

STATE OF ILLINOIS  
SECRETARY OF STATE  
SECURITIES DEPARTMENT

IN THE MATTER OF: TURBOATM.COM, its officers,  
and directors, employees, agents, partners, affiliates,  
successors and assigns, and Bo Small, individually.

FILE NO. 1000144

**SUMMARY ORDER  
TO CEASE AND DESIST**

**TO THE RESPONDENT:** TurboATM.com  
300 W Street  
Buffalo, New York 14201

Bo Small  
c/o TurboATM.com  
300 W Street  
Buffalo, New York 14201

On information and belief, I, Jesse White, Secretary of State, for the State of Illinois, through my designated representative, having been fully advised in the premises by the staff of the Securities Department, Office of the Secretary of State, herein find:

1. That www.turboatm.com ("Turbo"), is a website and business entity of unknown origin and form, which maintains its principal domain through its domain registrant Bo Small at 300 W Street, Buffalo, New York 14201.
2. That on March 17, 2010, a representative of the Respondent called at least one Illinois resident (the "Offeree") and left a voice-mail message to view the website www.turboatm.com.
3. That more than one Illinois resident viewed that website as a result of that call.
4. That the one page website offers a Business Opportunity: "\$500.00-\$1,000.00 Your First Week Using Our Secret Marketing Breakthrough! We have discovered a secret so powerful it literally "POURS" Cash Directly Into Your Pocket Automatically!! Guaranteed!!"

## Summary Order to Cease and Desist

5. That Section 5-5.10(a)(6) of Business Opportunity Sales Law of 1995, [815 ILCS 602 et seq.] (the "Act") provides, inter alia, that a business opportunity is a contract or agreement, between a seller and purchaser, express or implied, orally or in writing, wherein it is agreed that the seller or a person recommended by the seller shall provide to the purchaser any product, equipment, supplies or services enabling the purchaser to start a business when the purchaser is required to make a payment to the seller or a person recommended by the seller of more than \$500 and the seller represents directly or indirectly, orally or in writing, that: the seller or a person recommended by the seller will provide a marketing plan.
6. That the activities of Respondent described in paragraphs two through four (2-4), constitute a business opportunity as that term is defined in Section 5-5.10 of the Act.
7. That the activities of Respondent described in paragraph two through four (2-4) constitute an offer as that term is defined under Section 5-5.20 of the Act.
8. That Section 5-25 of the Act provides, inter alia, that it is unlawful for any person to offer any business opportunity in this State unless the business opportunity is registered under the Act or is exempt under Section 5-10 of the Act.
9. That at all relevant times, Respondent Turboatm.com, its partners, officers and directors, agents, employees, affiliates, successors and assigns, and Bo Small, individually, failed to register the business opportunity described in paragraph four (4) as required pursuant to Section 5-25 of the Act.
10. That, by virtue of the foregoing, the Respondent violated Section 5-25 of the Act.
11. That Section 5-65 of the Act provides, inter alia, that whenever it appears to the Secretary of State that any person has engaged in or is about to engage in any act or practice constituting a violation of any provision of this Law or any rule, regulation, or order under this Law, the Secretary of State may issue an order directing the person to CEASE and DESIST from continuing the act or practice.

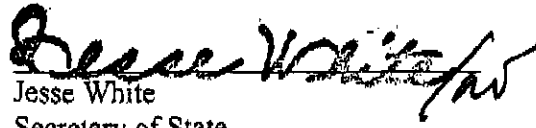
NOW THEREFORE IT IS HEREBY ORDERED THAT: Pursuant to the authority granted by Section 5-65 of the Act, Respondent Turboatm.com, its partners, officers and directors, employees, agents, affiliates, successors and assigns, and Bo Small, individually, are ordered to CEASE and DESIST from offering or selling any business opportunity in the State of Illinois until the further order of the Secretary of State.

Summary Order to Cease and Desist

NOTICE is hereby given that the Respondent may request a hearing on this matter by transmitting a written request to the Securities Director, Illinois Securities Department, 69 West Washington Street, Suite 1220, Chicago, Illinois 60602. Such request must be made within thirty (30) days after entry of this Summary Order to Cease and Desist. Upon receipt of a request for a hearing, a hearing will be scheduled as soon as reasonably practicable. Request for hearing will not stop the effectiveness of this Summary Order to Cease and Desist.

FAILURE BY ANY PERSON NAMED IN THIS ORDER TO REQUEST A HEARING WITHIN THIRTY (30) DAYS AFTER ENTRY OF THIS SUMMARY ORDER TO CEASE AND DESIST SHALL BE DEEMED TO CONSTITUTE A WAIVER OF ALL RIGHTS BY SUCH PERSON TO A HEARING AND THE ORDER TO CEASE AND DESIST AS TO SUCH PERSON WILL BECOME PERMANENT.

DATED: This 19<sup>th</sup> day of April, 2010.

  
Jesse White  
Secretary of State  
State of Illinois

Attorney for the Secretary of State:

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