

STATE OF ILLINOIS  
SECRETARY OF STATE  
SECURITIES DEPARTMENT

IN THE MATTER OF: SCOTT GOLDSTEIN  
AND EUROPEAN ASSETS, INC.

File No. C1200026

NOTICE OF HEARING

TO THE RESPONDENTS: SCOTT D. GOLDSTEIN  
847 Bonita Avenue  
Elk Grove Village, Illinois 60007

EUROPEAN ASSETS, INC.  
Attn: Scott Goldstein  
847 Bonita Avenue  
Elk Grove Village, Illinois 60007

You are hereby notified that pursuant to Section 15-45 of the Illinois Loan Brokers Act of 1995 [815 ILCS 175/15-15] (the "Act") and 14 Ill. Adm. Code 130, Subpart K, a public hearing will be held at 69 West Washington Street, Suite 1220, Chicago, Illinois 60602, on March 17, 2016, at the hour of 1:00 p.m. or as soon as possible thereafter, before George Georgopoulos or such other duly designated Hearing Officer of the Secretary of State.

Said hearing will be held to determine whether an Order shall be entered prohibiting European Assets, Inc. and Scott D. Goldstein. from offering, advising the sale of, and selling securities in the State of Illinois, and/or granting such other relief as may be authorized under the Act including but not limited to the imposition of a monetary fine in the maximum amount pursuant to Section 15-55 of the Act, payable within ten (10) business days of the entry of the Order.

The grounds for such proposed action are as follows:

BACKGROUND FACTS

1. European Assets, Inc. ("Respondent EAI" or collectively with Respondent Scott Goldstein, "Respondents") was an Illinois corporation. Its last known address is 847 Bonita Avenue, Elk Grove Village, Illinois 60007.

## NOTICE OF HEARING

-2-

2. Scott D. Goldstein ("Respondent Scott" or collectively with Respondent EAI, "Respondents") was the President and CEO of Respondent EUI. His last known address is 847 Bonita Avenue, Elk Grove Village, Illinois 60007.
3. Complainant SC and Complainant WM (or collectively "Complainants") are residents of the State of Illinois.
4. In the summer of 2011, Complainant SC met Respondent Goldstein at the Crystal Lake Golf Club where Respondent Goldstein started talking to people regarding Respondent EAI and its "40 million dollar line of credit."
5. According to Complainant SC, Respondent Goldstein stated that it would take approximately 2 weeks for him to receive a million dollar line of credit for his business.
6. On or about December 5, 2011, Respondent Goldstein on behalf of Respondent EAI entered into an agreement to provide consulting services to Complainant SC's business to "bringing on investor or venture capitalist group to fund the amount of one million dollars."
7. In exchange for Respondents' services, Complainant SC tendered to Respondent Goldstein a check in the amount of \$1,500.00, made payable to Respondent Goldstein for the "upfront fee."
8. In November 2011, Complainant WM met Respondent Goldstein at his business. According to Complainant WM, Respondent Goldstein stated that he had inherited his father's company, Respondent EIA and that Respondent EIA had 35 million dollars in cash that it could loan.
9. According to Complainant WM, Respondent Goldstein stated that it would take approximately 30 days for him to receive a 5 million dollar loan for his business.
10. On or about November 21, 2011, Respondent Goldstein on behalf of Respondent EAI entered into an agreement to provide consulting services to Complainant WM's business to "bringing on investor or venture capitalist group to fund the amount of five million dollars."
11. In exchange for Respondents' services, Complainant WM tendered to Respondent Goldstein a check in the amount of \$3,500.00, made payable to Respondent Goldstein for the "upfront fee."
12. According to Complainants they would give the check or checks they intended to invest directly to Respondent Bayer who in turn would provide them a receipt of their investments within a couple of days.

**NOTICE OF HEARING**

-3-

13. That the above-referenced Respondent is a loan broker as that term is defined pursuant to Section 15-5.15 of the Illinois Loan Brokers Act of 1995 [815 ILCS 175/15-1 et seq.] (the "Act").

**COUNT I**

**815 ILCS 175/15-10 and 15-85(b) violations:  
Respondent is an unregistered loan broker**

- 1-13. The Illinois Secretary of State re-alleges and incorporates paragraphs 1 through 13 above, as paragraphs 1 through 13 of this Count I.
14. Section 15-10 of the Illinois Loan Brokers Act of 1995, 815 ILCS 175/15-10 *et seq.*, (the "Act") states that it shall be a violation of the provisions of this Act for any person to "engage in the business of loan brokering unless registered under this."
15. Section 15-85(b) of the Act provides, *inter alia*, that it is prohibited under the Act for a loan broker to either directly or indirectly act as a loan broker without registration under the Act unless exempt under the Act.
16. At all times relevant hereto, Respondent, its Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns, failed to file an application for registration as a loan broker with the Secretary of State prior to the aforementioned loan offer from the State of Illinois.
17. By virtue of the foregoing, Respondents its Officers, Directors, Employees, Affiliates, Successors, Agents, Assigns, have violated Sections 15-10 and/or 15-85(b) of the Act.

**COUNT II**

**815 ILCS 175/15-85(a) violation: Respondent employed a  
scheme to defraud in connection  
with the sale of securities**

- 1-13. The Illinois Secretary of State re-alleges and incorporates paragraphs 1 through 13 of Count I, as paragraphs 1 through 13 of this Count III.

NOTICE OF HEARING

-4-

14. Section 15-85(a) of the Act provides that it shall be a violation of the Act for a loan broker, in connection with a contract for the services of a loan broker, to either directly or indirectly:
- (1) Employ any devices, scheme, or article to defraud;
  - (2) Make any untrue statements of a material fact or omit to state a material fact necessary in order to make the statements made, in light of the circumstances under which they are made, not misleading; or
  - (3) Engage in any act, practice or course of business that operates or would operate as a fraud or deceit upon any person.
15. The facts alleged in paragraphs 1 through 14 above allege facts that show conduct by the Respondent that violate Section 15-85(a) of the Act. In particular: Respondents engaged in a scheme of soliciting individuals and charging upfront fees in exchange to secure purported "millions of dollars in lines of credits" for the victim. However, the complainants never received the loans as Respondents guaranteed.


You are further notified that you are required pursuant to Section 145.400 of the Rules and Regulations (14 Ill. Adm. Code 145) (the "Rules"), to file an answer to the allegations outlined above within thirty (30) days of the receipt of this Notice. A failure to file an answer within the prescribed time shall be construed as an admission of the allegations contained in the Notice of Hearing.

Furthermore, you may be requested by legal counsel; may present evidence; may cross-examine witnesses and otherwise participate. A failure to so appear shall constitute default, unless any Respondent has upon due notice moved for and obtained a continuance.

A copy of the Rules, promulgated under the Act and pertaining to hearings held by the Office of the Secretary of State, Securities Department, is included with this Notice.

Delivery of Notice to the designated representative of any Respondent constitutes service upon such Respondent.

Dated: This 22nd day of January 2016.

  
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JESSE WHITE  
Secretary of State  
State of Illinois

NOTICE OF HEARING

-5-

Attorney for the Secretary of State:

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Hearing Officer:

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