

STATE OF NEVADA
OFFICE OF THE SECRETARY OF STATE
SECURITIES DIVISION

2250 LAS VEGAS BOULEVARD NORTH, SUITE 400
NORTH LAS VEGAS, NEVADA 89030

In the Matter of:

THOMAS BECKER, an individual;
WELLINGTON SPORTS CLUB, LLC;
WELSCORP, Inc.; and EINSTEIN
SPORTS ADVISORY, LTD.

Respondents.

File No. INV19-121

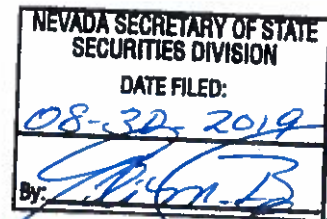
TO:

Thomas Becker
440 Welpman Way
Henderson, NV 89044

Wellington Sports Club, LLC
c/o John Thomas
1810 E. Sahara
Las Vegas, NV 89104

Einstein Sports Advisory, LTD.
c/o Ronald A. Colquitt, Esq.
321 Casino Center Blvd. #112
Las Vegas, NV 89101

Welscorp, Inc.
c/o Incorp Services, Inc.
3773 Howard Hughes Pkwy, Suite 500S
Las Vegas, NV 89169-6014



NOTICE OF SUMMARY ORDER TO CEASE AND DESIST,
INTENDED ACTION PURSUANT TO NRS 90.630(2),
AND OPPORTUNITY FOR HEARING PURSUANT TO NRS 90.630(3)

YOU ARE HEREBY NOTIFIED that pursuant to the legal authority granted the Administrator of the Securities Division of the Office of the Secretary of State, State of Nevada ("Administrator"), specifically Nevada Revised Statutes ("NRS") 90.630, the Administrator hereby issues this SUMMARY ORDER TO CEASE AND DESIST to Thomas Becker ("Becker"), an

individual, Wellington Sports Club, LLC ("Wellington"), Einstein Sports Advisory, Ltd. ("Einstein"), and Welscorp, Inc. ("Welscorp.")

YOU ARE HEREBY FURTHER NOTIFIED that you have a right to request a hearing on the matters set forth in the Summary Order to Cease and Desist. If you do not request a hearing in writing within 45 days after receipt of this notice, you waive your right to a hearing and the Administrator may issue a permanent order. Should you request a hearing, the Administrator shall set the matter for hearing at her earliest convenience but not less than 15 days or more than 60 days after she receives written notice of that request for a hearing. Should you request a hearing, the Administrator will notify you by registered or certified mail of the time and place set for the hearing.

YOU ARE HEREBY FURTHER NOTIFIED that the Securities Division, in addition to seeking a Final Order to Cease and Desist, may also seek any of the sanctions allowed pursuant to NRS 90.630, and may seek to hold Respondents liable for the costs of the investigation in this matter if this matter should proceed to hearing. The Nevada Securities Division does not waive the right to seek criminal prosecution pursuant to 90.650.

YOU ARE HEREBY FURTHER NOTIFIED:

NRS 90.650, Criminal penalties.

1. A person who willfully violates:

- (a) A provision of this chapter, except NRS 90.600, or who violates NRS 90.600 knowing that the statement made is false or misleading in any material respect;
- (b) A regulation adopted pursuant to this chapter; or
- (c) An order denying, suspending or revoking the effectiveness of registration or an order to cease and desist issued by the Administrator pursuant to this chapter,

□ is guilty of a category B felony and shall be punished by imprisonment in the state prison for a minimum term of not less than 1 year and a maximum term of not more than 20 years, or by a fine of not more than \$500,000, or by both fine and imprisonment, for each violation. In addition to any other penalty, the court shall order the person to pay restitution and may order the person to repay the costs of investigation and prosecution incurred by the Division and the Office of the Attorney General. If the violation was committed against an older person or vulnerable person, any restitution and costs of investigation and prosecution imposed by the court must be in an amount equal to twice the amount that would otherwise have been imposed by the court. Money recovered for reimbursement of the costs of investigation and prosecution must be deposited in the State General Fund for credit to the Secretary of State's Operating General Fund Budget Account.

2. A person convicted of violating a regulation or order under this chapter may be fined, but must not be imprisoned, if the person proves lack of knowledge of the regulation or order.
3. This chapter does not limit the power of the State to punish a person for conduct which constitutes a crime under other law.

1 DATED this 30th day of August, 2019.

2 NEVADA SECURITIES DIVISION
3 OFFICE OF THE SECRETARY OF STATE

4 

5 ERIN M. HOUSTON, ADMINISTRATOR
6 DEPUTY SECRETARY OF STATE FOR SECURITIES
7

8 **SUMMARY ORDER TO CEASE AND DESIST**

9 1. The Securities Division of the Office of the Secretary of State, State of Nevada
10 ("Division"), under the authority of the Nevada Uniform Securities Act ("Act"), codified in Chapter
11 90 of the NRS, has conducted and is continuing to conduct an investigation into the activities of
12 Respondents in connection with the applicable laws governing the registration of securities and the
13 regulation of broker-dealers and investment advisers in the State of Nevada.

14 2. The Administrator is authorized to enter a Summary Order to Cease and Desist
15 pursuant to NRS 90.630.

16 3. The Administrator has reviewed the Complaint for Summary Order and Final Order
17 to Cease and Desist and Other Appropriate Relief ("Complaint") filed on August 30, 2019, against
18 Respondents in the above-entitled matter. A copy of the Complaint is attached hereto and
19 incorporated herein by reference.

20 4. The factual allegations of the Complaint are accepted as true for the limited purposes
21 of this Summary Order to Cease and Desist and are hereby incorporated herein by reference.

22 **FINDINGS OF FACT**

23 5. For the limited purpose of this Summary Order to Cease and Desist, the Administrator
24 accepts all factual allegations set forth in the Complaint as true and finds that a Summary Order to
25 Cease and Desist is in the public interest and necessary to protect the public from potential financial
26 harm.

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1 **CONCLUSIONS OF LAW**

2 6. The securities sold by Respondents are not registered with the Division, are not exempt
3 from registration with the Division, and/or are not federally covered securities.

4 7. Respondent Becker has violated and continues to violate NRS 90.310 by acting as a
5 sales representative or agent of the issuer without being licensed by the Division.

6 8. Respondents have violated and continue to violate NRS 90.460 by offering to sell and
7 selling securities that are not registered with the Division, are not exempt from registration with the
8 Division, and/or are not federally-covered securities.

9 9. Respondents have violated and continue to violate NRS 90.570 by engaging in an act,
10 practice, or course of business which operates or would operate as a fraud or deceit upon a person,
11 including but not limited to offering to sell and selling securities and failing to deliver the purchased
12 securities or a full refund of the purchase price.

13 **SUMMARY ORDER**

14 Based upon the foregoing Findings of Fact and Conclusions of Law, and the Administrator's
15 findings that Respondents pose an immediate danger to the public welfare because Respondents are
16 actively engaging in violations of the Act and appear to intend to violate said Act in the future,
17 THOMAS BECKER, individually or as a representative of Wellington Sports Club, LLC; Einstein
18 Sports Advisory, Ltd.; and Welscorp, Inc are hereby ordered to immediately Cease and Desist from
19 further activities in violation of the Act, including but not limited to offering for sale unregistered
20 securities, acting as a sales representative or agent of the issuer without being licensed, and engaging
21 in an act, practice, or course of business which operates or would operate as a fraud or deceit upon a
22 person.

23 Further, based upon the foregoing Findings of Fact and Conclusions of Law, and the
24 Administrator's findings the Respondents pose an immediate danger to the public welfare, the
25 Administrator revokes registration exemptions set forth in NRS 90.530(10) and NRS 90.530(11)
26 regarding issuer transactions, evidence of indebtedness, investment contracts or stock, sold by
27 THOMAS BECKER, individually or as a representative of Wellington Sports Club, LLC; Einstein
28 Sports Advisory, Ltd.; and Welscorp, Inc, including the investment contracts set forth in the

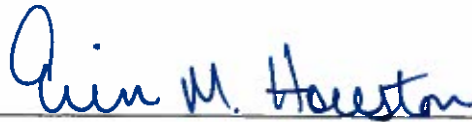
1 Complaint for Summary Order and Final Order to Cease and Desist and Other Appropriate Relief,
2 and to be issued or issued by the same.

3 This Summary Order to Cease and Desist is effective immediately upon signing.

4 IT IS SO ORDERED.

5 DATED this 30th day of August, 2019.

6
7 NEVADA SECURITIES DIVISION
8 OFFICE OF THE SECRETARY OF STATE

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10 ERIN M. HOUSTON, ADMINISTRATOR
11 DEPUTY SECRETARY OF STATE FOR SECURITIES
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CERTIFICATE OF MAILING

I certify that I am an employee of the Securities Division of the Office of the Secretary of State, State of Nevada, and that on this 30th day of August, 2019, I have caused a true and correct copy of the foregoing Summary Order to Cease and Desist to be served by United States Certified Mail, Return Receipt Requested, and First Class Mail, to the following:

**Thomas Becker
440 Welpman Way
Henderson, NV 89044**

**Wellington Sports Club, LLC
c/o John Thomas
1810 E. Sahara
Las Vegas, NV 89104**

**Einstein Sports Advisory, LTD.
c/o Ronald A. Colquitt, Esq.
321 Casino Center Blvd. #112
Las Vegas, NV 89101**

**Welscorp, Inc.
c/o Incorp Services, Inc.
3773 Howard Hughes Pkwy, Suite 500S
Las Vegas, NV 89169-6014**



Employee of the Nevada Securities Division

STATE OF NEVADA
OFFICE OF THE SECRETARY OF STATE
SECURITIES DIVISION
2250 LAS VEGAS BOULEVARD NORTH, SUITE 400
NORTH LAS VEGAS, NEVADA 89030

In the Matter of:

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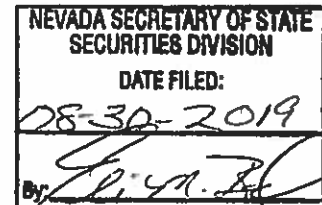
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COMPLAINT FOR SUMMARY ORDER AND FINAL ORDER
TO CEASE AND DESIST AND OTHER APPROPRIATE RELIEF

COMES NOW, the Securities Division of the Office of the Secretary of State, State of Nevada ("Division"), and for its complaint against the above-named Respondents for violations of the Nevada Uniform Securities Act, as codified in Chapter 90 of the Nevada Revised Statutes, alleges as follows:

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1 **PARTIES**

2 1. Respondent Thomas Becker ("Becker"), is an individual who, upon information and
3 belief, is a resident of Las Vegas, Nevada.

4 2. Respondent Wellington Sports Club, LLC ("Wellington"), is a Washington state
5 limited liability company, registered as a Foreign Limited –Liability Company, and in revoked status
6 with the Nevada Secretary of State. Its Manager, Thomas Becker, lists Nevada address at 1810 East
7 Sahara, Las Vegas, NV 89104.

8 3. Respondent Welscorp, Inc. ("Welscorp"), is a domestic corporation that is registered
9 and in active status with the Nevada Secretary of State. Its most recent address for its sole Officer
10 and Director, Thomas Becker, identified in its annual list filed on or about August 16, 2018, is 3773
11 Howard Hughes Parkway, Suite 5005, Las Vegas Nevada

12 4. Respondent Einstein Sports Advisory, Ltd ("Einstein") is a domestic limited liability
13 company that is registered and in active status with the Nevada Secretary of State. Its Manager,
14 Thomas Becker, lists a Nevada address at 1810 E. Sahara Ave., Las Vegas, NV, in the annual list
15 filed on or about November 09, 2018.

16 5. Becker, Wellington, Welscorp, and Einstein are known hereinafter, collectively, as
17 Respondents.

18 **FACTUAL BACKGROUND**

19 6. At all times relevant, Respondents Wellington, Welscorp, and Einstein have each
20 offered an investment in a type of contract which purportedly provided an investor with a return on
21 their investment through the efforts of Respondents by "entity wagering." Entity wagering allows
22 entities to solicit and collect funds from a group of investors which are then pooled together and
23 utilized to place wagers by the entities on various sporting events. Any profits or losses are
24 apportioned among the pooled investors. Entity wagering was legalized in Nevada in 2015, and
25 Nevada remains the only state with legalized entity wagering.

26 7. Respondents' entity wagering agreements purport to increase an investor's money by
27 a specific percentage over a defined contract period. The contracts provide that the increase in the
28 value of the invested funds is solely through the efforts of the Respondents. All purported profits

1 were then to be either split between the investor and Becker or rolled over into a new defined-period
2 contract.

3 8. On or about January 2017, Unnamed Investor #1 ("UI1") learned of the purported
4 investment opportunity with Respondent Wellington through an acquaintance. UI1 resides in the
5 State of Oregon. UI1 was provided with and signed a Sports Advisory Agreement and also signed
6 a "Sports Investment Broker Agreement for U.S. Independent Contractors" with Wellington. The
7 contract which entitled UI1 to be a "non-exclusive direct seller and referrer of both the...Secured
8 Equity Betting Program and the...Multi-Fold Contract Investment Services."

9 9. As part of her new role as a direct seller for Respondent, UI1 was provided access to
10 a password-protected website for Respondent Wellington. This website included a script for
11 potential investors that described the "deal" as follows:

12 "Wellington offers Multi-Fold Contracts that will grow your bankroll until you
13 achieve a certain amount of money. The number of folds depends on the amount
14 invested. For example...

15 \$25,000 yields you \$75,000 (3-Fold Contract)

16 \$50,000 yields you \$175,000 (3.5-Fold Contract)

17 \$100,000 yields you \$400,000 (4-Fold Contract)

18 \$250,000 yields you \$1,250,000 (5-Fold Contract)"

19 10. On or about February 2017, UI1 made an initial investment of \$25,000.00 with
20 Respondent Wellington. UI1 wired those funds to a Wells Fargo bank account ending x6666, located
21 in Las Vegas, Nevada.

22 11. UI1 began to grow concerned after her personal financial adviser informed her that he
23 had learned that Becker had previously been convicted of fraudulent activities. UI1 requested a return
24 of her total investment and received the same almost immediately.

25 12. Unnamed Investor #2 (UI2) similarly learned of the Respondents entity wagering
26 investment opportunity through a trusted friend who had a professional relationship with Respondent
27 Becker and vouched for the legitimacy of the investment scheme.

1 13. On or about July 2016, UI2 made his initial investment of \$25,000.00 with Respondent
2 Wellington. UI2's online investment account (which was contained in the password protected
3 website portal as described supra) reflected that his "3-Fold Contract" was increasing in line with
4 the contract target dates. For this reason, UI2 invested another \$25,000.00 on or about July 2017,
5 even though he had yet to receive any dividends or payout from his original investment.

6 14. Shortly thereafter, UI2 began to grow wary of a potential fraud by Respondent
7 Wellington and Becker, because Respondent Becker stopped responding to UI2's correspondence
8 and inquiries about the status of his investment and payouts. UI2 asked for funds to be dispersed
9 several times over the course of summer and fall of 2017. He heard from Respondent Becker only
10 three times. On or about October 2017, Becker promised UI2 that his share of profits would be paid
11 within one hundred twenty (120) days. UI2 never received any monies or further communication
12 from Respondent Becker or anyone else associated with Respondent Wellington from that date to
13 the date of this Complaint.

14 15. Respondents Wellington and Becker have ceased all communications of any kind with
15 UI2, who resides in Italy and Canada.

16 16. UI2's cancelled check for \$25,000.00 in July 2017 shows that UI2's check was
17 deposited into a Bank of the West account ending x9228.

18 17. The "Sports Advisory Agreement" between UI2 and Wellington lists "Jonathan West"
19 as "managing director" the address provided at 1810 E. Sahara Avenue, Suite 1449, Las Vegas,
20 Nevada 89104.

21 18. Unnamed Investor #3 (UI3) heard about Respondent Einstein through a friend and
22 colleague.

23 19. On or about October 2017, UI3 decided to invest \$25,000.00 with Respondent Einstein
24 and accordingly signed a Sports Advisory Agreement. The contract stated that UI3 agreed to allow
25 Einstein to invest his funds and make sports betting picks on his behalf until his initial investment
26 grew from \$25,000.00 to \$150,000.00.

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1 20. Like UI1 and UI2, UI3 was assigned access to a personalized online portal to track his
2 investment and subsequent earnings. This portal reflected a balance of approximately \$88,000.00
3 as of February 2019.

4 21. Despite repeated attempts to obtain access to his alleged profits, UI3 has never
5 received any payment for his investment or its alleged earnings. Upon information and belief, UI3
6 believes that his purported account balance was not accurate and that his original investment of
7 \$25,000.00 is gone.

8 22. Unnamed Investor #4 (UI4), a Virginia Resident, was recruited to invest with
9 Respondent Einstein by a long-time friend who was acting as a "sales agent" for Respondent
10 Einstein, upon information and belief.

11 23. UI4 signed a Sports Advisory Agreement with Respondent Einstein on or about July
12 2018. UI4 made an initial investment of \$30,000.00 for a "3-Fold" return over a one year contract
13 period.

14 24. UI4 received wiring instructions from manager "Jonathan West" directing UI4's initial
15 investment funds to a Chase Bank account ending x9386, located in Henderson, Nevada.

16 25. UI4 monitored his growing online account balance--as maintained by Einstein--and
17 decided to invest an additional \$35,000.00 on or about February 2019. This second investment
18 contract was called a "Sports Advisory Staking Agreement – Plan A" but contained terms virtually
19 identical to the initial Sports Advisory Agreement. UI4 pooled his \$35,000.00 investment with a
20 friend who invested \$15,000.00, for a total second contract investment of \$50,000.00.

21 26. Despite an online account balance of \$90,000.00, UI4 has never received payment of
22 any sort for his alleged investment earnings. UI4 has sought payment from Respondents for several
23 months and sent a demand letter seeking full payment of \$90,000.00 to "Jonathan West" as manager
24 of Respondent Einstein in August 2019. UI4 did not receive a response to this demand letter or any
25 other communication from Respondents about the status of the return on his investments as set forth
26 in his Sports Advisory Agreement.

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1 27. At all times relevant, Thomas Becker was the sole manager of Respondent Wellington,
2 according to records maintained by the Commercial Recordings division of the Nevada Secretary of
3 State.

4 28. At all times relevant, Thomas Becker was the sole manager of Respondent Einstein.,
5 according to records maintained by the Commercial Recordings division of the Nevada Secretary of
6 State.

7 29. At all times relevant, Thomas Becker was the President, Secretary, Treasurer, and
8 Director of Welscorp, according to records maintained by the Commercial Recordings division of
9 the Nevada Secretary of State.

10 30. According to records maintained by the Division, no individual including Respondent
11 Becker has ever been licensed with the Division as a sales representative of a broker/dealer or as an
12 agent of the issuer. Upon information and belief, Respondents did not disclose this fact to UI1, UI2,
13 UI3, UI4 or to other investors whom Respondents may have solicited.

14 31. According to records maintained by the Division, Respondents have never filed an
15 application for the registration of securities or a notice of exemption from registration with the
16 Division. Upon information and belief, Respondents did not disclose this fact to UI1, UI2, UI3, UI4
17 or to other investors whom Respondents may have solicited.

18 32. CG Technology is the only sportsbook in the State of Nevada that has been approved
19 by the Nevada Gaming Commission to accept entity wagering. Upon information and belief,
20 Respondents have never been an approved entity with CG Technology, and CG Technology has
21 never accepted wagers from Respondents.

22 STATUTORY BACKGROUND

23 33. The Nevada Uniform Securities Act ("Act"), as codified in Chapter 90 of the Nevada
24 Revised Statutes ("NRS") and regulates the offer, sale, and purchase of securities in or from the State
25 of Nevada.

26 34. NRS 90.295 defines a "security" as:

27 [A] note, stock, bond, debenture, evidence of indebtedness, certificate
28 of interest or participation in a profit-sharing agreement, a limited

1 partnership interest, an interest in a limited-liability company,
2 collateral-trust certificate, preorganization certificate or subscription,
3 transferable share, investment contract, viatical settlement investment,
4 voting-trust certificate, certificate of deposit for a security, fractional
5 undivided interest in an oil, gas or other mineral lease or in payments
6 out of production of such a lease, right or royalty, a put, call, straddle or
7 option on a security, certificate of deposit or group or index of securities
8 including any interest therein or based on the value of any of the
9 foregoing, or, in general, any interest or instrument commonly known
10 as a security or any certificate of interest or participation in, temporary
11 or interim certificate for, receipt for, whole or partial guarantee of or
12 warrant or right to subscribe to or purchase any of the foregoing.

13 35. Additionally, Nevada Administrative Code 90.090 defines an investment contract as
14 follows: 1) any investment in a common enterprise with the expectation of a profit to be derived
15 substantially through the efforts of a promoter or other third party; or 2) any investment by which:
16 (a) an offeree furnishes initial value to an offeror; (b) a portion of this initial value is subjected to the
17 risks of the enterprise; c) the furnishing of the initial value is induced by the offeror's promises or
18 representations which give rise to a reasonable understanding that a valuable benefit of some kind
19 over and above the initial value will accrue to the offeree as a result of the operation of the enterprise;
20 and d) the offeree does not receive the right to exercise the practical or actual control over the
21 managerial decisions of the enterprise.

22 36. Here, the Sports Advisory Agreements signed by UI1, UI2, UI3, and UI4 are
23 investment contracts as defined in NAC 90.090 and are therefore securities pursuant to NRS 90.295.
24 because the investors have each given funds into Respondents purported sports betting mutual fund
25 based on the promises of exaggerated returns resulting from Respondents' efforts utilizing their self-
26 described winning algorithm.

27 37. NRS 90.280 defines "sale" and "sell" as including "every contract of sale, contract to
28 sell, or other disposition, of a security or interest in a security for value." Additionally, "offer to
sell" includes "every attempt or offer to dispose of, or solicitation of an offer to purchase, a security
or interest in a security for value."

38. NRS 90.255 defines "issuer" as "a person who issues or proposes to issue a security."

1 39. NRS 90.285 defines "sales representative" as "a natural person other than a broker-
2 dealer, authorized to act and acting for a broker-dealer or issuer effecting or attempting to effect
3 purchases or sales of securities."

4 40. NRS 90.220 defines a "broker-dealer" as "any person engaged in the business of
5 effecting transactions in securities for the account of others or for the person's own account."

6 41. As set forth in NRS 90.310, it is a violation of the Act for any person to act as a broker-
7 dealer or sales representative unless licensed or exempt from licensing under the Act; additionally,
8 it is a violation of the Act for any issuer or any licensed broker-dealer to employ or contract with a
9 person as a sales representative unless the sales representative is licensed or exempt from licensing
10 under the Act.

11 42. As set forth in NRS 90.460, it is a violation of the Act for a person to offer to sell or
12 sell any security in this State unless the security is registered or the security or transaction is exempt
13 under the Act.

14 43. As set forth in NRS 90.550, the Administrator by order may deny or revoke an
15 exemption specified in NRS 90.520 or 90.530, with respect to a specific security or transaction.

16 44. As set forth in NRS 90.570, in connection with the offer to sell, sale, offer to purchase
17 or purchase of a security, a person shall not, directly or indirectly, employ any device, scheme or
18 artifice to defraud; make an untrue statement of a material fact or omit to state a material fact
19 necessary in order to make the statements made not misleading in the light of the circumstances
20 under which they are made; or engage in an act, practice or course of business which operates or
21 would operate as a fraud or deceit upon a person.

22 45. As set forth in NRS 90.630(1), if the Administrator of the Division reasonably believes
23 that a security is being offered or has been offered or sold in violation of the Act, or that a person is
24 acting in violation of the Act, the Administrator may issue, without a prior hearing, a Summary Order
25 against the person engaged in the prohibited activities, directing such person to desist and refrain
26 from further activity until the security is registered or such person is licensed under the Act.

27 46. Pursuant to NRS 90.630(2), the Administrator of the Division, after giving notice by
28 registered certified mail and conducting a hearing in an administrative proceeding, unless the right

1 to notice and hearing is waived by the person against whom the sanction is imposed, may: (a) issue
2 an order against the person to cease and desist; (b) censure the person if he or she is a licensed broker-
3 dealer, sales representative, investment adviser or representative of an investment adviser; (c) bar or
4 suspend the person from association with a licensed broker-dealer or investment adviser in this State;
5 (d) issue an order against an applicant, licensed person or other person who willfully violates this
6 chapter, imposing a civil penalty of not more than \$25,000 for each violation, or if the violation was
7 committed against an older person or vulnerable person, a civil penalty equal to twice the amount of
8 the civil penalty that would otherwise have been imposed pursuant to this paragraph, not to exceed
9 \$50,000 for each violation; or (e) initiate one or more of the actions specified in NRS 90.640.

10 47. Pursuant to NRS 90.575, Respondent Becker, acting as a sales representative or sales
11 representative issuer, owed a fiduciary duty to UI1, UI2, UI3, and UI4 to act in their best interest.

12 COUNT I

13 (Unlicensed Broker-Dealer and Sales Representative)

14 48. The Division realleges and incorporates by reference paragraphs 1 through 47 above
15 as if set forth fully herein.

16 49. Respondents Wellington, Einstein, and Welscorp are not licensed as a broker-dealers
17 with the Division.

18 50. No person, including Respondent Becker, is licensed as sales representative of the
19 issuer for any entity Respondent with the Division.

20 51. Respondents, by engaging in the conduct above, have violated and continue to violate
21 NRS 90.310.

22 COUNT II

23 (Offer or Sale of Unregistered Securities)

24 52. The Division realleges and incorporates by reference paragraphs 1 through 51 above
25 as if set forth fully herein.

26 53. Respondents have not filed an application for the registration of securities or a notice
27 of exemption from registration with the Division for the sale of the securities as described supra.

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54. Respondents have violated and continue to violate NRS 90.460 by offering to sell and selling securities that are not registered with the Division, are not exempt from registration with the Division, and/or are not federally-covered securities.

COUNT III

(Operating as a Deceit Upon a Client)

55. The Division realleges and incorporates by reference paragraphs 1 through 50 above as if set forth fully herein.

56. Respondents by engaging in the conduct set forth above, have employed a device, scheme, or artifice to defraud by engaging in the offer of unregistered, non-exempt securities that are not federally-covered securities.

57. Respondents have violated and continue to violate NRS 90.570 by engaging directly or indirectly in an act, practice, or course of business that operates or would operate as a deceit upon a client.

REQUEST FOR RELIEF

Based upon the foregoing, the Division respectfully requests the following:

1. That a Summary Order be entered requiring that Respondents immediately Cease and Desist from violating the Act;

2. That a Final Order be entered requiring that Respondents immediately Cease and Desist from violating the Act;

3. That a Civil Penalty not to exceed \$25,000.00 be imposed, jointly and severally, against Respondents for each violation of the Act;

4. That a Civil Penalty not to exceed \$50,000.00 be imposed, jointly and severally, against Respondents for each violation of the Act against an older person or a vulnerable person;

5. That the exemptions from registration set forth in NRS 90.530 be revoked for any security issued by Respondents and/or sold by any Respondents, including the above investment contracts. Reasonable attorney's fees and costs of investigation; and

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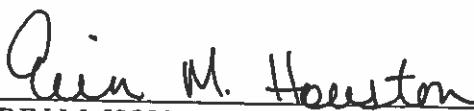
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1 6. For such other and further relief as the Hearing Officer deems just and proper.

2 Dated this 30th day of August, 2019.

3 Respectfully submitted,

4 NEVADA SECURITIES DIVISION
5 OFFICE OF THE SECRETARY OF STATE

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7 _____
8 ERIN M. HOUSTON
9 SECURITIES ADMINISTRATOR
10 DEPUTY SECRETARY OF STATE FOR SECURITIES

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CERTIFICATE OF MAILING

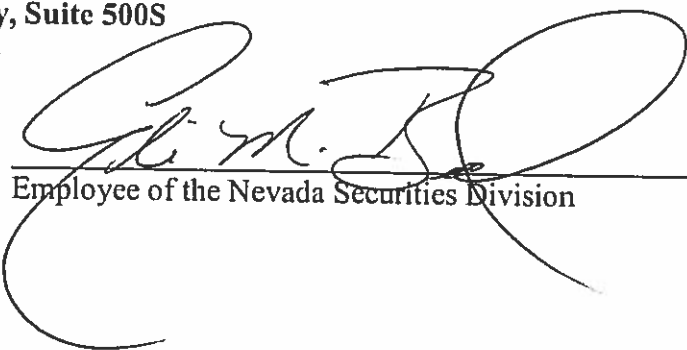
I certify that I am an employee of the Securities Division of the Office of the Secretary of State, State of Nevada, and that on this 30th day of August 2019, I have caused a true and correct copy of the foregoing Complaint for Summary and Final Order to Cease and Desist and Other Appropriate Relief to be served by United States Certified Mail, Return Receipt Requested, and First Class Mail, to the following:

**Thomas Becker
440 Welpman Way
Henderson, NV 89044**

**Wellington Sports Club, LLC
c/o John Thomas
1810 E. Sahara
Las Vegas, NV 89104**

**Einstein Sports Advisory, LTD.
c/o Ronald A. Colquitt, Esq.
321 Casino Center Blvd. #112
Las Vegas, NV 89101**

**Welscorp, Inc.
c/o Incorp Services, Inc.
3773 Howard Hughes Pkwy, Suite 500S
Las Vegas, NV 89169-6014**



Employee of the Nevada Securities Division