

On March 16, 2015, the Administrator sent a Temporary Cease and Desist Order
Effectively Immediately, Assessing Civil Penalties, with Notice of Hearing Rights and Notice
of Final Cease and Desist Order ("Temporary Cease and Desist") by certified mail, return
receipt requested, to St. Andrew's registered agent at 3753 Howard Hughes Pkwy., Suite 200,
Las Vegas, Nevada, 89169.

23 On March 20, 2015, the registered agent received and signed for the Temporary Cease24 and Desist.

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Bartoli and St. Andrews made no request for a hearing within 15 days after the 1 2 Temporary Cease and Desist was received by the registered agent.

II. FACTS

1. Bartoli is a resident of Peru.

5 2. Bartoli formed St. Andrews, entity no. E0656532012-3, in the State of Nevada on 6 December 21, 2012. The registered agent was located at 3753 Howard Hughes Pkwy., Suite 200, Las Vegas, Nevada, 89169. 7

8 3. In December 2012, Alaska resident J.C. started reading investment articles in the 9 LeMetropole Café written by an individual named Robert Martin Williams. At the time, J.C. 10 did not know that Robert Martin Williams was an alias used by Bartoli (Robert Martin Williams will hereinafter be referred to as Bartoli).

12 4. After six months of reading Bartoli's articles, J.C. began communicating with him. 13 Bartoli informed J.C. that it was a good time to invest in bonds and commodities, and that J.C. 14 could start making those investments through St. Andrews.

15 5. Over the course of the next four months, J.C. wire transferred a total of \$120,000 to 16 the Banco Internacional Del Peru (account no. ********1418) to invest in bonds and

17 commodities with St. Andrews:

18	DATE	AMOUNT
19	July 1, 2013	\$40,000
20	August 5, 2013	\$40,000
21	September 30, 2013	\$25,000
22	November 20, 2013	\$15,000
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DEPARTMENT OF COMMERCE, COMMUNITY, AND ECONOMIC DEVELOPMENT DIVISION OF BANKING AND SECURITIES 550 WEST SEVENTH AVENUE, SUITE 1850 ANCHORAGE, ALASKA 99501 6

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6. From July 1, 2013 to December 9, 2013, J.C received an email statement from
 Bartoli each time a supposed trade was executed. The statement displayed the trade, price, and
 amount invested.

7. The last statement that J.C. received from Bartoli showed a 279.69% increase in his
account, and a new total balance of \$455,631.20.

8. On December 10, 2013, J.C. stopped receiving any communications from Bartoli.
 9. On December 11, 2013, Bartoli was arrested in Peru as part of a joint operation
 between the FBI, Diplomatic Secret Service, and the Peruvian National Police. Bartoli was a
 wanted fugitive in a separate matter where a 10-count indictment was filed against him in the
 U.S. District Court for the Northern District of Ohio (case no. 5:03-cr-00387) on October 15,
 2003. In the indictment, Bartoli was charged with conspiracy, securities fraud, sale of
 unregistered securities, wire fraud, mail fraud, money laundering, and attempted income tax
 evasion.

14 10. A short time after the arrest, J.C. learned that Bartoli was using an alias and St.
15 Andrews to scam investors. It is not clear what Bartoli did with J.C.'s money, but there is no
16 evidence that any of the money was actually used to invest in bonds and commodities.
17 11. As of the date of this Order, J.C. has not recovered any money from Bartoli.

III. CONCLUSIONS OF LAW

19 1. The bonds offered to J.C. were "securities" as that term is defined in AS
20 45.55.990(32) of the Alaska Securities Act.

21 2. Respondents violated AS 45.55.010 by fraudulently taking \$120,000 from J.C.
 22 3. Respondents are subject to a civil penalty pursuant to AS 45.55.920(b) because
 23 Respondents knowingly and intentionally violated AS 45.55.010.

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