STATE OF NORTH CAROLINA

Department of The Secretary of State

THE NORTH CAROLINA SECURITIES DIVISION,	)	
Petitioner,	)	
vs.	)	**CONSENT ORDER**
JOHN DAVID TURNER,	)	
Individual CRD #1176333 and	)	
Sole Proprietorship Investment Adviser	)	
CRD #138512,	)	
	)	**FILE NO. 05-016-CC**
Respondent.	)	

WHEREAS, JOHN DAVID TURNER (hereinafter, "Turner") is a natural person who maintains residential addresses at 2 Park Road, North Wilkesboro, North Carolina, 28659; 329 Greenway Lane, Wilkesboro, North Carolina, 28697; and 1792 Oakley Ridge Road, North Wilkesboro, North Carolina, 28659; and

WHEREAS, the Secretary of State of the State of North Carolina (the "Secretary of State"), as Administrator of the North Carolina Securities Act and the North Carolina Investment Advisers Act (North Carolina General Statutes, Chapters 78A & 78C, respectively), the Securities Division of the Department of the Secretary of State (the "Securities Division"), and the Respondent have negotiated this Consent Order; and

WHEREAS, the Respondent has cooperated with the Securities Division by responding to inquiries, providing documentary evidence and other materials relating to the Securities Division's securities investigation into certain activities undertaken by Respondent; and

WHEREAS, the Respondent elects to permanently waive any right to judicial review or a hearing and appeal under Chapters 78A and 78C (the North Carolina Securities Act and the

North Carolina Investment Advisers Act, respectively) or Chapter 150B of the North Carolina General Statutes (the Administrative Procedure Act) with respect to this Consent Order; and

WHEREAS, the Respondent has requested withdrawal of its registration as an investment adviser (with respect to CRD #138512) in the State of North Carolina by filing a Form ADV-W with the Investment Adviser Registration Depository (IARD) operated by the National Association of Securities Dealers;

NOW, THEREFORE, the Securities Administrator, acting through her duly appointed Deputy Securities Administrator, pursuant to and under all authority granted by the North Carolina Securities Act, and with the consent of the Respondent, does hereby enter into this Consent Order in settlement of the Temporary Order to Cease and Desist and Summary Suspension of Registration issued and entered on April 28, 2006 against John David Turner.

I.
JURISDICTION AND CONSENT

Respondent admits the jurisdiction of the Securities Division, neither admits nor denies the Findings of Fact and Conclusions of Law contained in this Consent Order, and consents to the entry of this Consent Order by the Deputy Securities Administrator.

II.
FINDINGS OF FACT

The Securities Administrator, acting by and through her duly appointed Deputy Securities Administrator, makes the following findings of fact regarding a securities investigation into certain activities undertaken by the Respondent:

1. Respondent **JOHN DAVID TURNER** (hereinafter "Turner") is a natural person who maintains residential addresses at 2 Park Road, North Wilkesboro, North Carolina, 28659; 329 Greenway Lane, Wilkesboro, North Carolina, 28697; and 1792 Oakley Ridge Road, North Wilkesboro, North Carolina, 28659, and who maintains a principal office and place of business as an investment adviser at 915 Main Street, Park Place #36, North Wilkesboro, North Carolina, 28659.

2. Respondent Turner is a person registered as an investment adviser with the State of North Carolina pursuant to N.C.G.S. §78C-17(a) and has been so registered since December 31, 2005.

3. Beginning in April, 1997 and continuing through November 1997, Respondent Turner transacted business in North Carolina as a securities dealer or salesman by offering and selling securities in the form of bonds issued by Worldwide Bond Partners, Inc. and/or World Wide Bond Partners, Inc. and/or Evergreen Security, Ltd. (hereinafter "World Wide Bonds") which were purported to provide a rate of return of 12% per annum until maturity (maturity of the bonds was equal to five years from the date of issue of each of the bonds).

4. At the time of offering and selling the securities of World Wide Bonds to the investing public in North Carolina, the securities being offered and sold were not registered under the North Carolina Securities Act, in violation of N.C.G.S. §78A-24.

5. In connection with the offer and sale of the aforesaid securities to the investing public in North Carolina, Respondent Turner omitted to state material facts necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, in violation of N.C.G.S. §78A-8(2), in that Respondent Turner omitted to state to offerees that the securities being offered and sold were being done so in violation of the North Carolina Securities Act, specifically in violation of N.C.G.S. §78A-24.

6. It is in the public interest of the citizens of North Carolina that Respondent Turner be prohibited from violating the provisions of the North Carolina Securities Act in connection with selling or making offers to sell securities and buying or soliciting offers to buy securities.

7. Respondent Turner presently continues to have the ability to offer and sell securities to persons in North Carolina in violation of the provisions of N.C.G.S. §§78A-8 and 78A-24.

III.
CONCLUSIONS OF LAW

1. The Securities Administrator has jurisdiction over the subject matter of this proceeding and over the person of the Respondent.

2. The North Carolina Securities Division finds the Respondent has engaged in conduct in violation of the North Carolina Securities Act, specifically N.C.G.S. §78A-8(2), in that Respondent Turner omitted to state to offerees that the securities being offered and sold were being done so in violation of the North Carolina Securities Act.

3. The North Carolina Securities Division finds the Respondent has engaged in conduct in violation of the North Carolina Securities Act, specifically N.C.G.S. §78A-24

4. The Securities Administrator finds that the entry of this Consent Order is necessary or appropriate in the public interest or for the protection of investors and clients and consistent with the purposes fairly intended by the policy and provisions of both the North Carolina Securities Act and the North Carolina Investment Advisers Act.

IV.
ORDER

NOW, THEREFORE, with the consent and agreement of the Respondent, it is **HEREBY ORDERED AND AGREED** that Respondent John David Turner shall immediately cease and desist from:

a. offering for sale, soliciting offers to purchase, or selling, in or from North Carolina, the securities of Worldwide Bond Partners, Inc. and/or World Wide Bond Partners, Inc. and/or Evergreen Security, Ltd. or any security of any issuer, howsoever denominated, unless and until said securities are registered pursuant to the provisions of the North Carolina Securities Act; and

b. in connection with the offer, sale or purchase of any security, omitting to state material facts necessary in order to make statements made, in light of the circumstances under which such statements are made, not misleading.

IT IS FURTHER ORDERED AND AGREED that Respondent Turner's request for withdrawal from registration as an investment adviser in North Carolina is hereby effective upon the condition that Turner shall not apply for registration as an investment adviser or securities dealer in North Carolina for 12 months following the issuance and entry of this Consent Order. Should Turner seek registration as an investment adviser or securities dealer in the State of North Carolina thereafter, the Securities Administrator will not consider the matters addressed herein in determining whether to approve said registration, provided that nothing herein shall preclude the Securities Administrator from considering these matters solely for the purpose of determining whether an enforcement action based on other grounds is in the public interest.

IT IS FURTHER ORDERED AND AGREED that if Turner seeks registration as an investment adviser representative or as a securities salesman in North Carolina within 12 months following the issuance and entry of this Consent Order, Turner's registration shall be subject to the following conditions:

a. Turner shall not act in any principal, supervisory, or managerial capacity for a securities dealer, investment adviser or investment adviser covered under federal law;

b. Turner shall report to the North Carolina Securities Division all investigations, proceedings, and written customer complaints against him arising out of activities in the securities industry. Turner shall report the preceding events to the North Carolina Securities Division not later than 5 business days following his receipt of the notice of such event;

c. Turner shall not exercise discretionary authority in the account of any customers without the prior written consent of the North Carolina Securities Division;

d. The securities dealer, investment adviser or investment adviser covered under federal law will undertake enhanced supervision of Turner conducted by a person who is registered in the State of North Carolina;

e. Turner shall keep the North Carolina Securities Division informed of the name of the individual at the securities dealer, investment adviser or investment adviser covered under federal law who is specifically responsible for the exercise of the enhanced supervision; and

f. Turner shall reference "In the Matter of John David Turner, File No.: 05-016-CC" in any written correspondence, notice or other writings submitted to the North Carolina Securities Division in connection with his obligations under this Consent Order.

Failure by Turner to comply with the above conditions will constitute grounds for the Securities Administrator to consider the matters addressed herein in considering any application for registration submitted by Turner subsequent to the date of this Consent Order or to take any other enforcement action.

Respondent, by execution of this Consent Order, waives any right to a hearing or judicial review thereof. Said Respondent affirmatively states that he has freely agreed to the signing of this Consent Order, and that no threats, promises or offers of any kind, other than as stated in this document, have been made by the Securities Administrator, Deputy Securities Administrator, any member of the staff of the Securities Division, or any agent or employee of the Department of the Secretary of State in connection with the signing of this Consent Order.

This Consent Order shall become final upon entry.

WITNESS MY HAND AND THE OFFICIAL SEAL of the North Carolina Department of the Secretary of State, this the 27th day of June 2006.

Time of entry: 3:52 P.M.

ELAINE F. MARSHALL
SECRETARY OF STATE OF NORTH CAROLINA and
SECURITIES ADMINISTRATOR, by

DAVID S. MASSEY
DEPUTY SECURITIES ADMINISTRATOR