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2 **STATE OF CALIFORNIA**
3 **BUSINESS, TRANSPORTATION AND HOUSING AGENCY**
4 **DEPARTMENT OF CORPORATIONS**

5 TO: David Watkins
6 Mansion Comics LLC
7 Mansion Media
8 3006 67th Ave. N
9 Brooklyn Center, MN 55429

10 **DESIST AND REFRAIN ORDER**
11 **(For violations of section 25110 of the Corporations Code)**

12 The California Corporations Commissioner finds that:

13 1. Mansion Comics LLC (“Mansion Comics”) is a limited liability company organized
14 under the laws of Minnesota on June 23, 2011. Its principal place of business is 3006 67th Ave. N,
15 Brooklyn Center, MN 55429.

16 2. According to the Investor Financing Agreement used by Mansion Comics, Mansion
17 Media is the parent company of Mansion Comics. Mansion Media is an entity of unknown form.
18 According to the Investor Financing Agreement, Mansion Media is also located at 3006 67th Ave. N,
19 Brooklyn Center, MN 55429.

20 3. At all relevant times, David Watkins (“Watkins”) was the control person of Mansion
21 Comics and Mansion Media.

22 4. Beginning in 2011 or earlier, Watkins, Mansion Comics, and Mansion Media offered
23 and sold securities in the form of investment contracts to residents of California and elsewhere. The
24 Investor Financing Agreement was used to sell these securities. The Investor Financing Agreement
25 provided that for an investment of \$12,000, the investor would acquire the right to share in 5% of the
26 profits of Mansion Comics.

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1 5. These securities were offered or sold in this state in issuer transactions. The
2 Department of Corporations has not issued a permit or other form of qualification authorizing any
3 person to offer or sell these securities in this state.

4 6. Watkins, Mansion Comics, and Mansion Media offered and sold these securities by
5 means of general solicitation in the form of online advertisements on Craigslist (www.craigslist.org).

6 Based upon the foregoing findings, the California Corporations Commissioner is of the
7 opinion that the investment contracts that are being or have been offered or sold by David Watkins,
8 Mansion Comics LLC, and Mansion Media are securities subject to qualification under the California
9 Corporate Securities Law of 1968 and are being or have been offered or sold without being qualified
10 in violation of Corporations Code section 25110. Pursuant to Corporations Code section 25532,
11 David Watkins, Mansion Comics LLC, and Mansion Media are hereby ordered to desist and refrain
12 from the further offer or sale in the State of California of securities, including but not limited to
13 investment contracts, unless and until qualification has been made under the law or unless exempt.

14 This Order is necessary, in the public interest, for the protection of investors and consistent
15 with the purposes, policies, and provisions of the Corporate Securities Law of 1968.

16 Dated: January 24, 2013
17 Sacramento, California

18 JAN LYNN OWEN
19 California Corporations Commissioner

20 By _____

21 MARY ANN SMITH
22 Deputy Commissioner
23 Enforcement Division

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