State of Missouri Office of Secretary of State

Case No. AP-07-46

IN THE MATTER OF:

INTEGRITY SOLUTIONS FINANCIAL SERVICES, LLC; INTEGRITY SOLUTIONS TAX CONSULTANTS, INC.; EVERETT BIAS a/k/a EVERETT SANCHEZ BIAS; JOHN CAMPBELL a/k/a JOHN CAMPBELL-BEY; and PETER HALL,

Respondents.

Serve Integrity Solutions Financial Services, LLC; Integrity Solutions Tax Consultants, Inc., and Everett Bias a/k/a Everett Sanchez Bias, at:

> 11645 South Walnut Street Olathe, Kansas 66061-8302

- Serve John Campbell a/k/a/ John Campbell-Bey at: 2901 W. Coast Highway, Suite 200 Newport Beach, California 92633
- Serve Peter Hall at: 318 W. 90th Street Apt. 3 New York, New York 10024-1618

FINAL ORDER TO CEASE AND DESIST

On August 27, 2008, the Enforcement Section of the Securities Division, by and through Mary S. Hosmer, Assistant Commissioner of Securities, submitted a Petition for Final Order to Cease and Desist as to all Respondents and Petition for Payment of Civil Penalties and Costs as to Respondents John Campbell and Peter Hall (the "Petition"). After reviewing the Petition the Commissioner issues the following findings of facts, conclusion of law, and order:

- 1. On August 22, 2007, Katie Whitman, Deputy Chief Counsel for the Securities Division and on behalf of the Enforcement Section, submitted a Petition for Order to Cease and Desist and Order to Show Cause Why Civil Penalties and Costs Should not be Imposed in the above-styled matter.
- 2. On September 4, 2007, the Commissioner issued an Order to Cease and Desist and Order to Show Cause Why Civil Penalties and Costs Should not be Imposed against Respondents.
- On October 2, 2007, the Commissioner received a Request for Hearing filed by attorney John Harl Campbell on behalf of Respondents Integrity Solutions Financial Services, LLC, Integrity Solutions Tax Consultants, Inc., and Everett Bias, a/k/a, Everett Sanchez Bias. No other Respondent requested a hearing.
- 4. On October 15, 2007, the commissioner issued a Hearing Order / Notice of Filing / Notices of Hearing setting a pre-hearing conference for November 19, 2007, and a Hearing for December 17, 2007.
- 5. On November 19, 2007, a pre-hearing conference was held in this matter. Assistant Commissioner Mary Hosmer appeared in person on behalf of the Enforcement Section. John Harl Campbell appeared in person on behalf of Respondents Integrity Solutions Financial Services, LLC, Integrity Solutions Tax Consultants, Inc., and Everett Bias a/k/a Everett Sanchez Bias.
- 6. During the pre-hearing conference, all parties in attendance requested that the hearing set for December 17, 2007, be continued. Thereafter, counsel for Respondents Integrity Solutions Financial Services, LLC, Integrity Solutions Tax Consultants, Inc., and Everett Bias a/k/a Everett Sanchez Bias, and counsel for the Division, requested additional continuances.
- 7. On August 22, 2008, Respondents Integrity Solutions Financial Services, LLC, Integrity Solutions Tax Consultants, Inc., and

Everett Bias a/k/a Everett Sanchez Bias, through their counsel, withdrew their request for a hearing on the order to cease and desist. In this request counsel did not withdraw the request for a hearing as to the penalties and costs in this matter, and specifically requested a hearing on "fines and penalties."

- 8. In the Petition, the Enforcement Section of the Securities Division requested that the commissioner issue a Final Order to Cease and Desist as to all Respondents in this matter.
- In the Petition, the Enforcement Section of the Securities Division requested that the commissioner order Respondents John Campbell and Peter Hall to pay, jointly and severally, a portion of the costs of the investigation in this matter in the amount of four thousand ninety-five dollars (\$4,095.00).
- In the Petition, the Enforcement Section of the Securities Division requested that the commissioner order Respondents John Campbell and Peter Hall to each pay a civil penalty in the amount of ten thousand dollars (\$10,000.00) for multiple violations of Section 409.3-301, RSMo. (Cum Supp. 2007).
- In the Petition, the Enforcement Section of the Securities Division requested that the commissioner order Respondents John Campbell and Peter Hall to each pay a civil penalty in the amount of ten thousand dollars (\$10,000.00) for multiple violations of Section 409.4-402, RSMo. (Cum Supp. 2007).
- 12. In the Petition, the Enforcement Section of the Securities Division requested that the commissioner order Respondents John Campbell and Peter Hall to each pay a civil penalty in the amount of ten thousand dollars (\$10,000.00) for multiple violations of Section 409.5-501, RSMo. (Cum. Supp. 2007).
- 13. In the Petition, the Enforcement Section of the Securities Division requested that this matter, as to costs and penalties against Respondents Integrity Solutions Financial Services, LLC, Integrity Solutions Tax Consultants, Inc., and Everett Bias a/k/a Everett Sanchez Bias, be continued for a hearing.
- 14. This order is in the public interest and consistent with the purposes intended by the Missouri Securities Act of 2003.

ORDER

NOW, THEREFORE, it is hereby ORDERED that:

- A. The Cease and Desist Order entered in Case Number AP-07-46 on September 4, 2007, is **FINAL** as to all Respondents in this matter.
- B. A hearing shall be set by separate order concerning the Enforcement Section's request for civil penalties and costs as to all Respondents.
- C. All Respondents shall pay their own costs and attorneys' fees with respect to this matter.

SO ORDERED.

WITNESS MY HAND AND OFFICIAL SEAL OF MY OFFICE AT JEFFERSON CITY, MISSOURI THIS 4TH DAY OF SEPTEMBER, 2008.

ROBIN CARNAHAN SECRETARY OF STATE

(Signed/Sealed) MATTHEW D. KITZI COMMISSIONER OF SECURITIES I hereby certify that on this 4th day of September, 2008, copies of the foregoing Final Order in the above styled case was **mailed by regular U.S. Mail to:**

John Harl Campbell 4075 Highway 54, #101A Osage Beach, Missouri 65065 ATTORNEY FOR RESPONDENTS INTEGRITY SOLUTIONS FINANCIAL SERVICES, LLC, INTERGRITY SOLUTIONS TAX CONSULTANTS, INC., AND EVERETT BIAS A/K/A EVERETT SANCHEZ BIAS

and mailed by certified U.S. Mail, postage prepaid, to:

John Campbell a/k/a John Campbell-Bey 2901 W. Coast Highway, Suite 200 Newport Beach, California 92633

Peter Hall 318 W. 90th Street, Apt. 3 New York, New York 10024-1618

and hand delivered to:

Mary Hosmer Assistant Commissioner

John Hale, Specialist