

STATE OF ILLINOIS
SECRETARY OF STATE
SECURITIES DEPARTMENT

IN THE MATTER OF: METRO EAST INSURANCE GROUP,)
ITS OFFICERS, DIRECTORS,) File No. 0900516
EMPLOYEES, AFFILIATES, SUCCESSORS,)
AGENTS AND ASSIGNS,)
AND VICTORIA RENOIS MCGEE-HARRIS)
)

TEMPORARY ORDER OF PROHIBITION AND SUSPENSION OF REGISTRATION

TO THE RESPONDENTS: Metro East Insurance Group
Victoria Renois McGee-Harris (CRD#1183259)
7164 Washington Ave.
St. Louis, Missouri 63130

Metro East Insurance Group
Victoria Renois McGee-Harris (CRD#1183259)
4956 Benchmark Center Drive
Suite A
Swansea, Illinois 62226

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 Illinois Securities Department, Office of the Secretary of State, herein find:

1. That Respondent, Metro East Insurance Group, is a purported business entity with a last known address of 4956 Benchmark Center Drive, Suite A, Swansea, Illinois 62226;
2. That Respondent Victoria Renois McGee-Harris, DOB November 8, 1952, CRD #1183259, is a registered securities salesperson with the Illinois Securities Department through Tower Square Securities, Inc., and is licensed with the Illinois Department of Insurance, with a last known home address of 7164 Washington Ave., St. Louis, Missouri 63130 and a last known business address of 4956 Benchmark Center Drive, Suite A, Swansea, Illinois 62226, and at all times relevant was an Officer, Director, Agent or Employee of Metro East Insurance Group;
3. That on or about February 23, 2007, Respondent Victoria Renois McGee-Harris met with her client, TA, an Illinois resident, asked TA for her checkbook, advised TA that Respondent was making an investment for TA, filled out check #1032, payable to Metro East Insurance

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Group, dated February 23, 2007, in the amount of \$40,000, at which time TA signed said check after which Respondent took possession of said check and deposited said check in Respondent Metro East Insurance Group's bank account on February 23, 2007;

4. That on or about March 29, 2007, Respondent Victoria Renois McGee-Harris again met with TA, asked for TA's checkbook, wrote out check #1033, payable to Metro East Insurance Group, dated March 29, 2007, in the amount of \$50,000, and wrote in the check memo "Oppenh", at which time TA signed the check after which Respondent took possession of said check and deposited said check in Respondent Metro East Insurance Group's bank account on April 2, 2007;
5. That Respondent Victoria Renois McGee-Harris has signatory authority in regards to the aforesaid Respondent Metro East Insurance Group bank account;
6. That since the aforesaid signing and execution of the two aforesaid checks #1032 and #1033, totaling \$90,000, Respondent Victoria Renois McGee-Harris continued to represent multiple times to TA and/or her daughter, TH, that said funds from said checks had been invested in AllianceBernstein and Evergreen Investments securities/investment accounts, when in fact said funds were not so invested, nor were said funds invested for TA in any other securities or investment account, but rather said funds were used by Respondents for Respondents' own benefit, use and expenses;
7. That during the months of March and April, 2009, Respondents represented that TA had not been receiving AllianceBernstein and/or Evergreen Investment account statements because TA's home address was incorrect and that TA's AllianceBernstein's account had to be moved because TA did not fit a "risk profile" as set forth in the original accounts; Respondent further represented that the combined accounts lost approximately \$30,000 due to market conditions;
8. That on or about March 3, 2009, an AllianceBernstein account was opened by the Respondents in TA's name for the amount of \$30,429.00 and that no such account existed prior to that time;

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9. That on or about May 7, 2009, the Respondents paid \$30,095.00 to Evergreen Investments from funds paid to Respondents by another individual other than TA;
10. That on or about May 8, 2009, an Evergreen Investment account was opened by the Respondents in TA's name with an initial investment amount of \$30,095.00 and that no such account existed prior to that time;
11. That as of December 3, 2009, TA was 74 years old;
12. That TA is a native of Okinawa and that English is TA's second language;
13. That TA has been a client of Respondent Victoria Renois McGee-Harris for over 20 years during which Respondent McGee-Harris has acted as TA's securities salesperson and that Respondent McGee-Harris and TA have developed a relationship in which TA trusts Respondent McGee-Harris and in which TA is dependent on and follows Respondent McGee-Harris' recommendations and advice;
14. That TA's husband passed away in June, 2005;
15. That prior to his passing, TA's husband trusted Respondent McGee-Harris completely and advised TA that if anything happened to him, that TA was to follow Respondent McGee-Harris' advice;
16. That each of the aforesaid purported investments is a security as that term is defined pursuant to Section 2.1. of the Illinois Securities Law of 1953 [815 ILCS 5/1 et seq.] (the "Act");
17. That Section 5 of the Act provides, inter alia, that all securities except those exempt under Section 3 of the Act or those offered and sold in transactions exempt under Section 4 of the Act shall be registered with the Secretary of State prior to their offer or sale in the State of Illinois;
18. That Section 12.F of the Act provides, inter alia, that it shall be a violation of the Act for any person to engage in any transaction, practice or course of business in connection with the sale or purchase of securities which works or tends to work a fraud or deceit upon the purchaser or seller thereof;

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19. That Section 12.G of the Act provides, inter alia, that it shall be a violation of the Act for any person to obtain money or property through the sale of securities by means of any untrue statement of a material fact or any omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading;
20. That Section 12.I of the Act provides, inter alia, that it shall be a violation of the Act for any person to employ any device, scheme or artifice to defraud in connection with the sale or purchase of any security, directly or indirectly;
21. That Section 8.E.1(b) of the Act states, inter alia, that subject to the provisions of subsection F of Section 11 of the Act, the registration of a salesperson may be suspended or revoked if the Secretary of State finds that the salesperson or investor adviser representative has engaged in any unethical practice in the offer or sale of securities;
22. That Section 8.E.1(g) of the Act states, inter alia, that subject to the provisions of subsection F of Section 11 of the Act, the registration of a salesperson may be suspended or revoked if the Secretary of State finds that the salesperson or investor adviser representative has violated any of the provisions of this Act;
23. That at all times relevant hereto, Respondents Metro East Insurance Group, by and through its Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns, and Victoria Renois McGee-Harris, obtained money through the sale of securities by means of an untrue statement of material fact or omission to state a material fact, by representing to TA and/or TA's daughter, TH, that TA's funds from checks #1032 and #1033, totaling \$90,000, were invested in AllianceBernstein and Evergreen Investment securities/investment accounts in 2007, where fact, Respondents never invested said funds in said securities/investment accounts or any other securities/investment account, but rather used said funds for Respondents' own benefit, use and expenses; furthermore, Respondents continued to represent that the purported aforesaid 2007 accounts existed up through the time new accounts in AllianceBernstein and

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Evergreen Investment were opened by Respondents in TA's name in 2009; furthermore, Respondents failed to disclose that said new 2009 accounts were opened and funded by Respondents with funds other than the original aforesaid funds from checks #1032 and #1033, and that in the case of the Evergreen Investment account, said account was opened and funded by Respondents from funds obtained from an individual other than TA; furthermore, Respondents represented that the aforesaid new 2009 accounts were reopened, or moved from, the accounts purportedly opened in 2007 because TA's address was changed and/or because TA did not fit a purported risk profile, and further represented said 2007 accounts lost money due to market conditions, when in fact no such accounts existed prior to 2009;

24. That at all times relevant hereto, Respondents Metro East Insurance Group, by and through its Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns, and Victoria Renois McGee-Harris, engaged in a transaction, practice or course of business in connection with the sale or purchase of securities that worked or tended to work a fraud or deceit upon the purchaser thereof, by representing to TA and/or TA's daughter, TH, that TA's funds from checks #1032 and #1033, totaling \$90,000, were invested in AllianceBernstein and Evergreen Investment securities/investment accounts in 2007, where fact, Respondents never invested said funds in said securities/investment accounts or any other securities/investment account, but rather used said funds for Respondents' own benefit, use and expenses; furthermore, Respondents continued to represent that the purported aforesaid 2007 accounts existed up through the time new accounts in AllianceBernstein and Evergreen Investment were opened by Respondents in TA's name in 2009; furthermore, said new 2009 accounts were opened and funded by Respondents with funds other than the original aforesaid funds from checks #1032 and #1033, and that in the case of the Evergreen Investment account, said account was opened and funded by Respondents from funds obtained from an individual other than TA; furthermore, Respondents represented that the aforesaid new 2009 accounts were reopened, or moved from, the accounts purportedly opened in 2007 because TA's address was changed and/or because TA did not fit a purported risk profile, and further represented said 2007 accounts lost money due to market

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conditions, when in fact no such accounts existed prior to 2009; that said new 2009 accounts were so opened and funded and the aforesaid continuing representations were made by Respondents to further Respondents' aforesaid deception that TA's original funds were so invested in 2007 when in fact said original funds had not been so invested but rather were used for Respondents' benefit, use and expenses;

25. That at all times relevant hereto, Respondents Metro East Insurance Group, by and through its Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns, and Victoria Renois McGee-Harris, employed a device, scheme or artifice to defraud in connection with the sale or purchase of any security, directly or indirectly, by representing to TA and/or TA's daughter, TH, that TA's funds from checks #1032 and #1033, totaling \$90,000, were invested in AllianceBernstein and Evergreen Investment securities/investment accounts in 2007, where fact, Respondents never invested said funds in said securities/investment accounts or any other securities/investment account, but rather used said funds for Respondents' own benefit, use and expenses; furthermore, Respondents continued to represent that the purported aforesaid 2007 accounts existed up through the time new accounts in AllianceBernstein and Evergreen Investment were opened by Respondents in TA's name in 2009; furthermore, said new 2009 accounts were opened and funded by Respondents with funds other than the original aforesaid funds from checks #1032 and #1033, and that in the case of the Evergreen Investment account, said account was opened and funded by Respondents from funds obtained from an individual other than TA; furthermore, Respondents represented that the aforesaid new 2009 accounts were reopened, or moved from, the accounts purportedly opened in 2007 because TA's address was changed and/or because TA did not fit a purported risk profile, and further represented said 2007 accounts lost money due to market conditions, when in fact no such accounts existed prior to 2009; that said new 2009 accounts were so opened and funded and the aforesaid continuing representations were made by Respondents to further Respondents' aforesaid deception that TA's original funds were so invested in 2007 when in fact said original funds had not been so invested but rather were used for Respondents' benefit, use and expenses;

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26. That at all times relevant hereto, Respondents Metro East Insurance Group, by and through its Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns, and Victoria Renois McGee-Harris, engaged in an unethical practice in the offer or sale of securities and in a fraudulent business practice as well as violated the Act by representing to TA and/or TA's daughter, TH, that TA's funds from checks #1032 and #1033, totaling \$90,000, were invested in AllianceBernstein and Evergreen Investment securities/investment accounts in 2007, where fact, Respondents never invested said funds in said securities/investment accounts or any other securities/investment account, but rather used said funds for Respondents' own benefit, use and expenses; furthermore, Respondents continued to represent that the purported aforesaid 2007 accounts existed up through the time new accounts in AllianceBernstein and Evergreen Investment were opened by Respondents in TA's name in 2009; furthermore, said new 2009 accounts were opened and funded by Respondents with funds other than the original aforesaid funds from checks #1032 and #1033, and that in the case of the Evergreen Investment account, said account was opened and funded by Respondents from funds obtained from an individual other than TA; furthermore, Respondents represented that the aforesaid new 2009 accounts were reopened, or moved from, the accounts purportedly opened in 2007 because TA's address was changed and/or because TA did not fit a purported risk profile, and further represented said 2007 accounts lost money due to market conditions, when in fact no such accounts existed prior to 2009; that said new 2009 accounts were so opened and funded and the aforesaid continuing representations were made by Respondents to further Respondents' aforesaid deception that TA's original funds were so invested in 2007 when in fact said original funds had not been so invested but rather were used for Respondents' benefit, use and expenses;
27. That by virtue of the foregoing, Respondents Metro East Insurance Group, by and through its Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns, and Victoria Renois McGee-Harris, have violated Sections 12.F, 12.G and 12.I of the Act;
28. That Section 11.F.(2) of the Act provides, inter alia, that the Secretary of State may temporarily suspend or prohibit the offer or sale of securities by any person

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if the Secretary of State in his or her opinion, based upon credible evidence, deems it necessary to prevent an imminent violation of the Act or to prevent losses to investors which the Secretary of State reasonably believes will occur as a result of a prior violation of the Act;

29. That based upon the foregoing, the Secretary of State deems it necessary, in order to prevent imminent and additional violations of the Act, and to prevent losses to investors as a result of the referenced prior violation of the Act, to enter an order pursuant to the authority granted under Sections 8.E.1(b), 8.E.1(g) and 11.F of the Act which prohibits Respondents Metro East Insurance Group, by and through its Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns, and Victoria Renois McGee-Harris, from offering and/or selling securities in the State of Illinois and suspends the securities salesperson registration of Respondent Victoria Renois McGee-Harris; and
30. That based upon the credible evidence available to the Secretary of State, the entry of this Temporary Order is in the public interest and is consistent with the purposes of the Act.

NOW THEREFORE, IT IS HEREBY ORDERED THAT: pursuant to the authority granted by Sections 8.E.1(b), 8.E.1(g) and 11.F of the Act, Respondents Metro East Insurance Group, by and through its Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns, and Victoria Renois McGee-Harris, are hereby PROHIBITED from offering and/or selling securities in or from the State of Illinois and the securities registration of Respondent Victoria Renois McGee-Harris is SUSPENDED until further order of the Secretary of State.

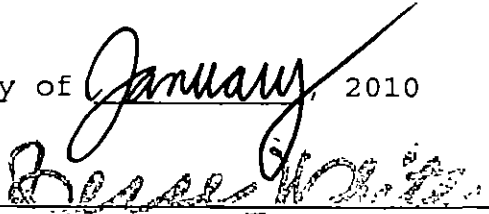
NOTICE is hereby given that the Respondents may request a hearing on this matter by transmitting such request in writing to Securities Director, Illinois Securities Department, 300 West Jefferson, Suite 300A, Springfield, Illinois 62702. Such request must be made within thirty (30) days of the date of entry of this Temporary Order. Upon receipt of a request for hearing, a hearing will be scheduled. Request for hearing will not stop the effectiveness of this Temporary Order and will extend the effectiveness of this Temporary Order for ninety days from the date the hearing request is received by the Department.

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FAILURE BY ANY RESPONDENT TO REQUEST A HEARING WITHIN THIRTY (30) DAYS AFTER ENTRY OF THIS TEMPORARY ORDER SHALL CONSTITUTE AN ADMISSION OF ANY FACTS ALLEGED HEREIN AND CONSTITUTES SUFFICIENT BASIS TO MAKE THE TEMPORARY ORDER FINAL.

ENTERED: This 3rd day of January, 2010



JESSE WHITE
Secretary of State
State of Illinois

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