

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

IN THE MATTER OF: KEITH ALLEN MILLS.

File No. 1200342

NOTICE OF HEARING

TO RESPONDENT: Keith Allen Mills, Register # 00955-104
CRD# 1195093
Federal Prison Camp Pensacola
P.O. Box 3949
Pensacola, FL 32509

Keith Allen Mills
CRD# 1195093
2222 Avenue of the Stars - #2606
Los Angeles, CA 90067

TAKE NOTICE: A public hearing shall be held at the office of the Illinois Securities Department, Office of the Secretary of State of Illinois, at 69 W Washington Street - Suite 1220, in Chicago, Illinois 60602, on June 4, 2013, at 11:00 a.m., or as soon thereafter as possible before Hearing Officer George Berbas, or such other hearing officer who shall be presiding at that time

At this hearing, the Illinois Securities Department of the Office of the Secretary of State of Illinois shall seek entry of an order granting the following relief:

1. Revocation of the registration of Respondent Keith Allen Mills as a securities salesperson, in accordance with sections 8.E(1)(b), 8.E(1)(g), 8.E(1)(h), 11.E(2), 12.D, and 12.E of the Illinois Securities Law of 1953, as amended ("Act") 815 ILCS 5/8 E(1)(b); 5/8.E(1)(g); 5/8(1)(h); 5/11.E(2); 5/12.D; and 5/12.E
2. Permanent prohibition of Respondent Mills from offering or selling securities in Illinois, in accordance with sections 11 E(2), and 12 D and 12.E of the Act
3. Permanent prohibition of Respondent Mills from acting as an investment adviser, investment adviser representative, or federal covered investment adviser, in accordance with sections 8.E(1)(b), 8.E(1)(g), 8.E(1)(h), 11.E(2), and 12.D and 12.E of the Act
4. Any other relief authorized by the Act

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NATURE OF THE CASE

Respondent Keith Allen Mills, a securities salesperson registered in Illinois, failed to report to the Illinois Secretary of State that he had been charged with a felony; and he made false sworn statements to the Secretary of State about his business activities. Mills' failure to disclose the felony charge and his false statements involved a Florida business Mills and others used to defraud more than 90 investors. On January 14, 2013, Mills was sentenced to serve approximately five and a half years in prison for his role in the fraud, and ordered to pay some \$1.9 million in restitution.

FACTS

1. Respondent Keith Allen Mills is an individual who most recently has been registered as a securities salesperson in Illinois since August 1, 2011. He had an earlier period of registration as a salesperson in Illinois and other states from 1988 through 2000
2. The last residential address Mills reported to the Secretary of State on September 10, 2012, as part of his salesperson registration, was 2222 Avenue of the Stars - #2606, in Los Angeles, California 90067.
3. On January 14, 2013, Mills was sentenced and ordered to begin serving his sentence on March 4, 2013, in a federal criminal case known as *U.S. v. Mills*, U.S. District Court for the Southern District of Florida, Case No. 12-CR-80190, in West Palm Beach, Florida. The U.S. Bureau of Prisons internet website reports that Mills is housed at Federal Prison Camp Pensacola, 110 Raby Avenue, in Pensacola, Florida, with a mailing address of P.O. Box 3943.
4. From July 18, 2011, through October 5, 2012. Mills was associated as a securities salesperson with Westpark Capital, Inc., a broker-dealer and investment advisory firm in Los Angeles, California.
5. From September 10, 2012, through September 28, 2012, Mills was a salesperson with Dawson James Securities, Inc., a broker-dealer in Boca Raton, Florida.
6. While registered as a salesperson for Westpark Capital and Dawson James Securities, Mills was president of a company called Business Vision Network Inc. ("BVN"). The company was organized as a Florida corporation from October 25, 2001, through September 28, 2012. As president, Mills directed the company's daily operations and controlled its finances.
7. BVN's principal place of business and mailing address was 1218 Breakers West Boulevard, in West Palm Beach, Florida 33411.
8. Respondent Mills and his associates marketed BVN to the public as a business that produced television infomercials, short- or regular-length programs that presented

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information about particular products or services, and offered the advertised items for sale.

- 9 On September 28, 2012, the U.S. Attorney's Office for the Southern District of Florida filed an information in *U.S. v. Mills*, U.S. District Court for the Southern District of Florida, Case No. 12-CR-80190, in West Palm Beach, Florida. An information is a charging document similar to an indictment.
10. The information charged that, from January 2009 through October 2010, Respondent Mills and others solicited investors with false claims, including that BVN was a successful, stable company with \$10 million in revenues
- 11 The information also charged that more than ninety persons invested a total of about \$1.9 million in the company, and that the funds instead were used to maintain lavish lifestyles for Respondent Mills and his associates.
12. On October 12, 2012, Respondent Mills pled guilty to one count of wire fraud in the federal case. On January 14, 2013, he was sentenced to imprisonment for fifty-seven months, followed by three years supervised release, and he was ordered to pay restitution in the amount of \$1,870,654.37.

SECTION 1

Failure to Report Felony Charge to Illinois Secretary of State

13. To maintain his registration as a salesperson in the state of Illinois, Respondent Keith Allen Mills was required to report to the Illinois Secretary of State that he had been charged with a felony, wire fraud, on September 28, 2012, in Florida. From October 15, 2012, through March 29, 2013, Mills failed to report to the Illinois Secretary of State that he had been charged with this felony
- 14 All applicants for registration as securities salespersons in the state of Illinois are required to file applications with the Illinois Secretary of State via the broker-dealer firms with which they are associated. 815 ILCS 5/8.C.
15. Both salesperson applicants and registered salespersons are required to report to the Secretary of State any material change in information they provided in their registration applications within ten business days of the change. 815 ILCS 5/8.C(8).
16. On July 17, 2011, Respondent Mills caused broker-dealer Westpark Capital, Inc., to file his salesperson registration application with the Illinois Secretary of State. From August 1, 2011, through February 15, 2012, Mills also caused Westpark Capital to file five amended applications

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17. On September 10, 2012, when Respondent Mills had moved to broker-dealer Dawson James Securities, Inc., he caused that firm to file his salesperson registration application with the Illinois Secretary of State
18. On each of these seven registration applications or amended applications, Mills swore or affirmed that his answers were true and complete to the best of his knowledge, and that he understood he was subject to administrative, civil or criminal penalties if he gave false or misleading answers.
19. From August 1, 2011, through March 29, 2013, Question 14A(1)(b) of the application asked: "Have you ever been charged with any felony?"
20. The information in *U.S. v Mills* charged Respondent Mills with the federal crime of fraud by wire, radio, or television, in violation of Title 18 of U.S. Code, sections 2 and 1343. 18 U.S.C 2 and 1343. This offense is a felony. 18 U.S.C.3156(a)(3).
21. The information in *Mills* was filed on September 28, 2012. An attorney representing Respondent Mills filed a response to the information on October 1, 2012.
22. As a consequence, from October 1, 2012, through March 29, 2013, Respondent Mills knew he had been charged with a felony.
23. Mills was required to report the charge to the Illinois Secretary of State within ten business days, no later than October 15, 2012. From October 15, 2012, through March 29, 2013, he did not report the charge to the Secretary of State.

SECTION 2

False Statements to Illinois Secretary of State regarding Business Activities

24. From August 1, 2011, through September 10, 2012, Respondent Mills made false statements to the Illinois Secretary of State about his business activities. Each time, instead of disclosing he had been operating Business Vision Network Inc., since 2001, more than ten years, he reported he was involved in no business activities other than his salesperson duties for broker-dealer firms Westpark Capital, Inc., and Dawson James Securities, Inc.
25. From August 1, 2011, through October 25, 2012, while Mills was associated with broker-dealers Westpark Capital, Inc, and Dawson James Securities, Inc., Question 13 of the application asked. "Are you currently engaged in any other business either as a proprietor, partner, officer, director, employee, trustee, agent or otherwise?"
26. On each of the seven applications or amended applications Mills filed with the Secretary of State through those firms, he stated he was not engaged in any other business.

SECTION 3

Fraudulent Business Practices: Wire Fraud

27. Respondent Mills' actions, using his company Business Vision Network, Inc., to solicit investors with false claims and using investment funds for Mills' personal benefit, were fraudulent business practices, as described in Section 8.E(1)(b) of the Illinois Securities Law of 1953, as amended. 815 ILCS 5/8.E(1)(b).

VIOLATIONS

28. Respondent Mills failed to report to the Illinois Secretary of State that he had been charged with a felony within ten business days after he was charged, as required by Section 8.C(8) of the Illinois Securities Law of 1953, as amended ("Act"). 815 ILCS 5/8.C(8).
29. Respondent Mills' failure to report his felony charge was a refusal to furnish material information requested by the Secretary of State to determine his business repute or qualifications as a salesperson, as required by Section 8.E(1)(h)
30. Under Section 8.E(1), Respondent Mills' registration as a salesperson in Illinois is subject to suspension or revocation because of his failure to comply with sections 8.C(8) and 8.E(1)(h)
31. Section 12.D of the Act provides in pertinent part that it is a violation of the Act to fail to file with the Secretary of State any application, report, or document required to be filed under the Act.
32. Respondent Mills' refusal to report his felony charge was a failure to file an application, report, or document required to be filed by sections 8.C(8) and 8.E(1)(h), in violation of Section 12.D.
33. Respondent Mills' repeated misrepresentations to the Secretary of State that he was engaged in no other business activities, when he in fact had been operating a business named Business Vision Network Inc., for more than ten years, were material in connection with information deemed necessary by the Secretary of State to determine Mills' business repute or qualifications as a salesperson, as required by Section 8.C(5).
34. Respondent Mills' statements in his registration applications and amended applications that he was engaged in no other business activities were misrepresentations that were material in connection with information deemed necessary by the Secretary of State to determine his business repute or qualifications as a salesperson, as required by Section 8.E(1)(h)

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35. Section 12.E of the Act provides in pertinent part that it is a violation of the Act to make or cause to be made a materially false or misleading statement in any application, report, or document required to be filed under the Act
36. Each of Respondent Mills' repeated misrepresentations about the other business activities information required by sections 8.C(5) and 8 E(1)(h) were each separate violations of Section 12.E.
37. Respondent Mills' violation of sections 12.D or 12.E subjects his salesperson registration to suspension or revocation, in accordance with Section 8.E(1)(g).
38. Section 11.E(2) of the Act provides in pertinent part that if the Secretary of State finds a person has violated sections 12.D or 12 E, the Secretary may temporarily or permanently prohibit or suspend the person from offering or selling any securities, any mineral investment contract, or any mineral deferred delivery contract in Illinois
39. Respondent Mills' violation of sections 12 D or 12.E subjects his salesperson registration to temporary or permanent prohibition or suspension from offering or selling any securities, any mineral investment contract, or any mineral deferred delivery contract in Illinois, in accordance with Section 11.E(2)
40. Section 8.E(1)(b) of the Act provides in pertinent part that a person's registration as a securities salesperson in Illinois is subject to suspension or revocation if he or she has engaged in any fraudulent business practice.
41. Respondent Mills' actions, using his company Business Vision Network, Inc., to solicit investors with false claims and using investment funds for Mills' personal benefit, were fraudulent business practices that subject his salesperson registration to suspension or revocation under Section 8.E(1)(b)

FURTHER NOTICE TO RESPONDENT: You are required to file an answer to the allegations outlined above or other responsive pleading within thirty days after service of this notice on you, in accordance with Section 130.1104(a) of the Rules and Regulations under the *Illinois Securities Law* ("Rules") Your failure to do so within the prescribed time shall be construed as an admission of the allegations contained in this notice and waives your right to a hearing. Upon such failure, the hearing officer shall make a recommendation that an appropriate order be entered, including finding you in default.

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Your answer and all other pleadings and motions must be filed with the Illinois Securities Department by addressing them to:

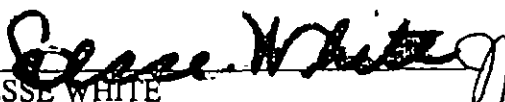
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69 W. Washington St. - Suite 1220
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You may appear personally on your own behalf, or be represented by an attorney. You or your attorney may present evidence; cross-examine witnesses; and otherwise participate in this proceeding. A failure to appear shall constitute default by you.

A copy of the Rules and Regulations promulgated under the Illinois Securities Law of 1953, as amended ("Act"), governing procedures for administrative hearings under the Act, is available at: <http://www.ilga.gov/commission/jcar/admincode/014/01400130sections.html>, or upon request.

Issued: This 3rd day of April, 2013


JESSE WHITE
Secretary of State
State of Illinois

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