SE2501651 BD

STATE OF MINNESOTA COMMISSIONER OF COMMERCE

In the Matter of

CONSENT CEASE AND DESIST ORDER

Caruba International Business Services LLC d/b/a Caruba International, a Florida corporation; Ivan F. Shew-A Tjon; Stanley Shew-A-Tjon; Elizabeth Shew-A-Tjon; and Daryl Reason.

TO: Gerald P. Nehra
Attorney at Law
1710 Beach Street
Muskegon, Michigan 49441

Commissioner of Commerce Glenn Wilson (hereinafter "Commissioner") has determined as follows:

- 1. The Commissioner has advised, Caruba International Business Services LLC d/b/a Caruba International, a Florida corporation; Ivan F. Shew-A Tjon; Stanley Shew-A-Tjon; Elizabeth Shew-A-Tjon; and Daryl Reason, (hereinafter "Respondents") that he is prepared to commence formal action pursuant to Minn. Stat. § 45.027, subd. 5 (2002) against Respondents based on allegations that Respondents sold unregistered investment contracts in violation of Minn. Stat. §§ 80A.04 and 80A.02 (2004).
- 2. Respondents acknowledge that they has been advised of their rights to a hearing in this matter, to present argument to the Commissioner and to appeal from any adverse determination after a hearing, and Respondents hereby expressly waive those rights.

 Respondents further acknowledge that they have been represented by legal counsel throughout these proceedings, or have been advised of their right to be represented by legal counsel, which right they hereby waive.

3. Respondents have agreed to informal disposition of this matter without a hearing as provided under Minn. Stat. § 14.59 (2004) and Minn. R. 1400.5900 (2003).

4. The following Order is in the public interest.

NOW, THEREFORE, IT IS HEREBY ORDERED, that pursuant to Minn. Stat. § 45.027, subd. 5 (2004) Respondents Caruba International Business Services LLC d/b/a Caruba International, a Florida corporation; Ivan F. Shew-A Tjon; Stanley Shew-A-Tjon; Elizabeth Shew-A-Tjon; and Daryl Reason shall cease and desist from offering or selling in the State of Minnesota the above-described or any other securities until compliance with Minn. Stat. Ch. 80A (2004) has been achieved and until further Order of the Commissioner.

IT IS FURTHER ORDERED, that Respondents Caruba International Business Services LLC d/b/a Caruba International, a Florida corporation; Ivan F. Shew-A Tjon; Stanley Shew-A-Tjon; Elizabeth Shew-A-Tjon; and Daryl Reason shall pay full and complete refunds of any funds paid to all Minnesota residents;

IT IS FURTHER ORDERED, that within thirty (30) days of execution of this Order, Respondents Caruba International Business Services LLC d/b/a Caruba International, a Florida corporation; Ivan F. Shew-A Tjon; Stanley Shew-A-Tjon; Elizabeth Shew-A-Tjon; and Daryl Reason agree to fully and completely cooperate with the investigation and legal actions relating to any parties or transactions referred to herein.

This Order shall be effective upon signature by or on behalf of the Commissioner.

Dated:

GLENN WILSON

Commissioner of Commerce

State of Minnesota

By:

Patrick Nelson

Deputy Commissioner

85 Seventh Place East, Suite 500

St. Paul, Minnesota 55101

Telephone: (651) 296-2594

CONSENT TO ENTRY OF ORDER

The undersigned, Stanley Shew-A-Tjon, an individual, states that he has read the foregoing Consent Order; that he knows and fully understands its contents and effect; that he is authorized to execute this Consent to Entry of Order as a Respondent; that he has been advised of Respondent's right to a hearing; that Respondent has been represented by legal counsel in this matter; or that he has been advised of Respondent's right to be represented by legal counsel and that he has waived this right; and that he consents to entry of this Order by the Commissioner of Commerce. It is further expressly understood that this Order constitutes the entire settlement agreement between the parties hereto, there being no other promises or agreements, either express or implied.

F/Lic #5325-780 - 50-300-0

422, 205 (date) by Stanley Shew-A-Tjon,

STATE OF

COUNTY OF

This instrument was acknowledged before me on

an individual.

(stamp)

(Signature of notary officer)

Title (and Rank)

My commission expires

Linda Bemstein

Expires October 21, 2006