

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

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

**File No. 0700416**

**CONSENT ORDER**

**TO RESPONDENT  
TOWNSEND:**

Rebecca Anne Townsend  
CRD# 5161595  
5149 Grand Avenue  
Downers Grove, Illinois 60515.

c/o Michael Blegen  
Attorney for Respondent Townsend  
Blegen & Garvey  
53 W. Jackson Blvd. - Suite 1437  
Chicago, IL 60604

WHEREAS, Respondent Rebecca Anne Townsend ("Townsend") executed a Stipulation to Enter Consent Order ("Stipulation"), which is incorporated by reference into this Consent Order ("Consent Order").

WHEREAS, by means of the Stipulation, Respondent Townsend has admitted the Illinois Securities Department of the Office of the Secretary of State properly served her 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; has admitted to the jurisdiction of the Secretary of State over her person and over the subject-matter of this proceeding, in accordance with Sections 11.F(1), 8.D-5, 8.E(1)(g), and 12.E of the Illinois Securities Law of 1953, as amended; and has consented to the entry of this Consent Order without admitting or denying the allegations contained in the Stipulation and in this Consent Order.

WHEREAS, the Illinois Secretary of State finds that: the Illinois Securities Department of the Office of the Secretary of State properly served Respondent Townsend 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"); the Secretary has personal jurisdiction over the person of Respondent Townsend and over the subject-matter of this proceeding, in accordance with Sections 11.F(1), 8.D-5, 8.E(1)(g), and 12.E of the Act.

WHEREAS, by means of the Stipulation, Respondent Townsend has neither admitted nor denied the truth of the following allegations, which are contained in Count III of the Notice of Hearing, but acknowledges the allegations shall be adopted as the Secretary of State's Findings of Fact.

WHEREAS, the Secretary of State makes the following Findings of Fact:

**False or Misleading Registration Application**

1. On or about April 25, 2007, Respondent Rebecca Anne Townsend caused an application for Investment Adviser Representative registration to be filed with the Secretary of State that failed to disclose Respondent Townsend's role as a managing member of a business known as Locke Haven, LLC.
2. Respondent John H. Lohmeier ("Lohmeier") is a natural person whose residential address is 3811 Washington, Oak Brook, Illinois 60523.
3. Respondent Townsend is a natural person whose residential address is 5149 Grand Avenue, Downers Grove, Illinois 60515.
4. Respondent TradeRight Corp., d/b/a TradeRight Securities, Inc. ("TradeRight"), is a corporation organized in Florida. From at least as early as September 2006, and continuing through at least as late as May 2007, TradeRight was registered with the Illinois Secretary of State as a broker-dealer and an investment adviser. Respondent TradeRight's principal place of business is 1003 S.E. 27<sup>th</sup> Terrace, Cape Coral, Florida 33904. Its other business address is 123 East 9th Street - Suite 1A, Lockport, Illinois 60441.
5. Respondent Michael J. Rukujzo is a natural person whose residential address is 24117 Brown Lane, Plainfield, IL 60544. From at least as early as December 2003, and continuing through at least as late as May 2007, Respondent Rukujzo was president, treasurer, chief executive officer, and Illinois-registered principal of Respondent TradeRight.
6. Respondent George Dragel is a natural person whose residential address is 14109 Yorktown Drive, Orland Park, Illinois 60462. From at least as early as November 2007, and continuing through at least as late as May 2007, Respondent Dragel was corporate secretary of Respondent TradeRight.
7. Respondent Christopher R. Wurtzinger is a natural person whose residential address is 715 North Willard Court, Chicago, Illinois 60622. From at least as early as September 2006, and continuing through at least as late as May 2007, Respondent Wurtzinger was an officer of Respondent TradeRight and its chief compliance officer.

8. Locke Haven, LLC ("Locke Haven"), is a business entity that was organized as a limited liability company in Illinois on or about February 1, 2007. The principal office of the limited liability company is 123 E. 9<sup>th</sup> Street – Suite 1A, Lockport, Illinois 60441.
9. Enterprise Trust Company ("Enterprise Trust") is a business entity whose office is located at 3305 Spring Mountain Road, Suite 66, Las Vegas, Nevada 89102. From at least as early as September 2006, and continuing through at least as late as May 2007, it also had an office located at 600 Enterprise Drive, Oak Brook, IL 60523.
10. In late 2006, Respondent TradeRight and Enterprise Trust entered into an agreement regarding the purchase of the assets of a California-based broker-dealer named Advisory Financial Consultants, Inc.
11. Respondents Lohmeier and Townsend of Enterprise Trust, and Respondents Rukujzo and Dragel of TradeRight, formed Locke Haven and represented themselves as managing members of Locke Haven from at least as early as December 2006, and continuing through at least as late as January 2007.
12. Respondents Lohmeier, Townsend, Rukujzo, and Dragel used Locke Haven to facilitate the purchase of the assets of Advisory Financial.
13. In or around December 2006, Locke Haven, through the actions of Respondents Lohmeier, Townsend, Rukujzo, and Dragel, executed an asset purchase agreement with Advisory Financial Consultants, Inc.
14. Section 8.D-5 of the Illinois Securities Law of 1953, as amended (815 ILCS 5/1 *et seq.*) ("Act"), provides that an Illinois-registered investment adviser wishing to register an investment adviser representative in the State of Illinois shall file an application with the Secretary of State which the investment adviser representative is required to provide the investment adviser, executed, verified, or authenticated by the investment adviser representative, setting forth information provided in Section 8.D-5 of the Act.
15. 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" ("Form U4") utilizing the Investment Adviser Registration Depository, a computer-based electronic filing system.
16. At all times relevant to this order, Question 13 of the Form U4 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.)

17. Section 8.D-5 of the Act provides that the Form U-4 must be amended within ten days after a change occurs that renders inaccurate any information contained in the initial application.
18. Some time on or before April 25, 2007, Respondent Townsend completed a Form U-4 application for registration as an Investment Adviser Representative that failed to disclose her position as a managing member of Locke Haven.
19. On or about April 25, 2007, Respondent TradeRight, through the actions of Respondents Wurtzinger and Townsend, filed the Form U4 application that failed to disclose Respondent Townsend's position as a managing member of Locke Haven.
20. 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.
21. By causing Respondent TradeRight to file an application for salesperson registration that failed to disclose Respondent Townsend's position as a managing member of Locke Haven, Respondent Townsend violated Section 12.E of the Act.

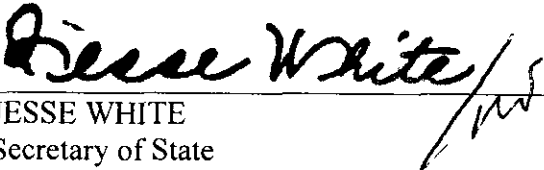
WHEREAS, Respondent Townsend acknowledges that the Secretary's Findings of Fact and Conclusions of Law in this order may act as a disqualification in the registration or licensing decisions of any other securities, banking, insurance, or other professional licensing bodies.

WHEREAS, by means of the Stipulation, Respondent Townsend, without admitting or denying the allegations in the Stipulation and in this order, has agreed to entry by the Secretary of State of a consent order imposing the following terms.

**NOW, THEREFORE, IT IS HEREBY ORDERED THAT:**

1. Respondent Rebecca Anne Townsend is permanently prohibited from offering or selling any *security* on behalf of any *person* other than herself, to any *person* except a securities exchange; and from acting as an *issuer, controlling person, underwriter, dealer, principal of a dealer, salesperson, investment adviser, principal of an investment adviser, investment adviser representative*, in or from Illinois or involving Illinois residents, as the italicized terms are defined in Sections 2.1, 2.2, 2.3, 2.4, 2.5, 2.5a, 2.6, 2.7, 2.8a, 2.9, 2.11, 2.12a, and 2.12b of the Act.
2. Respondent Townsend shall pay costs of investigation of the Illinois Securities Department in the amount of eight hundred dollars (\$800.00), to be paid by certified or cashier's check made payable to the "Illinois Secretary of State," to be filed with the Illinois Securities Department within one hundred twenty days of the date of entry of this order, and to be deposited in the Securities Audit and Enforcement Fund of Secretary of State.
2. The hearing scheduled for August 20, 2008 is removed from the hearing calendar as to Respondent Townsend.

ENTERED: This 24<sup>th</sup> day of September, 2008.

  
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JESSE WHITE  
Secretary of State  
State of Illinois

Attorneys for the Secretary of State:

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Bernadette Cole  
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NOTICE TO RESPONDENT: 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.

Consent Order

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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 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.