

**ADMINISTRATIVE PROCEEDING
BEFORE THE
SECURITIES COMMISSIONER OF MARYLAND**

IN THE MATTER OF:	*	
EDWARD JAMES LAWSON	*	
and	*	
AUTOMATED REVENUE CREATION, LLC	*	OAH No.: OAG-SD-50-08-36717 Securities Division No. 2007-0080
and	*	
GUARANTEED RESULTS ADVERTISING, LLC,	*	
	*	
RESPONDENTS.	*	
	*	
* * * * *		

FINAL ORDER

WHEREAS, the Securities Division of the Office of the Attorney General (“Securities Division”), pursuant to the authority granted in section 11-701 of the Maryland Securities Act, Title 11, Corporations and Associations Article, Annotated Code of Maryland (2007 Repl. Vol. & Supp. 2013) (the “Securities Act”), undertook an investigation into the securities-related activities of Edward James Lawson, Automated Revenue Creation, LLC, and Guraranteed Results Advertising, LLC (collectively the “Respondents”); and

WHEREAS, as a result of that investigation, the Maryland Securities Commissioner (the “Securities Commissioner”) found grounds to allege that the Respondents violated sections 11-301, 11-

401, 11-402, and 11-501 of the Securities Act;

WHEREAS, pursuant to section 11-701.1(a) of the Securities Act, on June 24, 2008, the Securities Commissioner issued a Summary Order to Cease and Desist and Order to Show Cause (“Summary Order”) ordering that Edward James Lawson, Automated Revenue Creation, LLC, and Guaranteed Results Advertising, LLC, and each of them, their respective officers, directors, employees, agents and anyone else involved in the offer or sale of investments in its “NarrowCast” advertising business in or through the Respondents, immediately cease and desist from soliciting investments in, or offering or selling securities or investment contracts in or from Maryland, pending a hearing in this matter or until such time as the Securities Commissioner modified or rescinded the Summary Order; and

WHEREAS, the Summary Order further provided that each Respondent show cause why a final order should not be issued against it, assessing that Respondent the statutory penalty of \$5,000 per violation of the Securities Act, and permanently barring that Respondent from engaging in the securities business in or from Maryland; and

WHEREAS, on July 10, 2008, Joseph R. Price, Esquire, on behalf of Respondents, filed Respondents’ Answer, which was supplemented on July 25, 2008 by Respondents’ Specific Answer; and

WHEREAS, pursuant to a Scheduling Order dated July 18, 2008 that extended filing deadlines pending the completion of settlement discussions, on September 30, 2008, the Securities Commissioner referred this matter to the Office of Administrative Hearings for a hearing and proposed decision; and

WHEREAS, the matter was assigned to the Honorable Nicole Pastore Klein who set the matter for a telephone prehearing conference (“PHC”) scheduled on November 6, 2008; and

WHEREAS, on November 6, 2008, Judge Klein conducted a PHC during which John P. McLane, Assistant Attorney General, represented the Securities Division and Repondent Lawson represented himself and the other Respondents; and

WHEREAS, during the PHC, Assistant Attorney General McLane and Respondents agreed that

the matter could be decided on their oral joint Motion for Summary Decision and Respondents conceded to the issues presented, the statement in support of the Securities Division's claim and the Statement of Facts outlined in the Securities Division's Prehearing Statement; and

WHEREAS, on December 5, 2008, Judge Klein issued a Proposed Ruling on Motion for Summary Judgment ("Proposed Ruling") in which she proposed that the parties' joint motion for summary judgment be granted and the Summary Order be upheld in its entirety; and

WHEREAS, the Proposed Ruling provided that the parties could file exceptions to the Proposed Ruling; and

WHEREAS, on December 22, 2008, Assistant Attorney General McLane filed Securities Division's Exceptions to the Administrative Law Judge's Proposed Ruling on Motion for Summary Judgment, which did not take exception to the proposed findings of fact and conclusions of law but took exception to the sanctions and provided additional information to support the Division's proposal for a civil penalty in the amount of \$1,000,000; and

WHEREAS, Respondents did not file Exceptions nor did they file a reply to the Securities Division's Exceptions; and

WHEREAS, on March 30, 2009, the Securities Commissioner sent to Respondents a letter giving Respondents fifteen (15) days to file a response to the Securities Division's Exceptions and, if Respondents did make a filing, gave the Securities Division fifteen (15) days to reply to Respondents' submission; and

WHEREAS, Respondents did not submit a filing or otherwise respond to the Securities Commissioner's letter; and

NOW, THEREFORE, THE COMMISSIONER FINDS, CONCLUDES AND ORDERS:

I. JURISDICTION

1. The Securities Commissioner has jurisdiction in this proceeding pursuant to section 11-

701 of the Securities Act.

II. RESPONDENTS

2. Edward James Lawson is the Managing Director/President/ CEO of Automated Revenue Creation, LLC, and Guaranteed Results Advertising, LLC, with business addresses in Rockville, Maryland. In various filings with the State of Maryland, Edward Lawson also used addresses in Gaithersburg, Maryland.

3. Automated Revenue Creation, LLC is a Maryland limited liability company since 2006, with an address in Gaithersburg, Maryland. In company documents, Respondent ARC used the same address in Rockville, Maryland as was used by the other Respondents.

4. Guaranteed Results Advertising, LLC is a Maryland limited liability company since 2006, with the same address in Rockville, Maryland as the other Respondents.

III. FINDINGS OF FACT

5. The Commissioner adopts the Findings of Fact in Judge Klein's December 5, 2008 Proposed Ruling on Motion for Summary Judgment, attached as Exhibit A hereto.

6. The Commissioner adopts as an additional Finding of Fact the following: The Respondents offered and sold more than 130 individual investment contracts to more than 100 individual investors, either persons or business entities, and received more than \$7,000,000 as a result of the sales.

IV. CONCLUSIONS OF LAW

7. Respondents violated section 11-501 of the Securities Act by selling securities that were not registered, exempt from registration, or federal covered securities.

8. Respondents violated section 11-401 of the Securities Act by acting as unregistered agents or broker-dealers.

9. Respondents violated section 11-402(a) of the Securities Act by employing unregistered agents.

10. Respondents violated the antifraud provisions of section 11-301 of the Securities Act.

11. Respondents, based upon the Findings of Fact made in this order, committed more than 500 violations of the Securities Act including a violation of each of sections 11-301, 11-401, 11-402 and 11-501 in connection with each sale of each individual investment contract.

V. SANCTIONS

NOW, THEREFORE, pursuant to section 11-701.1 of the Securities Act, it is hereby ORDERED THAT:

12. Each Respondent permanently cease and desist from engaging in fraud in the offer and sale of securities in violation of section 11-301 of the Securities Act.

13. Each Respondent permanently cease and desist from acting as an unregistered broker-dealer or agent in violation of section 11-401 of the Securities Act.

14. Each Respondent permanently cease and desist from engaging in the offer and sale of unregistered, non-exempt securities in violation of section 11-501 of the Securities Act.

15. Respondents are assessed, jointly and severally, a civil monetary penalty in the amount of \$1,500,000, payable by certified check to the Office of the Attorney General, to be offset by any amounts paid as restitution to investors in the securities that are the subject of this order. This penalty is calculated based on the number of violations (500) multiplied by the statutory maximum of \$5000 per violation, adjusted to be commensurate with civil penalties imposed in other cases.

VI. JURISDICTION RETAINED

16. Jurisdiction is retained by the Securities Commissioner for the purposes of enabling any party to this Final Order to apply for such further orders and directions as may be necessary or appropriate for the construction or enforcement of this Final Order.

VII. APPEAL RIGHTS

17. Pursuant to the Code of Maryland Regulations, COMAR 02.02.06.24, each Respondent

has the right to file an appeal of this Final Order with the Circuit Court of Maryland. Any appeal must be filed within 30 days from the date this Order is mailed by the Securities Division.

DATE OF THIS ORDER:

February 19, 2014

SO ORDERED:

**Commissioner's Signature is
on File with Original Document**

Melanie Senter Lubin
Securities Commissioner

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