

STATE OF ALABAMA
ALABAMA SECURITIES COMMISSION

IN THE MATTER OF:

CARUBA INTERNATIONAL, LLC.
IVAN F. SHEW-A-TJON

RESPONDENTS

ADMINISTRATIVE ORDER
NO. CO-2005-0005

CONSENT ORDER

The Alabama Securities Commission ("Commission"), having the power to administer and provide for the enforcement of all provisions of Title 8, Chapter 6, Code of Alabama 1975, the Alabama Securities Act ("Act"), upon due consideration of the subject matter hereof, and having confirmed information of the offers for sale and/or sale of securities into, within or from the state of Alabama, has determined as follows:

RESPONDENTS

1. CARUBA INTERNATIONAL, LLC ("CARUBA"), is an inactive Florida limited liability company with a business address of 1802 N. University Drive, Suite 102-337, Plantation, FL 33322.
2. IVAN F. SHEW-A-TJON ("SHEW"), is represented to be the manager, owner and President/CEO of CARUBA with a home address of 10874 Hawks Vista Street, Plantation, FL 33324-8208.

STATEMENT OF FACTS

3. The Commission is in receipt of information that IVAN SHEW-A-TJON engaged in the offer and/or sale of securities, to wit: investment contracts entitled "High Yield Private Placement" with a minimum investment of \$1000 and return on investment of 7-120 percent annually, to Alabama residents.

4. The Commission is in receipt of documents that CARUBA, engaged in the solicitation of securities, specifically "hedge funds" "securities, both, newly issued and on the secondary market", "commercial paper (mortgages, notes, repurchase agreements)" and "discounted bonds treasury bills and banker's acceptances." Furthermore, CARUBA acted in the capacity of an investment advisor, and/or Broker Dealer while providing "investment advisory services," "investment management services," "effecting transactions for its own account in the same investments purchased or sold," and being "responsible for the custody of such securities and other assets."

5. A review of the files of the Registration Division of the Alabama Securities Commission found no registration with the Commission pursuant to Section 8-6-3 through 8-6-8 of the Alabama Securities Act, nor a claim for exemption under Section 8-6-10 or 8-6-11 of the Act for the RESPONDANTS or for the securities being offered and sold.

6. On March 4, 2005, the Commission staff issued a Cease and Desist Order No. CD-2005-0005, directing CARUBA and other respondents to immediately cease and desist from further offers or sales of any security into within or from the State of Alabama.

7. In response to Administrative Order CD-2005-0005 an informal hearing was requested by Ivan Shew -A-Tjon. On May 10, 2005, an informal hearing was held at the office of the Alabama Securities Commission. In attendance were Mr. Ivan Shew -A-Tjon and his representing Counsels Gerald P Nehra, and Julian McPhillips.

CONCLUSIONS OF LAW

8. RESPONDENTS are neither registered nor exempt from registration as a dealer or agent in the state of Alabama, and have effected securities transactions with residents of the state of Alabama.

9. Transacting business in the state of Alabama as a dealer or agent, without benefit of registration or exemption from registration, is a violation of Section 8-6-3(a), Code of Alabama 1975.

WHEREAS, RESPONDENTS neither admit nor deny that securities transactions were effected in the state of Alabama prior to registration, but state that the information and assertions presented to the Commission during its investigation of this matter are true and correct; that RESPONDENTS understand the Commission relied upon such information and assertions in its determination to accept this Order, and that should information or assertions prove to be incorrect or misrepresented, the Commission may seek such other administrative, civil or criminal remedies that may be available to it under the provisions of the Act.

WHEREAS, RESPONDENTS have voluntarily waived all rights to a hearing upon entry of this Order, and have consented to the entry of this Order, and

WHEREAS, the Commission finds this Order necessary and appropriate in the public interest for the protection of investors, and consistent with the purposes fairly intended by the policy and provisions of the Act, and

WHEREAS, the Commission and RESPONDENTS are desirous of settling this matter as hereafter set forth and agree to the entry of this Order.

ACCORDINGLY, IT IS HEREBY ORDERED:

1. That RESPONDENTS shall, until such time as are properly registered in the state of Alabama, refrain from effecting securities transactions into, within or from the state of Alabama.

2. That RESPONDENT CARUBA shall ensure that proper procedures are enacted to preclude any future non-compliance with the Act.

3. That in accordance with Section 8-6-19(j)(1), Code of Alabama 1975, RESPONDENTS shall pay to the **state of Alabama** an administrative assessment in the total sum Ten Thousand Dollars (\$10,000), said funds to be tendered in certified funds contemporaneously with the entry of this Order.

4. That in accordance with Section 8-6-19(k)(1), Code of Alabama 1975, RESPONDENTS shall pay to the **Alabama Securities Commission**, as partial reimbursement for the Commission's cost for investigating this matter, the sum of Ten Thousand Dollars (\$10,000), said funds to be tendered in certified funds contemporaneously with the entry of this Order.

5. That the entry of this Order resolves the Cease and Desist Order, Administrative Order No. CD-2005-0005, issued March 4, 2005 as it pertains to Caruba and Ivan Shew-A-Tjon only.

AGREED AND CONSENTED to on dates indicated:

RESPONDENTS:

CARUBA INTERNATIONAL LLC

BY: 

TITLE: President / CEO

DATE: 10-11-05

IVAN F. SHEW-A-TJON

BY: 
TITLE: President & CEO
DATE: 10-11-05

APPROVED AND ORDERED this 18th day of October, 2005

ALABAMA SECURITIES COMMISSION
770 Washington Avenue, Suite 570
Montgomery, AL 36130-4700
(334) 242-2984

BY:


JOSEPH P. BORG
Director

