

**STATE OF NEVADA
OFFICE OF THE SECRETARY OF STATE
SECURITIES DIVISION
2250 LAS VEGAS BOULEVARD NORTH
NORTH LAS VEGAS, NEVADA 89030**


In the Matter of:

**PERRY C. SANTILLO, JR., CRD No. 4623850,
an individual and d/b/a HIGH POINT
INSURANCE SOLUTION; ADVICE AND
LIFE GROUP, LLC, d/b/a HIGH POINT
INSURANCE SOLUTIONS; FIRST
NATIONLE SOLUTION, LLC; and
MIDDLEBURY DEVELOPMENT, LLC,**

Respondents.

**ADMINISTRATIVE CONSENT ORDER
TO CEASE AND DESIST**

File No. **INV18-021**

NEVADA SECRETARY OF STATE SECURITIES DIVISION	
DATE FILED:	
04-26-2019	
By:	

**TO: Perry C. Santillo, Jr., High Point Insurance Solution, Advice and Life Group, LLC,
High Point Insurance Solutions, First Nationle Solution, LLC and Middlebury
Development, LLC
c/o Kimberly Stein, Esq.
Holley, Driggs, Walch, Fine, Puzey, Stein & Thompson
400 S. Fourth Street, 3rd Floor
Las Vegas, Nevada 89101
Counsel for Respondents**

WHEREAS, Respondent Perry C. Santillo, Jr., CRD No. 4623850 ("Santillo"), is an individual who is a resident of New York. On or about April 26, 2017, Santillo filed a fictitious firm name ("FFN") with the Clark County Clerk's Office, instrument no. 201704261143526, to do business as ("d/b/a") "High Point Insurance Solution," with a mailing address of 3041 W. Horizon Ridge Parkway, Suite 150, Henderson, NV 89052. That address is listed on High Point Insurance Solution's website: www.highpointsolution.com.

WHEREAS, Respondent First Nationle Solution, LLC ("FNS"), is a Michigan-based limited liability company registered as a foreign limited liability company in "Revoked" status with Nevada Secretary of State, Commercial Recordings, Nevada Business ID No. NV20121611288. Mr. Santillo is listed as the manager for FNS, with a listed address of 36 West Main Street, Suite 600, Rochester, NY 14614. The listed Commercial Registered Agent for FNS in the State of Nevada resigned on February 5, 2018.

WHEREAS, a Complaint for Summary Order and Final Order to Cease and Desist and Other Appropriate Relief was filed by the Nevada Securities Division ("Division") against, and properly

1 served upon, Santillo, an individual and d/b/a High Point Insurance Solution, Advice and Life Group,
2 LLC, d/b/a High Point Insurance Solutions, FNS, and Middlebury Development, LLC ("Respondents")
3 on March 23, 2018;

4 **WHEREAS**, a Notice and Summary Order to Cease and Desist was filed against and properly
5 served upon Respondents on March 23, 2018;

6 **WHEREAS**, Respondents requested a hearing within forty-five (45) days of receiving the
7 Notice and Summary Order to Cease and Desist;

8 **WHEREAS**, the Division and Respondents have stipulated to the continuance of the hearing
9 date, and the hearing date is currently set by Order to occur on Wednesday, April 17, 2019;

10 **WHEREAS**, Respondents have advised the Nevada Securities Division ("Division") of their
11 agreement to resolve the above-referenced violations and to comply with the requirements in the State
12 of Nevada on the terms specified in this Administrative Consent Order ("Order"); and

13 **WHEREAS**, Respondents now elect to permanently and expressly waive any right to a hearing
14 and appeal under the Nevada Uniform Securities Act ("Act") and/or to seek judicial review under the
15 Nevada Administrative Procedures Act, codified in NRS Chapter 233B, with respect to this Order.

16 **NOW THEREFORE**, the Administrator of the Division, pursuant to the Act, hereby enters
17 this Order:

18 **I.**

19 **FINDINGS OF FACT**

- 20 1. Respondent Santillo, an individual, is a resident of New York. On or about April 26, 2017,
21 Santillo filed a fictitious firm name ("FFN") with the Clark County Clerk's Office, instrument
22 no. 201704261143526, to do business as ("d/b/a") "High Point Insurance Solution," with a
23 mailing address of 3041 W. Horizon Ridge Parkway, Suite 150, Henderson, NV 89052. That
24 address is listed on High Point Insurance Solution's website: www.highpointsolution.com.
- 25 2. Respondent Advice and Life Group, LLC ("ALG"), is a New York-based LLC that is registered
26 as a foreign limited liability company in "Default" status with the Nevada Secretary of State
27 Commercial Recordings Division ("Commercial Recordings"), Nevada Business ID No.
28 NV20141744983. On or about January 23, 2017, ALG filed a FFN with the Clark County

1 Clerk's Office, instrument no. 201701231138462, d/b/a "High Point Insurance Solution," with
2 a mailing address of 36 West Main Street, Suite 600, Richester [sic], New York 14614. The
3 ZIP code 14614 is associated with the city of Rochester, New York.

4 3. According to records maintained on-line by the State of Maryland, High Point Insurance
5 Solution, Department ID T00436285, is a registered trade name for ALG. Its owner is recorded
6 as Santillo, 202 Belmont Road, Rochester, NY 14612. The location listed for High Point
7 Insurance Solution is 100 West Road, Suite 405, Towson, Maryland 21204. This address is
8 also listed as a location address on the High Point Insurance Solution website:
9 www.highpointsolution.com.

10 4. Internet domain registry data obtained by means of a WHOIS query/response protocol indicated
11 that the website for High Point Insurance Solution, www.highpointsolution.com, was registered
12 by the organization "Advice and Life Group" on or about October 12, 2016. There are no
13 references to Advice and Life Group anywhere on the website; likewise, there are no references
14 to High Point Insurance Solution in the website's domain registry data.

15 5. Respondent FNS, is a Michigan-based limited liability company registered as a foreign limited
16 liability company in "Revoked" status with Commercial Recordings, Nevada Business ID No.
17 NV20121611288. Mr. Santillo is listed as the manager for FNS, with a listed address of 36
18 West Main Street, Suite 600, Rochester, NY 14614. The listed Commercial Registered Agent
19 for FNS in the State of Nevada resigned on February 5, 2018.

20 6. According to records maintained on-line by the New York Department of State, Division of
21 Corporations, FNS is currently in "Active" status, with a listed address of 36 West Main Street,
22 Suite 600, Rochester, NY 14614.

23 7. Respondent Middlebury Development, LLC is a Michigan-based limited liability company.
24 Records maintained by the State of Michigan list the address for Middlebury Development,
25 LLC as being 1986 Dell Rose Drive, Bloomfield, Michigan, 48302. The manager is listed as
26 Richard Vito, whose listed mailing address is 36 West Main Street, Suite 600, Rochester, New
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1 York, 14614. Middlebury Development, LLC does not have a business license in the State of
2 Nevada.

3 8. At all times relevant, Santillo, as manager for High Point Insurance Solutions, operated a call
4 center, located at 3041 W. Horizon Ridge Parkway, Suite 150, Henderson, Nevada. Santillo
5 and his five Nevada employees utilized "cold-call" technology to contact hundreds of
6 individuals daily from this call center.

7 9. Santillo, through his former employee, J.F. approached unnamed Unnamed Investor #1, a
8 Nevada resident, to invest in products sold by Santillo.

9 10. After an introduction by J.F., Santillo personally presented Unnamed Investor #1 with the
10 opportunity to invest in a fixed index annuity with "Athene." Santillo represented to Unnamed
11 Investor #1 that Unnamed Investor #1 would have an income base of \$569,910.00 and a lifetime
12 income withdrawal of \$33,625.00 after ten (10) years for an initial premium of \$250,000.00.
13 Santillo presented Unnamed Investor #1 with a document entitled "Athene Ascent Income
14 Rider – Lifetime Income Option Comparison" and "Supplemental Illustration" to support this
15 claim.

16 11. Unnamed Investor #1 invested a total of \$266,224.27 in the "fixed index annuity" following
17 Santillo's presentation of the purported fixed income annuity investment opportunity.

18 12. Unnamed Investor #1 also invested \$108,690.47 in "NEX Medical Solution," an investment
19 opportunity presented by Santillo that was described as a medical device being marketed to
20 physicians.

21 13. Unnamed Investor #1 relied on Santillo to provide the necessary paperwork to make the
22 transfers and to determine how much money he would need to transfer.

23 14. On July 27, 2017, Unnamed Investor #1 signed forms provided by Santillo titled "Full
24 Distribution – Rollover," "Interested Party Designation," "General Fee Schedule," "Adoption
25 Agreement Traditional, Roth, SEP," and "Rollover Form," which directed that Unnamed
26 Investor #1's monies were to roll over from Unnamed Investor #1's UnitedHealth 401(k) to the
27 self-directed IRA custodian, Quest IRA, Inc., which was recommended by Santillo.

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- 1 15. On August 14, 2017, Unnamed Investor #1 signed a "Direction of Investment" form from the
2 self-directed IRA custodian, Quest IRA, Inc., indicating that a note for \$250,000.00 was
3 purchased in the self-directed IRA account. The terms set forth in the note included 6.00%
4 interest with a maturity date of August 14, 2020. The note was issued by FNS.
- 5 16. Unnamed Investor #1 was not concurrently provided with a subscription agreement or other
6 prospectus regarding his investments with Santillo and did not receive the same until almost
7 two months after making his initial investment as described supra. On October 5, 2017,
8 Unnamed Investor #1 signed a "Subscription Agreement" for FNS ("Subscription Agreement").
9 The Subscription Agreement identified FNS as the "Debtor" and Unnamed Investor #1 as the
10 "Offeree."
- 11 17. Unnamed Investor #1 never received a fixed index annuity as described by Santillo. He instead
12 received a basic promissory note as described above. According to the Subscription Agreement,
13 "the security offered hereunder (the "Note") constitutes a nonnegotiable debt that matures on
14 August 14, 2020. Interest will accrue quarterly and will come due on the first day of each
15 contractual quarter until the Note matures—at 6.00% per annum." The interest was to be paid
16 directly to Unnamed Investor #1.
- 17 18. Unnamed Investor #1 received three distribution payments of \$2,250.00 on October 25, 2017,
18 November 22, 2017, and December 22, 2017 respectively. Each distribution also withheld
19 \$250.00 for income taxes. Unnamed Investor #1 has never received any additional monies
20 despite numerous inquiries to Santillo and to QuestIRA, the private trust company acting as a
21 custodian.
- 22 19. Unnamed Investor #1 has not received any statements from Santillo, FNS, or High Point
23 Insurance solution regarding the FNS promissory note or any other information on the status of
24 his investments.
- 25 20. Unnamed Investor #1 is not an accredited investor as defined by 17 CFR §230.501(a)(5)-(6),
26 which states that an accredited investor is "any natural person whose individual net
27 worth...exceeds \$1,000,000" or "any natural person who had an individual income in excess of
28 \$200,000.00 in each of the two most recent years." At the time of investment, Unnamed

1 Investor #1's assets were limited to less than \$750,000.00 and his yearly income was between
2 \$50,000.00 and \$75,000.00.

3 21. Respondents have been compensated for their involvement in selling the aforementioned
4 investments to Unnamed Investor #1.

5 22. On or about February 1, 2018, the Securities Division of the Office of the Maryland Attorney
6 General issued a *Summary Order to Cease and Desist and Order to Show Cause* against Santillo
7 and High Point Insurance Solutions alleging violations of the Maryland Securities Act,
8 including unlicensed sales activity in that state.

9 23. Unnamed Investor #1 received a letter from QuestIRA, Inc. on or about February 7, 2018,
10 stating that QuestIRA was ceasing all transactions related to High Point Wealth Management,
11 High Point Insurance Solutions, and Santillo, as a result of the Cease *Summary Order to Cease*
12 *and Desist and Order to Show Cause* from the Maryland Attorney General's Office.

13 24. On or about February 12, 2018, Unnamed Investor #1 received a letter in the mail from Mr.
14 Santillo, written on "High Point Insurance Solution" letterhead with the address of 100 West
15 Road, Suite 405, Towson, Maryland 21204. The letter provided, in pertinent part:

16
17 I am writing you in response to the email that has been sent by Quest
18 IRA, Inc. regarding the receipt of the Maryland Cease & Desist
notice.

19 I'd like to begin by reassuring you that we have not engaged in any
20 wrongdoing, this is a notice of an inquiry by the Securities
21 Commissioner. We are fully cooperating and working diligently to
22 educate the office as to our business structure and unwavering
commitment to compliance.

23 I sincerely apologize for any inconvenience that this may have
24 caused you. I also want you to rest assured that this has not and will
not affect your accounts.

25 Sincerely, Perry Santillo, Jr., President/CEO.

26
27 25. According to records maintained by the Division, none of the Respondents have ever been
28 licensed with the Division as a sales representative of a broker/dealer or issuer, or been licensed

as a representative of an investment adviser. None of the Respondents disclosed this fact to Unnamed Investor #1 or to other investors solicited through the Henderson location.

26. According to records maintained by the Division, none of the Respondents have ever been licensed with the Division as a broker-dealer or an investment adviser. Respondents never disclosed this fact to Unnamed Investor #1 or to other investors solicited through the Henderson location. According to records maintained by the Division, neither FNS, Advice and Life Group, LLC, Middlebury Development, LLC nor any associated d/b/a with the entities, has ever filed an application for the registration of securities or a notice of exemption from registration with the Division. Neither FNS, ALG, Middlebury Development, LLC, nor any associated d/b/a ever disclosed this fact to Unnamed Investor #1 or to other investors solicited through the Henderson location.

27. On or about March 23, 2018, the Division filed and served a Complaint for Summary Order and Final Order to Cease and Desist and Other Appropriate Relief, which was properly served on Respondents.

28. On or about March 23, 2018, the Division filed and served a Notice and Summary Order to Cease and Desist on the Respondents. After this time, the Division received a second complaint from Unnamed Investor #2.

29. On or about May 7, 2018, Respondent caused a Request for Hearing to be served on the Division

30. Respondents, through counsel, stipulated to enlarge the time for hearing.

31. Respondents, by signing the instant agreement, permanently and expressly waive any right to a hearing and appeal under the Act and/or to seek judicial review under the Nevada Administrative Procedures Act, codified in NRS Chapter 233B, with respect to this Order.

II.

CONCLUSIONS OF LAW

1. The Nevada Uniform Securities Act ("Act"), is codified in Chapter 90 of the Nevada Revised Statutes ("NRS") and regulates the offer, sale, and purchase of securities in or from the State of Nevada.

NRS 90.295 defines a "security" as:

1 [A] note, stock, bond, debenture, evidence of indebtedness, certificate of interest or
2 participation in a profit-sharing agreement, a limited partnership interest, an interest
3 in a limited-liability company, collateral-trust certificate, preorganization certificate
4 or subscription, transferable share, investment contract, viatical settlement
5 investment, voting-trust certificate, certificate of deposit for a security, fractional
6 undivided interest in an oil, gas or other mineral lease or in payments out of
7 production of such a lease, right or royalty, a put, call, straddle or option on a security,
8 certificate of deposit or group or index of securities including any interest therein or
9 based on the value of any of the foregoing, or, in general, any interest or instrument
commonly known as a security or any certificate of interest or participation in,
temporary or interim certificate for, receipt for, whole or partial guarantee of or
warrant or right to subscribe to or purchase any of the foregoing.

- 10 2. NRS 90.280 defines "sale" and "sell" as including "every contract of sale, contract to sell, or
11 other disposition, of a security or interest in a security for value." Additionally, "offer to sell"
12 includes "every attempt or offer to dispose of, or solicitation of an offer to purchase, a security
13 or interest in a security for value."
- 14 3. NRS 90.255 defines "issuer" as "a person who issues or proposes to issue a security."
- 15 4. NRS 90.220 defines "broker-dealer" as "any person engaged in the business of effecting
16 transactions in securities for the account of others or for a person's own account."
- 17 5. NRS 90.285 defines "sales representative" as "a natural person other than a broker-dealer,
18 authorized to act and acting for a broker-dealer or issuer effecting or attempting to effect
19 purchases or sales of securities."
- 20 6. NRS 90.250 defines "investment adviser" as "any person who, for compensation, engages in
21 the business of advising others as to the value of securities or as to the advisability of investing
22 in, purchasing, or selling securities..."
- 23 7. NRS 90.278 defines "representative of an investment adviser" as:

24 [A]ny person employed by or associated with an investment adviser
25 who: (a) Provides advice concerning securities; (b) Manages accounts or
26 portfolios of clients; (c) Determines the advice concerning securities that
27 is offered to clients; (d) Solicits for the sale of investment advice, unless
28 the person is a sales representative licensed pursuant to this chapter; (e)
Sells, offers to sell, or negotiates for the sale of investment advice; or (f)

Supervises employees who engage in the activities described in paragraphs (a) to (e), inclusive.

8. Based upon the above facts, Respondents acted as an investment adviser by receiving compensation in the form of unaccounted for monies from Unnamed Investor #1 in exchange for advising Unnamed Investor #1 as to the value of various securities including the FNS promissory note and the investment with NEX Medical Solutions.
9. Based upon the above facts, Respondent Santillo acted as a representative of an investment adviser by providing advice concerning the sale of a security to Unnamed Investor #1 and , Unnamed Investor #2, through his association with entity Respondents.
10. Based upon the above facts, Respondents acted as a broker-dealer by engaging in the business of transacting the sale of a security, the Promissory Note and NEX Medical Solutions investment, to Unnamed Investor #1.
11. Based upon the above facts, Respondent Santillo acted as a sales representative of a broker-dealer by effecting the sale of securities, to wit, the Promissory Note and NEX Medical Solutions investment, to Unnamed Investor #1.
12. Based upon the above facts, Respondent FNS acted as an issuer selling unregistered securities in violation of the Nevada Uniform Act by issuing a non-exempt Promissory Note to Unnamed Investor #1.
13. Based upon the above facts, Respondent Santillo acted as an unlicensed sales representative of an issuer recommending and selling unregistered securities.
14. As set forth in NRS 90.310, it is a violation of the Act for any person to act as a broker-dealer or sales representative unless licensed or exempt from licensing under the Act. Additionally, it is a violation of the Act for any issuer to employ or contract with a person as a sales representative unless the sales representative is licensed or exempt from licensing under the Act. Based upon the foregoing, Respondents have violated NRS 90.310.

- 1 15. As set forth in NRS 90.330, it is a violation of the Act for any person to act as an investment
2 adviser or as a representative of an investment adviser unless licensed or exempt from licensing
3 under the Act. Based upon the foregoing, Respondents have violated NRS 90.330
- 4 16. As set forth in NRS 90.460, it is a violation of the Act for a person to offer to sell or sell any
5 security in this State unless the security is registered or the security or transaction is exempt
6 under the Act. Based upon the foregoing, Respondents have violated NRS 90.460.
- 7 17. As set forth in NRS 90.550, the Administrator by order may deny or revoke an exemption
8 specified in NRS 90.520 or 90.530, with respect to a specific security or transaction.
- 9 18. As set forth in NRS 90.570, in connection with the offer to sell, sale, offer to purchase or
10 purchase of a security, a person shall not, directly or indirectly, employ any device, scheme or
11 artifice to defraud; make an untrue statement of a material fact or omit to state a material fact
12 necessary in order to make the statements made not misleading in the light of the circumstances
13 under which they are made; or engage in an act, practice or course of business which operates
14 or would operate as a fraud or deceit upon a person.
- 15 19. As set forth in NRS 90.590, it is a violation of the Act for an investment adviser, representative
16 of an investment adviser, or other person who represents an investment adviser in performing
17 an act that requires licensing as an investment adviser, to directly or indirectly engage in an act,
18 practice, or course of business that operates or would operate as a deceit upon a client.
- 19 20. Pursuant to NRS 90.575, the Respondents, acting as an investment adviser, broker-dealer, sales
20 representative and representative of an investment adviser, owed to Unnamed Investor # 1 and
21 Unnamed Investor #2 a fiduciary duty to act in his best interest.
- 22 21. The Division has jurisdiction over this matter pursuant to the Act which authorizes the Division
23 to regulate the business activities of broker dealers, sales representatives, investment advisers,
24 investment adviser representatives and securities offerings in the State of Nevada.
- 25 22. The Respondents have operated a scheme or artifice to defraud Unnamed Investor #1 and
26 Unnamed Investor #2 in violation of NRS 90.570 by making an untrue statement of material
27 fact and/or omitting a material fact necessary in order to make the statements not misleading
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1 in light of the circumstances by providing Unnamed Investor #1 with a "bait and switch"
2 investment opportunity, to wit, a purported fixed income annuity product which was actually
3 a promissory note issued by FNS.

4 23. The Respondents have performed an act, practice, or course of business that operates as a deceit
5 upon a client by providing Unnamed Investor #1 with a "bait and switch" investment
6 opportunity, to wit, a purported fixed income annuity product which was actually a promissory
7 note issued by First Nationle Solutions, LLC, and failing to provide payment to Unnamed
8 Investor #1 under the terms of the same in violation of NRS 90.570 and 90.590.

9 24. Respondents have violated their fiduciary duty to act in Unnamed Investor #1 and Unnamed
10 Investor #2's best interest while acting as an investment adviser, broker-dealer, sales
11 representative, and representative of an investment adviser investment advisers, broker-
12 dealers, and sales representative in violation of NRS 90.575.

13 III.

14 ORDER

15 Finding the following appropriate and in the public interest, and on the basis of the Findings
16 of Facts, Conclusions of Law, and Respondents' consent to the entry of this Order,

17 IT IS HEREBY ORDERED:

- 18 1. Santillo and all Respondents are hereby permanently barred from offering, soliciting, or
19 selling any securities or investment advisory services and shall not make any application
20 in the future to be licensed as an investment adviser, a representative of an investment
21 adviser, sales representative of a broker-dealer or sales representative of an issuer.
- 22 2. All exemptions as to the offering and sale of securities as set forth in NRS 90.520 and
23 90.530 are hereby revoked as to each Respondent.
- 24 3. Violation of this Order constitutes a felony pursuant to NRS 90.650.
- 25 4. In consideration of Respondents' consent to entry of this Order, the Division will not
26 pursue any further administrative proceedings other than as set forth in this Order
27 against Respondents in connection with the subject matter of this Order.
- 28 5. Nothing in this Order shall be construed as a waiver of the Division's right to investigate

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and pursue any criminal violations by Respondents.

6. Nothing in this Order is intended to limit or create for third parties, any private remedies against Respondents.

7. This Order shall be effective as of the date on which it is signed by the Administrator as set forth below.

DATED this 26 day of April, 2019.

BY ORDER OF THE ADMINISTRATOR
Office of the Secretary of State, Securities Division


ERIN HOUSTON
Deputy Secretary for Securities
Securities Administrator

1
2 **CONSENT TO ENTRY OF ADMINISTRATIVE ORDER**

3 Respondent Perry Santillo ("Santillo") hereby acknowledges that he has been served with a
4 copy of this Order, has read the foregoing Order, is aware of his rights to a hearing and appeal in this
5 matter, and has waived the same.


6 Santillo specifically acknowledges that a violation of this Order may constitute a felony
7 pursuant to NRS 90.650.

8 Santillo admits the jurisdiction of the Securities Division of the Nevada Office of the Secretary
9 of State; neither admits nor denies the Statement of Facts or Conclusions of Law contained in this
10 Order; and consents to entry of this Order by the Administrator of the Division as settlement of the
11 issues contained within this Order.

12 Santillo states that no promise of any kind or nature, other than the consideration set forth in
13 the Order, was made to it to induce it to enter into this Order and that it has entered into this Order
14 voluntarily.

15
16 
PERRY SANTILLO

17
18 Subscribed and sworn to before me
19 On this 15 day of April, 2019

20
21 
22 Notary Public, in and for the
23 County of Rutherford State of Tn
Expires: 09-19-2021



1 **CONSENT TO ENTRY OF ADMINISTRATIVE ORDER**

2 Respondent High Point Insurance Solution, by through its authorized representative, hereby
3 acknowledges that it has been served with a copy of this Order, has read the foregoing Order, is aware
4 of its rights to a hearing and appeal in this matter, and has waived the same.


5 Respondent High Point Insurance Solution, by and through their Authorized Representative,
6 specifically acknowledges that a violation of this Order may constitute a felony pursuant to NRS
7 90.650.

8 Respondent High Point Insurance Solution, by and through their Authorized Representative,
9 admits the jurisdiction of the Securities Division of the Nevada Office of the Secretary of State; neither
10 admits nor denies the Statement of Facts or Conclusions of Law contained in this Order; and consents
11 to entry of this Order by the Administrator of the Division as settlement of the issues contained within
12 this Order.


13 Respondent High Point Insurance Solution, by and through their Authorized Representative,
14 states that no promise of any kind or nature, other than the consideration set forth in the Order, was
15 made to it to induce it to enter into this Order and that it has entered into this Order voluntarily.

16 Perry Santillo acknowledges that he is the authorized representative for Respondent High Point
17 Insurance Solution and that as such, has been authorized by both to enter into this Order for and on
18 behalf of Santillo and all related entity Respondents.

19
20 HIGH POINT INSURANCE SOLUTIONS

21 
22 By: PERRY SANTILLO
23 Authorized Representative for High Point Insurance Solutions

24
25 Subscribed and sworn to before me
26 On this 15 day of April, 2019

27 
28 Notary Public, in and for the
 County of Rutherford State of Tn
 Expires: 09-19-2021



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2 **CONSENT TO ENTRY OF ADMINISTRATIVE ORDER**

3 Respondent First Nationle Solution, LLC; by through its authorized representative, hereby
4 acknowledges that it has been served with a copy of this Order, has read the foregoing Order, is aware
5 of its rights to a hearing and appeal in this matter, and has waived the same.

6 Respondent First Nationle Solution, LLC, by and through their Authorized Representative,
7 specifically acknowledges that a violation of this Order may constitute a felony pursuant to NRS
8 90.650.

9 Respondent First Nationle Solution, LLC, by and through their Authorized Representative,
10 admits the jurisdiction of the Securities Division of the Nevada Office of the Secretary of State; neither
11 admits nor denies the Statement of Facts or Conclusions of Law contained in this Order; and consents
12 to entry of this Order by the Administrator of the Division as settlement of the issues contained within
13 this Order.

14 Respondent First Nationle Solution, LLC, by and through their Authorized Representative,
15 states that no promise of any kind or nature, other than the consideration set forth in the Order, was
16 made to it to induce it to enter into this Order and that it has entered into this Order voluntarily.

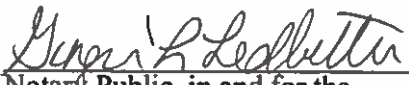
17 Perry Santillo acknowledges that he is the authorized representative for Respondent First
18 Nationle Solution, LLC and that as such, has been authorized by both to enter into this Order for and
19 on behalf of Santillo and all related entity Respondents.

20 FIRST NATIONLE SOLUTION, LLC

21
22 
23 BY PERRY SANTILLO

24 Authorized Representative for First Nationle Solution, LLC

25 Subscribed and sworn to before me
26 On this 15 day of April, 2019

27 
28 Notary Public, in and for, the
County of Rutherford, State of Tn

Expires: 09-19-2021



1 **CONSENT TO ENTRY OF ADMINISTRATIVE ORDER**

2 Respondent Middlebury Development, LLC, by through its authorized representative, hereby
3 acknowledges that it has been served with a copy of this Order, has read the foregoing Order, is aware
4 of its rights to a hearing and appeal in this matter, and has waived the same.


5 Respondent Middlebury Development, LLC, by and through their Authorized Representative,
6 specifically acknowledges that a violation of this Order may constitute a felony pursuant to NRS
7 90.650.

8 Respondent Middlebury Development, LLC, by and through their Authorized Representative,
9 admits the jurisdiction of the Securities Division of the Nevada Office of the Secretary of State; neither
10 admits nor denies the Statement of Facts or Conclusions of Law contained in this Order; and consents
11 to entry of this Order by the Administrator of the Division as settlement of the issues contained within
12 this Order.


13 Respondent Middlebury Development, LLC, by and through their Authorized Representative,
14 states that no promise of any kind or nature, other than the consideration set forth in the Order, was
15 made to it to induce it to enter into this Order and that it has entered into this Order voluntarily.

16 Perry Santillo acknowledges that he is the authorized representative for Respondent Middlebury
17 Development, LLC and that as such, has been authorized by both to enter into this Order for and on
18 behalf of Santillo and all related entity Respondents.

19
20 MIDDLEBURY DEVELOPMENT, LLC

21 
22 By: PERRY SANTILLO
23 Authorized Representative for Middlebury Development, LLC

24
25 Subscribed and sworn to before me
26 On this 15 day of April, 2019

27 
28 Notary Public, in and for the
 County of Rutherford State of Tn

Expires: 09-19-2021

