

**STATE OF ILLINOIS  
SECRETARY OF STATE  
SECURITIES DEPARTMENT**

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**IN THE MATTER OF:** )

**Ervin Robinson,** )

**Shirley Robinson,** )

**Vision Financial Partners, LLC and its** )  
partners, members, officers, directors, )  
agents, employees, affiliates, successors, )  
and assigns, )

**File Number 0900213**

**Vision Trading Partners, LLC and its** )  
partners, members, officers, directors, )  
agents, employees, affiliates, successors, )  
and assigns )

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**ORDER OF PROHIBITION**

**TO THE RESPONDENTS:**

Ervin Robinson  
644 Phlox Circle  
Matteson, IL 60443-1768

Ervin Robinson  
7759 S Eberhart, Suite 100  
Chicago, IL 60619

Shirley Robinson  
644 Phlox Circle  
Matteson, IL 60443-1768

Shirley Robinson  
7759 S. Eberhart, Suite 100  
Chicago, IL 60619

Vision Financial Partners, LLC  
644 Phlox Circle  
Matteson, IL 60443-1768

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Vision Financial Partners, LLC  
7759 S. Eberhart, Suite 100  
Chicago, IL 60619

Vision Trading Partners, LLC  
644 Phlox Circle  
Matteson, IL 60443-1768

Vision Trading Partners, LLC  
7759 S. Eberhart, Suite 100  
Chicago, IL 60619

WHEREAS, a Temporary Order of Prohibition was issued by the Illinois Secretary of State, on October 30, 2009, temporarily prohibiting the Respondents from offering or selling securities in the State of Illinois for a maximum period of ninety (90) days.

WHEREAS, pursuant to Section 11 F of the Illinois Securities Law of 1953 [815 ILCS 5/1 *et seq*] (the "Act"), the failure to request a hearing within thirty (30) calendar days of the entry of a Temporary Order of Prohibition shall constitute an admission of any facts alleged therein and constitute a sufficient basis to make the Temporary Order final.

WHEREAS, the Respondents have failed to request a hearing on the matters contained in the Temporary Order of Prohibition within thirty (30) calendar days of the entry of said Temporary Order and the Respondents are hereby deemed to have admitted the facts alleged in the said Temporary Order

WHEREAS, the Secretary of State, by and through his duly authorized representative, has adopted the Findings of Fact contained in the said Temporary Order as the Secretary of State's Findings of Fact as follows

- 1 Respondent **Ervin Robinson** is a co-President of Vision Financial Partners, LLC and Vision Trading Partners, LLC and has last known addresses of 7759 S Eberhart, Suite 100, Chicago, IL 60619 and 644 Phlox Circle, Matteson, IL 60443-1768
- 2 Respondent **Shirley Robinson** is a co-President of Vision Financial Partners, LLC and Vision Trading Partners, LLC and has last known addresses of 7759 S. Eberhart, Suite 100, Chicago, IL 60619 and 644 Phlox Circle, Matteson, IL 60443-1768
- 3 Respondent **Vision Financial Partners, LLC** ("VFP") is a Nevada LLC with its principal place of business being the State of Illinois VFP was formed on or about January 25, 2007 and is an entity with last known addresses of 7759 S. Eberhart, Suite 100, Chicago, IL 60619 and 644 Phlox Circle, Matteson, IL 60443-1768.

- 4 Respondent **Vision Trading Partners, LLC** is an entity with last known addresses of 7759 S Eberhart, Suite 100, Chicago, IL 60619 and 644 Phlox Circle, Matteson, IL 60443-1768.

**FRAUD IN THE OFFER AND SALE OF SECURITIES**

- 5 Respondent VFP held itself out on its website to be “a long term secure profit investment program, backed up by Real Estate & other assets.” In addition, the website stated, “Profits from these assets are used to enhance our program and increase its stability for the long term.”
- 6 Starting at least as early as March of 2007, Respondents began to advertise about investments in VFP by circulating flyers to members of various churches.
- 7 One such flyer stated that investors can “Receive interest returns of 18% - 22%”, have their home mortgages paid off in five to seven years, reduce their monthly mortgage note by half, and can create additional streams of income.
- 8 One of the investments advertised by VFP was an investment scheme that exchanged the equity in an investor’s home for a promise to pay off all mortgage liens on an investor’s residence in just five to seven years.
- 9 The aforementioned investment scheme worked in the following manner:
- a Before or during the offer and sale of the investment contract to an investor, VFP encouraged that investor to take out a home equity mortgage loan on their residence.
  - b. Once the funds from the home equity loan were disbursed to the investor, the investor would then entrust these funds to VFP for their “investment”.
  - c Once VFP received these funds, VFP was to begin paying a certain amount of money toward the investor’s mortgage every month until the mortgage was completely paid off in the specified amount of time.
  - d. The investor was also required to make payments to VFP each month representing his or her “share” of the mortgage payment
- 10 The investment scheme described above constitutes the offer and sale of an investment contract, and thus a security as those terms are defined in Sections 2 1. 2 5. and 2 5a of the Illinois Securities Law of 1953 [815 ILCS 5/1 *et seq.*] (the “Act”)
- 11 VFP offered and sold these investment contracts to more than one Illinois investor.
- 12 For example, Investor A took out a home equity loan on his residence in the amount of \$123,574 00 and entrusted these funds to VFP after entering into an investment contract with the following terms

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- a. VFP was to make monthly payments in the amount of \$1,309.27 each month on Investor A's existing mortgages.
  - b. Investor A was to pay VFP \$535.41 a month for his "share" of the monthly mortgage payments.
  - c. Investor A would have his residence free and clear of the two mortgages on his property in five years.
13. In the course of the offer and sale of the investment contract to Investor A, Respondents promised Investor A that in the event that VFP was unable to make Investor A's monthly mortgage payments, VFP had an insurance policy that would continue to pay the mortgage, or they would sell properties that they owned to return the full amount of Investor A's investment principal to him.
14. VFP also guaranteed investors that they would not lose the principal amount of their investments. As described to potential investors on its website, VFP stated:
- In a worst-case scenario, the Company would have assets and chattel, which should theoretically provide enough to return all, of every lender's original principal. But they don't plan to fail! Vision is succeeding quite well and is currently ahead of its obligations to lenders.**
15. Furthermore, paragraph 12 of VFP's Terms and Conditions Agreement states that "VISION FINANCIAL PARTNERS DOES GUARANTEE RETURN OF INITIAL LOAN."
16. Notwithstanding VFP's assurances, VFP only made the promised payments on Investor A's mortgage for about a year and then stopped making them altogether.
17. When Investor A called Respondent Ervin Robinson to inquire about the missed payments, Respondent Robinson told Investor A that he "can't do anything about it"
18. Despite the Respondents' promises, the Respondents never purchased an insurance policy to protect Investor A from a default on the agreement and never sold any assets to pay back Investor A the principal of his investment.
19. Section 12 A of the Act provides that it shall be a violation for any person to offer or sell any security except in accordance with the provisions of the Act
20. Section 12 F of the Act provides that it shall be a violation of the provisions of this 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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21. Section 12 G of the Act provides that it shall be a violation of the provisions of this 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 light of the circumstances under which they were made, not misleading.
22. Section 12.I of the Act provides that it shall be a violation of the provisions of this 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.

### **OFFER AND SALE OF UNREGISTERED SECURITIES**

23. Section 5 of the Act provides, *inter alia*, that all securities except those exempt under Section 3 or those offered or sold in transactions exempt under Section 4 "shall be registered either by coordination or qualification prior to their offer or sale" in the State of Illinois
24. Respondents failed to file with the Secretary of State an application for registration of the securities described above as required by the Act and, as a result, the securities were not registered pursuant to Section 5 of the Act prior to their offer or sale in the State of Illinois.
25. Section 12 A of the Act provides that it shall be a violation for any person to offer or sell any security except in accordance with the provisions of the Act
26. Section 12 D of the Act provides, *inter alia*, that it shall be a violation for any person to fail to file with the Secretary of State any application, report or document required to be filed under the provisions of the Act or any rule or regulation made by the Secretary of State pursuant to the Act

### **FAILURE TO COMPLY WITH AN ORDER OF THE SECRETARY OF STATE**

27. On or about April 24, 2009, The Illinois Securities Department of the Office of the Secretary of State of Illinois ("the Department") opened an investigation of VFP and the investment scheme described above
28. On June 4, 2009, in the course of the investigation into VFP's investment scheme and pursuant to Sections 11 C and 11.D of the Act, the Department issued separate "11.C" letters to Respondents Ervin and Shirley Robinson requesting specific records and documents of the company. Each 11.C letter stated that "Failure to respond fully and accurately to this request by June 10, 2009... may be treated as a violation of Section 12.D of the Act."
29. Respondents Ervin and Shirley Robinson received their respective 11 C letters via certified mail on June 6, 2009

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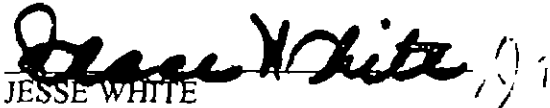
30. As of October 30, 2009, the Respondents have failed and refused to produce the documents requested pursuant to the 11.C letter
31. That the "11.C" letters described above constitute orders of the Secretary of State pursuant to Sections 11 C. and 11.D of the Act
32. Section 12 D of the Act provides, *inter alia*, that it shall be a violation for any person to fail to comply with the terms of any order of the Secretary of State issued pursuant to Section 11 hereof.

WHEREAS, the Secretary of State, by and through his duly authorized representative, has adopted the Conclusions of Law contained in the said Temporary Order as the Secretary of State's Conclusions of Law as follows:

- 1 By virtue of the foregoing, Respondents violated Sections 12.A, 12 D, 12.F, 12 G, and 12.I of the Act
- 2 By virtue of the foregoing, Respondents Ervin Robinson, Shirley Robinson, Vision Financial Partners, LLC, and Vision Trading Partners, LLC, and each of the Respondent's partners, members, officers and directors, agents, employees, affiliates, successors and assigns are subject to, pursuant to Section 11.F of the Act, an Order which permanently prohibits them from offering or selling securities in the State of Illinois

NOW THEREFORE, IT IS HEREBY ORDERED THAT pursuant to Section 11.F of the Act, Respondents **Ervin Robinson, Shirley Robinson, Vision Financial Partners, LLC, and Vision Trading Partners, LLC**, and each of Respondent's partners, members, officers and directors, agents, employees, affiliates, successors and assigns are hereby **PERMANENTLY PROHIBITED** from offering or selling any securities in or from the State of Illinois.

Dated This 7th day of December, 2009

  
JESSE WHITE  
Secretary of State  
State of Illinois

NOTICE Failure to comply with the terms of this Order shall be a violation of the Section 12 D of the Act Any person or entity who fails to comply with the terms of this Order of the Secretary of State, having knowledge of the existence of the Order, shall be guilty of a Class 4 Felony

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This is a final order subject to administrative review pursuant to the Administrative Review Law, {735 ILCS 5/3-101 et seq.} and the Rules and Regulations of the Illinois Securities Act, {14 Ill Admin Code Ch I, Section 130.1123}. Any action for Judicial Review must be commenced within thirty-five (35) days from the date a copy of this Order is served upon the party seeking review.

Attorney for the Secretary of State

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Illinois Securities Department  
Office of the Secretary of State  
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