

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

IN THE MATTER OF: SEED INTERNATIONAL,)
LTD., d/b/a CHURCHILL ASSOCAITES,)
OCEAN INTERNATIONAL MARKETING, LTD.,)
and ISACK NADYA.)

FILE NO. 0400250

TEMPORARY ORDER OF PROHIBITION

**TO THE RESPONDENTS: Seed International, Ltd.
d/b/a Churchill Associates
Buckinghamshire House
174 South Church Street
PO Box 1778
GT Grand Cayman**

**Ocean International Marketing, Ltd.
De Leuve
Schiedamsedijk 42
3011 ED Rotterdam
The Netherlands**

**Isack Nadya
De Leuve
Schiedamsedijk 42
3011 ED Rotterdam
The Netherlands**

TEMPORARY ORDER OF PROHIBITION

On information and belief, I, Jesse White, Secretary of State of Illinois, through my designated representative, who has been fully advised in the premises by the staff of the Securities Department, Office of the Secretary of State, herein find:

1. Seed International, Ltd. ("Seed") is a foreign business entity with a last known address of Buckinghamshire House, 174 South Church Street, PO Box 1778, GT Grand Cayman. Seed does business as "Churchill Associates."

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2. Ocean International Marketing, LTD. ("Ocean") is a foreign business entity with a last known address of DeLeuve, Schiedamsedijk 42, 3011 ED Rotterdam.
3. Isack Nadya ("Nadya") is a representative of Seed and Ocean, with a last known address of DeLeuve, Schiedamsedijk 42, 3011 ED Rotterdam, The Netherlands.
4. Seed and Ocean offer investments in wine contracts ("Wine Contracts"). Respondents advertised to potential investors and existing investors that they owned interests and were obtaining interests in private wine collections, which they expected to sell at a profit to generate positive returns for investors. Ocean markets the Wine Contracts and Seed is the managing entity.
5. Nadya, on behalf of Seed and Ocean, offered and sold to at least one Illinois resident an investment in Wine Contracts.
6. The Wine Contracts are investment contracts, and therefore are securities, as defined in Sections 2.1, 2.5 and 2.5a of the Illinois Securities Law of 1953, 815 ILCS 5/1 *et seq.* (the Act)
7. The Wine Contracts offered and sold by Respondents Seed, Ocean and Nadya were not registered with the Illinois Securities Department pursuant to Section 5 of the Act.
8. Respondent Nadya was not, and never has been, registered with the Illinois Securities Department to offer or sell securities pursuant to Section 8 of the Act.
9. Section 12.A of the Act states that it shall be a violation of the Act for any person to offer or sell any security except in accordance with the provisions of this Act. 815 ILCS 5/12.A.
10. Section 12.C of the Act states that it shall be a violation of the Act for any person to act as a dealer or salesperson, unless registered as such, where such registration is required, under the provision of the Act. 815 ILCS 5/12.C.
11. Section 12.D of the Act states that it shall be a violation of the Act for any person 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 pursuant to this Act. 815 ILCS 5/12.D.
12. By virtue of the foregoing, Respondents Seed, Ocean and Nadya violated Sections 12.A and 12.D of the Act.

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13. By virtue of the foregoing, Respondent Nadya violated Section 12.C of the Act.
14. The aforementioned findings are based upon credible evidence.
15. Section 11.F(2) of the Act provides, *inter alia*, that the Secretary of State may temporarily prohibit the offer or sale of securities by any person, without notice and prior hearing, if the Secretary of State shall deem it necessary to prevent an imminent violation of the Act or to prevent losses to investors that will occur as a result of prior violations of the Act.
16. The entry of this Temporary Order **PROHIBITING** Respondents Seed International LTD., d/b/a Churchill Associates, Ocean International Marketing, LTD., and Isack Nadya from offering or selling securities in the State of Illinois is in the public interest and for the protection of the investing public and is consistent with the purposes intended by the provisions of the Act.

NOW THEREFORE IT IS HEREBY ORDERED THAT: pursuant to the authority granted by Section 11.F of the Act:

Respondents Seed International LTD., d/b/a Churchill Associates, Ocean International Marketing, LTD., and Isack Nadya are **PROHIBITED** from offering to sell or selling securities in or from the State of Illinois until further Order of the Secretary of State.

NOTICE is hereby given that Respondent may request a hearing on this matter by transmitting such request in writing to the Director, Illinois Securities Department, 69 W. Washington Street, Suite 1220, Chicago, Illinois 60602. Such request must be made within thirty (30) calendar days of the date of entry the Temporary Order of Prohibition. Upon receipt of a request for hearing, a hearing will be scheduled as soon as reasonably practicable. A request for hearing will not stop the effectiveness of this Temporary Order and will extend the effectiveness of this Temporary Order for sixty days from the date the hearing request is received by the Department.

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FAILURE BY ANY RESPONDENT TO REQUEST A HEARING WITHIN THIRTY (30) CALENDAR DAYS AFTER ENTRY OF THIS TEMPORARY ORDER OF PROHIBITION SHALL CONSTITUTE AN ADMISSION OF ANY FACTS ALLEGED HEREIN AND SHALL CONSTITUTE SUFFICIENT BASIS TO MAKE THIS TEMPORARY ORDER OF PROHIBITION FINAL.

Dated: This 24th day of May 2006.

A handwritten signature in black ink that reads "Jesse White" with a stylized flourish at the end.

JESSE WHITE
Secretary of State
State of Illinois

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