

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

IN THE MATTER OF: TRADERIGHT CORPORATION,)
d/b/a TRADERIGHT SECURITIES, INC., CHRISTOPHER)
R. WURTZINGER, MICHAEL J. RUKUJZO,)
GEORGE DRAGEL, JOHN H. LOHMEIER,)
and REBECCA A. TOWNSEND.)

File No. 0700416

CONSENT ORDER

TO RESPONDENTS:

TradeRight Corporation,
d/b/a TradeRight Securities, Inc.
CRD# 45598
1003 S.E. 27th Terrace
Cape Coral, FL 33904

TradeRight Corporation
123 East 9th Street - Suite 1A
Lockport, IL 60441

Michael J. Rukujzo as Registered Agent
for TradeRight Corp.
1003 S.E. 27th Terrace
Cape Coral, FL 33094

Michael J. Rukujzo
CRD# 1386173
24117 Brown Lane
Plainfield, Il 60544

George Dragel
CRD# 1718650
14109 Yorktown Drive
Orland Park, Il 60462

Christopher R. Wurtzinger
CRD# 1921024
715 North Willard Court
Chicago, Il 60622

c/o James V. Garvey
Attorney for Respondents
Vedder, Price, Kaufman & Kammholz, P.C.
222 N. LaSalle St. – Suite 2400
Chicago, IL 60601

WHEREAS, Respondents TradeRight Corporation (“TradeRight”), doing business as TradeRight Securities, Inc., Michael J. Rukujzo (“Rukujzo”), George Dragel (“Dragel”), and Christopher R. Wurtzinger (collectively, “TradeRight Respondents”) executed a Stipulation to Enter Consent Order (“Stipulation”) which is incorporated by reference into this order.

WHEREAS, by means of the Stipulation, each of the TradeRight Respondents has:

1. Admitted the Illinois Securities Department of the Office of the Secretary of State properly served each with the Notice of Hearing in this proceeding dated September 12, 2007, in accordance with Section 11.F(1) of the Illinois Securities Law of 1953, as amended (“Act”).
2. Admitted the Secretary of State has personal jurisdiction over each and has subject-matter jurisdiction over the allegations in this proceeding, in accordance with Sections 8.C(8); 8.D-5; 8.E(1)(e)(iv), (f), (g), and (h); 11.E(4); 11.F(1); and 12.E of the Act.
3. Consented to the entry of this order.

WHEREAS, by means of the Stipulation, each of the TradeRight Respondents has acknowledged, without admitting or denying the truth of the following allegations, that these allegations are contained in the Notice of Hearing and shall be adopted as the Secretary of State’s Findings of Fact in this Order:

1. False or Misleading Registration Application of Respondents Rukujzo and Dragel
Violations by Respondents TradeRight, Wurtzinger, Rukujzo, and Dragel

1. Respondent TradeRight Corporation, d/b/a TradeRight Securities, Inc., is a Florida corporation. At all times relevant to this order, TradeRight was registered with the Illinois Secretary of State as a securities dealer and investment adviser. Respondent TradeRight’s principal place of business is 123 East 9th Street - Suite 1A, Lockport, Illinois 60441. Its other business address 1003 S.E. 27th Terrace, Cape Coral, Florida 33904. Respondent Michael J. Rukujzo is Respondent TradeRight’s registered agent for service of process at 1003 S.E. 27th Terrace, Cape Coral, Florida 33904.
2. Respondent Christopher R. Wurtzinger (“Wurtzinger”) is a natural person whose residential address is 715 North Willard Court, Chicago, Illinois 60622. At all times relevant to this order, Respondent Wurtzinger was an officer of TradeRight and acted as

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TradeRight's chief compliance officer. At all times relevant to this order, Respondent Wurtzinger was registered with the Illinois Secretary of State as both a Salesperson and Investment Advisor Representative for Respondent TradeRight.

3. Respondent Michael J. Rukujzo ("Rukujzo") is a natural person whose residential address is 24117 Brown Lane, Plainfield, Illinois 60544. At all times relevant to this order, Respondent Rukujzo was the president and chief executive officer of Respondent TradeRight. At all times relevant to this order, Respondent Rukujzo was registered with the Illinois Secretary of State as a salesperson for Respondent TradeRight.
4. Respondent George Dragel ("Dragel") is a natural person whose residential address is 14109 Yorktown Drive, Orland Park, Illinois 60462. At all times relevant to this order, Respondent Dragel was registered with the Illinois Secretary of State as a salesperson for Respondent TradeRight.
5. John H. Lohmeier ("Lohmeier") is a natural person whose residential address is 3811 Washington, Oak Brook, Illinois 60523.
6. Respondent Rebecca A. Townsend ("Townsend") is a natural person whose residential address is 5149 Grand Avenue, Downers Grove, Illinois 60515.
7. Locke Haven, LLC ("Locke Haven"), is a limited liability company chartered in the State of Illinois, whose principal office is 123 E. 9th Street – Suite 1A, Lockport, Illinois 60441.
8. Enterprise Trust Company ("Enterprise Trust") is a business entity whose offices are: 3305 Spring Mountain Road, Suite 66, Las Vegas, Nevada 89102; and 600 Enterprise Drive, Oak Brook, Illinois 60523.
9. In late 2006, Respondent TradeRight and Enterprise Trust agreed to jointly purchase the assets of a broker-dealer named Advisory Financial Consultants, Inc.
10. In order to facilitate the purchase, Respondent TradeRight and Enterprise Trust, formed Locke Haven.
11. At all times relevant to this order, Respondents Rukujzo, Dragel, Lohmeier, and Townsend were managing members of Locke Haven.
12. TradeRight's officers and senior management actively participated in the process of acquiring the assets of Advisory Financial Consultants, Inc., and in the formation of Locke Haven.
13. In or around December 2006, Locke Haven purchased the assets of Advisory Financial Consultants, Inc. Locke Haven made the purchase by entering into an asset purchase agreement with Advisory Financial Consultants, Inc. In the agreement, Locke Haven

identified Respondents Rukujzo, Dragel, Lohmeier, and Townsend as the managing members of Locke Haven.

14. Respondent Wurtzinger signed the asset purchase agreement on behalf of Respondent TradeRight, and Respondents Rukujzo, Dragel, Lohmeier, and Townsend signed the agreement on behalf of Locke Haven.
15. Section 8.C of the Illinois Securities Law of 1953, as amended (815 ILCS 5/1 *et seq.*) (“Act”), provides that a securities dealer wishing to register a securities salesperson in the State of Illinois shall file an application with the Secretary of State which the salesperson is required to provide to the dealer, executed, verified, or authenticated by the salesperson setting forth information required by the Secretary.
16. The Illinois Securities Department of the Secretary of State required Respondent TradeRight to file a “Uniform Application for Securities Industry Registration or Transfer” (“U-4 Form”), utilizing the Central Registration Depository, a computer-based electronic filing system.
17. At all times relevant to this order, Question 13 of the U-4 Form asked applicants:

Are you currently engaged in any other business either as a proprietor, partner, officer, director, employee, trustee, agent or otherwise? If YES, please provide the following details: the name of the other business, whether the business is *investment-related*, the address of the other business, the nature of the other business, your position, title, or relationship with the other business, the start date of your relationship, the approximate number of hours/month you devote to the other business, the number of hours you devote to the other business during securities trading hours, and briefly describe your duties relating to the other business. (Emphasis in original.)
18. Section 8.C(8) of the Act provides that any change that renders no longer accurate any information contained in any application for registration or re-registration as a securities salesperson must be reported within ten business days after the change occurs.
19. At all times relevant to this order, Respondent TradeRight, by and through the actions of Respondents Wurtzinger, Rukujzo, and Dragel, had on file U-4 Forms for the securities salesperson registrations of Rukujzo and Dragel that failed to disclose their roles as managing members of Locke Haven and failed to update their U-4 Forms to disclose their roles as managing members of Locke Haven.
20. Respondent Wurtzinger, as chief compliance officer of Respondent TradeRight, and as a signatory of the asset purchase agreement between Locke Haven and Advisory Financial Consultants, Inc., knew or should have known Respondents Rukujzo and Dragel's roles as managing members of Locke Haven.

21. To date, Respondents TradeRight, Wurtzinger, Rukujzo, and Dragel have failed to file or cause to be filed with the Secretary of State a U-4 Form for Rukujzo and Dragel's securities salespersons registrations disclosing their role as managing members of Locke Haven.
22. Section 12.E of the Act provides that it shall be a violation of the Act for any person to make, or cause to be made, in any application, report, or document filed under this Act or any rule or regulation made by the Secretary of State pursuant to this Act, any statement which was false or misleading with respect to any material fact.
23. By virtue of the foregoing, Respondents TradeRight, Wurtzinger, Rukujzo, and Dragel each violated Section 12.E of the Act.
24. By virtue of Respondents TradeRight, Wurtzinger, Rukujzo, and Dragel's violations of Section 12.E of the Act, they each are subject to the remedies and financial sanctions provided in the Act.
25. Section 8.E(1)(e)(iv) of the Act provides that the registration of a securities dealer may be suspended or revoked if the Secretary of State finds the dealer has failed to maintain and enforce written procedures to supervise the types of business in which it engages, and to supervise the activities of its salespersons that are reasonably designed to achieve compliance with applicable securities laws and regulations.
26. By virtue of the foregoing, Respondent TradeRight's registration as a securities dealer in the State of Illinois is subject to suspension or revocation, in accordance with Section 8.E(1)(e)(iv) of the Act.
27. Section 8.E(1)(h) of the Act provides that the registration of a securities salesperson may be suspended or revoked if the Secretary of State finds the salesperson has made any material misrepresentation to the Secretary in connection with any information deemed necessary by the Secretary to determine a salesperson's business repute or qualifications, or has refused to furnish any such information requested by the Secretary.
28. By virtue of the foregoing, Respondents Rukujzo and Dragel's registrations as securities salespersons in the State of Illinois are subject to suspension or revocation, in accordance with Section 8.E(1)(h) of the Act.

2. False or Misleading Registration Application of Respondents Lohmeier and Townsend
Violations by Respondents TradeRight, Wurtzinger, Lohmeier, and Townsend

- 1-28. Paragraphs 1 through 28 of Section 1 are realleged and incorporated by reference.

29. Section 8.D-5 of the Illinois Securities Law of 1953, as amended (815 ILCS 5/1 *et seq.*) (“Act”), provides that a registered investment adviser wishing to register an investment adviser in the State of Illinois shall file an application with the Secretary of State which the Investment Adviser Representative is required to provide to the Investment Adviser, executed, verified, or authenticated by the Investment Adviser Representative, setting forth information provided in Section 8.D-5 of the Act.
30. Section 130.839 of the Rules and Regulations under the Act (14 Ill. Adm. Code 130.839), provides that an application, properly filed with the Secretary of State in accordance with Section 8.D-5, includes filing a “Uniform Application for Securities Industry Registration or Transfer” (“U-4 Form”) utilizing the Investment Adviser Registration Depository system.
31. At all times relevant to this order, Question 13 of the U-4 Form asked applicants:

Are you currently engaged in any other business either as a proprietor, partner, officer, director, employee, trustee, agent or otherwise? If YES, please provide the following details: the name of the other business, whether the business is *investment-related*, the address of the other business, the nature of the other business, your position, title, or relationship with the other business, the start date of your relationship, the approximate number of hours/month you devote to the other business, the number of hours you devote to the other business during securities trading hours, and briefly describe your duties relating to the other business. (Emphasis in original.)
32. Section 8.D-5 of the Act provides that the U-4 Form must be amended within ten business days after a change occurs that renders inaccurate any information contained in the initial application.
33. On or about April 25, 2007, Respondent TradeRight, by and through the actions of Respondents Wurtzinger, Lohmeier, and Townsend caused U-4 Forms for Lohmeier and Townsend’s investment adviser representative registrations that failed to disclose Lohmeier and Townsend’s roles as managing members of Locke Haven.
34. Respondent Wurtzinger, as chief compliance officer of Respondent TradeRight, and as a signatory of the asset purchase agreement between Locke Haven and Advisory Financial Consultants, Inc., knew or should have known Respondents Lohmeier and Townsend’s roles as managing members of Locke Haven.
35. To date, Respondents TradeRight, Wurtzinger, Lohmeier, and Townsend each have failed to file or cause to be filed with the Secretary of State a U-4 Form for Lohmeier and Townsend’s securities investment adviser representative registrations disclosing their roles as managing members of Locke Haven.

36. Section 12.E of the Act provides that it shall be a violation of the Act for any person to make, or cause to be made, in any application, report, or document filed under the Act or any rule or regulation made by the Secretary of State in accordance with the Act, any statement which was false or misleading with respect to any material fact.
37. By virtue of the foregoing, Respondents TradeRight, Wurtzinger, Lohmeier, and Townsend each violated Section 12.E of the Act.
38. By virtue of Respondents TradeRight, Wurtzinger, Lohmeier, and Townsend's violations of Section 12.E of the Act, they each are subject to the remedies and financial penalties provided in the Act.
39. Section 8.E(1)(f) of the Act provides that the registration of an investment adviser may be suspended or revoked if the Secretary of State finds the investment adviser has failed reasonably to supervise the advisory activities of any of its investment adviser representatives or employees, and the failure has permitted or facilitated a violation of Section 12 of this Act.
40. By virtue of the foregoing, Respondent TradeRight's registration as an investment adviser in the State of Illinois is subject to suspension or revocation, in accordance with Section 8.E(1)(f) of the Act.

WHEREAS, by means of the Stipulation, Respondents TradeRight Corporation, doing business as TradeRight Securities, Inc., Michael J. Rukujzo, and George Dragel each have acknowledged, without admitting or denying the following conclusions of law, that these conclusions are hereby adopted as the Secretary of State's Conclusions of Law:

1. Respondent TradeRight Corporation, doing business as TradeRight Securities, Inc., filed applications, and Respondents Wurtzinger, Rukujzo, and Dragel caused applications for securities salesperson registrations by Respondents Rukujzo and Dragel to be filed under the Illinois Securities Law of 1953, as amended (815 ILCS 5/1 *et seq.*) ("Act") that contained statements that were false or misleading with respect to a material fact regarding other business activity in which Respondents Rukujzo and Dragel were engaged, in violation of Section 12.E of the Act.
2. Respondents TradeRight Corporation filed applications, and Respondents Wurtzinger and Rukujzo caused applications for investment adviser representative registrations by Respondents John H. Lohmeier and Rebecca A. Townsend to be filed under the Act that contained statements that were false or misleading with respect to a material fact regarding other business activity in which Respondents John H. Lohmeier and Rebecca A. Townsend were engaged, in violation of Section 12.E of the Act.
3. Respondents Rukujzo and Dragel each made a material misrepresentation to the Secretary of State in connection with information required by the Secretary under Section 8.E(1)(h) of the Act to determine a securities salesperson's business repute or

qualifications when they caused statements to be filed with the Secretary regarding other business activity in which each was engaged.

4. Respondent TradeRight Corporation failed to maintain and enforce written procedures to supervise the activities of its salespersons, Respondents Rukujzo and Dragel, that were reasonably designed to prevent the filing of false or misleading salespersons' applications, as required by Section 8.E(1)(e)(iv) of the Act.
5. Respondent TradeRight Corporation failed to reasonably supervise the advisory activities of its investment adviser representatives, Respondents Lohmeier and Townsend, as required by section 8.E(1)(f), regarding filing information required by the Secretary under Section 8.E(1)(h) of the Act regarding other business activity in which each was engaged, and that failure permitted the violations of Section 12.E of the Act described in paragraph 2 of these conclusions.

WHEREAS, by means of the Stipulation, Respondents TradeRight Corporation, doing business as TradeRight Securities, Inc., Michael J. Rukujzo, and George Dragel each has acknowledged the Secretary of State shall enter the following order, and each has consented to entry of this order:

NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

1. Respondents TradeRight Corporation, doing business as TradeRight Securities, Inc., Michael J. Rukujzo, George Dragel, and Christopher R. Wurtzinger, are fined jointly and severally for the violations of the Illinois Securities Law of 1953, as amended ("Act"), identified in the Secretary's Conclusions of Law in the total amount of five thousand dollars (\$5,000.00), to be paid by certified or cashier's check made payable to the Illinois Secretary of State, to be deposited in the Securities Audit and Enforcement Fund, and filed with the Illinois Securities Department within ten days of the date of the entry this order.
2. Respondents TradeRight Corporation, doing business as TradeRight Securities, Inc., Michael J. Rukujzo, George Dragel, and Christopher R. Wurtzinger shall jointly and severally be liable to make a total contribution to the Secretary of State's Securities Investor Education Fund in the amount of five thousand dollars (\$5,000.00), to be paid by certified or cashier's check made payable to the Illinois Secretary of State, to be deposited in the Securities Investor Education Fund, and filed with the Illinois Securities Department within ten days of the date of the entry of this order.
3. Within sixty days of the date of the entry of this order, Respondent TradeRight Corporation shall perform and complete a review of its reporting of outside business activities for all securities salespersons and investment adviser representatives associated

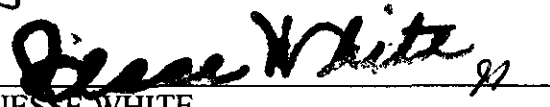
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with TradeRight Securities, Inc., and file with Secretary a statement referencing this file number and caption that certifies this review has been performed and completed.

4. As long as Respondent TradeRight Corporation is registered as either a securities dealer or investment adviser by the State of Illinois, the company shall seek legal counsel prior to acquiring ten percent or greater ownership of any securities dealer or investment adviser, to determine whether or how it may do so in compliance with all applicable securities laws and regulations.
5. As long as Respondent TradeRight Corporation is registered as either a securities dealer or investment adviser by the State of Illinois, the company shall seek legal counsel prior to acquiring ten percent or greater assets of any securities dealer or investment adviser, to determine whether or how it may do so in compliance with all applicable securities laws and regulations.
6. The hearing in this proceeding scheduled to commence on July 15, 2008, is removed from the hearing calendar only as to Respondents TradeRight Corporation, doing business as TradeRight Securities, Inc., Michael J. Rukujzo, George Dragel, and Christopher R. Wurtzinger.

ENTERED: This 24th day of July, 2008.



JESSE WHITE
Secretary of State
State of Illinois

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NOTICE TO RESPONDENTS: Failure to comply with the terms of this order shall constitute a violation of Section 12.D of the Illinois Securities Law of 1953. Any person or entity failing to comply with the terms of this order and having knowledge of the existence of this order, shall be guilty of a Class 4 felony. 815 ILCS 5/12.D; and 5/14.A.

This is a final order and is subject to judicial review under the Administrative Review Law, in accordance with Section 11.H of the Illinois Securities Law of 1953, and the Illinois

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Administrative Code. 735 ILCS 5/3-101 *et seq.*; 815 ILCS 5/11.H; and 14 Ill. Admin. Code 130.1123.

Any action for judicial review of this order must be commenced within 35 days from the date a copy of this order was served by U.S. mail upon the party seeking review, in accordance with Section 103 of the Administrative Review Law. 735 ILCS 5/3-103.