

DENISE VOIGT CRAWFORD
SECURITIES COMMISSIONER



NICHOLAS C. TAYLOR
CHAIRMAN

JOHN R. MORGAN
DEPUTY SECURITIES COMMISSIONER

JOSE ADAN TREVINO
MEMBER

State Securities Board

MAIL: P.O. BOX 13167
AUSTIN, TEXAS 78711-3167

208 E. 10th Street, 5th Floor
Austin, Texas 78701
Phone (512) 305-8300
FAX (512) 305-8310
<http://www.ssb.state.tx.us>

KENNETH W. ANDERSON, JR.
MEMBER

SSB Docket No. 00-010

IN THE MATTER OF
WILTRUST.COM; WILTRUST.WS;
DAVE DUNN & ASSOCIATES;
AND DAVE DUNN

§
§
§
§

Order No. CP-1391

TO: WILTRUST.COM
2424 Winrock Boulevard, #236
Houston, Texas 77057

WILTRUST.WS
2424 Winrock Boulevard, #236
Houston, Texas 77057

Dave Dunn & Associates
2424 Winrock Boulevard, #236
Houston, Texas 77057

Dave Dunn
2424 Winrock Boulevard, #236
Houston, Texas 77057

CEASE PUBLICATION ORDER

This is your OFFICIAL NOTICE of the issuance by the Securities Commissioner of the State of Texas ("Securities Commissioner") of an ORDER TO CEASE PUBLICATION, pursuant to Section 23.6 of The Securities Act, TEX. REV. CIV. STAT. ANN. art. 581-1 et seq. (Vernon 1964 & Supp. 2000) ("Texas Securities Act") of materials published and disseminated within the State of Texas relating to the offer for sale and sale of securities.

1. The Staff of the Enforcement Division of the Texas State Securities Board ("Staff") has presented evidence sufficient for the Securities Commissioner to find that WILTRUST.COM; WILTRUST.WS; Dave Dunn & Associates; and Dave Dunn (collectively "Respondents"), have made offers for sale of securities which contain statements that are materially misleading or are otherwise likely to deceive the public.

2. The Staff has presented evidence sufficient for the Securities Commissioner to find that Respondents placed, or permitted to be placed, an advertisement on the Internet, located at website "http:\\wiltrust.com, and sites related thereto, which seeks to sell evidences of indebtedness and/or investment contracts. The program offered is a "bank debenture instrument" program and a "referral program" paying commissions for recruiting into the bank debenture program. The investment is described on the site as a "Leveraged High Yield Investment" and seeks investments up to \$10,000.

Anticipated returns are stated to be up to \$180,000 in one year on a \$10,000 investment. The investment program is described on the site, a substantial portion of which is herein below excerpted:

"Welcome to *Wiltrust I*, where your dreams of becoming financially secure can be accomplished. How would you like to participate in a trade where the returns were REMARKABLE? How would you like to turn only \$100 into \$1800 within a year? Or even \$10,000 into \$180,000? How would you like to double or triple that just by referring people to this program? It's simple, it's easy, and all you have to do is fill out the form. You can be set for life with a simple application that takes only 3 minutes of your time to fill out. How would you like to also get paid top dollar for telling people about this amazing opportunity! It's all possible and best of all, it's profitable.

Invest in Success

The concept of this system is simple. You will be able to take part in a trade that has only been available to the ultra **wealthy** and extremely knowledgeable. These low risk trades with high returns are hard to find and can cost you millions just to participate, but we take it a step further. We offer these exact same wealth generating trades to you at an unbelievably low cost to enter. We have participated in a very secretive yet very lucrative trade that will generate millions. We had to invest a high amount of capital in order to be part of this trade. However, we are offering an opportunity for regular people to participate in a trade of this magnitude. We know that the average person doesn't have thousands of dollars to invest, but does the **average** person have \$100? Would you invest \$100 to receive up to \$1800? Wouldn't you be crazy not to? Well, now you have the opportunity to participate in a trade where you **can earn a** high interest yield with a low cost to you. This means for a limited time, while the spaces are still available, you will be able to participate in these incredibly profitable trades at a very low investment of only \$100! That meager \$100 can generate up to \$1800 of income for you within the next 12 months. What's the catch? There is none. You may want to check out our [FAQ](#) page to better understand why we sell off positions (units). Now that you have a general idea of what we do, it's

time for you to take the next step. To get started, [CLICK HERE](#) and in minutes you will be set.

We are able to achieve even higher returns than we are paying you, enabling us to make a profit. To understand the nature of the trades we are involved in, [CLICK HERE](#). *The purpose of this link is to introduce the beginner to some general trading concepts. Although reasonably accurate, it does contain some inaccuracies. Further, no two trades are exactly alike, but this document will give you a good idea of how they work. (If this link does not work, please NOTIFY US via Email.)*

You can now get paid a 5% commission on every person that you tell about this opportunity, and another 5% commission on every person that they refer. This will be placed directly into the program, just like the funds you put in.

Order your units now! These amazing and profitable trades will only cost you \$1 O/unit if you order them now. That's right, not thousands of dollars, but only \$10, and you may purchase as many as you wish. With a guaranteed return of \$180/unit, it's hard to pass up the opportunity, since it's also available only for a limited time. To get started, [CLICK HERE](#) and in minutes you will be set.

Copyright © 2000 by Wiltrust.ws
All Rights Reserved

The following table illustrates how quickly your money can grow just by leaving it in the program. During the first four months your money doubles. During the second four months your money triples. During the third four month period your money also triples. This compounding effect will actually make your money grow 18 times (2x3x3) in just one year.

Entry Level	4 Months	8 Months	12 Months
\$100	\$200	\$600	\$1,800
\$250	\$500	\$1,500	\$4,500
\$500	\$1,000	\$3,000	\$9,000
\$750	\$1,500	\$4,500	\$13,500
\$1,000	\$2,000	\$6,000	\$18,000
\$1,500	\$3,000	\$9,000	\$27,000

\$2,500	\$5,000	\$15,000	\$45,000
\$5,000	\$10,000	\$30,000	\$90,000
\$7,500	\$15,000	\$45,000	\$135,000
\$10,000	\$20,000	\$60,000	\$180,000

You may purchase any number of units shown in the above table, or any other amount of your choosing, so long as the trade remains open. Once we sell the allotted number of units, the trade will begin and you will not be able to purchase additional units.

Every four months you will have an opportunity to sell any number of your units, but you will not be able to purchase additional units. You must put in your sell order at any time prior to the end of each four-month period, then your order will automatically execute at the new price level. Each unit sells for \$10, but will be worth \$20 after four months, \$60 after eight months, and \$180 after 12 months, at which time the program will end and all units will automatically be sold.

Referral Program: The current referral program is two levels deep, paying you a 5% commission on all units purchased by your referrals and another 5% on *their* referrals. These funds are converted into units and placed directly into the program at the time that the trade commences..

How to Buy Units/How to Send Funds: You can join the program, buy units, and refer others all in one easy step. To get started, [CLICK HERE](#) and in minutes you will be set.

You will receive an email explaining where and how to deposit funds into your account, and how to access the Members Area. Deposits can be made by bank or wire transfer, or by sending cash to one of our processing centers.

How to Sell/How to Receive Funds: Withdrawals are **made** by bank or wire transfer to any non-US bank account of your choosing. You may use the same account that you have used with another program. You also may join the program right now even if you do not yet have a non-US bank account, because we do not need your bank account information until you are ready to receive your funds.

It is your responsibility to open and maintain your own account. The following list of non-US banks is provided for your convenience:

- Bank Crozier, Grenada
- First Antilles, Panama
- First Bank, Grenada
- Paritate Bank, Latvia (Maestro debit card, US\$85)
- Provident Bank, Belize
- Rishon Bank, Barbados (Visa debit card, US\$400)

Notice: Wiltrust may at any time and without notice close this trade to non-members and replace the current registration form with a waiting list form for the next trade.

Copyright © 2000 by Wiltrust.ws
All Rights Reserved

The trading in "bank debenture instruments" is a multi-trillion dollar industry worldwide. Top World Banks (Money Center Banks) are authorized to issue blocks of debt instruments like Bank Purchase Orders (BPOs), Promissory Bank Notes or Mid-Term Notes (MTNs), Zero Coupon Bonds (Zeros), Documentary Letters of Credit (DLCs), Stand By Letters of Credit (SLCs), or Bank Debenture Instruments (BDIs) under International Chamber of Commerce guidelines (ICC-400 & 500)...

Questions and Answers

If this is such a good investment, why have we not heard about it?

The internal trading of bank debentures is a privileged and highly lucrative profit source for participating banks, and as a result, these opportunities are not made known to the public (bank customers). It would be difficult, at best, to entice clients to purchase Certificates of Deposit, yielding 2.5% to 6%, if they were aware that other, equally secure investment accounts yielded more than ten times higher rates of return. The banks and traders always employ the strictest non-disclosure and non-circumvention clauses in trading contracts to ensure the confidentiality of the transactions. The contracts usually contain explicit language forbidding the contracted parties to disclose any aspect of the transaction for a period of five years. As a result, it is difficult to locate experienced individuals who are knowledgeable and willing to candidly discuss these opportunities and the high profitability associated with them, since in so doing, they would severely jeopardize their opportunity to participate in further transactions.

There are no smoke and mirrors involved; all of the trading programs are conducted under the specific guidelines set up by the International Chamber of Commerce (I.C.C.), generally known as I.C.C. 500 & 600.

The I.C.C. is the regulatory body for the World's Great Money Center Banks and is based in Paris, France. It has existed for more than 100 years and exerts strict control on world banking procedures.

Can I participate through my U.S. bank or brokerage firm?

There is no advantage to the U.S. Federal Reserve in making Forfeiting transactions available in the United States. Under the Glass-Steagal Act of 1933, U.S. Banks and Brokerage Houses are prohibited by law from offering such programs in the domestic markets. In addition, as a result of the 1929 collapse, American bankers are severely inhibited by various regulatory procedures and other requirements which make it impossible for them to offer these transactions to their U.S. clients. Chances are that your attorney, banker and broker have absolutely no knowledge of these programs since they are only conducted by Top Money Center Banks located in Western Europe.

NOTE: Forfeiting (Bank Debenture Trading) Programs should not be confused with Derivatives, which are risky and highly speculative, and consist of a pyramid of borrowed collateral (debt), built upon or 'derived from' the Investor's underlying investment. Any deviation from the hoped for market conditions can bring the pyramid crashing down, instantly burying the speculator in a mountain of debt..."

3. The Staff has presented evidence sufficient for the Securities Commissioner to find that Respondents engaged in the offer for sale of securities in the State of Texas.
4. The Staff has presented evidence sufficient for the Securities Commissioner to find that the securities offered by Respondents were not registered as required by the provisions of the Texas Securities Act.
5. The Staff has presented evidence sufficient for the Securities Commissioner to find that, in connection with the offer for sale of securities within the State of Texas, relating to the offer of the above-referenced securities, Respondents made statements that are materially misleading or are otherwise likely to deceive the public, to wit:
 - a. References to I.C.C. 500 are misleading in that the I.C.C. has issued a press release specifically indicating that references to I.C.C. Publication 500 in "Bank Debenture Trading Programmes" are false and misleading and that, in fact, such a trading programme "does not exist". Additionally, the I.C.C. has indicated that such solicitations are "fraudulent" and have claimed "tens of millions of dollars from victims worldwide".
 - b. The said reference to the I.C.C. is also misleading because it fails to disclose that the I.C.C. has issued a Special Report on Prime Bank Instrument

Frauds, specifically describing programs with the same characteristics as the program being offered by Respondents as “fraudulent”. Moreover, the United States Securities & Exchange Commission has repeatedly announced that such prime bank and debenture trading programs **are** non-existent and fraudulent.

- c. The said offering fails to disclose to whom the offeror will provide the investor funds.

The Securities Commissioner hereby FINDS and is of the opinion that the evidence presented by the Staff shows that, in connection with the offer for sale and **sale of** securities, the sales materials used by Respondents contain statements that are materially misleading or are otherwise likely to deceive the public.

The Securities Commissioner further FINDS and is of the opinion that the evidence presented by the Staff demonstrates sufficient proof of grounds necessary **for the issuance** of an ORDER TO CEASE PUBLICATION as provided by Section 23.B of the Texas Securities Act.

ORDER

It is therefore ORDERED by the Securities Commissioner, pursuant to Section 23.B of the Texas Securities Act, that WILTRUST.COM; WILTRUST.WS; Dave Dunn & Associates; and Dave Dunn CEASE PUBLICATION, dissemination and use of advertisements and sales materials that are materially misleading or otherwise likely to deceive the public, including, but not limited to, those materials that relate to the above-referenced offers for sale of securities issued by Respondents and any advertisements or sales materials substantially similar thereto in connection with the offer for sale or sale of securities within the State of Texas.

Dated this 12th day of April, 2000.



DENISE VOIGT CRAWFORD
Securities Commissioner