3rd Floor, Phoenix, Arizona, 85007, addressed to Mike Dailey.

The Answer shall contain an admission or denial of each allegation in this Notice and the original signature of the answering respondent or respondent's attorney. A statement of a lack of sufficient knowledge or information shall be considered a denial of an allegation. An allegation not denied shall be considered admitted.

When the answering respondent intends in good faith to deny only a part or a qualification of an allegation, the respondent shall specify that part or qualification of the allegation and shall admit the remainder. Respondent waives any affirmative defense not raised in the answer.

The officer presiding over the hearing may grant relief from the requirement to file an Answer for good cause shown.

Dated this 22 day of July, 2008.



Matthew J. Neubert
Director of Securities

MD