

**BEFORE THE SECURITIES COMMISSIONER
OF THE STATE OF KANSAS**

In the Matter of:

DAVID M. HULSHOF, d/b/a
BUENA VISTA BUSINESS SERVICES, L.L.C.,
and his representatives and agents,

Docket No. 09 E 014
KSC No. 2008-5448

Respondent.

Pursuant to K.S.A. 17-12a604

STIPULATION FOR CONSENT ORDER

This proceeding follows an investigation conducted by the staff of the Office of the Securities Commissioner of Kansas, pursuant to K.S.A. 17-12a602. As a result of the investigation, staff for the Office of the Securities Commissioner alleges that:

Allegations of Fact

1. Respondent David M. Hulshof ["Respondent"] is a resident of Kansas with a last known address of [REDACTED].
2. Respondent has used the name "Buena Vista Business Services, L.L.C." in his business operations. This entity is not registered with the Office of the Kansas Secretary of State.
3. [REDACTED] ["REDACTED"] is a resident of Leawood, Kansas, and former business acquaintance of Respondent.
4. Respondent approached [REDACTED] about investing \$100,000.00 in a company called Rapid Fire Solutions, Inc. ["Rapid Fire"]. A term of the investment was for [REDACTED] to co-sign on a loan for Rapid Fire in the amount of \$95,000.00.

5. On or about August 25, 2006, in Leawood, Kansas, [REDACTED] wrote a check to Rapid Fire, in the amount of \$5,000.00, and provided it to Steven T. Rasmussen, Managing Partner.

6. On or about September 8, 2006, [REDACTED] signed a Guaranty with Country Club Bank, Leawood, Kansas, in support of a Promissory Note and a Security Agreement, both dated September 12, 2006, guaranteeing a \$100,000.00 loan to Rapid Fire.

7. Respondent earned a commission of \$5,067.00 on the [REDACTED] investment in Rapid Fire.

8. Respondent is not registered as an agent with the Office of the Kansas Securities Commissioner.

Allegations of Law

9. The investment sold by Respondent to [REDACTED] is a security as defined by K.S.A. 17-12a102.

10. Pursuant to K.S.A. 17-12a604, if the Commissioner finds, by written findings of fact and conclusions of law, that a person has violated this act, he may enter an order against the person containing one or more of the following sanctions or remedies: cease and desist order, a civil penalty up to \$40,000.00, a bar, restitution, disgorgement and/or actual costs of the proceeding.

11. Respondent acted as an agent in the sale of a security without being registered with the Office of the Kansas Securities Commissioner, in violation of K.S.A. 17-12a402.

12. Adequate grounds exist under K.S.A. 17-12a402 and 17-12a604 to invoke administrative sanctions against Respondent and such order is in the public interest.

Respondent, wishing to obtain disposition of this matter without invoking any right to a hearing before the Securities Commissioner, or his designee, has determined not to contest the issuance of an order by the Commissioner on the basis of the above allegations.

IT IS, THEREFORE, STIPULATED AND AGREED by and between Respondent and staff for the Securities Commissioner of Kansas that:

1. The Consent Order may be issued by the Kansas Securities Commissioner without further proceedings in this matter.
2. Respondent neither admits nor denies the above allegations.
3. Respondent agrees to DISGORGE the commission received, in the amount of \$5,067.00, to [REDACTED].
4. Respondent agrees to pay a FINE in the amount of \$1,500.00.
5. Respondent hereby waives his right to a hearing before the Commissioner, or his designee, with respect to this matter, the issuance of the Consent Order and the above allegations.

APPROVED BY:

/s/ David Hulshof
David M. Hulshof
Respondent

11/12/09
Date

/s/ R. Mark Nasteff
R. Mark Nasteff, Jr., #18940
Mitchell, Kristl & Lieber, P.C.
1220 Washington, Suite 300
Kansas City, Missouri 64105
Attorney for Respondent

11/16/09
Date

/s/ Gail Bright
Gail E. Bright, #14572
Associate General Counsel
Office of the Kansas Securities Commissioner
618 S. Kansas Ave.
Topeka, Kansas 66603

11/17/09
Date