

Without admitting or denying the findings of fact and conclusions of law set forth below, except as to the jurisdiction of the Securities Commissioner over the Respondents and the subject

to counsel, expressly consent to the entry of this Consent Order, which resolves the allegations against them set forth herein. The Respondents elect to waive permanently any right to a hearing and appeal under S.C. Code Ann. § 35-1-609, with respect to this Consent Order.

6. Dixon is the sole owner and manager of BHWM.

7. BHWM has never been registered with the Division as an investment adviser or a broker-dealer.

IV. FINDINGS OF FACT

8. Future Income Payments, LLC ("FIP") was a Delaware limited liability company

with a registered agent, Agents and Corporations, Inc., located at 1201 Orange Street, Suite 601, One Commerce Center, Wilmington, Delaware 19801.

9. Scott Kohn was the sole owner and manager of FIP.

10. FIP's business model revolved around the sourcing and sale of retirees' recurring income from pension benefits.

(6:19-cr-000239-CRI, March 12, 2019). Among various charges, the indictment alleged that “[a]s state regulators began prohibiting FIP from operating in various states and pensioners struggled

the Respondents when the FIP scheme collapsed. At the time of the collapse, the investors to

¹ In the matter of Future Income Payments, LLC; FIP, LLC; and Scott A. Kohn – Order to Cease and Desist (4/4/2019), <http://2hsvz0174ah31vgcm16peuy12tz.wpengine.netdna-cdn.com/wp-content/uploads/2019/04/Order-to-Cease-and-Desist-4.5-01935944xD2C78.pdf>

BROWN, KIRK. [O.G.] Marshals capture Scott Kohn, accused in Greenville of preying on veterans. *The Greenville News*, 23 Sept. 2019, [https://www.greenvilleonline.com/story/news/local/2019/09/23/marshals-](https://www.greenvilleonline.com/story/news/local/2019/09/23/marshals-capture-scott-kohn-accused-of-preying-on-veterans/2718217000/)

[capture-scott-kohn-accused-of-preying-on-veterans/2718217000/](https://www.greenvilleonline.com/story/news/local/2019/09/23/marshals-capture-scott-kohn-accused-of-preying-on-veterans/2718217000/). Accessed 10/1/2020.

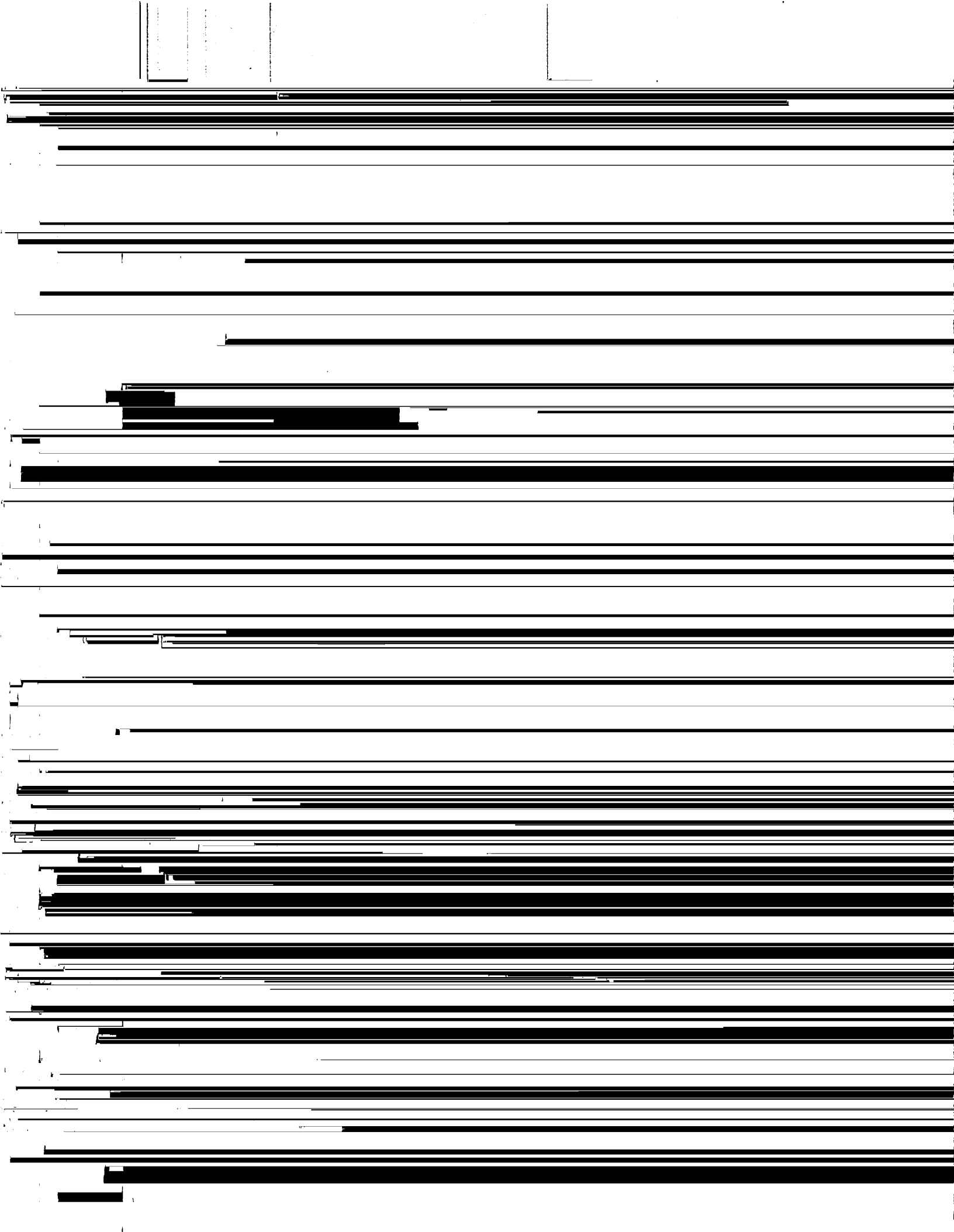
from such registration constitutes a willful failure to comply with the Act, pursuant to S.C. Code Ann. § 35-1-412(d)(2).

29. The Respondents acted as agents, as defined by S.C. Code Ann. § 35-1-102(2), in connection with the offer and sale of securities in South Carolina.

30. The Respondents were neither registered as agents with the Division, nor exempt from such registration in violation of S.C. Code Ann. § 35-1-402(a).

31. Acting as an agent in connection with the offer and sale of securities, without being registered with the Division as such or exempt from registration, constitutes a willful failure to comply with the Act, pursuant to S.C. Code Ann. § 35-1-412(d)(2).

32. The Respondents' 114 willful violations of the Act provide the basis for this order.



thereof;

- b. The Respondents shall jointly and severally pay a civil penalty in the amount of \$400,000;
- c. The Respondents have disgorged certain of their commissions to to the

investors, and such disgorgement shall be credited against the Respondents' civil penalty. Because of the remedial efforts of the Respondents, the civil penalty ordered in paragraph b, *supra*, is hereby **SUSPENDED**;

- d. Dixon agrees to forfeit his insurance license for a period of three years from the date of approval of this Consent Order by the Securities Commissioner;
- e. Dixon agrees not to register with FINRA for a period of three years from the date of approval of this Consent Order by the Securities Commissioner;

f. Dixon agrees to ensure that he and

- g. Dixon expressly consents and agrees that he is **PERMANENTLY BARRED** from participating in any aspect of the securities industry in or from the State of South Carolina.

0183926 as to the Respondents.

Number

part of this Consent Order, the Respondents agree that they will

by the time of the next hearing, the Respondents will have

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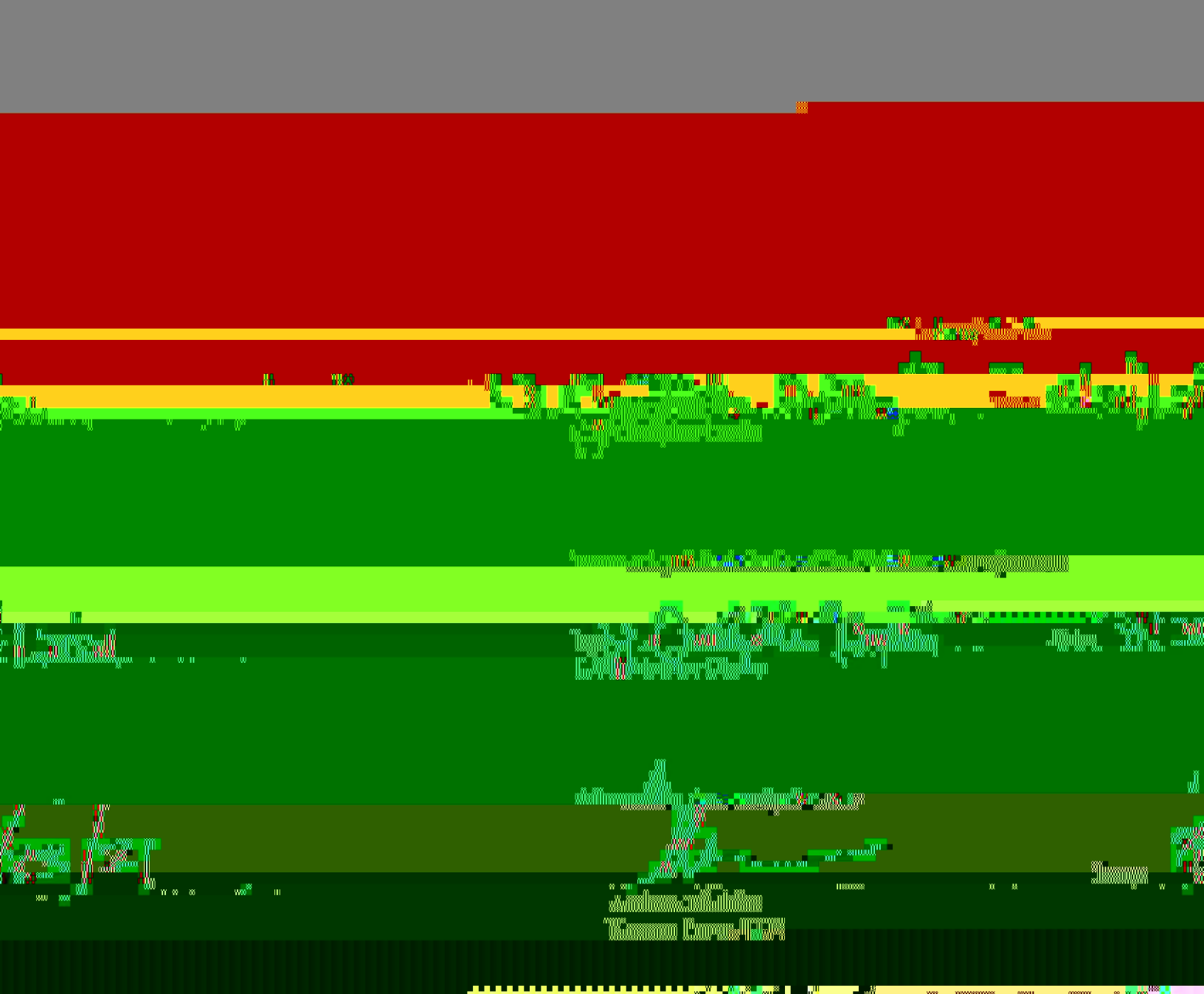
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Commissioner
State of South Carolina



Jonathan D. Williams
Assistant Deputy Attorney General