

STATE OF ILLINOIS  
SECRETARY OF STATE  
SECURITIES DEPARTMENT

IN THE MATTER OF: TRADERIGHT CORP., d/b/a  
TRADERIGHT SECURITIES, INC., CHRISTOPHER  
R. WURTZINGER, MICHAEL J. RUKUJZO,  
GEORGE DRAGEL, JOHN H. LOHMEIER,  
and REBECCA A. TOWNSEND

Case No. 0700416

NOTICE OF HEARING

**TO RESPONDENTS:**

TradeRight Corp.,  
d/b/a TradeRight Securities, Inc.  
CRD# 45598  
1003 S.E. 27<sup>th</sup> Terrace  
Cape Coral, FL 33904

TradeRight Corp.  
123 East 9th Street - Suite 1A  
Lockport, IL 60441

Michael J. Rukujzo as Registered Agent  
for TradeRight Corp.  
1003 S.E. 27<sup>th</sup> Terrace  
Cape Coral, FL 33094

Christopher R. Wurtzinger  
CRD# 1921024  
715 North Willard Court  
Chicago, Il 60622

Michael J. Rukujzo  
CRD# 1386173  
24117 Brown Lane  
Plainfield, Il 60544

George Dragel  
CRD# 1718650  
14109 Yorktown Drive  
Orland Park, Il 60462

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John H. Lohmeier  
CRD# 5161396  
3811 Washington  
Oak Brook, IL 60523

Rebecca A. Townsend  
CRD# 5161595  
5149 Grand Ave.  
Downers Grove, IL 60515

You are hereby notified that pursuant to Section 11.E of the Illinois Securities Law of 1953, as amended [815 ILCS 5/1 *et. seq.*] ("Act"), and Subpart K of the Illinois Administrative Code [14 Ill. Adm. Code Part 130, Subpart K], a public hearing will be held at 69 W. Washington Street, Suite 1220, Chicago, Illinois 60602, on the 14th day of November, 2007, at the hour of 10:00 a.m., or as soon as possible thereafter, before Illinois Secretary of State Hearing Officer James Kopecky, or such other hearing officer who shall be presiding at that time.

The purpose of this hearing is to determine whether an order should be entered imposing any of the remedies and financial sanctions against the Respondents for the violations of the Illinois Securities Laws alleged below. Each Respondent is subject to the following remedies and financial sanctions:

1. Suspension or revocation of registration as a Dealer, Salesperson, Investment Adviser, or Investment Adviser Representative.
2. Suspension or prohibition from engaging in the business of an Investment Advisor and/or Investment Advisor Representative.
3. Suspension or prohibition from engaging in the business of selling or offering for sale securities.
4. Suspension or prohibition of the offer or sale of any securities.
5. Suspension or prohibition from offering or selling securities.
6. Imposition of a fine not to exceed \$10,000 for each of the violations of the Illinois Securities Law described below.
7. Order of public censure.
8. Payment of all reasonable expenses, including attorney's fees and witness fees, for the costs of investigation of the allegations in this proceeding.

**COUNT I**

**False or Misleading Registration Application of Respondent Rukujzo**

Violations by Respondents TradeRight, Wurtzinger, and Rukujzo

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1. Respondent TradeRight Corp., d/b/a TradeRight Securities, Inc. ("TradeRight" or, collectively with Christopher Richard Wurtzinger, Michael J. Rukujzo, George Dragel, John H. Lohmeier, and Rebecca A. Townsend, "Respondents"), is a Florida corporation. At all times relevant to this notice, TradeRight was registered with the Illinois Secretary of State as a broker-dealer and an investment adviser. Respondent TradeRight's principal place of business is 1003 S.E. 27<sup>th</sup> Terrace, Cape Coral, FL 33904. Its other business address is 123 East 9th Street - Suite 1A, Lockport, IL United States 60441. Respondent Michael J. Rukujzo is Respondent TradeRight's registered agent for service of process at 1003 S.E. 27<sup>th</sup> Terrace, Cape Coral, FL 33904.
2. Respondent Christopher R. Wurtzinger ("Wurtzinger" or, collectively with TradeRight Corp., Michael J. Rukujzo, George Dragel, John H. Lohmeier, and Rebecca A. Townsend, "Respondents") is a natural person whose residential address is 715 North Willard Court, Chicago, IL 60622. At all times relevant to this notice, Respondent Wurtzinger was an officer of TradeRight and acted as TradeRight's chief compliance officer. At all times relevant to this notice, Respondent Wurtzinger was registered with the Illinois Secretary of State as both a Salesperson and Investment Advisor Representative for Respondent TradeRight.
3. Respondent Michael J. Rukujzo ("Rukujzo" or, collectively with TradeRight Corp., Christopher Richard Wurtzinger, George Dragel, John H. Lohmeier, and Rebecca A. Townsend, "Respondents") is a natural person whose residential address is 24117 Brown Lane, Plainfield, IL 60544. At all times relevant to this notice, Respondent Rukujzo was the president and chief executive officer of Respondent TradeRight. At all times relevant to this notice, Respondent Rukujzo was registered with the Illinois Secretary of State as a salesperson for Respondent TradeRight.
4. Respondent George Dragel ("Dragel" or, collectively with TradeRight Corp., Christopher Richard Wurtzinger, Michael J. Rukujzo, John H. Lohmeier, and Rebecca A. Townsend, "Respondents") is a natural person whose residential address is 14109 Yorktown Drive, Orland Park, IL 60462. At all times relevant to this notice, Respondent Dragel was registered with the Illinois Secretary of State as a salesperson for Respondent TradeRight.
5. John H. Lohmeier ("Lohmeier" or, collectively with TradeRight Corp., Christopher Richard Wurtzinger, Michael J. Rukujzo, George Dragel, and Rebecca A. Townsend, "Respondents") is a natural person whose residential address is 3811 Washington, Oak Brook, IL 60523.
6. Respondent Rebecca A. Townsend ("Townsend" or, collectively with TradeRight Corp., Christopher Richard Wurtzinger, Michael J. Rukujzo, George Dragel, and John H. Lohmeier, "Respondents") is a natural person whose residential address is 5149 Grand Avenue, Downers Grove, IL 60515.

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7. Locke Haven, LLC ("Locke Haven"), is a limited liability company chartered in the State of Illinois, whose principal office is 123 E. 9<sup>th</sup> Street – Suite 1A, Lockport, IL 60441.
8. Enterprise Trust Company ("Enterprise Trust") is a business entity whose offices are: 3305 Spring Mountain Road, Suite 66, Las Vegas, Nevada 89102; and 600 Enterprise Drive, Oak Brook, IL 60523.
9. In late 2006, Respondent TradeRight and Enterprise Trust agreed to jointly purchase the assets of a broker-dealer named Advisory Financial Consultants, Inc.
10. In order to facilitate the purchase, Respondent TradeRight and Enterprise Trust, formed Locke Haven.
11. At all times relevant to this notice, Respondents Rukujzo, Dragel, Lohmeier, and Townsend were managing members of Locke Haven.
12. TradeRight's Officers and Senior Management actively participated in the process of acquiring the assets of Advisory Financial Consultants, Inc., and in the formation of Locke Haven.
13. In or around December 2006, Locke Haven purchased the assets of Advisory Financial Consultants, Inc. Locke Haven made the purchase by entering into an asset purchase agreement with Advisory Financial Consultants, Inc. In the agreement, Locke Haven identified Respondents Rukujzo, Dragel, Lohmeier, and Townsend as the managing members of Locke Haven.
14. Respondent Wurtzinger signed the asset purchase agreement on behalf of Respondent TradeRight.
15. Section 8.C of the Illinois Securities Law of 1953, as amended (815 ILCS 5/1 *et seq.*) ("Act"), provides that a dealer wishing to register a salesperson in the State of Illinois shall file an application with the Secretary of State which the salesperson is required to provide to the dealer, executed, verified, or authenticated by the salesperson setting forth information provided in Section 8.C of the Act.
16. Section 130.810 of the Rules and Regulations under the Act (14 Ill. Adm. Code 130.810) provides that the application, properly filed with the Secretary of State in accordance with Section 8.C of the Act, includes filing a "Uniform Application for Securities Industry Registration or Transfer" ("U-4 Form"), utilizing the Central Registration Depository system.
17. At all times relevant to this notice, Question 13 of the U-4 Form asked applicants:

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Are you currently engaged in any other business either as a proprietor, partner, officer, director, employee, trustee, agent or otherwise? If YES, please provide the following details: the name of the other business, whether the business is *investment-related*, the address of the other business, the nature of the other business, your position, title, or relationship with the other business, the start date of your relationship, the approximate number of hours/month you devote to the other business, the number of hours you devote to the other business during securities trading hours, and briefly describe your duties relating to the other business. (Emphasis in original.)

18. Section 8.C of the Act provides the U-4 Form must be amended within ten days after a change occurs that renders inaccurate any information contained in the initial application.
19. At all times relevant to this notice, Respondent TradeRight, by and through the actions of Respondents Wurtzinger and Rukujzo, had on file a U-4 Form for Respondent Rukujzo's securities salesperson registration that failed to disclose Respondent Rukujzo's role as a managing member of Locke Haven and failed to update Respondent Rukujzo's U-4 Form to disclose Respondent Rukujzo's role as a managing member of Locke Haven.
20. Respondent Wurtzinger, as chief compliance officer of Respondent TradeRight, and as a signatory of the asset purchase agreement between Locke Haven and Advisory Financial Consultants, Inc., knew or should have known Respondent Rukujzo's role as a managing member of Locke Haven.
21. To date, Respondents TradeRight, Wurtzinger, and Rukujzo have failed to file or cause to be filed with the Secretary of State a U-4 Form for Respondent Rukujzo's securities salesperson registration disclosing Respondent's Rukujzo role as a managing member of Locke Haven.
22. Section 12.E of the Act provides that it shall be a violation of the Act for any person to make, or cause to be made, in any application, report, or document filed under this Act or any rule or regulation made by the Secretary of State pursuant to this Act, any statement which was false or misleading with respect to any material fact.
23. By virtue of the foregoing, Respondents TradeRight, Wurtzinger, and Rukujzo each violated Section 12.E of the Act.
24. By virtue of Respondents TradeRight, Wurtzinger, and Rukujzo's violations of Section 12.E of the Act, they each are subject to the remedies and financial sanctions provided in the Act.

25. Section 8.E(1)(e)(iv) of the Act provides that the registration of a dealer may be suspended or revoked if the Secretary of State finds the dealer has failed to maintain and enforce written procedures to supervise the types of business in which it engages, and to supervise the activities of its salespersons that are reasonably designed to achieve compliance with applicable securities laws and regulations.
26. By virtue of the foregoing, Respondent TradeRight's registration as a dealer in the State of Illinois is subject to suspension or revocation, in accordance with Section 8.E(1)(e)(iv) of the Act.
27. Section 8.E(1)(h) of the Act provides that the registration of a securities salesperson may be suspended or revoked if the Secretary of State finds the salesperson has made any material misrepresentation to the Secretary in connection with any information deemed necessary by the Secretary to determine a salesperson's business repute or qualifications, or has refused to furnish any such information requested by the Secretary.
28. By virtue of the foregoing, Respondent Rukujzo's registration as a salesperson in the State of Illinois is subject to suspension or revocation, in accordance with Section 8.E(1)(h) of the Act.

## COUNT II

### **False or Misleading Registration Application of Respondent Dragel**

Violations by Respondents TradeRight, Wurtzinger, and Dragel

- 1-28. Paragraphs 1 through 28 of Count I are realleged and incorporated by reference.
29. Section 8.C of the Illinois Securities Law of 1953, as amended (815 ILCS 5/1 *et seq.*) ("Act"), provides that a dealer wishing to register a salesperson in the State of Illinois shall file an application with the Secretary of State which the salesperson is required to provide to the dealer, executed, verified, or authenticated by the salesperson, setting forth information provided in Section 8.C of the Act.
30. Section 130.810 of the Rules and Regulations under the Act (14 Ill. Adm. Code 130.810), provides that an application, properly filed with the Secretary of State in accordance with Section 8.C, includes filing a "Uniform Application for Securities Industry Registration or Transfer" ("U-4 Form") utilizing the Central Registration Depository system.

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31. At all times relevant to this order, Question 13 of the U-4 Form asked applicants:

Are you currently engaged in any other business either as a proprietor, partner, officer, director, employee, trustee, agent or otherwise? If YES, please provide the following details: the name of the other business, whether the business is *investment-related*, the address of the other business, the nature of the other business, your position, title, or relationship with the other business, the start date of your relationship, the approximate number of hours/month you devote to the other business, the number of hours you devote to the other business during securities trading hours, and briefly describe your duties relating to the other business. (Emphasis in original.)
32. Section 8.C of the Act provides that the U-4 Form must be amended within ten days after a change occurs that renders inaccurate any information contained in the initial application.
33. At all times relevant to this notice, Respondent TradeRight, by and through the actions Respondents Wurtzinger and Dragel, had on file a U-4 Form for Respondent Dragel's securities salesperson registration that failed to disclose Respondent Dragel's role as a managing member and failed to update Respondent Dragel's U-4 Form to disclose Respondent Dragel's role as a managing member of Locke Haven.
34. Respondent Wurtzinger, as chief compliance officer of Respondent TradeRight, and as a signatory of the asset purchase agreement between Locke Haven and Advisory Financial Consultants, Inc., knew or should have known Respondent Dragel's role as a managing member of Locke Haven.
35. To date, Respondents TradeRight, Wurtzinger, and Dragel each have failed to file or cause to be filed with the Secretary of State a U-4 Form for Respondent Dragel's securities salesperson registration disclosing Dragel's role as a managing member of Locke Haven.
36. Section 12.E of the Act provides that it shall be a violation of the Act for any person to make, or cause to be made, in any application, report, or document filed under the Act or any rule or regulation made by the Secretary of State in accordance with the Act, any statement which was false or misleading with respect to any material fact.
37. By virtue of the foregoing, Respondents TradeRight, Wurtzinger, and Dragel each violated Section 12.E of the Act.

38. By virtue of Respondents TradeRight, Wurtzinger, and Dragel's violations of Section 12.E of the Act, they each are subject to the remedies and financial penalties provided in the Act.
39. Section 8.E(1)(e)(iv) of the Act provides that the registration of a dealer may be suspended or revoked if the Secretary of State finds the dealer has failed to maintain and enforce written procedures to supervise the types of business in which it engages and to supervise the activities of its salespersons that are reasonably designed to achieve compliance with applicable securities laws and regulations.
40. By virtue of the foregoing, Respondent TradeRight's registration as a dealer in the State of Illinois is subject to suspension or revocation, in accordance with Section 8.E(1)(e)(iv) of the Act.
41. Section 8.E(1)(h) of the Act provides that the registration of a securities salesperson may be suspended or revoked if the Secretary of State finds the salesperson has made any material misrepresentation to the Secretary in connection with any information deemed necessary by the Secretary to determine a salesperson's business repute or qualifications, or has refused to furnish any such information requested by the Secretary.
42. By virtue of the foregoing, Respondent Dragel's registration as a securities salesperson in the State of Illinois is subject to suspension or revocation, in accordance with Section 8.E(1)(h) of the Act.

### **Count III**

#### **False or Misleading Registration Application of Respondent Lohmeier** Violations by Respondents TradeRight, Wurtzinger, and Lohmeier

- 1-28. Paragraphs 1 through 28 of Count I are realleged and incorporated by reference.
29. Section 8.D-5 of the Illinois Securities Law of 1953, as amended (815 ILCS 5/1 *et seq.*) ("Act"), provides that a registered investment adviser wishing to register an investment adviser in the State of Illinois shall file an application with the Secretary of State which the Investment Adviser Representative is required to provide to the Investment Adviser, executed, verified, or authenticated by the Investment Adviser Representative, setting forth information provided in Section 8.D-5 of the Act.
30. Section 130.839 of the Rules and Regulations under the Act (14 Ill. Adm. Code 130.839), provides that an application, properly filed with the Secretary of State in accordance with Section 8.D-5, includes filing a "Uniform Application for

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Securities Industry Registration or Transfer" ("U-4 Form") utilizing the Investment Adviser Registration Depository system.

31. At all times relevant to this order, Question 13 of the U-4 Form asked applicants:

Are you currently engaged in any other business either as a proprietor, partner, officer, director, employee, trustee, agent or otherwise? If YES, please provide the following details: the name of the other business, whether the business is *investment-related*, the address of the other business, the nature of the other business, your position, title, or relationship with the other business, the start date of your relationship, the approximate number of hours/month you devote to the other business, the number of hours you devote to the other business during securities trading hours, and briefly describe your duties relating to the other business. (Emphasis in original.)
32. Section 8.D-5 of the Act provides that the U-4 Form must be amended within ten days after a change occurs that renders inaccurate any information contained in the initial application.
33. On or about April 25, 2007, Respondent TradeRight, by and through the actions of Respondents Wurtzinger and Lohmeier, caused to be filed a U-4 Form for Lohmeier's Investment Adviser Representative registration that failed to disclose Respondent Lohmeier's role as a managing member of Locke Haven.
34. Respondent Wurtzinger, as chief compliance officer of Respondent TradeRight, and as a signatory of the asset purchase agreement between Locke Haven and Advisory Financial Consultants, Inc., knew or should have known Respondent Lohmeier's role as a managing member of Locke Haven.
35. To date, Respondents TradeRight, Wurtzinger, and Lohmeier each have failed to file or cause to be filed with the Secretary of State a U-4 Form for Respondent Lohmeier's securities investment adviser representative registration disclosing Lohmeier's role as a managing member of Locke Haven.
36. Section 12.E of the Act provides that it shall be a violation of the Act for any person to make, or cause to be made, in any application, report, or document filed under the Act or any rule or regulation made by the Secretary of State in accordance with the Act, any statement which was false or misleading with respect to any material fact.
37. By virtue of the foregoing, Respondents TradeRight, Wurtzinger, and Lohmeier each violated Section 12.E of the Act.

38. By virtue of Respondents TradeRight, Wurtzinger, and Lohmeier's violations of Section 12.E of the Act, they each are subject to the remedies and financial penalties provided in the Act.
39. Section 8.E(1)(f) of the Act provides that the registration of an Investment Adviser may be suspended or revoked if the Secretary of State finds the Investment Adviser has failed reasonably to supervise the advisory activities of any of its investment adviser representatives or employees, and the failure has permitted or facilitated a violation of Section 12 of this Act.
40. By virtue of the foregoing, Respondent TradeRight's registration as an investment adviser in the State of Illinois is subject to suspension or revocation, in accordance with Section 8.E(1)(f) of the Act.

#### **Count IV**

##### **False or Misleading Registration Application of Respondent Townsend** Violations by Respondents TradeRight, Wurtzinger, and Townsend

- 1-28. Paragraphs 1 through 28 of Count I are realleged and incorporated by reference.
29. Section 8.D-5 of the Illinois Securities Law of 1953, as amended (815 ILCS 5/1 *et seq.*) ("Act"), provides that a registered investment adviser wishing to register an Investment Adviser Representative in the State of Illinois shall file an application with the Secretary of State which the Investment Adviser Representative is required to provide to the investment adviser, executed, verified, or authenticated by the investment adviser representative, setting forth information provided in Section 8.D-5 of the Act.
30. Section 130.839 of the Rules and Regulations under the Act (14 Ill. Adm. Code 130.839), provides that an application, properly filed with the Secretary of State in accordance with Section 8.D-5, includes filing a "Uniform Application for Securities Industry Registration or Transfer" ("U-4 Form") utilizing the Investment Adviser Registration Depository system.
31. At all times relevant to this order, Question 13 of the U-4 Form asked applicants:  
Are you currently engaged in any other business either as a proprietor, partner, officer, director, employee, trustee, agent or otherwise? If YES, please provide the following details: the name of the other business, whether the business is *investment-related*, the address of the other business, the nature of the other business, your position, title, or relationship with the other business, the start date of your relationship, the approximate number of hours/month you devote to the other business, the number of hours you devote to the other business during securities trading

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hours, and briefly describe your duties relating to the other business.  
(Emphasis in original.)

32. Section 8.D-5 of the Act provides that the U-4 Form must be amended within ten days after a change occurs that renders inaccurate any information contained in the initial application.
33. On or about April 25, 2007, Respondent TradeRight, by and through the actions Respondents Wurtzinger and Townsend, caused to be filed a U-4 Form for Respondent Townsend's Investment Adviser Representative registration that failed to disclose Respondent Townsend's role as a managing member of Locke Haven.
34. Respondent Wurtzinger, as chief compliance officer of Respondent TradeRight, and as a signatory of the asset purchase agreement between Locke Haven and Advisory Financial Consultants, Inc., knew or should have known Respondent Townsend's role as a managing member of Locke Haven.
35. To date, Respondents TradeRight, Wurtzinger, and Townsend each have failed to file or cause to be filed with the Secretary of State a U-4 Form for Respondent Townsend's securities investment adviser representative registration disclosing Townsend's role as a managing member of Locke Haven.
36. Section 12.E of the Act provides that it shall be a violation of the Act for any person to make, or cause to be made, in any application, report, or document filed under the Act or any rule or regulation made by the Secretary of State in accordance with the Act, any statement which was false or misleading with respect to any material fact.
37. By virtue of the foregoing, Respondents TradeRight, Wurtzinger, and Townsend each violated Section 12.E of the Act.
38. By virtue of Respondents TradeRight, Wurtzinger, and Townsend's violations of Section 12.E of the Act, they each are subject to the remedies and financial penalties provided in the Act.
39. Section 8.E(1)(f) of the Act provides that the registration of an investment adviser may be suspended or revoked if the Secretary of State finds the investment adviser has failed reasonably to supervise the advisory activities of any of its investment adviser representatives or employees, and the failure has permitted or facilitated a violation of Section 12 of this Act.
40. By virtue of the foregoing, Respondent TradeRight's registration as an Investment Adviser in the State of Illinois is subject to suspension or revocation, in accordance with Section 8.E(1)(f) of the Act.

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**You are further notified that:**

The Illinois Securities Department of the Office of the Secretary of State seeks an Order:

1. Imposing the maximum financial sanction authorized for each violation against each Respondent;
2. Revoking Respondent Traderight's registration as a Dealer;
3. Revoking Respondent Traderight's registration as a Investment Advisor;
4. Revoking Respondents Rukujzo's, Wurtzinger's, and Dragel's registrations as Salespersons;
5. Revoking Respondent Wurtzinger's registration as an Investment Adviser Representative;
6. Prohibiting each Respondent from engaging in the business of selling or offering to sell securities;
7. Prohibiting each Respondent from engaging in the business of an Investment Advisor;
8. Prohibiting each Respondent from engaging in the business of an Investment Advisor Representative;
9. Censuring each Respondent; and
10. Requiring the payment of all reasonable expenses, including attorney's fees and witness fees, for the costs of investigation of the allegations in this proceeding.

You are required to file an answer to the allegations outlined above or other responsive pleading within thirty days of service of this notice on you, in accordance with Section 130.1104(a) of the Rules and Regulations under the Illinois Securities Law ("Rules"). Your failure to do so within the prescribed time shall be construed as an admission of the allegations contained in this notice and waives your right to a hearing. Upon such failure, the hearing officer shall make a recommendation that an appropriate order be entered, including finding you in default.

You may appear personally on your own behalf, or be represented by an attorney. You or your attorney may present evidence; cross-examine witnesses; and otherwise participate in this proceeding. A failure to appear shall constitute default by you.

A copy of the Rules and Regulations promulgated under the Illinois Securities Law and pertaining to hearings held by the Office of the Secretary of State, Illinois Securities Department, are available at <http://www.ilga.gov/commission/jcar/admincode/014/01400130sections.html>, or upon request.

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Delivery of this and any future notices to the designated representative of a Respondent constitutes service upon the Respondent.

Dated: This 12<sup>th</sup> day of September, 2007.

A handwritten signature in black ink that reads "Jesse White" with a stylized flourish at the end.

JESSE WHITE  
Secretary of State  
State of Illinois

Bernadette Cole  
James Nix  
Enforcement Attorneys  
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Illinois Securities Department  
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