

**UNITED STATES OF AMERICA**  
**Before the**  
**SECURITIES AND EXCHANGE COMMISSION**

**SECURITIES EXCHANGE ACT OF 1934**  
**Release No. 76681 / December 17, 2015**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-16967**

**In the Matter of**

**JAMES L. ERWIN and**  
**JOINT VENTURE SOLUTIONS,**  
**INC.,**

Respondents.

**ORDER MAKING FINDINGS AND**  
**IMPOSING REMEDIAL SANCTIONS**  
**PURSUANT TO SECTION 15(b) OF THE**  
**SECURITIES EXCHANGE ACT OF 1934**

**I.**

The Securities and Exchange Commission (“Commission”) deems it appropriate and in the public interest to accept the Offer of Settlement submitted by Respondents James L. Erwin and Joint Venture Solutions, Inc. (“Respondents”) pursuant to Rule 240(a) of the Rules of Practice of the Commission, 17 C.F.R. § 201.240(a), for the purpose of settlement of these proceedings initiated against Respondents on November 23, 2015, as amended, pursuant to Section 15(b) of the Securities Exchange Act of 1934 (“Exchange Act”).

**II.**

Solely for the purpose of these proceedings and any other proceedings brought by or on behalf of the Commission, or to which the Commission is a party, and without admitting or denying the findings herein, except as to the Commission’s jurisdiction over him and the subject matter of these proceedings and the findings contained in Sections III.2., III.3., and III.4 below, which are admitted, Respondents consent to the entry of this Order Making Findings and Imposing Remedial Sanctions Pursuant To Section 15(b) of the Securities Exchange Act of 1934 (“Order”), as set forth below.

### III.

On the basis of this Order and Respondents' Offer, the Commission finds that:

1. From fall 2009 through summer 2011, James L. Erwin, resident of Las Vegas, Nevada, was the sole owner, officer, and employee of Joint Venture Solutions, Inc., a Nevada company. Erwin and Joint Venture Solutions have never been, and have never applied with the Commission to be, a registered securities broker or dealer, nor has Erwin ever been associated with any registered broker or dealer. During the time in which they engaged in the conduct underlying the complaint described below, neither Erwin nor Joint Venture Solutions was registered with the Commission in any capacity.

2. On July 7, 2015, the United States District Court for the District of Nevada entered a final judgment against Respondents in the civil action entitled Securities and Exchange Commission v. James Erwin, et al., Civil Action No. 2:14-CV-623. In doing so, the Court found that Respondents acted as unregistered brokers or dealers in violation of Section 15(a) of the Securities and Exchange Act of 1934, and sold unregistered securities in violation of Sections 5(a) and 5(c) of the Securities Act of 1933. As a result of these violations, and in addition to ordering other relief, the Court permanently enjoined Respondents from future violations of Section 15(a) of the Exchange Act and Sections 5(a) and 5(c) of the Securities Act.

3. The Commission's complaint alleged that, from fall 2009 to summer 2011, Respondents acted as unregistered brokers or dealers when they solicited potential investors for two fraudulent advance-fee high-yield investment programs offered by Switzerland-based Malom Group AG ("Malom"). Respondents successfully solicited at least five investors into the two programs, who collectively invested approximately \$2,575,000. These investors lost all of their invested funds. For recruiting these investors, Respondents were compensated with a percentage of each investment, receiving a total of \$210,000 in transaction-based compensation.

4. By virtue of the conduct alleged in the complaint and in a motion for summary judgment, the Court found that Respondents violated Section 15(a)(1) of the Exchange Act by acting as unregistered brokers or dealers. The Court also found that Respondents violated Section 5(a) and (c) of the Securities Act by offering and selling to investors unregistered securities that did not qualify for an exemption from the registration requirements.

### IV.

In view of the foregoing, the Commission deems it appropriate and in the public interest to impose the sanctions agreed to in Respondents' Offer.

Accordingly, it is hereby ORDERED pursuant to Section 15(b)(6) of the Exchange Act that Respondents Erwin and Joint Venture Solutions, Inc. be, and hereby are barred from association with any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization; and

Pursuant to Section 15(b)(6) of the Exchange Act Respondents Erwin and Joint Venture Solutions, Inc. be, and hereby are barred from participating in any offering of a penny stock, including: acting as a promoter, finder, consultant, agent or other person who engages in activities with a broker, dealer or issuer for purposes of the issuance or trading in any penny stock, or inducing or attempting to induce the purchase or sale of any penny stock.

Any reapplication for association by the Respondents will be subject to the applicable laws and regulations governing the reentry process, and reentry may be conditioned upon a number of factors, including, but not limited to, the satisfaction of any or all of the following: (a) any disgorgement ordered against the Respondents, whether or not the Commission has fully or partially waived payment of such disgorgement; (b) any arbitration award related to the conduct that served as the basis for the Commission order; (c) any self-regulatory organization arbitration award to a customer, whether or not related to the conduct that served as the basis for the Commission order; and (d) any restitution order by a self-regulatory organization, whether or not related to the conduct that served as the basis for the Commission order.

For the Commission, by its Secretary, pursuant to delegated authority.

Brent J. Fields  
Secretary