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E. WALLY KINNEY
MEMBER

IN THE MATTER OF
SENIOR MOMENTS, ROBERT "BOB"
MARTINS AND VIRGINIA MARIE MARTINS

§
§ Order No. ENF-11-CDO-1698
§

TO: Senior Moments
10120 West Flamingo Road #4-344, Las Vegas, Nevada 89147,
10120 West Flamingo Road #4-433, Las Vegas, Nevada 89147, and
9030 W. Sahara Ave. #470, Las Vegas, Nevada 89117

Robert "Bob" Martins
10120 West Flamingo Road #4-344, Las Vegas, Nevada 89147,
10120 West Flamingo Road #4-433, Las Vegas, Nevada 89147,
9030 W. Sahara Ave. #470, Las Vegas, Nevada 89117, and
4690 Laguna Vista, Las Vegas, Nevada 89147

Virginia Marie Martins
10120 West Flamingo Road #4-344, Las Vegas, Nevada 89147,
10120 West Flamingo Road #4-433, Las Vegas, Nevada 89147,
9030 W. Sahara Ave. #470, Las Vegas, Nevada 89117, and
4690 Laguna Vista, Las Vegas, Nevada 89147

EMERGENCY CEASE & DESIST ORDER

This is your OFFICIAL NOTICE of the issuance by the Securities Commissioner of the State of Texas ("Securities Commissioner") of an EMERGENCY CEASE AND DESIST ORDER pursuant to Section 23-2 of The Securities Act, TEX. REV. CIV. STAT. ANN. art. 581-1 et seq. (Vernon 2010) ("Texas Securities Act").

The Staff of the Enforcement Division ("the Staff") of the Texas State Securities Board ("the Securities Board") has presented evidence sufficient for the Securities Commissioner to find that:

FINDINGS OF FACT

1. Senior Moments (“Respondent Senior Moments”) maintains last known addresses at 10120 West Flamingo Road #4-344, Las Vegas, Nevada 89147, 10120 West Flamingo Road #4-433, Las Vegas, Nevada 89147, and 9030 W. Sahara Ave. #470, Las Vegas, Nevada 89117.
2. Robert “Bob” Martins (“Respondent R. Martins”) maintains last known addresses at 10120 West Flamingo Road #4-344, Las Vegas, Nevada 89147, 10120 West Flamingo Road #4-433, Las Vegas, Nevada 89147, 9030 W. Sahara Ave. #470, Las Vegas, Nevada 89117, and 4690 Laguna Vista, Las Vegas, Nevada, 89147.
3. Virginia Marie Martins (“Respondent V. Martins”) maintains last known addresses at 10120 West Flamingo Road #4-344, Las Vegas, Nevada 89147, 10120 West Flamingo Road #4-433, Las Vegas, Nevada 89147, 9030 W. Sahara Ave. #470, Las Vegas, Nevada 89117, and 4690 Laguna Vista, Las Vegas, Nevada, 89147.
4. Respondents Senior Moments, R. Martins and V. Martins (collectively “Respondents”) are offering investments in life settlement contracts in Texas. They are carrying advertisements through the financial services forum of craigslist.org and elsewhere that tout the profitability and safety of these investments. Respondents Senior Moments and R. Martins are specifically representing as follows:
 - a. Investors will receive a fractional interest in a life insurance policy written on individuals aged 63 or older,
 - b. The investment is “recession proof” and has “total immunity from the economy,”
 - c. The investment is “secured” or “collateralized” by life insurance policies written on “high risk seniors,” and
 - d. Potential returns can exceed thirty times the principal investment.
5. Respondents Senior Moments and R. Martins are telling investors that this investment is structured as follows:
 - a. Respondent Senior Moments is the owner and beneficiary of a life insurance policy,
 - b. Respondent Senior Moments will assign seventy-five percent of its beneficial interest in said life insurance policy,
 - c. The investor will pay all premiums to Respondent Senior Moments or his or her interest will “revert” to Respondent Senior Moments,

- d. After a term of two years, the life insurance policy will be sold to a hedge fund for twenty percent of its face value unless the investor elects to keep and maintain the life insurance policy, and
 - e. Respondent Senior Moments will replace the life insurance policy if the insured commits suicide or the policy otherwise becomes ineffective during the first two years of the policy.
6. The aforementioned investment has not been registered by qualification, notification or coordination and no permit has been granted for its sale in Texas.
 7. Respondents have not been registered with the Securities Commissioner as dealers or agents at any time material hereto.
 8. In connection with the offer for sale of the aforementioned investment, Respondents are intentionally failing to disclose one or more of the following material facts:
 - a. Information relating to the federal conviction of Respondent R. Martins, to-wit:
 - i. Respondent R. Martins was found guilty on or about January 28, 2002, of nine counts of wire fraud, one count of conspiracy to commit wire fraud, one count of conspiracy to commit money laundering, three counts of engaging in monetary transactions with criminally derived property and one count of transportation of stolen property in United States of America v. Robert Martins, Case Number 1:98-cr-01325-SAS, United States District Court for the Southern District of New York,
 - ii. Respondent R. Martins was thereafter sentenced to serve 135 months in federal prison,
 - iii. Respondent R. Martins was also ordered to pay restitution in the amount of \$16,762,000, and
 - iv. On or about October 28, 2010, Respondent R. Martins was transferred from a Residential Re-entry Center to home confinement to continue to serve his sentence with a projected release date of March 30, 2011.
 - b. The true risks associated with the investment including, but not limited to, the risks related to investments in life settlement contracts, the contestability of the life insurance policies, the potential sale of the life insurance policies to an unidentified hedge fund, the manner in which the investment is “secured” or “collateralized” by life insurance policies, and the potential loss of investor funds.

- c. Information relating to the business operations of Respondent Senior Moments including, but not limited to, the following:
 - i. The experience, business repute, and qualifications of directors, officers, or control persons of Respondent Senior Moments,
 - ii. The true physical address and location of Respondent Senior Moments,
 - iii. The assets, liabilities, or capitalization of Respondent Senior Moments, or any information that will allow a prospective investor to assess or verify that Respondent Senior Moments will satisfy its obligations throughout the term of the investment, and
 - iv. The operating history of Respondent Senior Moments, including information that reflects its performance in generating a profit for investors through the sale of the investments identified herein.
 - d. Information relating to Respondents R. Martins and V. Martins including, but not limited to, their experience, business repute, qualifications and other information that reflects their performance in generating a profit for investors through the sale of the investments identified herein.
 - e. Information regarding the nature of the life insurance policies including, but not limited to, the methodology used to identify life insurance policies, the terms of the life insurance policies used in the investments and the identities and ratings of the insurance carriers issuing the policies.
 - f. True and accurate information that will allow an investor to make an informed decision about whether to maintain or sell their interest in the life insurance policy at the end of the two year term.
9. Respondents are making offers containing statements that are materially misleading or otherwise likely to deceive the public by engaging in one or more of the following actions:
- a. Representing that they will pay a “finders’ fee” to individuals who solicit new clients, which is materially misleading or otherwise likely to deceive the public because they are also failing to disclose that individuals who sell the investments in Texas for a “finders’ fee” must generally be registered as dealers or agents pursuant to the Texas Securities Act.
 - b. Touting lucrative returns and representing that they “comply with all laws to make this a legal and legitimate investment opportunity,” which is materially misleading or otherwise likely to deceive the public because they are also failing to disclose the aforementioned material facts.

CONCLUSIONS OF LAW

1. The investments described herein are securities as that term is defined by Section 4.A of the Texas Securities Act.
2. Respondents are violating Section 7 of the Texas Securities Act by offering securities for sale in Texas at a time when the securities are not registered with the Securities Commissioner.
3. Respondents are violating Section 12 of the Texas Securities Act by offering securities for sale in Texas without being registered pursuant to the provisions of Section 12 of the Texas Securities Act.
4. Respondents are engaging in fraud in connection with the offer for sale and sale of securities.
5. Respondents are making offers containing statements that are materially misleading or otherwise likely to deceive the public.
6. Respondents' conduct, acts, and practices threaten immediate and irreparable public harm.
7. The foregoing violations constitute bases for the issuance of an Emergency Cease and Desist Order pursuant to Section 23-2 of the Texas Securities Act.

ORDER

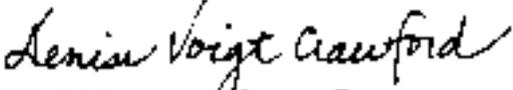
1. It is therefore ORDERED that Respondents immediately CEASE AND DESIST from offering for sale any security in Texas until the security is registered with the Securities Commissioner or is offered for sale pursuant to an exemption from registration under the Texas Securities Act.
2. It is further ORDERED that Respondents immediately CEASE AND DESIST from acting as securities dealers or agents in Texas until Respondents are registered with the Securities Commissioner or are acting pursuant to an exemption from registration under the Texas Securities Act.
3. It is further ORDERED that Respondents immediately CEASE AND DESIST from engaging in any fraud in connection with the offer for sale of any security in Texas.
4. It is further ORDERED that Respondents immediately CEASE AND DESIST from offering securities in Texas through an offer containing a statement that is materially misleading or otherwise likely to deceive the public.

NOTICE

Pursuant to Section 23-2 of the Texas Securities Act, you may request a hearing before the 31st day after the date you were served with this Order. The request for a hearing must be in writing, directed to the Securities Commissioner, and state the grounds for the request to set aside or modify the Order. Failure to request a hearing will result in the Order becoming final and non-appealable.

You are advised under Section 29.D of the Texas Securities Act that any knowing violation of an order issued by the Securities Commissioner under the authority of Section 23-2 of the Texas Securities Act is a criminal offense punishable by a fine of not more than \$5,000, or imprisonment in the penitentiary of not more than two years, or by both such fine and imprisonment.

SIGNED AND ENTERED by the Securities Commissioner on this 2nd day of February, 2011.


DENISE VOIGT CRAWFORD
Securities Commissioner