

STATE OF NORTH DAKOTA  
COUNTY OF BURLEIGH

BEFORE THE  
SECURITIES COMMISSIONER

In the Matter of Foreign Currency )  
International and their Officers, )  
Agents, and Employees, )  
Respondents. )

**CEASE AND DESIST ORDER,  
NOTICE OF CIVIL PENALTY,  
AND NOTICE OF RIGHT TO  
REQUEST A HEARING**

.....  
**THE SECURITIES COMMISSIONER OF THE STATE OF NORTH DAKOTA TO  
FOREIGN CURRENCY INTERNATIONAL AND THEIR OFFICERS, DIRECTORS,  
AGENTS, AND EMPLOYEES:**

The Securities Commissioner has a reasonable basis to believe that the Respondents have engaged in, are engaging in, or are about to engage in, acts, practices or transactions, as more fully described below, which are prohibited under Chapter 51-23 of the North Dakota Century Code (N.D.C.C.). It is necessary and appropriate in the public interest and for the protection of investors to restrain these acts, practices, or transactions of the Respondents.

1. The Respondents have offered for sale and/or sold foreign currency options, which are commodities options as defined in §51-23-02(4) N.D.C.C., to residents of North Dakota in violation of §51-23-03 N.D.C.C.
2. The subject commodities options were not sold by exempt persons under §51-23-04; nor were they offered in exempt transactions under §51-23-05 N.D.C.C.

**NOW, THEREFORE, IT IS ORDERED**, pursuant to §51-23-12(1) N.D.C.C., that the Respondents immediately shall **CEASE AND DESIST** from offering for sale or selling in North Dakota the subject commodities options, or any other commodities option or contract, however denominated, except that this order does not prohibit the offer or sale of commodities options or contracts through exempt persons under §51-23-04 or through exempt transactions under §51-23-05 N.D.C.C.

**NOTICE OF CIVIL PENALTIES**

**YOU ARE NOTIFIED** that the above-cited violations are sufficient grounds for the imposition of civil penalties pursuant to §51-23-12(1) N.D.C.C. The Securities Commissioner does not order a civil penalty herein but expressly reserves the authority to assess civil penalties regarding the violations outlined above, any other violations subsequently discovered, or any future commodity options or contract sales violations or violations of this order.

NOTICE OF RIGHT TO REQUEST HEARING

**YOU ARE NOTIFIED** that pursuant to §51-23-20 N.D.C.C. you may request a hearing before the Securities Commissioner if such a request is made in writing WITHIN THIRTY BUSINESS DAYS FROM THE ENTRY OF THIS ORDER. The respondent has the right to be represented by legal counsel at the hearing.

IN TESTIMONY WHEREOF, witness my hand and seal this 26<sup>th</sup> day of June 1998.



A handwritten signature in black ink that reads "SYVER VINJE". The signature is written in a cursive style with a horizontal line underneath.

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

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AFFIDAVIT OF MAILING

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, Friday, June 26, 1998 I deposited in the Central Mailing Bureau of the United States Post Office Department in the State Capitol in Bismarck, North Dakota, true and correct copies of the following documents:

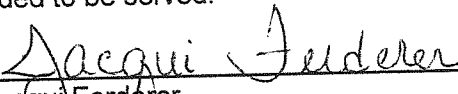
**CEASE AND DESIST ORDER,  
NOTICE OF CIVIL PENALTY AND  
NOTICE OF RIGHT TO REQUEST A HEARING,  
AND SUBPOENA DUCES TECUM.**

Copies of the above documents were securely enclosed in an envelope with postage duly prepaid, sent via certified mail, return receipt requested, and addressed to:

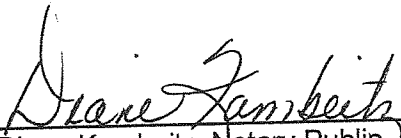
FOREIGN CURRENCY INTERNATIONAL  
CORPORATE HEADQUARTERS  
TOWER PLACE SUITE 1950  
3340 PEACHTREE ROAD NE  
ATLANTA, GA 30326

FOREIGN CURRENCY INTERNATIONAL  
SOUTHEAST REGIONAL BRANCH  
SHADOWOOD OFFICE SUITE 480  
2100 POWERS FERRY ROAD  
ATLANTA, GA 30339

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

  
\_\_\_\_\_  
Jacqui Ferderer

Subscribed and sworn to before me on June 26, 1998.

  
\_\_\_\_\_  
Diane Kambeitz, Notary Public  
Burleigh County, North Dakota  
My commission expires 03/10/2000