

STATE OF OKLAHOMA  
DEPARTMENT OF SECURITIES  
FIRST NATIONAL CENTER, SUITE 860  
120 NORTH ROBINSON  
OKLAHOMA CITY, OKLAHOMA 73102



In the Matter of:

Thomas Cunningham  
and Savoy Jewels, Inc.,

Respondents.

ODS File No. 14-009

**NOTICE OF SERVICE ON THE ADMINISTRATOR**  
**AND**  
**AFFIDAVIT OF COMPLIANCE**

STATE OF OKLAHOMA    )  
                                  )  
COUNTY OF OKLAHOMA)    ss.

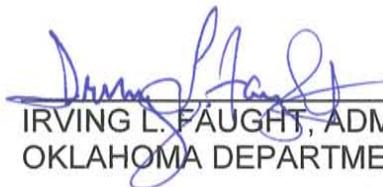
The undersigned affiant, of lawful age, being first duly sworn upon oath deposes and states:

1. That he is the Administrator of the Oklahoma Department of Securities ("Administrator").
2. That a copy of the *Order to Cease and Desist and Notice of Opportunity for Hearing*, ("Order and Notice") was delivered to Affiant in the office of the Administrator on the 6th day of March, 2014, pursuant to Section 1-611 of the Oklahoma Uniform Securities Act of 2004 ("Act"), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (2011).
3. That the Administrator has received service of process on behalf of Respondents, pursuant to Section 1-611 of the Act.
4. That a copy of the Order and Notice and a copy of this *Notice of Service on the Administrator and Affidavit of Compliance* are being sent this 7th day of March, 2014, by certified mail, return receipt requested, delivery restricted to the addressees, to the last known addresses of Respondents, in compliance with Section 1-611 of the Act.
5. That this Affidavit of Compliance is declared filed of record as of the date set forth below in compliance with Section 1-611 of the Act.

FURTHER AFFIANT SAYETH NOT.

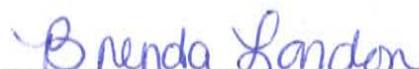
Dated this 7th day of March, 2014.

(SEAL)

  
\_\_\_\_\_  
IRVING L. FAUGHT, ADMINISTRATOR OF THE  
OKLAHOMA DEPARTMENT OF SECURITIES

Subscribed and sworn to before me this 7th day of March, 2014.

(SEAL)

  
\_\_\_\_\_  
BRENDA LONDON, NOTARY PUBLIC



STATE OF OKLAHOMA  
DEPARTMENT OF SECURITIES  
FIRST NATIONAL CENTER, SUITE 860  
120 NORTH ROBINSON  
OKLAHOMA CITY, OKLAHOMA 73102



In the Matter of:

Thomas Cunningham  
and Savoy Jewels, Inc.,

Respondents.

ODS File No. 14-009

**ORDER TO CEASE AND DESIST**  
**AND**  
**NOTICE OF OPPORTUNITY FOR HEARING**

**ORDER TO CEASE AND DESIST**

Pursuant to Section 1-602 of the Oklahoma Uniform Securities Act of 2004 ("Act"), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (2011), and 660:2-7-3 of the Rules of the Oklahoma Securities Commission and the Administrator of the Department of Securities ("Rules"), Okla. Admin. Code §§ 660:1-1-1 through 660:25-7-1, an investigation was conducted by the Oklahoma Department of Securities ("Department") into the activities of Thomas Cunningham ("Cunningham") and Savoy Jewels, Inc. ("Savoy") (collectively, "Respondents").

**Findings of Fact**

1. Cunningham is an individual who currently resides in Los Angeles, California. Cunningham is not, and at all times material hereto was not, registered in any capacity under the Act.
2. Savoy is a California corporation that represents itself as being engaged in the business of selling diamonds and other jewelry through its website, SavoyDiamonds.com. Savoy is not, and at all times material hereto was not, registered in any capacity under the Act.
3. On July 30, 2013, an Oklahoma resident ("Investor") was contacted via telephone by a person who identified himself as Cunningham. Cunningham offered the Investor common stock in Savoy (the "Stock").

4. On August 1, 2013, the Investor received a private placement memorandum, subscription agreement and other correspondence (the "Offering Documents") from Savoy. The Offering Documents identified Cunningham as the president of Savoy. The Offering Documents further contained a subscription agreement for the purchase of twenty-five thousand shares of the Stock at a purchase price of one dollar per share.
5. The Stock is not registered under the Act.

To the extent any of these Findings of Fact are more properly characterized as Conclusions of Law, they should be so considered.

#### Authorities

1. Section 1-102 of the Act provides in pertinent part:

2. "Agent" means an individual . . . who represents an issuer in effecting or attempting to effect purchases or sales of the issuer's securities.

\* \* \*

19. "Issuer" means a person that issues or proposes to issue a security[.]

\* \* \*

32. "Security" means . . . [a share of] stock. . . [.]

2. Section 1-301 of the Act provides in pertinent part:

It is unlawful for a person to offer or sell a security in this state unless:

1. The security is a federal covered security;
2. The security, transaction, or offer is exempted from registration under [Sections 1-201 through 1-203]; or
3. The security is registered under this act.

3. Section 1-402 of the Act provides in pertinent part:

A. It is unlawful for an individual to transact business in this state as an agent unless the individual is registered under this act as an agent or is exempt from registration as an agent under subsection B of this section.

\* \* \*

D. It is unlawful for . . . an issuer engaged in offering, selling, or purchasing securities in this state, to employ or associate with an agent who transacts business in this state on behalf of . . . issuers unless the agent is registered under subsection A of this section[.]

4. Section 1-604 of the Act provides in pertinent part:

A. If the Administrator determines that a person has engaged, is engaging, or is about to engage in an act, practice, or course of business constituting a violation of this act or a rule adopted or order issued under this act or constituting a dishonest or unethical practice or that a person has materially aided, is materially aiding, or is about to materially aid an act, practice, or course of business constituting a violation of this act or a rule adopted or order issued under this act or constituting a dishonest or unethical practice, the Administrator may:

1. Issue an order directing the person to cease and desist from engaging in the act, practice, or course of business or to take other action necessary or appropriate to comply with this act[.]

#### Conclusions of Law

1. The Stock is a security, as defined in the Act.
2. Savoy is an issuer, as defined in the Act.
3. Cunningham is an agent, as defined in the Act.
4. Respondents offered securities in the state of Oklahoma.
5. Cunningham transacted business in this state as an unregistered agent, in violation of Section 1-402 of the Act.

6. Savoy employed or associated with an unregistered agent who transacted business in this state on its behalf, in violation of Section 1-402 of the Act.

7. Respondents offered unregistered securities in this state, in violation of Section 1-301 of the Act.

8. Pursuant to Section 1-604 of the Act, the Administrator has the authority to order Respondents to cease and desist from engaging in acts, practices, or a course of business constituting a violation of the Act.

9. It is in the public interest to order Respondents to cease and desist from engaging in acts, practices, or a course of business constituting a violation of the Act.

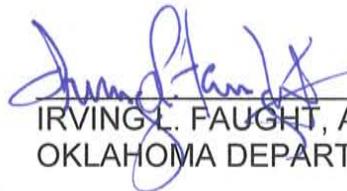
To the extent any of these Conclusions of Law are more properly characterized as Findings of Fact, they should be so considered.

#### ORDER

Based on Section 1-604 of the Act and the Findings of Fact, Authorities and Conclusions of Law set forth above, **IT IS HEREBY ORDERED** that Respondents immediately cease and desist from engaging in acts, practices or a course of business constituting a violation of the Act.

Witness my Hand and the Official Seal of the Oklahoma Department of Securities this 7th of March, 2014.

(SEAL)



IRVING L. FAUGHT, ADMINISTRATOR OF THE  
OKLAHOMA DEPARTMENT OF SECURITIES

**NOTICE OF OPPORTUNITY FOR HEARING**

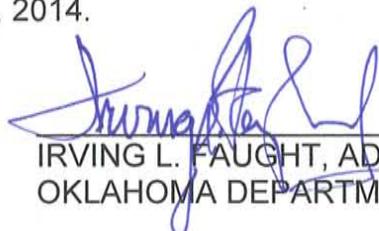
Pursuant to Section 1-604 of the Act and the Rules of the Oklahoma Securities Commission and the Administrator of the Oklahoma Department of Securities ("Rules"), Okla. Admin. Code, §§ 660:1-1-1 through 660:25-7-1, the Administrator hereby gives notice to Respondents of their right to request a hearing. Each Respondent's request for hearing must be received by the Administrator within thirty (30) days after service of the *Order to Cease and Desist* ("Order"). The request for hearing must be in writing and Respondents shall specifically admit or deny each allegation that is contained in the Order.

Within fifteen (15) days after receipt of a request for hearing, this matter will be scheduled for hearing. The hearing shall commence within fifteen (15) days of the matter being set for hearing. Notice of the date, time and location of the hearing shall be given to Respondents. If a hearing is requested or ordered, the Administrator, after notice of and opportunity for hearing, may modify or vacate the Order or extend it until final determination.

If the Respondents do not request a hearing within thirty (30) days after the date of service of the Order and none is ordered by the Administrator, the Order becomes final by operation of law as to the Respondents.

Witness my Hand and the Official Seal of the Oklahoma Department of Securities this 7th day of March, 2014.

(SEAL)

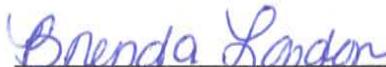
  
\_\_\_\_\_  
IRVING L. FAUGHT, ADMINISTRATOR OF THE  
OKLAHOMA DEPARTMENT OF SECURITIES

CERTIFICATE OF MAILING

The undersigned hereby certifies that on the 7th day of March, 2014, a true and correct copy of the above and foregoing *Order to Cease and Desist and Notice of Opportunity for Hearing* was mailed by certified mail, return receipt requested, delivery restricted, with postage prepaid thereon, addressed to:

Savoy Jewels Inc  
269 S Beverly Dr #1103  
Beverly Hills CA 90212  
(Address of a Commercial Mail Receiving Agency)

Tom Cunningham  
2121 Bentley Ave  
Los Angeles CA 90025

  
\_\_\_\_\_  
Brenda London, Paralegal

U.S. Postal Service  
**CERTIFIED MAIL RECEIPT**  
 (Domestic Mail Only; No Insurance Coverage Provided)

7000 0520 0022 7150 3455

CDNOH 14-009 5mm

Postage	\$ 48	3.7.14	Postmark Here
Certified Fee	330		
Return Receipt Fee (Endorsement Required)	270		
Restricted Delivery Fee (Endorsement Required)	505		
<b>Total Postage &amp; Fees</b>	<b>\$ 11.53</b>		

Savoy Jewels Inc  
 269 S Beverly Dr #1103  
 Beverly Hills CA 90212

*by mailer)*

for Instructions

U.S. Postal Service  
**CERTIFIED MAIL RECEIPT**  
 (Domestic Mail Only; No Insurance Coverage Provided)

294E 0512 2200 0250 0002

CDNOH 14-009 5mm

Postage	\$ 48	3.7.14	Postmark Here
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<b>Total Postage &amp; Fees</b>	<b>\$ 11.53</b>		

Tom Cunningham  
 2121 Bentley Ave  
 Los Angeles CA 90025

*by mailer)*

for Instructions

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

**RESTRICTED DELIVERY**

Savoy Jewels Inc  
269 S Beverly Dr #1103  
Beverly Hills CA 90212

CD Not Smm 14-009

2. Article Number (Copy from service label)

70000520002271503455

PS Form 3811, July 1999

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) B. Date of Delivery

M. Zarnosky 3/22/14

C. Signature

X R. Zarnosky  Agent  
 Addressee

D. Is delivery address different from item 1?  Yes  
If YES, enter delivery address below:  No

3. Service Type

- Certified Mail  Express Mail
- Registered  Return Receipt for Merchandise
- Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)

Yes

Domestic Return Receipt

102595-00-M-0952

OKLAHOMA DEPARTMENT OF SECURITIES  
First National Center, Suite 860  
120 North Robinson  
Oklahoma City, Oklahoma 73102

2014 MAR 20 P 1: 54

RECEIVED  
OKLAHOMA DEPT  
OF SECURITIES

CERTIFIED MAIL



7000 0520 0022 7150 3462

OKLAHOMA CITY



RESTRICTED DELIVERY

Tom Cunningham  
2121 Bentley Ave  
Los Angeles

200

NIXIE 918 7E 1009 0003/13/14

RETURN TO SENDER  
ATTEMPTED - NOT KNOWN  
UNABLE TO FORWARD

BC: 73102749499 \*0957-04364-07-40

9502537496

