

STATE OF ALABAMA
ALABAMA SECURITIES COMMISSION

IN THE MATTER OF:

BULL OR BEAR TRADING INC.)
SCOTT ANTHONY HARWELL)

RESPONDENTS)

ADMINISTRATIVE ORDER
NO. CD-2007-0035

CEASE AND DESIST ORDER

The Alabama Securities Commission ("Commission"), having the authority to administer and provide for the enforcement of all provisions of Title 8, Chapter 6, Code of Alabama 1975, the Alabama Securities Act ("Act"), upon due consideration of the subject matter hereof, and having confirmed information of the offers for sale and/or sale of securities, into, within or from the state of Alabama, has determined as follows:

RESPONDENT

1. BULL OR BEAR TRADING INC., (BULL or BEAR) with a business address of 1015 Montlimar Drive, Suite D2, Mobile, Alabama 36609.

2. SCOTT ANTHONY HARWELL (HARWELL), (CRD#2126913) is currently registered as a broker-dealer agent with Harbor Financial Services LLC., with a business address of 1555 University Blvd South, Suite B, Mobile, Alabama 36609. HARWELL was previously registered from September 1993 through May 2, 2007, in the state of Alabama as a broker-dealer agent with Spike Financial Services (CRD# 112193) located at 1015 Montlimar Drive, Suite D-2, Mobile, Alabama 36608. During all times relevant to this order, HARWELL was registered as a broker-dealer agent with Spike Financial Services.

STATEMENT OF FACTS

3. The Alabama Securities Commission is in receipt of information that on or about October 13, 2006, HARWELL solicited and sold, to an Alabama resident, 15,000 shares of Bull or Bear Trading, Inc. company stock for the purchase price of \$11,250.00. Pursuant to documents provided to the Alabama investor from HARWELL, HARWELL is the owner and Chief Operating Officer of Bull or Bear Trading, Inc.

4. On or about October 14, 2006, HARWELL and the Alabama resident entered into an agreement whereby the resident would return to HARWELL the stock certificates, obtained as a result of the aforementioned stock purchase, and HARWELL would return the residents invested funds. The Alabama resident returned the stock certificates to HARWELL. As of the date of this Order HARWELL has failed to return the invested funds to the Alabama resident.

5. On August 20, 2007, a review of the files of the Alabama Securities Commission Registration Division revealed no record of registration or exemption from registration for the shares of Bull or Bear Trading, Inc. company stock.

CONCLUSIONS OF LAW

6. The securities offered and sold by HARWELL, shares of Bull or Bear Trading, Inc. company stock, were not registered or exempt from registration in the state of Alabama. Pursuant to Section 8-6-4, Code of Alabama 1975, it is unlawful to offer or sell any security unless it is registered under the Act.

This Order does not prevent the Alabama Securities Commission from seeking such other civil or criminal remedies that are available to it under the Act.

This Order is appropriate in the public interest for the protection of investors and is consistent with the purposes of the Act.

ACCORDINGLY, IT IS HEREBY ORDERED that RESPONDENTS BULL or BEAR TRADING INC., and SCOTT HARWELL immediately **CEASE AND DESIST** from further offers or sales of any security into, within or from the state of Alabama.

Entered at Montgomery, Alabama, this 11th day of December, 2007.

ALABAMA SECURITIES COMMISSION
770 Washington Avenue, Suite 570
Montgomery, AL 36130-4700
(334) 242-2984
BY:


J. RANDALL MCNEILL
Deputy Director

