

STATE OF OREGON
DEPARTMENT OF CONSUMER AND BUSINESS SERVICES
DIVISION OF FINANCIAL REGULATION

In the Matter of:

Case No. S-17-0103

WELLINGTON SPORTS CLUB, LLC;
WELSCORP, INC.; THOMAS J. BECKER;
and FRANCESCA HORBAY,

FINAL ORDER TO CEASE AND
DESIST, ORDER DENYING USE OF
EXEMPTIONS AND ASSESSING
CIVIL PENALTIES, AND CONSENT
TO ENTRY OF ORDER

Respondents.

The Director of the Department of Consumer and Business Services for the State of Oregon (“the Director”), conducted an investigation of Wellington Sports Club, LLC; Welscorp, Inc.; Thomas J. Becker; and Francesca Horbay (collectively, “Respondents”) and determined that they violated certain provisions of the Oregon Securities Law, Oregon Revised Statutes (“ORS”) chapter 59 and Oregon Administrative Rules (“OAR”) chapter 441.

Respondents have cooperated with the Director’s investigation and wish to settle this matter with the Director.

Now, therefore, as evidenced by the signatures subscribed below, Respondents hereby consent to entry of this Order upon the following Findings of Fact and Conclusions of Law.

FINDINGS OF FACT

The Director FINDS that:

1. Wellington Sports Club, LLC (“Wellington”) is a Washington company with a principal address of 1810 E. Sahara Ave. #1449, Las Vegas, NV 89104.
2. Wellington is not registered with the Oregon Secretary of State.
3. Thomas J. Becker (“Becker”) is the vice-president and sole managing member



1 of Wellington.

2 4. Wellington offers a sports betting investment program in which Wellington
3 places wagers on the outcome of sporting events and shares the payouts from these
4 wagers with its investors based on the payout schedule described in paragraphs 5 and 6 of
5 this Order.

6 5. Wellington's sports betting investment program proposes to grow an
7 investor's money within a twelve-month period ("contract period") according to the
8 following payout schedule:

- 9 A. \$25,000 for a \$10,000 investment (2.5-Fold Contract),
- 10 B. \$75,000 for a \$25,000 investment (3-Fold Contract),
- 11 C. \$175,000 for a \$50,000 investment (3.5-Fold Contract),
- 12 D. \$400,00 for a \$100,000 investment (4-Fold Contract), and
- 13 E. \$1,200,000 for a \$250,000 investment (5-Fold Contract).

14 The above results, however, are not guaranteed.

15 6. To achieve the above payout schedule, Wellington offers a "Multi-Fold
16 Contract" that proposes to grow the investor's money to a "Target amount" that is equal
17 twice the investor's potential payout. If the Target amount is achieved within the contract
18 period, the investor receives half the Target amount. Wellington gets the other half. Thus,
19 in a Multi-Fold Contract, an investment of \$25,000 will yield a payout of \$150,000, but
20 because half of the payout goes to Wellington, the investor receives \$75,000. The
21 investor may reinvest his or her payout by entering into another Multi-Fold Contract. If
22 the Target amount is not achieved within the contract period, the investor may either
23 extend the contract period for up to twelve months or obtain a refund of his or her money
24 plus half of any payout earned during the contract period.

25 7. Francesca Horbay ("Horbay") is a Wellington investor. She is not an
26 employee of Wellington, but because she is Becker's close friend, Wellington provided



1 her with a company e-mail address, francesca@wellingtonsportsclub.com, gave her a cell
2 phone, and paid for the cell phone bills. Horbay's name was posted on Wellington's
3 password protected website, www.wellingtonsportsclub.com, with the title "Sports
4 Investment Broker." Her company e-mail address and cell phone number were also
5 posted on the website.

6 8. In January or February 2017, JK, an Oregon resident, learned about
7 Wellington's sports betting investment program from Horbay. Horbay told JK that the
8 Wellington's sports betting system was developed by a personal friend, JW, who has
9 been working on sports betting models for 52 years and is Wellington's chief analyst.
10 Horbay further stated that JW has a team of eight researchers who have helped him
11 develop an algorithm that showed consistently good results. Horbay provided JK with the
12 password to Wellington's website, which contained Horbay's name, title, and contact
13 information, as described in paragraph 7 of this Order.

14 9. On or about February 6, 2017, JK spoke to Becker on the telephone, and he
15 explained to her how Wellington's investment program worked. Becker stated that
16 Wellington pools investor funds so that it could place wagers with a larger number of
17 permutations, which have lower risk and bigger payouts. That same day, JK signed a
18 contract to invest \$25,000 with Wellington.

19 10. On or about February 7, 2017, JK wired \$25,019.23 from her credit union
20 account to a bank account in Henderson, Nevada held by Welscorp, Inc. ("Welscorp").

21 11. Welscorp is a Nevada corporation solely owned by Becker. Its principal
22 address is 3773 Howard Hughes Pkwy Ste 500S, Las Vegas, NV 89169.

23 12. Welscorp is not registered with the Oregon Secretary of State.

24 13. Becker is the only person with authorized access to Welscorp's bank account.

25 14. After consulting her investment advisor, JK recalled her wire transfer and
26 asked Becker to return her money. Mr. Becker approved the return of JK's wire transfer,





1 and she received her money back on February 27, 2017.

2 15. RL, another Oregon resident, also invested money with Wellington after
3 learning about Wellington’s investment program from Horbay and speaking with Becker
4 on the telephone several times. On February 13, 2017, a wire transfer from RL in the
5 amount of \$10,019.46 was credited to Welscorp’s bank account. After completion of his
6 investment contract, RL received \$25,000, which he then reinvested. He subsequently
7 received \$75,000 from Wellington.

8 16. JK and RL (collectively, “the Oregon investors”) had no control over their
9 money once they had relinquished the money to Wellington. They were not involved in
10 the placing of bets and were entirely reliant upon the management and expertise of
11 Becker and Wellington’s employees for the handling of their funds.

12 17. At all times relevant to this Order, Wellington placed wagers on the outcome
13 of sports events at legal sports books in the Las Vegas metropolitan area using cash-only
14 transactions. These sports books included South Point, SLS, Tuscan, Green Valley
15 Ranch, Westgate Las Vegas Superbook, Palace Station, and CG Technology.

16 18. At all times relevant to this Order, Becker and Horbay were not licensed with
17 the Oregon Division of Financial Regulation (“the Division”) to transact business in
18 Oregon as securities salespersons.

19 19. At all times relevant to this Order, the investments that Respondents sold to
20 the Oregon investors were not registered with the Division as securities.

21 CONCLUSIONS OF LAW

22 The Director CONCLUDES that:

23 20. The investments that Respondents offered and sold to the Oregon investors
24 were investment contracts and, therefore, securities as defined in ORS 59.015(19)(a).

25 21. The securities that Respondents offered and sold to the Oregon investors were
26 not registered pursuant to ORS chapter 59 and OAR chapter 441.

1 22. Respondents offered and sold unregistered securities to the Oregon investors,
2 in violation of ORS 59.055.

3 23. Becker and Horbay acted as securities “salespersons” as defined in ORS
4 59.015(18)(a) by representing or purporting to represent an issuer or owner of securities
5 in effecting transactions in securities.

6 24. Becker and Horbay transacted business in Oregon as securities salespersons
7 without a license, in violation of ORS 59.165.

8 25. ORS 59.045(2) authorizes the Director to deny Respondents the use of any
9 exemptions set forth in ORS 59.025 and 59.035, as the Director has reason to believe that
10 Respondents have engaged in violations of the Oregon Securities Law.

11 26. ORS 59.995 authorizes the Director to assess civil penalties of up to \$20,000
12 per violation against Respondents for violating the Oregon Securities Law. In the case of
13 a continuing violation, each day’s continuance is a separate violation, but the maximum
14 penalty for any continuing violation is \$100,000.

15 **ORDER**

16 Now therefore, the Director issues the following:

17 Order to Cease and Desist

18 27. As authorized by ORS 59.245(4), the Director hereby ORDERS Respondents
19 to CEASE AND DESIST from offering or selling unregistered securities in Oregon, in
20 violation of ORS 59.055, and violating any other provision of the Oregon Securities law.

21 28. As authorized by ORS 59.245(4), the Director further ORDERS Becker and
22 Horbay to CEASE and DESIST from transacting business in Oregon as securities
23 salespersons without a license, in violation of ORS 59.165.

24 29. Respondents agree never to apply for any license under the Oregon Securities
25 Law. Respondents further agree never to be an officer or director of, employed by, or
26 contracted with any individual or entity issued a license under the Oregon Securities Law.



1 30. Respondents agree to include a statement in all of their websites that any
2 sports betting investment program offered by Respondents is not available to persons in
3 Oregon.

4 Order Denying Use of Exemptions

5 31. Pursuant to ORS 59.045(2), the Director hereby DENIES Respondents and
6 any affiliated and/or successor entity, the use of securities and transaction exemptions
7 that would otherwise be available to them under ORS 59.025 and 59.035.

8 Order Assessing Civil Penalties

9 32. Pursuant to ORS 59.995, the Director hereby ORDERS Respondents to pay,
10 jointly and severally, total civil penalties in the amount of Thirty-Five Thousand Dollars
11 (\$35,000) allocated as follows:

12 A. A civil penalty of Fifteen Thousand Dollars (\$15,000) for selling unregistered
13 securities, in violation of ORS 59.055, and

14 B. A civil penalty of Twenty Thousand Dollars (\$20,000) for selling securities
15 without a license, in violation of ORS 59.165.

16 33. Along with this Order, Respondents shall submit to the Director a payment of
17 Thirty-Five Thousand Dollars (\$35,000) in civil penalties.

18
19 SO ORDERED this 13th day of April, 2018.

20 CAMERON C. SMITH, Director
21 Department of Consumer and Business Services

22 /s/ David Tatman

23 David C. Tatman, Chief of Enforcement
24 Division of Financial Regulation
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ENTITY CONSENT TO ENTRY OF ORDER

I, Thomas J. Becker, am an officer and/or manager of Wellington Sports Club, LLC (“Wellington”). I am authorized to act on behalf of Wellington. I have read the foregoing Order, and I know and fully understand the contents hereof. I have been advised of the right to a hearing and of the right to be represented by counsel in this matter. Wellington voluntarily consents to the entry of this Order without any force or duress, expressly waiving any right to a hearing in this matter, as well as any rights to administrative or judicial review of this Order.

Wellington understands that the Director reserves the right to take further action to enforce this Order if Wellington violates any of its terms or to take appropriate action upon discovery that Wellington has committed violations of the Oregon Securities Law other than those described in this Order. Wellington’s waiver of its hearing and appeal rights does not apply to any future enforcement action the Director may take against Wellington.

Wellington, along with its officers, directors, employees, or agents, will fully comply with the terms and conditions stated herein. Wellington understands that this Order is a public document.

Signature: /s/ Thomas J. Becker

Position Held: MANAGER

ENTITY CONSENT TO ENTRY OF ORDER

I, Thomas J. Becker, am an officer and/or manager of Welscorp, Inc. (“Welscorp”). I am authorized to act on behalf of Welscorp. I have read the foregoing Order, and I know and fully understand the contents hereof. I have been advised of the right to a hearing and of the right to be represented by counsel in this matter. Welscorp voluntarily consents to the entry of this Order without any force or duress, expressly



1 waiving any right to a hearing in this matter, as well as any rights to administrative or
2 judicial review of this Order.

3 Welscorp understands that the Director reserves the right to take further action to
4 enforce this Order if Welscorp violates any of its terms or to take appropriate action upon
5 discovery that Welscorp has committed violations of the Oregon Securities Law other
6 than those described in this Order. Welscorp's waiver of its hearing and appeal rights
7 does not apply to any future enforcement action the Director may take against Welscorp.

8 Welscorp, along with their officers, directors, employees, or agents, will fully
9 comply with the terms and conditions stated herein. Welscorp understands that this Order
10 is a public document.

11 Signature: /s/ Thomas J. Becker

12 Position Held: CEO

13
14 **CONSENT TO ENTRY OF ORDER**

15 I, Thomas J. Becker, state that I have read the foregoing Order and that I know
16 and fully understand the contents hereof. The factual allegations stated herein are true and
17 correct. I have been advised of the right to a hearing and of the right to be represented by
18 counsel in this matter. I voluntarily consent to the entry of this Order without any force or
19 duress, expressly waiving any right to a hearing in this matter, as well as any rights to
20 administrative or judicial review of this Order.

21 I understand that the Director reserves the right to take further action against me
22 to enforce this Order if I violate any of its terms or to take appropriate action upon
23 discovery that I have committed violations of the Oregon Securities Law other than those
24 described in this Order. Waiver of my hearing and appeal rights does not apply to any
25 future enforcement action the Director may take against me.

26 I will fully comply with the terms and conditions stated herein. Further, I



1 understand that this Order is a public document.

2
3 /s/ Thomas J. Becker
Signature

4
5 **CONSENT TO ENTRY OF ORDER**

6 I, Francesca Horbay, state that I have read the foregoing Order and that I know
7 and fully understand the contents hereof. The factual allegations stated herein are true and
8 correct. I have been advised of the right to a hearing and of the right to be represented by
9 counsel in this matter. I voluntarily consent to the entry of this Order without any force or
10 duress, expressly waiving any right to a hearing in this matter, as well as any rights to
11 administrative or judicial review of this Order.

12 I understand that the Director reserves the right to take further action against me
13 to enforce this Order if I violate any of its terms or to take appropriate action upon
14 discovery that I have committed violations of the Oregon Securities Law other than those
15 described in this Order. Waiver of my hearing and appeal rights does not apply to any
16 future enforcement action the Director may take against me.

17 I will fully comply with the terms and conditions stated herein. Further, I
18 understand that this Order is a public document.

19
20 _____
Signature

21 State of _____

22 County of _____

23
24 Signed or attested before me on the ____ day of _____, 2018.

25
26 _____
Notary Public

Division of Financial Regulation
Labor and Industries Building
350 Winter Street NE, Suite 410
Salem, OR 97301-3881
Telephone: (503) 378-4387



1 understand that this Order is a public document.

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Signature

CONSENT TO ENTRY OF ORDER

I, Francesca Horbay, state that I have read the foregoing Order and that I know and fully understand the contents hereof. The factual allegations stated herein are true and correct. I have been advised of the right to a hearing and of the right to be represented by counsel in this matter. I voluntarily consent to the entry of this Order without any force or duress, expressly waiving any right to a hearing in this matter, as well as any rights to administrative or judicial review of this Order.

I understand that the Director reserves the right to take further action against me to enforce this Order if I violate any of its terms or to take appropriate action upon discovery that I have committed violations of the Oregon Securities Law other than those described in this Order. Waiver of my hearing and appeal rights does not apply to any future enforcement action the Director may take against me.

I will fully comply with the terms and conditions stated herein. Further, I understand that this Order is a public document.

/s/ Francesca Horbay
Signature

State of ON

County of Canada

Signed or attested before me on the 5 day of April, 2018.

/s/ illegible
Notary Public

Division of Financial Regulation
Labor and Industries Building
350 Winter Street NE, Suite 410
Salem, OR 97301-3881
Telephone: (503) 378-4387



1
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3 STATE OF OREGON
4 DEPARTMENT OF CONSUMER AND BUSINESS SERVICES
5 DIVISION OF FINANCIAL REGULATION

6 In the Matter of:

Case No. S-17-0103

7 WELLINGTON SPORTS CLUB, LLC;
8 WELSCORP, INC.; THOMAS J. BECKER;
9 and FRANCESCA HORBAY,

FINAL ORDER TO CEASE AND
DESIST, ORDER DENYING USE OF
EXEMPTIONS AND ASSESSING
CIVIL PENALTIES, AND CONSENT
TO ENTRY OF ORDER

10 Respondents.

11 The Director of the Department of Consumer and Business Services for the State
12 of Oregon (“the Director”), conducted an investigation of Wellington Sports Club, LLC;
13 Welscorp, Inc.; Thomas J. Becker; and Francesca Horbay (collectively, “Respondents”)
14 and determined that they violated certain provisions of the Oregon Securities Law,
15 Oregon Revised Statutes (“ORS”) chapter 59 and Oregon Administrative Rules (“OAR”)
16 chapter 441.

17 Respondents have cooperated with the Director’s investigation and wish to settle
18 this matter with the Director.

19 Now, therefore, as evidenced by the signatures subscribed below, Respondents
20 hereby consent to entry of this Order upon the following Findings of Fact and
21 Conclusions of Law.

22 **FINDINGS OF FACT**

23 The Director FINDS that:

- 24 1. Wellington Sports Club, LLC (“Wellington”) is a Washington company with
25 a principal address of 1810 E. Sahara Ave. #1449, Las Vegas, NV 89104.
26 2. Wellington is not registered with the Oregon Secretary of State.
3. Thomas J. Becker (“Becker”) is the vice-president and sole managing member



1 of Wellington.

2 4. Wellington offers a sports betting investment program in which Wellington
3 places wagers on the outcome of sporting events and shares the payouts from these
4 wagers with its investors based on the payout schedule described in paragraphs 5 and 6 of
5 this Order.

6 5. Wellington's sports betting investment program proposes to grow an
7 investor's money within a twelve-month period ("contract period") according to the
8 following payout schedule:

- 9 A. \$25,000 for a \$10,000 investment (2.5-Fold Contract),
- 10 B. \$75,000 for a \$25,000 investment (3-Fold Contract),
- 11 C. \$175,000 for a \$50,000 investment (3.5-Fold Contract),
- 12 D. \$400,00 for a \$100,000 investment (4-Fold Contract), and
- 13 E. \$1,200,000 for a \$250,000 investment (5-Fold Contract).

14 The above results, however, are not guaranteed.

15 6. To achieve the above payout schedule, Wellington offers a "Multi-Fold
16 Contract" that proposes to grow the investor's money to a "Target amount" that is equal
17 twice the investor's potential payout. If the Target amount is achieved within the contract
18 period, the investor receives half the Target amount. Wellington gets the other half. Thus,
19 in a Multi-Fold Contract, an investment of \$25,000 will yield a payout of \$150,000, but
20 because half of the payout goes to Wellington, the investor receives \$75,000. The
21 investor may reinvest his or her payout by entering into another Multi-Fold Contract. If
22 the Target amount is not achieved within the contract period, the investor may either
23 extend the contract period for up to twelve months or obtain a refund of his or her money
24 plus half of any payout earned during the contract period.

25 7. Francesca Horbay ("Horbay") is a Wellington investor. She is not an
26 employee of Wellington, but because she is Becker's close friend, Wellington provided



1 her with a company e-mail address, francesca@wellingtonsportsclub.com, gave her a cell
2 phone, and paid for the cell phone bills. Horbay's name was posted on Wellington's
3 password protected website, www.wellingtonsportsclub.com, with the title "Sports
4 Investment Broker." Her company e-mail address and cell phone number were also
5 posted on the website.

6 8. In January or February 2017, JK, an Oregon resident, learned about
7 Wellington's sports betting investment program from Horbay. Horbay told JK that the
8 Wellington's sports betting system was developed by a personal friend, JW, who has
9 been working on sports betting models for 52 years and is Wellington's chief analyst.
10 Horbay further stated that JW has a team of eight researchers who have helped him
11 develop an algorithm that showed consistently good results. Horbay provided JK with the
12 password to Wellington's website, which contained Horbay's name, title, and contact
13 information, as described in paragraph 7 of this Order.

14 9. On or about February 6, 2017, JK spoke to Becker on the telephone, and he
15 explained to her how Wellington's investment program worked. Becker stated that
16 Wellington pools investor funds so that it could place wagers with a larger number of
17 permutations, which have lower risk and bigger payouts. That same day, JK signed a
18 contract to invest \$25,000 with Wellington.

19 10. On or about February 7, 2017, JK wired \$25,019.23 from her credit union
20 account to a bank account in Henderson, Nevada held by Welscorp, Inc. ("Welscorp").

21 11. Welscorp is a Nevada corporation solely owned by Becker. Its principal
22 address is 3773 Howard Hughes Pkwy Ste 500S, Las Vegas, NV 89169.

23 12. Welscorp is not registered with the Oregon Secretary of State.

24 13. Becker is the only person with authorized access to Welscorp's bank account.

25 14. After consulting her investment advisor, JK recalled her wire transfer and
26 asked Becker to return her money. Mr. Becker approved the return of JK's wire transfer,





1 and she received her money back on February 27, 2017.

2 15. RL, another Oregon resident, also invested money with Wellington after
3 learning about Wellington's investment program from Horbay and speaking with Becker
4 on the telephone several times. On February 13, 2017, a wire transfer from RL in the
5 amount of \$10,019.46 was credited to Welscorp's bank account. After completion of his
6 investment contract, RL received \$25,000, which he then reinvested. He subsequently
7 received \$75,000 from Wellington.

8 16. JK and RL (collectively, "the Oregon investors") had no control over their
9 money once they had relinquished the money to Wellington. They were not involved in
10 the placing of bets and were entirely reliant upon the management and expertise of
11 Becker and Wellington's employees for the handling of their funds.

12 17. At all times relevant to this Order, Wellington placed wagers on the outcome
13 of sports events at legal sports books in the Las Vegas metropolitan area using cash-only
14 transactions. These sports books included South Point, SLS, Tuscany, Green Valley
15 Ranch, Westgate Las Vegas Superbook, Palace Station, and CG Technology.

16 18. At all times relevant to this Order, Becker and Horbay were not licensed with
17 the Oregon Division of Financial Regulation ("the Division") to transact business in
18 Oregon as securities salespersons.

19 19. At all times relevant to this Order, the investments that Respondents sold to
20 the Oregon investors were not registered with the Division as securities.

21 CONCLUSIONS OF LAW

22 The Director CONCLUDES that:

23 20. The investments that Respondents offered and sold to the Oregon investors
24 were investment contracts and, therefore, securities as defined in ORS 59.015(19)(a).

25 21. The securities that Respondents offered and sold to the Oregon investors were
26 not registered pursuant to ORS chapter 59 and OAR chapter 441.

1 22. Respondents offered and sold unregistered securities to the Oregon investors,
2 in violation of ORS 59.055.

3 23. Becker and Horbay acted as securities “salespersons” as defined in ORS
4 59.015(18)(a) by representing or purporting to represent an issuer or owner of securities
5 in effecting transactions in securities.

6 24. Becker and Horbay transacted business in Oregon as securities salespersons
7 without a license, in violation of ORS 59.165.

8 25. ORS 59.045(2) authorizes the Director to deny Respondents the use of any
9 exemptions set forth in ORS 59.025 and 59.035, as the Director has reason to believe that
10 Respondents have engaged in violations of the Oregon Securities Law.

11 26. ORS 59.995 authorizes the Director to assess civil penalties of up to \$20,000
12 per violation against Respondents for violating the Oregon Securities Law. In the case of
13 a continuing violation, each day’s continuance is a separate violation, but the maximum
14 penalty for any continuing violation is \$100,000.

15 **ORDER**

16 Now therefore, the Director issues the following:

17 Order to Cease and Desist

18 27. As authorized by ORS 59.245(4), the Director hereby ORDERS Respondents
19 to CEASE AND DESIST from offering or selling unregistered securities in Oregon, in
20 violation of ORS 59.055, and violating any other provision of the Oregon Securities law.

21 28. As authorized by ORS 59.245(4), the Director further ORDERS Becker and
22 Horbay to CEASE and DESIST from transacting business in Oregon as securities
23 salespersons without a license, in violation of ORS 59.165.

24 29. Respondents agree never to apply for any license under the Oregon Securities
25 Law. Respondents further agree never to be an officer or director of, employed by, or
26 contracted with any individual or entity issued a license under the Oregon Securities Law.



1 30. Respondents agree to include a statement in all of their websites that any
2 sports betting investment program offered by Respondents is not available to persons in
3 Oregon.

4 Order Denying Use of Exemptions

5 31. Pursuant to ORS 59.045(2), the Director hereby DENIES Respondents and
6 any affiliated and/or successor entity, the use of securities and transaction exemptions
7 that would otherwise be available to them under ORS 59.025 and 59.035.

8 Order Assessing Civil Penalties

9 32. Pursuant to ORS 59.995, the Director hereby ORDERS Respondents to pay,
10 jointly and severally, total civil penalties in the amount of Thirty-Five Thousand Dollars
11 (\$35,000) allocated as follows:

12 A. A civil penalty of Fifteen Thousand Dollars (\$15,000) for selling unregistered
13 securities, in violation of ORS 59.055, and

14 B. A civil penalty of Twenty Thousand Dollars (\$20,000) for selling securities
15 without a license, in violation of ORS 59.165.

16 33. Along with this Order, Respondents shall submit to the Director a payment of
17 Thirty-Five Thousand Dollars (\$35,000) in civil penalties.

18
19 SO ORDERED this _____ day of _____, 2018.

20 CAMERON C. SMITH, Director
21 Department of Consumer and Business Services

22
23 _____
24 David C. Tatman, Chief of Enforcement
25 Division of Financial Regulation

26 *[The remainder of this page intentionally left blank.]*



ENTITY CONSENT TO ENTRY OF ORDER

I, Thomas J. Becker, am an officer and/or manager of Wellington Sports Club, LLC (“Wellington”). I am authorized to act on behalf of Wellington. I have read the foregoing Order, and I know and fully understand the contents hereof. I have been advised of the right to a hearing and of the right to be represented by counsel in this matter. Wellington voluntarily consents to the entry of this Order without any force or duress, expressly waiving any right to a hearing in this matter, as well as any rights to administrative or judicial review of this Order.

Wellington understands that the Director reserves the right to take further action to enforce this Order if Wellington violates any of its terms or to take appropriate action upon discovery that Wellington has committed violations of the Oregon Securities Law other than those described in this Order. Wellington’s waiver of its hearing and appeal rights does not apply to any future enforcement action the Director may take against Wellington.

Wellington, along with its officers, directors, employees, or agents, will fully comply with the terms and conditions stated herein. Wellington understands that this Order is a public document.

Signature: /s/ Thomas J. Becker

Position Held: MGR.

State of _____
County of _____

State of Nevada
County of Clark
This instrument was acknowledged before me
this 16 day of April, 2018
by Thomas Joseph Becker.
/s/ Travis Turner

Signed or attested before me on the ____ day of _____, 2018.

Notary Public

Division of Financial Regulation
Labor and Industries Building
350 Winter Street, NE, Suite 410
Salem, OR 97301-3881
Telephone: (503) 378-4387



1 **ENTITY CONSENT TO ENTRY OF ORDER**

2 I, Thomas J. Becker, am an officer and/or manager of Welscorp, Inc.
3 (“Welscorp”). I am authorized to act on behalf of Welscorp. I have read the foregoing
4 Order, and I know and fully understand the contents hereof. I have been advised of the
5 right to a hearing and of the right to be represented by counsel in this matter. Welscorp
6 voluntarily consents to the entry of this Order without any force or duress, expressly
7 waiving any right to a hearing in this matter, as well as any rights to administrative or
8 judicial review of this Order.

9 Welscorp understands that the Director reserves the right to take further action to
10 enforce this Order if Welscorp violates any of its terms or to take appropriate action upon
11 discovery that Welscorp has committed violations of the Oregon Securities Law other
12 than those described in this Order. Welscorp’s waiver of its hearing and appeal rights
13 does not apply to any future enforcement action the Director may take against Welscorp.

14 Welscorp, along with their officers, directors, employees, or agents, will fully
15 comply with the terms and conditions stated herein. Welscorp understands that this Order
16 is a public document.

17 Signature: /s/ Thomas J. Becker

18 Position Held: CEO

19 State of _____
20

21 County of _____
22

State of Nevada
County of Clark
This instrument was acknowledged before me
this 16 day of April, 2018
by Thomas Joseph Becker.
/s/ Travis Turner

23 Signed or attested before me on the ____ day of _____, 2018.

24
25 _____
Notary Public

26
Division of Financial Regulation
Labor and Industries Building
330 Winter Street NE, Suite 410
Salem, OR 97301-5881
Telephone: (503) 578-4387



1 **CONSENT TO ENTRY OF ORDER**

2 I, Thomas J. Becker, state that I have read the foregoing Order and that I know
3 and fully understand the contents hereof. The factual allegations stated herein are true and
4 correct. I have been advised of the right to a hearing and of the right to be represented by
5 counsel in this matter. I voluntarily consent to the entry of this Order without any force or
6 duress, expressly waiving any right to a hearing in this matter, as well as any rights to
7 administrative or judicial review of this Order.

8 I understand that the Director reserves the right to take further action against me
9 to enforce this Order if I violate any of its terms or to take appropriate action upon
10 discovery that I have committed violations of the Oregon Securities Law other than those
11 described in this Order. Waiver of my hearing and appeal rights does not apply to any
12 future enforcement action the Director may take against me.

13 I will fully comply with the terms and conditions stated herein. Further, I
14 understand that this Order is a public document.

15 /s/ Thomas J. Becker
16 Signature

17 State of _____
18

19 County of _____
20

21 Signed or attested before me on the ____ day of _____, 2018.

22 _____
23 Notary Public

24 State of Nevada
25 County of Clark
26 This instrument was acknowledged before me
this 16 day of April, 2018
by Thomas Joseph Becker.
/s/ Travis Turner

Division of Financial Regulation
Labor and Industries Building
350 Winter Street NE, Suite 410
Salem, OR 97301-3881
Telephone: (503) 378-4387



CONSENT TO ENTRY OF ORDER

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I, Francesca Horbay, state that I have read the foregoing Order and that I know and fully understand the contents hereof. The factual allegations stated herein are true and correct. I have been advised of the right to a hearing and of the right to be represented by counsel in this matter. I voluntarily consent to the entry of this Order without any force or duress, expressly waiving any right to a hearing in this matter, as well as any rights to administrative or judicial review of this Order.

I understand that the Director reserves the right to take further action against me to enforce this Order if I violate any of its terms or to take appropriate action upon discovery that I have committed violations of the Oregon Securities Law other than those described in this Order. Waiver of my hearing and appeal rights does not apply to any future enforcement action the Director may take against me.

I will fully comply with the terms and conditions stated herein. Further, I understand that this Order is a public document.

Signature

State of _____

County of _____

Signed or attested before me on the ____ day of _____, 2018.

Notary Public

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Labor and Industries Building
350 Winter Street NE, Suite 410
Salem, OR 97301-3881
Telephone: (503) 378-4387

