

STATE OF ALABAMA  
ALABAMA SECURITIES COMMISSION

|                    |   |                      |
|--------------------|---|----------------------|
| IN THE MATTER OF:  | ) |                      |
|                    | ) |                      |
| TRADE PARTNERS INC | ) | ADMINISTRATIVE ORDER |
| SOJKARA LLC        | ) | NO CD-2003-0011      |
| CHRISTINE M ZMUDKA | ) |                      |
| ROBERT SEITTERS    | ) |                      |
| JOHN A MURPHY      | ) |                      |
|                    | ) |                      |
| <u>RESPONDENTS</u> | ) |                      |

CEASE AND DESIST 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 offer and/or sale of securities into, within, or from the State of Alabama, has determined as follows:

RESPONDENTS

1. TRADE PARTNERS INC ("TPI") is a viatical settlement company with a business address of, Grand Plaza Place Suite 570, 220 Lyon Street NW, Grand Rapids, Michigan 49503.
2. SOJKARA LLC ("SJC") is a viatical settlement company with a business address, 511 5<sup>TH</sup> Street, Traverse City Michigan 49684.
3. CHRISTINE M. ZMUDKA ("ZMUDKA") is the Vice President of TPI, with a business address of Grand Plaza Place Suite 570, 220 Lyon Street NW, Grand Rapids, Michigan 49503, and at all times relevant to violations set forth herein, ZMUDKA acted as an agent of TPI.
4. ROBERT SEITTERS ("SEITTERS") is the President of SJC, with a business address, 2375 Traverse Field Drive, Traverse City Michigan 49686, and at all times relevant to violations set forth herein, SEITTERS acted as an agent of SJC.

5. JOHN A. MURPHY ("MURPHY") is the President and owner of Future Benefits, Inc, a Mississippi Business Corporation with a business address of 2428 Military Road, Columbus, MS 39705-8130, and at all times relevant to violations set forth herein, MURPHY acted as an agent of TPI and SJC.

#### STATEMENT OF FACTS

6. The Commission is in receipt of information that ZMUDKA, SEITTERS, AND MURPHY engaged in the offer and/or sale of unregistered securities, to wit: investment contracts involving fractionalized Viatical Settlements, of TPI and SJC, to Alabama residents.

7. A review of the Registration files of the Alabama Securities Commission, disclosed no record of registration of TPI, SJC, ZMUDKA, SEITTERS, OR MURPHY, as securities agents/dealers in the state of Alabama

8. A review of the files of the Alabama Securities Commission, disclosed no record of registration, or exemption from registration, of the securities of TPI, or SJC.

9. On January 14, 2003, TPI, SJC, ZMUDKA, SEITTERS, and MURPHY, were issued a Final Cease and Desist Order and Administrative Penalty by the Mississippi Office of the Secretary of State Business Regulation & Enforcement Division for failure to respond to the original order dated August 6, 2002.

#### CONCLUSIONS OF LAW

10. TPI and SJC are neither registered nor exempt from registration as dealers in the state of Alabama, and have effected securities transactions with residents of the state of Alabama.

11. The sale of securities by an unregistered dealer in the state of Alabama is a violation of Section 8-6-3(a), Code of Alabama 1975.

12. ZMUDKA, SEITTERS, AND MURPHY are not registered as a securities agent in the state of Alabama.

13. Transacting business in the State of Alabama as a securities agent while unregistered is a violation of § 8-6-3(a), Code of Alabama, 1975.

14. The securities of TPI and SJC being solicited for sale by ZMUDKA, SEITTERS, and MURPHY as set forth in paragraph 6 above are neither registered nor exempt from registration in the state of Alabama.

15. The sale or attempted sale of unregistered, non-exempt securities into, within, or from the state of Alabama is a violation of § 8-6-4, Code of Alabama, 1975.

This Order does not prevent the Alabama Securities Commission from seeking such other civil or criminal remedies that are available to it under the Act.

This Order is appropriate in the public interest for the protection of investors and consistent with the purpose of the Act.

**ACCORDINGLY, IT IS HEREBY ORDERED** that, TPI, SJC, Zmudka, Seitters, and Murphy, immediately **CEASE AND DESIST** from further offers or sales of any security into, within, or from the State of Alabama.

Entered at Montgomery, Alabama, this 6<sup>th</sup> day of May, 2003



ALABAMA SECURITIES COMMISSION

770 Washington Street, Suite 570

Montgomery, Alabama 36130-4700

BY:

  
JOSEPH P. BORG

Director