

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

---

<b>IN THE MATTER OF:</b>	)	
	)	
	)	
<b>Christopher Turner</b>	)	<b>File Number: 0700205</b>
<b>Monument Peak Investments, LLC</b>	)	
<b>its partners,</b>	)	
<b>members, officers, directors, agents,</b>	)	
<b>employees, affiliates, successors and assigns.</b>	)	
	)	

---

**ORDER OF PROHIBITION**

**TO RESPONDENT:** Christopher Turner  
7210 Oak Street # 4SE  
River Forest, Illinois 60305

Monument Peak Investments, LLC  
c/o Christopher Turner  
7210 Oak Street # 4SE  
River Forest, Illinois 60305

WHEREAS, a Temporary Order of Prohibition was issued by the Illinois Secretary of State, on December 3, 2007, temporarily prohibiting the Respondents from offering or selling securities in the State of Illinois until further order from the Secretary of State.

WHEREAS, pursuant to Section 11.F of the Illinois Securities Law of 1953 [815 ILCS 5] (the "Act"), the failure to request a hearing within thirty (30) calendar days of the entry of a Temporary Order 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 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 Final Findings of Fact as follows:

**I. FRAUD IN THE SALE OF SECURITIES**

1. Respondent Christopher Turner ("Turner") is a natural person with the last known address of 7210 Oak Street # 4SE River Forest, Illinois 60305.
2. Respondent, Monument Peak Investments, LLC (Monument) has a last known business address of 7210 Oak Street # 4SE River Forest, Illinois 60305, and was formerly doing business at 1131 W. Lake Street # 129, Oak Park, Illinois 60301.
3. Turner represented to Illinois investors that he was doing business as Monument Peak Investments, LLC, and as shown by his following actions: opening bank accounts in the name of Monument Peak Investments, LLC, signing documents as Monument Peak Investments, LLC. including, but not limited to, notes, escrow commission agreements, and "financial services and working agreement".
4. In 2006, Respondent Turner directly sold and offered to sell Notes of Monument Peak Investment, LLC to the general public, including residents of the State of Illinois ("Investors").
5. On November 16, 2006, Turner solicited at least one Illinois Investor to purchase a Note of Monument Peak Investment, LLC at \$15,000 with the promise to pay 33% interest of \$5,000.00 over ninety (90) days.
6. Turner represented to the Investor that the proceeds of the investment were to be used to facilitate the purchase and/or development of property located at Summerhill Estate in Las Vegas, Nevada.
7. Contrary to the representation Turner made to the Investor, Turner deposited the Illinois Investor's check into Monument Peak Investments, LLC bank account and proceeded to dissipate the funds therein.
8. To date, the Illinois investor has been unable to contact the respondent, not received any return on his investment, and has failed to have his investment returned or any accounting of investment.
9. The activities described above constitute the offer and sale of a note and therefore 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").

10. Section 12.F of The Act states 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.” 815 ILCS 5/12.F.
11. Section 12.G of the Act states 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.” 815 ILCS 5/12.G.
12. Section 12.I of the Act states 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. 815 ILCS 5/12.I.
13. Respondents refused or omitted, to inform Investors that Monument Peak Investments, LLC was in default in the State of Nevada. Respondents refused or omitted, to inform Investors that Monument Peak Investments, LLC was not registered with the Secretary of State. By virtue of this conduct, Respondents violated Sections 12.F, 12.G, and 12.I of the Act.

## **II. FAILURE TO REGISTER SECURITIES**

14. In 2006, Respondent Turner directly sold and offered to sell Notes of Monument Peak Investment LLC. In 2006, Turner solicited at leased one Illinois Investors to purchase a Note of Monument Peak Investment, LLC at \$15,0000 with the promise to pay 33% interest of \$5,000.00 over ninety (90) days.
15. The activities described above constitute the offer and sale of a note and therefore 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").
16. 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 by qualification prior . . . to their offer or sale” in the State of Illinois.
17. Respondent 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 security was not registered pursuant to Section 5 of the Act prior to its offer in the State of Illinois.
18. Section 12.A of the Act provides, *inter alia*, that it shall be a violation for any person “to offer or sell any security except in accordance with the provisions of the Act.”

19. 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.”
20. By virtue of the foregoing, Respondent violated Sections 12.A and 12.D of the Act.

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. The Securities Department of the Office of the Secretary of State (“Department”) has jurisdiction over the subject-matter of this proceeding under Sections 2.1; 2.5; 2.5(a); 12.F; and 11.E(2) of the Illinois Securities Law (“Act”). 815 ILCS 5/2.1;2.5; 2.5(a); 12.F; and 11.E (1).
2. The Department has personal jurisdiction over each of the Respondents because:
  - (a) The Department properly served each Respondent with the Temporary Order of Prohibition entered in this proceeding on December 3, 2007, in accordance with Sections 10.B(1) and 11.F(2) of the Act.
  - (b) The Temporary Order contained the information required under Section 11.F(2) of the Act that the Respondents’ failures to request a hearing within thirty days after the date of the entry of the Temporary Order would constitute an admission of any facts contained in the Temporary Order and constitute a sufficient basis to make the Temporary Order final.
3. The notes described in the Findings of Fact of this Order are securities, as defined by Section 2.1 of the Act.
4. Respondents’ offers and sales of the notes and Respondents offer and sale of the investment contract constituted engagements in transactions, practices, or a course of business in connection with the sale and purchase of securities that worked or tended to work a fraud or deceit upon the purchasers, in violation of Section 12.F of the Act.
5. Respondents obtained money through the sale of a note by means of an omission to state a material fact necessary in order to make the statements offering the promissory note for sale, in the light of the circumstances under which it was made, not misleading, in violation of Section 12.G of the Act.
6. Respondents obtained money through the sale of a note by means of a scheme, or artifice to defraud in connection with the sale or purchase of a note, directly or indirectly in violation of Sections 12.I of the Act.

Order of Prohibition

-5-

7. Respondents offered and sold unregistered securities as set forth as described in the Findings of Fact of this Order violation of Section 12.A of the Act.
8. Respondents offered and sold unregistered securities as set forth as described in the Findings of Fact of this Order violation of Section 12.D of the Act.

NOW THEREFORE IT IS HEREBY ORDERED: That pursuant to Section 11.F of the Act, the Respondents, Christopher Turner and Monument Peak Investment LLC shall be and are hereby permanently PROHIBITED from offering or selling any securities in or from the State of Illinois.

Dated: This 4<sup>th</sup> day of January 2008.



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.

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:

Mary A. Lopez  
Illinois Securities Department  
69 West Washington Street  
Chicago, Illinois 60602  
312-793-3023