

**STATE OF ILLINOIS
SECRETARY OF STATE
SECURITIES DEPARTMENT**

IN THE MATTER OF:)
First Geneva Capital; Navigators)
International; Texas Holdings; Curtis Mann) FILE NO. 0800100
Benjamin Young; James)
Spurger)

ORDER OF PROHIBITION

**TO RESPONDENTS: First Geneva Capital
Whitefriars House, 6 Carmelie Street
London EC4Y OBS**

**Navigators International Co.
Union Court, Suite E-1, Elizabeth Ave. Shirley Street
Nassau, Bahamas**

**Texas Holdings Inc.
7065 West Ann Road, #130-125
Las Vegas, NV 89130**

**Curtis Mann
Whitefriars House, 6 Carmelie Street
London EC4Y OBS**

**Benjamin Young
Union Court, Suite E-1, Elizabeth Ave. Shirley Street,
Nassau, Bahamas**

**James Spurger
7065 West Ann Road, #130-125
Las Vegas, NV 89130**

WHEREAS, a Temporary Order of Prohibition was issued by the Illinois Secretary of State, on July 18, 2008, temporarily prohibiting the Respondents from offering or selling securities in the State of Illinois until further order from the Secretary of State.

Order of Prohibition

-2-

WHEREAS, pursuant to Section 11.F of the Illinois Securities Law of 1953 [815 ILCS 5] (the "Act"), the failure to request a hearing within thirty (30) calendar days of the entry of a Temporary Order shall constitute an admission of any facts alleged therein and constitute a sufficient basis to make the Temporary Order final.

WHEREAS, the Respondents have failed to request a hearing on the matters contained in the Temporary Order within thirty (30) calendar days of the entry of said Temporary Order and the Respondents are hereby deemed to have admitted the facts alleged in the said Temporary Order.

WHEREAS, the Secretary of State, by and through his duly authorized representative, has adopted the Findings of Fact contained in the said Temporary Order as the Secretary of State's Final Findings of Fact as follows:

BACKGROUND FACTS

1. Respondent, First Geneva Capital Ltd., (hereinafter "First Geneva Capital") has a last known address of Whitefriars House, 6 Carmelie Street, London EC4Y OBS.
2. Respondent, Navigators International Co., (hereinafter "Navigators") has a last known address of Union Court, Suite E-1, Elizabeth Ave. Shirley Street, Nassau, Bahamas.
3. Respondent, Texas Holdings Inc., (hereinafter "Texas Holdings") has a last known address of 7065 West Ann Road, #130-125 Las Vegas, NV 89130.
4. At all times relevant to this Temporary Order of Prohibition, Curtis Mann (hereinafter "Mann") was Vice President of Respondent #1, First Geneva Capital.
5. Respondent Mann has a last known address of Whitefriars House, 6 Carmelie Street, London EC4Y OBS.
6. At all times relevant to this Temporary Order of Prohibition, Benjamin Young (hereinafter "Young") was Vice President of Respondent #2, Navigators International.
7. Respondent Young has a last known address of Union Court, Suite E-1, Elizabeth Ave. Shirley Street, Nassau, Bahamas.
8. At all times relevant to this Temporary Order of Prohibition, James Spurger (hereinafter "Spurger") was President of Navigators International.
9. Respondent Spurger has a last known address of 7065 West Ann Road, #130-125 Las Vegas, NV 89130.
10. Complainant is an Illinois resident.

Count 1: Failure to Register Securities

11. In November of 2005, Respondents repeatedly solicited Complainant to purchase an interest in an investment scheme.
12. The Respondents made the following representations to Investor regarding the investment scheme:
 - a. That Respondent First Geneva Capital intends to raise a total amount of three million dollars from investors, which would then be deposited into escrow with a title company by the name of First American Title Co.
 - b. The Respondents would also deposit into the escrow account senior life insurance policies appraised at not less than the total funds in escrow in order to assure the escrow funds against loss.
 - c. The Respondents would then send the insured funds from escrow to a bonding company to issue a bond of 10 times the escrow amount.
 - d. The bonding company would then accept the transferred funds as payment of the bond premium.
 - e. The bonding company would then send the bond to a bank to be hypothecated as loan security.
 - f. The bank would then advance a line of credit to Navigators against the bond and, by prearrangement, would send back into escrow two times the amount of funds originally transferred to pay for the bond.
 - g. The funds (two times the amount of funds originally transferred to pay for the bond) now in escrow would comprise the original deposited capital of investors and 100% profit on that same capital.
 - h. That the investors who originally deposited money into the escrow at First American Title Co. would be entitled to the 100% profit on their investment.
 - i. The investors after realizing the 100% profit may withdraw the funds or they may leave the funds to continue working for them.
 - j. The remaining line of credit is advanced to Navigators.
13. In November of 2005, Complainant agreed to invest \$80,000 with Respondents in reliance on the Respondents' representations that Complainant would receive a 100 % rate of return.
14. In November of 2005 Complainant wired an \$80,000 payment to First American Title Co.

Order of Prohibition

-4-

15. To date, after wiring his payment as instructed, Complainant has yet to realize any profit on his investment.
16. Complainant, in January of 2007, demanded the return of his investment.
17. To this day, Respondents refuse to return Complainant's original investment.
18. The activities described above constitute the offer and sale of a security as those terms are defined in Sections 2.1, 2.5, and 2.5a of the Illinois Securities Law of 1953 [815 ILCS 5] (the "Act").
19. Section 5 of the Act provides, *inter alia*, that all securities except those exempt under Section 3 or those offered or sold in transactions exempt under Section 4 shall be registered either by coordination or by qualification prior to their offer or sale in the State of Illinois.
20. Respondents failed to file with the Secretary of State an application for registration of the securities described above as required by the Act and that as a result the security was not registered pursuant to Section 5 of the Act prior to its offer in the State of Illinois.
21. Section 12.D of the Illinois Securities Law of 1953, 815 ILCS 5/1 *et seq.*, ("the Act") provides, *inter alia*, that it shall be a violation of the Act to fail to file with the Secretary of State any application, report or document required to be filed under the provisions of this Act or any rule or regulation made by the Secretary of State pursuant to the Act or to fail to comply with the terms of any order of the Secretary of State issued pursuant to Section 11 hereof.

WHEREAS, the Secretary of State, by and through his duly authorized representative, has adopted the Conclusions of Law contained in the said Temporary Order as the Secretary of State's Conclusions of Law as follows:

Respondents violated Sections 12.D of the Act.

NOW THEREFORE IT IS HEREBY ORDERED: That pursuant to Section 11.F of the Act, the Respondents, First Geneva Capital Ltd, Navigators International Co, Texas Holdings Inc., Curtis Mann, Benjamin Young and James Spurger **shall be and are hereby permanently PROHIBITED** from offering or selling any securities in or from the State of Illinois.

Dated: This 12th day of January 2009.



JESSE WHITE
Secretary of State
State of Illinois

Order of Prohibition

-5-

NOTICE: Failure to comply with the terms of this Order shall be a violation of the Section 12.D of the Act. Any person or entity who fails to comply with the terms of this Order of the Secretary of State, having knowledge of the existence of the Order, shall be guilty of a Class 4 Felony.

This is a final order subject to administrative review pursuant to the Administrative Review Law, {735 ILCS 5/3-101 et seq.} and the Rules and Regulations of the Illinois Securities Act, {14 Ill. Admin. Code Ch. I, Section 130.1123}. Any action for Judicial Review must be commenced within thirty-five (35) days from the date a copy of this Order is served upon the party seeking review.

Attorney for the Secretary of State:

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