

**BEFORE THE SECURITIES COMMISSION
OF THE STATE OF DELAWARE**

IN THE MATTER OF :)	
)	
EDDIE GHABOUR)	
)	CASE NO. 00-03-02
Respondent.)	
)	
(CRD #3069984))	

CONSENT ORDER

1. Preliminary Statement

For purposes of resolving the above-referenced matter, the Division of Securities, Delaware Department of Justice ("Division") and Respondent, Eddie Ghabour ("Ghabour"), with Respondent neither admitting or denying the findings or conclusions set forth herein, do hereby consent to the entry of this Order, instituting an administrative proceeding, making findings and imposing sanctions.

II Findings

1. Eddie Ghabour is a Broker Dealer Agent registered in Delaware. At all times relevant to this investigation, he was an agent of Pruco Securities Corporation.
2. Eddie Ghabour sold proprietary mutual funds of Pruco Securities to on May 19, 1999. Prior to the sale of Securities, Ghabour represented to Mr. that sales loads would be 2 - 3 % of the purchase price, with one fund being as much as 5%.
3. In fact, the loads for the funds that purchased were as follows:

3. In fact, the loads for the funds that Mr. _____ purchased were as follows:

- a) Pruco Equity Fund - 4.5%
- b) Pruco Small Co. Value Fund - 4.5%
- c) Pruco World Fund Global - 4.5%
- d) High Yield Bond Fund - 4.0%

4. Eddie Ghabour's misrepresentation of the actual loads charged for the purchase of the mutual funds sold to _____ constituted a violation of 6 Del. C. § 7303 and § 7316.

5. As part of the mutual fund sale by Mr. Ghabour to Mr. _____, Ghabour asked questions contained in the Pruco "Mutual Fund Account Application Form." Mr. Ghabour filled in information on the form during the interview with Mr. _____. Mr. _____ has a sight disability and relied upon Mr. Ghabour to enter the proper information on the form.

6. At the completion of the interview, Mr. _____ executed the "Mutual Fund Account Application," and he retained a copy of the form as he had executed it on May 19, 1999.

7. As shown by Mr. _____ copy of the "Mutual Fund Account Application," certain blocks on the form had been left blank during his meeting with Mr. Ghabour including: Section 3; "Your Mutual Fund Selection - Share Class" (A, B or C shares); Section 3; "Were your selections based on an Investment Allocation pursuant to a company

approved Assistant Allocation Model ?"; and Section 10; "Owner's Investment Profile - Employer." Following execution of the Mutual Fund Application by Mr. _____, Mr. Ghabour modified the document by adding entries in the sections set forth above, without the knowledge, authorization and consent of _____ and submitted the modified form to Pruco. Modification of the executed document was reasonably anticipated to mislead others as to the terms of the agreement between Pruco and Mr. _____.

8. Ghabour's modification of the executed Mutual Fund Account Application constituted violations of 6 Del. C. § 7303; § 7316(a)(7) and Rule 609(c)(12) and (b)(26).

III Agreement

In view of the foregoing, the Respondent agrees to the following:

9. Respondent neither admits, nor denies, the findings set forth in paragraphs one through eight of this Agreement/Order and voluntarily consents to the entry of this Order, and further represents and agrees that no employee or representative of the Division of Securities has made any promise, representation or threat to induce its execution, other than the representations contained in this Consent Order.

10. Respondent voluntarily waives his right to an administrative hearing on the allegations as set forth in the findings, and any appeal rights that would have arisen from said hearing in accord with the Securities Act.

11. Respondent agrees to cease and desist all violations of the Delaware Securities Act.

12. Respondent agrees to refrain from committing any future violations of the Act.

13. Respondent agrees, within ten days of the date of final execution of this Order, to pay a Three Thousand Dollar (\$3,000.00) fine, made payable to the State of Delaware, Investor Protection Fund. This payment shall be mailed or hand delivered to, Delaware Division of Securities, Department of Justice, 820 N. French Street, 5th Floor, Wilmington, DE 19801, Attention: James Ropp.

14. Respondent agrees to pay interest to _____ in the amount of \$178.50. The check should be made payable to _____ and should be delivered in the same manner, and to the same place as specified in paragraph 13.

15. Respondent agrees to a six (6) month suspension of his Delaware registration as a Broker Dealer Agent, which suspension will be suspended after thirty (30) days for a five month probationary period subject to the condition that, he comply with all terms and conditions of this Order, and does not violate the Act.

16. Respondent agrees that any breach of the terms and conditions of this Agreement/Order shall be deemed a Material Breach of the entire agreement. If Respondent breaches this Agreement/Order within six (6) months of the date of execution of this Agreement by the Commissioner, the remaining five (5) month actual suspension of his registration will then be imposed.

17. Respondent understands that this Order is being executed solely for the

purpose of resolving and settling this dispute arising out of the specific matter outlined in the above referenced paragraphs. This Order shall have no effect on the Securities Division, or its agents' ability to take action with regard to any conduct of Respondent not related to the above referenced incidents, or to any conduct of Respondent which occurs subsequent to the execution of this Order.

18. Respondent agrees to make no statement, comment, or representation, public or private, written or oral, including, but not limited to his U-4 disclosure, which is inconsistent with the terms of this Agreement, except in the event that he may be called to defend himself in litigation.

IV Order

In view of the foregoing, the Securities Commissioner has determined that it is in the public interest to accept the above settlement. Accordingly, it is hereby ORDERED that:

1. Respondent shall cease and desist all violations of the Delaware Securities Act.
2. Respondent shall not commit future violations of the Delaware Securities Act.
3. Respondent is suspended from Registration as a Broker Dealer Agent for a period of six months commencing on the date of execution of this Agreement. Said six month suspension is suspended after a thirty (30) day actual suspension, for a five month probationary period, subject to the terms and conditions of this Agreement/Order.
4. Respondent shall pay an administrative fine in the amount of Three Thousand

Dollars (\$3,000.00) made payable to the State of Delaware, Investor Protection Fund, in the manner set forth in Paragraph 13 of the Agreement.

5. Respondent shall pay interest to _____ in the amount of \$178.50 by check made payable to _____ and said check will be delivered to the State of Delaware for ultimate delivery to _____ in the manner set forth in paragraph 14.


6. Respondent shall comply with all terms of the Agreement and Order set forth above.

Executed this 19 day of February, 2004



Eddie Ghabour

Executed this 19th day of February, 2004



Leonard Williams, Esquire
Attorney for Respondent

Executed this 20th day of February, 2004



James B. Ropp
Securities Commissioner