



3. On or about October 2, 2008, in New Castle County Delaware, Woodley did willfully sell, or offer for sale, a security to Woodley was not registered as an issuer agent with the Securities Division.

4. Woodley violated 6 *Del. C.* § 73-301 by transacting business in Delaware as an issuer agent without being properly registered.

5. On or about June 6, 2008 in New Castle County Delaware, Woodley and IG did willfully sell, or offer for sale, a security to own. The security offered for sale was not registered with the Securities Division and was not exempt from registration pursuant to any of the provisions of the Delaware Securities Act.

6. Woodley and IG violated 6 *Del. C.* § 73-202 by offering for sale or selling an unregistered security.

7. On or about June 6, 2008, in New Castle County Delaware, Woodley did willfully sell, or offer for sale, a security to Woodley was not registered as an issuer agent with the Securities Division.

8. Woodley violated 6 *Del. C.* § 73-301 by transacting business in Delaware as an issuer agent without being properly registered.

9. On or about April 2, 2009, in New Castle County Delaware, Woodley and IG did willfully sell, or offer for sale, a security to . The security offered for sale was not registered with the Securities Division and was not exempt from registration pursuant to any of the provisions of the Delaware Securities Act.

10. Woodley and IG violated 6 *Del. C.* § 73-202 by offering for sale or selling an unregistered security.

11. On or about April 2, 2009, in New Castle County Delaware, Woodley did willfully sell, or offer for sale, a security to Woodley was not registered as an issuer agent with the Securities Division.

12. Woodley violated 6 *Del. C.* § 73-301 by transacting business in Delaware as an issuer agent without being properly registered.

13. On or about April 8, 2009, in New Castle County Delaware, Woodley and IG did willfully sell, or offer for sale, a security to The security offered for sale was not registered with the Securities Division and was not exempt from registration pursuant to any of the provisions of the Delaware Securities Act.

14. Woodley and IG violated 6 *Del. C.* § 73-202 by offering for sale or selling an unregistered security.

15. On or about April 8, 2009, in New Castle County Delaware, Woodley did willfully sell, or offer for sale, a security to Woodley was not registered as an issuer agent with the Securities Division.

16. Woodley violated 6 *Del. C.* § 73-301 by transacting business in Delaware as an issuer agent without being properly registered.

#### ORDER

WHEREFORE, based on the findings and conclusions in this Order, the Commissioner, after due deliberation, finds that, in order to further the purposes of the Delaware Securities Act and to protect the public's interest in avoiding the

harm that may result from the kinds of misconduct the Respondents have engaged in, it is necessary and appropriate to issue the following Order:

NOW, THEREFORE, by the authority of § 73-601 of the Delaware Securities Act:

IT IS ORDERED that Woodley and IG, and every successor, affiliate, control person, agent, servant, and employee of them, and every entity owned, operated, or indirectly or directly controlled or hereinafter organized by or on behalf of them, shall immediately CEASE AND DESIST from all marketing, issuing and selling or offering to sell any securities in the State of Delaware and all marketing of related foreign currency exchange services, in violation of the Delaware Securities Act.

Any request by Respondent(s) for a hearing on an application to set aside, limit or suspend this Order must be made in writing, filed with the Commissioner and a copy served on the Division within twenty-five (25) days of service of written notification that this Order has been issued.

Upon receipt of such a timely written request for a hearing, the matter will be set down for a hearing to commence within fifteen (15) days after receipt unless the person making the request consents to a later date.

FAILURE TO COMPLY WITH THIS ORDER MAY RESULT IN CRIMINAL PROSECUTION, INJUNCTIVE PROCEEDINGS, CIVIL CONTEMPT PROCEEDINGS (INCLUDING CIVIL MONETARY PENALTIES) AND, SUBJECT TO THE RIGHT OF HEARING AFFORDED RESPONDENTS UNDER THE

DELAWARE SECURITIES ACT, THE IMPOSITION OF ADMINISTRATIVE  
MONETARY ASSESSMENTS AND STATUTORY BARS.

So ORDERED this 6<sup>th</sup> day of March, 2013

BY ORDER OF THE COMMISSIONER

A handwritten signature in black ink, appearing to read "Owen Lefkon", written over a horizontal line.

Owen Lefkon, Securities Commissioner