

**OFFICE OF THE MISSISSIPPI SECRETARY OF STATE
BUSINESS REGULATION AND ENFORCEMENT DIVISION**

IN THE MATTER OF :)	
)	Administrative Proceeding
)	Number S-03-0032
Brixon Group)	
1245 West Guadalupe Road)	
Mesa, AZ 85202)	
)	
Cameron Campbell)	
7825 Fay Avenue, Suite 200)	
La Jolla, CA 92307)	
)	
Alvin J. McCool)	
1616 East Main, Suite 206)	
Mesa, AZ 85203)	
)	
Don Manning)	
1616 East Main, Suite 206)	
Mesa, AZ 85203)	
)	
<i>Respondents</i>)	

**FINAL CEASE AND DESIST ORDER AND
ORDER IMPOSING ADMINISTRATIVE PENALTY**

I. JURISDICTION

COMES NOW, James O. Nelson, II, Assistant Secretary of State, Business Regulation and Enforcement Division (hereinafter "Division"), on behalf of Eric Clark, Secretary of State for the State of Mississippi, and states it appears that Respondent, Cameron Campbell, has promoted, offered and sold securities in violation of the Mississippi Securities Act, Miss. Code Ann. §75-71-101, et seq. (1991) (hereinafter "Act").

The Secretary of State, therefore, finds that he has jurisdiction over the subject matter and the parties herein.

II. FINDINGS OF FACT

The previous paragraphs are incorporated herein by reference.

1. Respondent Cameron Campbell (hereinafter "Campbell") is an adult natural person whose last known address is 7825 Fay Avenue, Suite 200, La Jolla, CA 92307, and who was at all times relevant herein an Investment Representative of Brixon.

2. Respondent sold investments to Mississippi residents in the form of Capital Private Placements (hereinafter "CPP").

3. The Division issued a Summary Cease and Desist Order and Notice of Intent to Impose Administrative Penalty (hereinafter "Summary Order") against Respondent Cameron Campbell. A certified copy of the Summary Order was served at the Respondent's address on October 4, 2004, as evidenced by the signed certified mail receipt attached hereto as "Exhibit A."

4. The Summary Order specified that should the Respondent want to contest the allegations alleged in the Summary Order he should submit a written request to the Division within thirty (30) days of receipt of the order.

5. As evidenced by Exhibit A, the Summary Order was served at the Respondent's address on October 4, 2004. Therefore, the thirty (30) day period expired on November 3, 2004. The Division received a request for administrative hearing from Respondent Campbell dated November 5, 2004. However, the postmark reflects that the request was mailed from San Diego, California on November 9, 2004. This request is untimely, therefore, entry of a Final Order is appropriate in this matter.

6. A check of the records required to be maintained by the Division reveals that Respondent is not registered to sell securities in the State of Mississippi.

7. A check of the records required to be maintained by the Division reveals no registration for CPPs offered, sold or issued by Brixon in the State of Mississippi.

III. APPLICABLE LAW

The previous paragraphs are incorporated herein by reference.

7. §75-71-401 of the Act states in part:

...it is unlawful for any person to offer or sell any security in the State of Mississippi unless (1) it is registered under this chapter or (2) the security or transaction is exempted under Article 3 of this chapter....

8. §75-71-301 of the Act states in part:

...it is unlawful for any ... issuer to employ an agent unless the agent is registered... [and] it is unlawful for any person to transact business in this state as a[n] agent unless he is registered under this chapter.

9. §75-71-105(k) of the Act states in part:

“Person” means an individual,...corporation [or] partnership....

10. §75-71-105(n) of the Act states:

"Security" means any note; stock; treasury stock; bond; debenture; evidence of indebtedness; certificate of interest or participation in any profit-sharing agreement; collateral-trust certificate; preorganization certificate or subscription; transferable share; investment contract; voting-trust certificate; certificate of deposit for a security; certificate of interest or participation in an oil, gas or mining title or lease or in payments out of production under such a title or lease; interest in a limited partnership; viatical settlement investment contract or a fractionalized or pooled interest therein; or, in general, any interest or instrument commonly known as a "security," or any certificate of interest or participation in, temporary or interim certificate for, receipt for, guarantee of, or warrant or right to subscribe to or purchase, any of the foregoing.

11. §75-71-119 of the Act states in part:
 - (a) ...Section ...75-71-401...appl[ies] to persons who sell or offer to sell when (1) an offer to sell is made in this state....
 - (b) an offer to sell is made in this state, whether or not either party is then present in this state, when the offer (1) originates from this state or (2) is directed by the offeror to this state...

IV. CONCLUSIONS OF LAW

The previous paragraphs are incorporated herein by reference.

12. The CPPs, offered and sold by Respondent, are securities as that term is defined in §75-71-105(n) of the Act.

13. These securities are not eligible for exemption from registration under the Act.

14. These securities were offered and sold to residents of the State of Mississippi as defined in §75-71-119 of the Act.

15. These securities have not been duly registered in violation of §75-71-401 of the Act.

V. ADMINISTRATIVE PENALTY

16. Upon consideration of the factors enumerated in §75-71-715(2)(b) of the Act, the Secretary of State finds that an administrative penalty in the amount of Fifty Thousand Dollars (\$50,000.00) shall be assessed against the Respondent. Payment shall be remitted to the "Mississippi Secretary of State's Office" within fifteen (15) days of the receipt of this Final Order.

VI. PUBLIC INTEREST

17. This Final Cease and Desist Order and Order Imposing Administrative Penalty serves the public interest and the protection of investors consistent with the purpose of the Act.

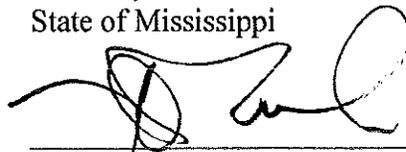
VII. ORDER

18. IT IS THEREFORE ORDERED, pursuant to the authority set out in §75-71-715(1) of the Act, that Respondent shall permanently Cease and Desist from any further activity in, or originating from, the State of Mississippi in connection with the offer and/or sale of Securities to any person without the Securities being duly registered or exempted from registration under the Act and Respondent being duly registered pursuant to the Act.

ENTERED, this the 27th day of NOVEMBER 2004.

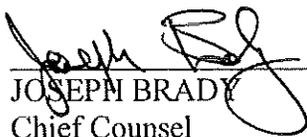
ERIC CLARK
Secretary of State
State of Mississippi

BY:



JAMES O. NELSON, II
Assistant Secretary of State
Business Regulation and Enforcement

Submitted by:



JOSEPH BRADY
Chief Counsel
Division of Business Regulation and Enforcement
Mississippi Secretary of State's Office
Post Office Box 136
Jackson, Mississippi 39205
(601) 359-1650

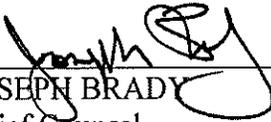
STATE OF MISSISSIPPI
I hereby certify that this is a true and complete copy of
the 7 page document on file in this office
DATED November 30, 2004
BY Ken Howard Eric Clark
This Certification Stamp Replaces Our
Previous Certification System

CERTIFICATE OF SERVICE

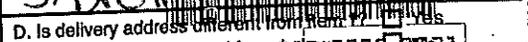
I, Joseph Brady, do hereby certify that I have this day mailed via United States Certified Mail, postage pre-paid, a true and correct copy of the **FINAL CEASE AND DESIST ORDER AND ORDER IMPOSING ADMINISTRATIVE PENALTY** to the following:

**Cameron Campbell
7825 Fay Avenue, Suite 200
La Jolla, CA 92307**

This the 30th day of November 2004.



JOSEPH BRADY
Chief Counsel

2. Article Number	COMPLETE THIS SECTION ON DELIVERY	
1. Article Addressed to: Cameron Campbell 7825 Fay Avenue, Suite 200 La Jolla, California 92307	A. Signature 	<input type="checkbox"/> Agent <input type="checkbox"/> Addressee
	B. Received by (Printed Name) J. Doolittle	Date of Delivery 08/01/2008
		
	D. Is delivery address different from that of the sender? If YES enter delivery address ZIP+4®	
3. Service Type		<input checked="" type="checkbox"/> Certified
4. Restricted Delivery? (Extra Fee)		<input checked="" type="checkbox"/> Yes

PS Form 3811

Domestic Return Receipt

ndr:

Exhibit A



FORM LA-CERT (Replaces #GCM 11B)

Is it time to reorder?
Please contact your supplier



7115 4411 7550 0000 2058

RETURN RECEIPT SERVICE	POSTAGE	\$0.37	POSTMARK OR DATE
	RESTRICTED DELIVERY FEE	\$2.75	
	CERTIFIED FEE	\$2.10	
	RETURN RECEIPT FEE	\$1.25	
SENT TO:	TOTAL POSTAGE AND FEES	\$6.47	
Code: File: CAMERON CAMPBELL 7825 FAY AVENUE, SUITE 200 LA JOLLA, CALIFORNIA 92307			

PS FORM 380B



RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(SEE OTHER SIDE)

Fold at the top of envelope to the right of the return address



7115 4411 7550 0000 2058

RETURN RECEIPT REQUESTED

FORM LA-CERT (Replaces #GCM 11B)
Is it time to reorder?
RESTRICTED DELIVERY

2. Article Number	COMPLETE THIS SECTION ON DELIVERY	
	A. Signature X	<input type="checkbox"/> Agent <input type="checkbox"/> Addressee
1. Article Addressed to: CAMERON CAMPBELL 7825 FAY AVENUE, SUITE 200 LA JOLLA, CALIFORNIA 92307	B. Received by (Printed Name)	C. Date of Delivery
	D. Is delivery address same as from form 117? <input type="checkbox"/> Yes If YES enter 7115 4411 7550 0000 2058	
	3. Service Type <input checked="" type="checkbox"/> Certified	
4. Restricted Delivery? (Extra Fee)	<input checked="" type="checkbox"/> Yes	

7115 4411 7550 0000 2058

ADDRESSEE LABEL

CAMERON CAMPBELL
7825 FAY AVENUE, SUITE 200
LA JOLLA, CALIFORNIA 92307

PS Form 3811

Domestic Return Receipt

Code:

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

PEEL OFF THIS STRIP TO EXPOSE
ADHESIVE AFFIX TO ENVELOPE OR
PACKAGE WITH THIS SIDE DOWN.

Keri Norwood - Joey
MS Secretary of State
P O Box 136
700 North Street
Jackson, MS 39205

PEEL OFF THIS STRIP TO EXPOSE
ADHESIVE AFFIX TO ENVELOPE OR
PACKAGE WITH THIS SIDE DOWN.

OPTIONAL LABEL