

STATE OF NORTH DAKOTA  
COUNTY OF BURLEIGH

BEFORE THE  
SECURITIES COMMISSIONER

In the Matter of *8989688*  
Denis M. Benson *8976253* )  
Respondents )

**NOTICE OF CIVIL PENALTY  
AND RIGHT TO REQUEST A  
HEARING**

WHEREAS, on June 8, 1998, the Commissioner issued a Cease and Desist Order based on multiple violations of North Dakota securities laws, including violations of the registration provisions of the Securities Act; and,

WHEREAS, on June 18, 1998, the Cease and Desist Order was sent to Denis Benson; and,

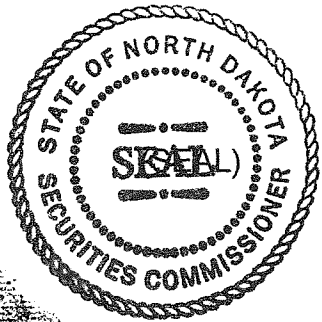
WHEREAS, respondent did not provide a request for hearing.

NOW, THEREFORE, it is hereby Ordered that respondent, Denis Benson is hereby assessed and shall make payment to the Commissioner, a civil penalty in the amount of \$20,000 for the violations set forth above and in the Cease and Desist Order dated June 8, 1998. The payment of the civil penalties are due and payable immediately upon receipt of this Order.

**NOTICE OF RIGHT TO REQUEST HEARING**

**YOU ARE NOTIFIED** that pursuant to §10-04-12 N.D.C.C. you may request a hearing before the Securities Commissioner if such a request is made in writing WITHIN TEN (10) DAYS AFTER THE RECEIPT OF THIS ORDER. The respondent has the right to be represented by legal counsel at the hearing.

*APC* IN TESTIMONY WHEREOF, witness my hand and seal this *26<sup>th</sup>* day of January, 1999.



*Syver Vinje*

Syver Vinje  
North Dakota Securities Commissioner  
600 East Boulevard Ave.  
State Capitol – Fifth Floor  
Bismarck, ND 58505-0510  
(701) 328-2910

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In the Matter of )  
Denis M. Benson, )  
 )  
 Respondents. )

AFFIDAVIT OF SERVICE  
BY MAIL

.....  
I, Jacqui Ferderer, being first duly sworn, state that I am a citizen of the United States over the age of twenty-one years and not a party to or interested in the above-entitled proceeding.

On, April 27, 1999, I deposited in the Central Mailing Bureau of the United States Post Office Department in the State Capitol in Bismarck, North Dakota, a true and correct copy of the following document:

**NOTICE OF CIVIL PENALTY AND  
RIGHT TO REQUEST A HEARING**

A copy of the above document was securely enclosed in an envelope with postage duly prepaid, sent via certified mail, return receipt requested, and addressed to:

Denis M. Benson  
140 Yorba Street #17  
Tustin, CA 92780-2933

Edward J. Morris, Esq.  
5 Montgomery Avenue  
Erdenheim, PA 19038

To the best of my knowledge, information, and belief, the addresses given above is the actual address of the parties intended to be served.

Jacqui Ferderer  
Jacqui Ferderer

Subscribed and sworn to before me this 27 day of April, 1999.

Diane Kambeitz  
Diane Kambeitz, Notary Public  
Burleigh County, North Dakota  
My commission expires 3/10/2000