



JON S. CORZINE
Governor

State of New Jersey
OFFICE OF THE ATTORNEY GENERAL
DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF LAW
PO Box 45029
NEWARK, NJ 07101

ANNE MILGRAM
Attorney General

ROBERT J. GILSON
Director

December 20, 2007

VIA HAND DELIVERY

CLERK'S OFFICE
New Jersey Superior Court
Chancery Division, Union County
2 Broad Street
Elizabeth, New Jersey 07207

RECEIVED

DEC 20 2007

JOHN F. MALONE
P.J.Ch.

Re: Milgram v. LeGall and New Century Investor, Inc.
Docket No. _____

Dear Sir or Madam:

Enclosed please find the original and two (2) copies of the following documents for filing to commence the above-referenced action:

- (1) Verified Complaint;
- (2) Certification of Pamela M. Fischer with Exhibits A - F;
- (3) Brief in Support of Plaintiff's Application for an Order to Show Cause and Preliminary Injunctive Relief; and
- (4) proposed Order to Show Cause.

Please stamp one copy of the documents "filed" and return with the messenger. Plaintiff will await notice of a decision on the proposed Order to Show Cause. Thank you.

Sincerely yours,

ANNE MILGRAM
ATTORNEY GENERAL OF NEW JERSEY

By: M. G. Harris
Megan O. Harris
Deputy Attorney General



December 20, 2007
Page 2

Enclosures

cc: Vincent Oliva, Bureau Chief
Amy Kopleton, Deputy Bureau Chief
Pamela Fischer, Bureau Investigator

ANNE MILGRAM
ATTORNEY GENERAL OF NEW JERSEY
Division of Law
124 Halsey Street, 5th Floor
P.O. Box 45029
Newark, New Jersey 07101
Attorney for Plaintiff

By: Megan J. Harris
Deputy Attorney General
(973) 648-3730

ANNE MILGRAM,
Attorney General of New Jersey,
on behalf of VINCENT J. OLIVA,
Chief of the New Jersey
Bureau of Securities,

Plaintiff,

v.

NEW CENTURY INVESTOR, Inc., a
New Jersey Corporation, and
TERRENCE LEGALL, individually
and as principal of New
Century Investor,

Defendants.

) SUPERIOR COURT OF NEW
) JERSEY
) CHANCERY DIVISION: GENERAL
) EQUITY
) UNION COUNTY

) DOCKET NO. _____
)
)

) Civil Action
)

) VERIFIED
) COMPLAINT
)
)
)

Anne Milgram, Attorney General of New Jersey, having offices at 124 Halsey Street in the City of Newark, County of Essex, State of New Jersey, on behalf of Vincent J. Oliva, Chief of the New Jersey Bureau of Securities ("plaintiff"), having offices at 153 Halsey Street in the City of Newark, County of Essex, State of New Jersey, says:

STATEMENT OF THE CASE

1. Plaintiff brings this civil action against New Century Investor and Terrence LeGall (collectively "defendants") pursuant to the New Jersey Uniform Securities Law (1997), N.J.S.A. 49:3-47 to 76 (the "Securities Law"), for violations of the following provisions: (1) N.J.S.A. 49:3-56(a) (acting as an unregistered investment adviser or unregistered investment adviser representative); and (2) N.J.S.A. 49:3-56(j) (employing an unregistered investment adviser representative). Plaintiff seeks preliminary and permanent injunctive relief, disgorgement, and restitution pursuant to the provisions of N.J.S.A. 49:3-69(a)(2), and civil monetary penalties pursuant to the provisions of N.J.S.A. 49:3-70.1.

PARTIES

2. The Attorney General of New Jersey brings this action on behalf of the Chief of the New Jersey Bureau of Securities (the "Bureau Chief" or "plaintiff") pursuant to the Bureau Chief's duty to enforce the provisions of the Securities Law.

3. Terrence LeGall ("LeGall") is an individual residing at 207 Carnegie Street, Linden, New Jersey. He is

the founder and Chief Executive Officer of New Century Investor, Inc.

4. New Century Investor, Inc. ("NCI") is a business founded in or around 2001 and incorporated in New Jersey in or about August 2006.

5. NCI's office location is 923 North Wood Avenue, Linden, New Jersey.

6. NCI alternately uses or has used 2 Jackson Drive, Suite 204, Cranford, New Jersey as its business address.

FACTUAL ALLEGATIONS

7. LeGall formed NCI in or around 2001 while he was living in California. (Fischer Cert.¹ ¶ 10).

8. LeGall uses or has used NCI as the business entity through which he provides advice to clients regarding buying and selling stock, as well as tax preparation and various other financial planning services. (Fischer Cert. ¶ 12).

9. LeGall began operating NCI from New Jersey in or around March 2003. (Fischer Cert. ¶ 10).

10. NCI charges a minimum annual "subscription fee" of \$595.00 to each new customer. The amount of the annual fee for NCI's services increases depending upon the amount

¹ "Fischer Cert." refers to the Certification of New Jersey Bureau of Securities Investigator Pamela M. Fischer, submitted in support of plaintiff's application for an order to show cause and preliminary injunctive relief.

of money a customer seeks to invest. The annual fee may be as much as 10% of the amount of money for which each client seeks advice or financial planning services. (Fischer Cert. ¶ 13).

11. NCI's subscription fee entitles each client to multiple services, including advice regarding stocks to purchase, when to sell stocks purchased, broker-dealer recommendations, tax preparation and advice, various reports and newsletters containing financial information and advice, and a personal financial check-up. (Fischer Cert. ¶ 14).

12. LeGall and NCI received at least \$119,922.34 in compensation for investment adviser services during the year 2006. (Fischer Cert. ¶ 19).

13. LeGall solicits clients, among other methods, through NCI's web site, newcenturyinvestor.com. (Fischer Cert. ¶ 15).

14. Newcenturyinvestor.com provides detailed information regarding NCI's investment advisory services and fees, subscription forms, contact information for NCI's office, a field for users to submit contact information to NCI electronically, and an "Investment Dictionary." The web site also lists LeGall's experiences and accolades in

the "Financial Services Industry." (Fischer Cert. ¶ 16, Ex. D).

15. In addition to soliciting clients through newcenturyinvestor.com, LeGall has advertised NCI's investment advisory and financial planning services through a radio program, the listing of NCI on other web sites, including asonenj.com, and personal contact with persons to whom LeGall pitched NCI's services. (Fischer Cert. ¶ 17).

16. Since NCI began operating from New Jersey in or around March 2003, LeGall has provided investment advice and other financial planning services to approximately 300 individuals, the majority of whom are, or were during the relevant period, New Jersey residents. (Fischer Cert. ¶ 18, Ex. C).

17. Neither LeGall nor NCI are currently registered with the Bureau in any capacity. (Fischer Cert. ¶¶ 5, 20, 23).

18. Neither LeGall nor NCI were registered with the Bureau in any capacity during the period of time relevant to this Complaint. (Fischer Cert. ¶¶ 5, 20, 23).

19. In March and April 2006, Bureau Investigators personally advised LeGall of the Securities Law's registration requirements related to investment advisers and provided LeGall with registration forms.

20. Defendants presently continue to operate an investment advisory service and solicit new clients while not registered with the Bureau. (Fischer Cert. ¶¶ 6, 7, 11, 21-23).

COUNT I

**DEFENDANT NCI IS ACTING AS AN UNREGISTERED
INVESTMENT ADVISER IN VIOLATION OF
N.J.S.A. 49:3-56
(Against defendant NCI)**

21. Plaintiff repeats the allegations set forth in the preceding paragraphs of this Complaint as though set forth fully herein.

22. In connection with the conduct and events described in the preceding paragraphs, NCI is acting or has acted as an investment adviser as the term "investment adviser" is defined in N.J.S.A. 49:3-49(g)(1).

23. NCI failed to register with the Bureau as an investment adviser in violation of N.J.S.A. 49:3-56.

24. Each instance of acting as an investment adviser to a client while not registered with the Bureau constitutes a violation of N.J.S.A. 49:3-56 and is cause for the imposition of injunctive relief pursuant to N.J.S.A. 49:3-69(a) and (b), a civil monetary penalty pursuant to N.J.S.A. 49:3-70.1, and an order of restitution and disgorgement pursuant to N.J.S.A. 49:3-69(a)(2).

COUNT II

DEFENDANT TERRENCE LEGALL IS ACTING AS AN
UNREGISTERED INVESTMENT ADVISER REPRESENTATIVE IN
VIOLATION OF N.J.S.A. 49:3-56
(Against defendant Terrence LeGall)

25. Plaintiff repeats the allegations set forth in the preceding paragraphs of this Complaint as though set forth fully herein.

26. In connection with the conduct and events described in the preceding paragraphs, LeGall is acting or has acted as an investment adviser representative as the term "investment adviser representative" is defined in N.J.S.A. 49:3-49(s).

27. LeGall failed to register with the Bureau as an investment adviser representative in violation of N.J.S.A. 49:3-56.

28. Each instance of acting as an investment adviser representative to a client of NCI while not registered with the Bureau constitutes a violation of N.J.S.A. 49:3-56 and is cause for the imposition of injunctive relief pursuant to N.J.S.A. 49:3-69(a) and (b), a civil monetary penalty pursuant to N.J.S.A. 49:3-70.1, and an order of restitution and disgorgement pursuant to N.J.S.A. 49:3-69(a)(2).

COUNT III

DEFENDANT NCI IS EMPLOYING AN UNREGISTERED
INVESTMENT ADVISER REPRESENTATIVE IN VIOLATION OF
N.J.S.A. 49:3-56(j)
(Against defendant NCI)

29. Plaintiff repeats the allegations set forth in the preceding paragraphs of this Complaint as though set forth fully herein.

30. In connection with the conduct and events described in the preceding paragraphs, NCI is employing or has employed an investment adviser representative who is not registered with the Bureau.

31. Each instance of employing an investment adviser representative to provide investment advice or financial planning services to a client of NCI while the representative was not registered with the Bureau constitutes a violation of N.J.S.A. 49:3-56(j) and is cause for the imposition of injunctive relief pursuant to N.J.S.A. 49:3-69(a) and (b), a civil monetary penalty pursuant to N.J.S.A. 49:3-70.1, and an order of restitution and disgorgement pursuant to N.J.S.A. 49:3-69(a)(2).

DEMAND FOR RELIEF

WHEREFORE, Plaintiff petitions this Court for an Order:

- (a) Finding that all defendants engaged in the acts and practices alleged above;
- (b) Finding that such acts and practices constituted violations of the Securities Law;
- (c) Preliminarily enjoining defendants from directly or indirectly offering or selling investment advice or other financial planning services pending final disposition of this matter;
- (d) Ordering defendants to immediately remove from the Internet any web site defendants have posted or caused to be posted offering investment advice or other financial planning services and preliminarily enjoining defendants from posting or causing to be posted the same or similar web site(s) to the Internet pending final disposition of this matter;
- (e) Enjoining defendants from destroying or concealing any documents, books, records, or other materials, including electronically-stored information, related to this matter;

- (f) Affording each person who purchased investment advice or financial planning services from NCI during the relevant period the option of receiving restitution of fees paid to NCI, plus interest and expenses incident to effecting the purchase of services and restitution;
- (g) Assessing civil monetary penalties against defendants for each violation of the Securities Law in accordance with N.J.S.A. 49:3-70.1;
- (h) Ordering defendants to pay restitution to investors who opt to receive restitution and to disgorge to the Bureau all profits and/or funds gained through violations of the Securities Law;
- (i) Ordering that defendants are enjoined from offering or selling investment advisory and financial planning services until they have fully complied with all provisions of the Securities Law, including the registration requirements of N.J.S.A. 49:3-56;
- (j) Permanently enjoining the defendants from further violating the Securities Law; and

(k) Affording plaintiff and affected third parties any additional relief the Court may deem just and equitable.

ANNE MILGRAM
ATTORNEY GENERAL OF NEW JERSEY
On behalf of Vincent J. Oliva
Chief of the New Jersey Bureau
Securities

By: M. J. Harris
Megan J. Harris
Deputy Attorney General

Dated: December 20, 2007

VERIFICATION

I, Pamela M. Fischer, certify as follows:

1. I am an Investigator for plaintiff, the Chief of the New Jersey Bureau of Securities.

2. I have read the foregoing complaint and certify of my own personal knowledge that the facts contained therein are true based upon the Bureau's investigation of defendants.

3. I am aware that if any of the foregoing statements is willfully false, I am subject to punishment.



Pamela M. Fischer
Investigator
New Jersey Bureau of Securities

Dated: December 20, 2007

RULE 4:5-1(b) (2) CERTIFICATION

I hereby certify that plaintiff is not aware of any other action pending in any court related to the subject matter of this Complaint, nor is plaintiff aware of any other party who should be joined in this action at the current time. Plaintiff filed an action against defendant Terrence LeGall to enforce two administrative subpoenas issued to LeGall in relation to the investigation of the allegations set forth in this Complaint (New Jersey Superior Court Docket No. ESX-C-355-06), which was resolved through a Consent Order dated December 6, 2006. Plaintiff has not initiated any other civil action in any court against defendants and is not now engaged in any arbitration proceeding against defendants, nor is any other civil action or arbitration proceeding contemplated.

ANNE MILGRAM
ATTORNEY GENERAL OF NEW JERSEY

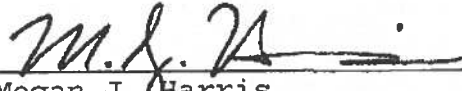
By: M. J. Harris
Megan J. Harris
Deputy Attorney General

Dated: December 20, 2007

DESIGNATION OF TRIAL COUNSEL
PURSUANT TO R. 4:5-1(c)

Deputy Attorney General Megan Harris is hereby designated as trial counsel for this matter.

ANNE MILGRAM
ATTORNEY GENERAL OF NEW JERSEY



Megan J. Harris
Deputy Attorney General

Dated: December 20, 2007

ANNE MILGRAM:
ATTORNEY GENERAL OF NEW JERSEY
Division of Law
124 Halsey Street, 5th Floor
P.O. Box 45029
Newark, New Jersey 07101
Attorney for Plaintiff

By: Megan J. Harris
Deputy Attorney General
(973) 648-3730

ANNE MILGRAM,
Attorney General of New Jersey,
on behalf of VINCENT J. OLIVA,
Chief of the New Jersey
Bureau of Securities,

Plaintiff,

v.

NEW CENTURY INVESTOR, Inc., a
New Jersey Corporation, and
TERRENCE LEGALL, individually
and as principal of New
Century Investor,

Defendants.

) SUPERIOR COURT OF NEW
) JERSEY
) CHANCERY DIVISION: GENERAL
) EQUITY
) UNION COUNTY

) DOCKET NO. _____
)
)

) Civil Action

) **CERTIFICATION OF PAMELA M.
) FISCHER IN SUPPORT OF
) PLAINTIFF'S APPLICATION
) FOR AN ORDER TO SHOW CAUSE**

I, PAMELA M. FISCHER, of full age, hereby certify as follows:

1. I am an attorney licensed to practice in New Jersey and New York. I have been licensed in New Jersey since December 2005 and New York since January 2007.

2. I am an investigator with the New Jersey Bureau of Securities (the "Bureau") and have been employed as such since October 2005.

3. As a Bureau Investigator, I conduct inquiries into and investigate violations of the New Jersey Uniform Securities Law (1997), N.J.S.A. 49:3-47 et seq. (the "Securities Law").

4. In March 2006, acting on a complaint the Bureau received and his recent discovery of the web site newcenturyinvestor.com, Bureau Investigator John Cronin, who is now retired, interviewed defendant Terrence LeGall ("LeGall") at the offices of New Century Investor ("NCI") in Linden, New Jersey.

5. Investigator Cronin's discovery of the newcenturyinvestor.com web site in 2006 indicated that LeGall was acting as the President and CEO of an investment advisory service. Before interviewing LeGall, Investigator Cronin checked the Bureau's records and found that neither LeGall nor New Century Investor was registered with the Bureau in any capacity.

6. Investigator Cronin's in-person interview of LeGall on March 30, 2006 resulted in LeGall confirming that he provides investment advice to clients for a fee. During the interview, Investigator Cronin advised LeGall of the

Securities Law's registration requirements related to investment advisers.

7. Several days after the interview, in early April 2006, Investigator Cronin mailed an Investment Adviser Registration Packet to LeGall, enclosing the forms necessary to apply for registration with the Bureau. A Certification of Investigator Cronin, asserting the foregoing facts and submitted in 2006 to the Essex County Chancery Division in support of a related subpoena enforcement action, is attached hereto as "Exhibit A."

8. I took over the investigation of this matter upon Investigator Cronin's retirement in late December 2006.

9. Pursuant to an administrative subpoena for testimony, I deposed LeGall on February 5, 2007. During the deposition, LeGall admitted that he had received the investment advisor registration forms mailed to him from the Bureau in April 2006. LeGall also admitted that he had continued his investment adviser activities from the time of the March 30, 2006 interview, when he was advised to complete registration with the Bureau, to some time in November 2006.

10. During the February 5, 2007 deposition, LeGall stated that he formed NCI in 2001 while he was living in California, and that he began to operate NCI from New

Jersey beginning in March 2003. LeGall identified a set of materials, which outline NCI's investment advice and financial planning services and include new member application forms, as those materials he presents to potential clients. The NCI new membership materials, presented as Exhibit S-1 during LeGall's February 5, 2007 deposition, are attached hereto as "Exhibit B."

11. LeGall testified during the February 5, 2007 deposition that he was aware of the Securities Law's registration requirements, and also testified that he intended to sit for the necessary exam (administered by the Financial Industry Regulatory Authority) to qualify for registration as an investment adviser. Several excerpts - consisting of pages 39 to 42, 59 to 60, and 75 to 78 - from the transcript of LeGall's February 5, 2007 deposition are attached hereto as "Exhibit C."

12. My investigation of this matter, including the deposition of LeGall on February 5, 2007, revealed that LeGall uses NCI as the business entity through which he provides advice to clients regarding buying and selling stock, as well as tax preparation and various other financial planning services.

13. NCI charges a minimum annual "subscription fee" of \$595.00 to each new customer. The amount of the annual

fee for NCI's services increases depending upon the amount of money a customer seeks to invest. The annual fee may be as much as 10% of the amount of money for which each client seeks advice or planning services.

14. NCI's subscription fee entitles each client to multiple services, including advice regarding which stocks to purchase, when to sell stocks purchased, broker-dealer recommendations, tax preparation and advice, various reports and newsletters containing financial information and advice, and a personal financial check-up.

15. LeGall solicits clients, among other methods, through NCI's web site, newcenturyinvestor.com.

16. Newcenturyinvestor.com provides detailed information regarding NCI's investment advisory services and fees, subscription forms, contact information for NCI's office, a field for users to submit contact information to NCI electronically, and an "Investment Dictionary." The web site also lists LeGall's experiences and accolades in the "Financial Services Industry." Much of the information found at newcenturyinvestor.com matches the information found in the materials LeGall confirmed as those he provides to new NCI clients (See "Exhibit B" to this Certification).

17. In addition to soliciting clients through newcenturyinvestor.com, LeGall has advertised NCI's investment advisory services through a radio program, the listing of NCI on other web sites, including asonenj.com, and personal contact with persons to whom LeGall pitched NCI's services.

18. Since NCI began operating from New Jersey in or around March 2003, LeGall has provided investment advice and other financial planning services to approximately 300 individuals and families, the majority of whom are New Jersey residents. A customer list LeGall provided to the Bureau in November 2006 is attached hereto as "Exhibit D."

19. LeGall and NCI received at least \$119,922.34 in compensation for investment adviser services during the year 2006.

20. To date, the Bureau has not received any complete application materials from LeGall or NCI seeking registration in connection with providing investment advisory services, nor has the Bureau received notice that LeGall sat for or passed the necessary investment adviser exam. Additionally, Neither LeGall nor NCI are registered as investment advisers with the United States Securities and Exchange Commission.

21. I discovered on December 4, 2007 that newcenturyinvestor.com remained functional on the Internet and that NCI continues to solicit new investment advisory and financial services clients through the web site. Several pages from newcenturyinvestor.com, printed from the Internet on December 17, 2007, are attached hereto as "Exhibit E."

22. On December 4, 2007, I sent an e-mail message to LeGall, using an address the NCI website provides as contact information and posing as a potential client of NCI. I stated in my message that I came across LeGall's web site when looking for someone to help me with financial advice, and requested an opportunity to speak with LeGall regarding whether NCI's services would match my investment goals and whether NCI is accepting new clients. Later in the day on December 4, 2007, LeGall responded to my e-mail with a request for my phone number so that he could call me to discuss becoming a new client. On December 5, 2007, LeGall sent another message in response to my December 4 inquiry, providing me with his cell phone number. The foregoing e-mail exchange is attached hereto as "Exhibit F."

23. Based on the foregoing history of the Bureau's investigation of LeGall's activities, in addition to the

active presence of newcenturyinvestor.com on the Internet and LeGall's response to my inquiry regarding investment advice on December 4, 2007, I have concluded that LeGall presently continues to operate NCI as an investment advice and financial planning service while not registered with the Bureau.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me is willfully false, I am subject to punishment.



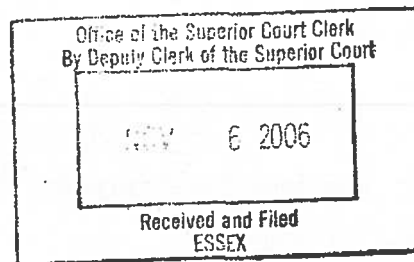
Pamela M. Fischer
Investigator, New Jersey Bureau of Securities

Dated: December 20, 2007

EXHIBIT A

STUART RABNER
 ATTORNEY GENERAL OF NEW JERSEY
 124 Halsey Street, 5th Floor
 P.O. Box 45029
 Newark, NJ 07101
 Attorney for Plaintiff

By: Megan J. Harris
 Deputy Attorney General
 (973) 648-3730



FRANKLIN L. WIDMANN,
 Chief of the New Jersey
 Bureau of Securities,

Plaintiff,

v.

TERRENCE G. LEGALL,

Defendant.

) SUPERIOR COURT OF NEW JERSEY
) CHANCERY DIVISION: GENERAL
) EQUITY
) ESSEX COUNTY
) DOCKET NO. _____

) Civil Action

) CERTIFICATION OF JOHN CRONIN
) IN SUPPORT OF PLAINTIFF'S
) APPLICATION FOR AN ORDER TO
) SHOW CAUSE

JOHN CRONIN, of full age, certifies as follows:

1. I am an investigator with the New Jersey Bureau of Securities (the "Bureau") and have been employed as such since January 1989.
2. As a Bureau Investigator, I conduct inquiries into and investigate possible violations of the New Jersey Uniform Securities Law (1997), N.J.S.A. 49:3-47 et seq. (the "Securities Law").
3. On November 7, 2003, an individual named Nocilja Acuna, who is a New Jersey resident, submitted a complaint to the Bureau regarding defendant Terrence LeGall. On March 10, 2004, I interviewed Ms. Acuna via telephone regarding her complaint. Attached hereto as "Exhibit A" is Ms. Acuna's Bureau complaint form, dated November 7, 2003.

4. At the time of Ms. Acuna's complaint, LeGall was believed to be living and working in California. Ms. Acuna stated that while LeGall was on a visit to New Jersey in 1999, he was introduced to her as a stock broker. During November 1999, Ms. Acuna gave LeGall a check for \$20,000 made payable to investment services company Morgan Stanley for the purpose of allowing LeGall to establish an account at Morgan Stanley on her behalf. Several weeks later, LeGall returned to New Jersey and asked Ms. Acuna to invest \$100,000 in a company called Qualcomm. Ms. Acuna told LeGall that she did not have \$100,000, but she gave him an additional \$20,000 to invest on her behalf. Ms. Acuna believed her second check in the amount of \$20,000 would also be deposited to an account at Morgan Stanley.

5. Ms. Acuna received several statements from Morgan Stanley regarding her first investment of \$20,000, indicating that an account was set up in her name and had suffered losses. As to Ms. Acuna's second investment of \$20,000, she received one statement directly from LeGall, dated May 31, 2000. The May 31, 2000 statement indicated that LeGall had purchased shares of Qualcomm Incorporated on Ms. Acuna's behalf. Ms. Acuna stated that she called Morgan Stanley regarding the second \$20,000, and a representative of Morgan Stanley told her that there was no record of a second \$20,000 deposit to her account.

6. When Ms. Acuna contacted the Bureau in 2003, she indicated that LeGall did not return any portion of her second investment of \$20,000, nor had she received payments of any kind as a result of the investment. On March 20, 2006, I spoke to Ms. Acuna via telephone and she informed me that she had not received any additional statements from LeGall since she made her complaint and her second investment of \$20,000 still had not been returned.

7. During February 2006, I discovered LeGall's name on a web site for a business titled New Century Investor ("New Century") at newcenturyinvestor.com. The web site indicates that New Century offers investment adviser services and is located in Linden, New Jersey. LeGall's name appears on the web site as New Century's founder. The web site also indicates that LeGall is the President and CEO of an investment company called LeGall Financial. Attached hereto as "Exhibit B" is a printout of a page from newcenturyinvestor.com titled "Membership Benefits," listing the services New Century offers.

8. I checked the Bureau's files and determined that neither New Century nor LeGall Financial is registered with the Bureau. I then decided to pursue further investigation of LeGall's activity in relation to New Century, LeGall Financial, and the 2003 complaint of Nocilja Acuna.

9. On March 30, 2006, along with Bureau Investigator Leon Martin, I went to New Century's Linden address and interviewed LeGall in person. LeGall stated that he relocated to New Jersey in 2002 and has been operating New Century from New Jersey since the summer of 2003. Before LeGall renamed the business "New Century Investor," it was operating as "LeGall Financial" in California. LeGall confirmed that he provides clients of New Century with investment adviser services for a fee. Investigator Martin and I informed LeGall of the Securities Law's registration requirements related to investment advisers. LeGall responded that he would take any steps necessary to comply with those requirements.

10. During the March 30, 2006 interview, I served LeGall with Bureau Subpoenas 5507 and 5508. Subpoena 5507 required that he produce the business records of New Century Investor and LeGall Financial to the Bureau no later than April 21, 2006. Subpoena 5508 required that

LeGall appear at the Bureau's office for an investigative deposition on May 10, 2006. Attached hereto as "Exhibit C" and "Exhibit D" are copies of Subpoena 5507 and Subpoena 5508.

11. In early April 2006, I mailed an Investment Adviser Registration Packet to LeGall, enclosing forms necessary to complete registration with the Bureau.

12. On April 21, 2006, LeGall appeared at the Bureau. In response to Subpoena 5507, he provided fifteen (15) pages of sales materials describing and advertising New Century's services, and three (3) pages of New Century client application and payment authorization forms. LeGall stated that his business records are in California and that he planned to travel to California within two weeks. LeGall stated that he would retrieve business records from California and produce them in response to Subpoena 5507 as soon as possible. LeGall also confirmed that he had received the Investment Adviser Registration Packet sent to him earlier in the month, although to date he has not returned any of the forms enclosed.

13. Because I had not yet received additional documents in response to Subpoena 5507, on May 9, 2006, I called LeGall's office and canceled the deposition scheduled for the following day. I did not speak to LeGall, but left a message with someone in his office.

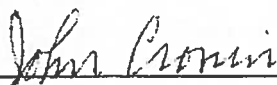
14. On August 31, 2006, Deputy Attorney General Megan Harris wrote a letter to LeGall and sent it via certified mail. The letter extended the deadline for providing a full response to Subpoena 5507 to September 22, 2006. The letter also attached a new Bureau Subpoena, No. 5610, which required LeGall to appear for an investigative deposition on October 11, 2006. A copy of the August 31 letter, its return receipt, and Subpoena 5610 are attached hereto as "Exhibit E."

15. LeGall did not contact me following the August 31 letter. On October 11, 2006, he failed to appear at the Bureau to give testimony. I waited, along with a court reporter and DAG Harris, for approximately 40 minutes.

16. On October 16, 2006, I received a note via regular mail from LeGall. The note stated that he was working on getting "the other papers" together and enclosed a copy of a document appearing to be a State of New Jersey Business Certificate for New Century Investor, dated September 6, 2006. The note and enclosed document are attached hereto as "Exhibit F."

17. As of November 3, 2006, I have not heard anything further from LeGall, nor have I received any additional documents.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me is willfully false, I am subject to punishment.



John Cronin
Supervising Investigator
New Jersey Bureau of Securities

Dated: November 6, 2006

EXHIBIT B

CVTRTT R

PLACE
STAMP
HERE

New Century Investor

2 Jackson Drive
Suite 204
Cranford, NJ 07016
1-(908)-448-1222
1-(908)-347-8100
1-(732)-904-2156

FOLD HERE

"We Invest In You"

WWW.NEWCENTURYINVESTOR.COM

S-
21



Terrence G. LeGall
Founder/Chairman/ CEO

**"RICH PEOPLE PLAN FOR THREE
GENERATIONS WHILE POOR
PEOPLE PLAN FOR SATURDAY NIGHT"**

If you were to research the Rockefeller family, this is what you would discover happened after the government-ordered break-up of John D. Rockefeller's multi-billion dollar oil company.

Standard Oil Corp. was broken-up by the government because it was a monopoly. It controlled about 95% of the oil in the US, just the way that Microsoft Corp. controls 90% of today's computer industry with its Windows software. A host of oil companies were formed from the break-up of Standard Oil. These companies included: Exxon/Mobil, Chevron, Texaco, and Amoco. The break-up of Standard Oil fell under the Anti-trust laws to ensure competition in all industries. The government has the power to do this in corporate America.

The Rockefellers are richer today than when John D. Rockefeller died two generations ago. This is the 3rd generation of his wealth. Rockefeller took what seemed to be an unfortunate situation and turned it into generational wealth.

There are 476 billionaires worldwide today, out of a population of more than 6 billion people. You do not have to become a billionaire, but you should want **FINANCIAL FREEDOM**.

What is **FINANCIAL FREEDOM**? **FINANCIAL FREEDOM** is having the money to do whatever you love to do whenever you want to do it.

This is what we consider the *True American Dream*
"NEW CENTURY INVESTOR"

Sincerely,

Terrence G. LeGall
Founder/ Chairman/ CEO



About the Founder

- Terrence G. LeGall has worked in the Financial Services Industry since 1980.
- An Investor since 1975, he built a multi million dollar portfolio using options, stocks, bonds and real estate.
- Founder / Chairman/ CEO of **LeGall Financial and New Century Investor**.
- Featured in **Black Enterprise Magazine** - October 1990 Money Issue. (*"How one Family Built a \$2.3 million Nest Egg"*).
- Appeared on the **Tim and Daphne Reid Show** (Tim, of TV hit shows **WKRP in Cincinnati** and **FRANK'S PLACE**, and Daphne, of TV hit show **FRESH PRINCE OF BELAIR** with Will Smith) - Dec. 1990 in Baltimore, Maryland.
- Featured in **USA TODAY** newspaper on March 27th, 1991 in the money section. (Investment Club Pays off).
- Hosted financial seminars in many states including: **New York, New Jersey, Pennsylvania, Illinois, Nevada, California, Florida, Michigan and Georgia**.
- Independent Consultant to individuals and groups on how to start an investment club or corporation.
- Provides insurance protection for many families in the event of the death of the income earner. As well as, how to use insurance as a vehicle to pay estate taxes.

The editor is an individual investor and is not registered as a securities broker-dealer or an investment adviser either with the U.S. Securities and Exchange Commission or any state securities regulatory authority.

WWW.NEWCENTURYINVESTOR.COM

Member Benefits

Usually, you would pay anywhere from \$1500.00 to \$5,000.00 for this type of Investment Research and Financial Information, but for new subscribers we are offering a discounted rate for the first year with a **MONEY BACK GUARANTEE**.

When you sign up for the service you will receive the following:

- We will guide you every step of the way.
- We will help you obtain the correct forms to open your account (s) to trade the stocks and/or options.
- You will receive easy to understand recommendations.
- Each trade will take minutes to complete.
- How to transfer/rollover your retirement account (s) ex. 401K to an IRA and any other type of account.
- Free report with 5 must own stocks for any portfolio. (A \$199.00 value).
- Free report of rising stocks that can potentially make you rich in the coming years.

Remember America Online before it became the powerhouse it is today? We discovered it's potential in 1992. We recognized Home Depot's staying power in 1989. Had you invested \$10,000.00 in each of these stocks, you would have a million dollars today. (A \$99.00 value).

- Free report of the 3 Hottest Growth Stocks To Buy Now. (\$99.00 value)
- Unlimited access by phone fax, or e-mail (A \$399.00 value)
- Quarterly newsletter dealing with tax laws and other financial matters. These reports alone can save you \$1,000.00 or more when filing your taxes every year. (A \$3000.00 value)
- During the year you will receive numerous buy and sell recommendations.
- We will teach you the inner workings of financial strategies.

We are so excited and confident that our service will make enormous profits and grow your portfolio, that we are offering you a **MONEY BACK GUARANTEE**. If you are ever dissatisfied, for any reason, you can cancel your membership and receive a 100 % refund on the remaining balance of your subscription. Our ultimate goal is to make you money and have you as a subscriber for life.

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Member Benefits cont.

Your free reports have a value of \$3,796.00, so your cost for the year's subscription is actually free. Investing involves risk; you could lose all or part of your investment. Past results are not necessarily indicative of future performance.

This service can be used in any type of account (IRA, 401K, 403B, investments groups, college or regular). If you trade in your retirement account, the profits are tax-deferred. This can reduce your taxes substantially.

For the investor who wants a more conservative investment style, we will be recommending stocks to trade in your portfolio. These stocks can be traded for the short term or held for the long term.

**The annual fee for new members start at \$595.00
Renewal Fee is \$1000.00 per year.**

The maximum contribution for 2004 to an IRA (Individual Retirement Accounts) is \$3000. If over age 50 = \$3500. If you were to invest at least \$1,000 per year in an IRA account and earn a profit of 100% compounded for 10 years, you can have over \$1,000,000. If you invest \$3,000, you should have \$3,000,000. Your goal should be at least \$5,000,000 when you retire, this way you do not run out of money before you die. If you have \$5,000,000 and earned 5% per year, you will make \$250,000 per year retirement income and never spend the five million dollars, which can then go to your heirs upon your death. This is called wealth preservation. You are planning for future generations by leaving money behind.

Some of our most recent recommendations made a profit of 168%, 334% and 90% respectively in three months. You can earn these kinds of returns on your portfolio by becoming a member in our exclusive group of investors.

Full disclosure: all of our trades will not be profitable but we have an 80% win/loss ratio.

Investing involves risk and is not suitable for all investors. We trade options and stocks.

The only guarantee in life is DEATH. Everything else is an option.

Account Type (s) to be Opened:

- Individual Joint IRA (Traditional, Roth, SEP)
 Rollover Business Custodial Investment Clubs

This is a Process and a Lifestyle!!!



Why People Fail Financially

Procrastination

The people who always say, "I will do it tomorrow" typically end-up 65 years old and poor.

Definition of Poor: Passed Over Opportunity Repeatedly No Financial Goals

If you have no **PLAN**, then you plan to **FAIL**.

Lack of Knowledge to Create Wealth

Most people fail to accept the financial information that is presented to them.

Short-term Thinking

We are an instant gratification society.

People Don't Pay Themselves First

Most people work for the money instead of having the money work for them. Here is a good strategy to live by (10-10-80).

10% to God

10% to You

80% to everything else

Patience

Most companies can take years to become successful (Wal-Mart, Home Depot, Microsoft, Dell)

Building true wealth requires the five D's.

1. Dedication 2. Desire 3. Drive 4. Determination 5. Discipline

Remember the Following...

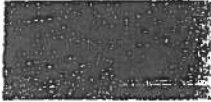
2% Make it happen (the wealthy)

3% Watch it happen

95% Don't even know what's happening

Excuses: meaningless devices used to rationalize the failure of a task.

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Privacy Policy

Respecting and protecting customer privacy has been of vital importance to New Century Investor since its inception. New Century Investor is committed to keeping our customer information private and secure.

Protecting the Confidentiality of Customer Information

We take our responsibility to protect the privacy and confidentiality of customer information very seriously. We maintain physical, electronic and procedural safeguards that comply with federal standards to store and secure information about you from unauthorized access, alteration and destruction. Our control policies, for example, authorize access to personal information only by individuals who need access to do their work.

The types of information New Century Investor shares, why and with whom

We do not share any of your information with other companies, *Never*.

Who is Covered by the Privacy Policy

The Privacy Policy applies to consumers who are customers or former customers of New Century Investor. We only have the information that you give to us at the time of sign up for our services.

Options Disclaimer

This website discusses exchange-traded options issued by The Options Clearing Corporation (OCC), including but not limited to equity options, stock index options, options on exchange-traded funds and trust issued receipts. Options involve risk and are not suitable for all investors.

Prior to buying or selling an option, a person must receive a copy of Characteristics and Risk of Standardized Options (ODD). Copies of the ODD and OCC Prospectus are available from your broker, by calling 1-888-OPTIONS, or from The Options Clearing Corporation, One North Wacker Drive, Suite 500, Chicago, Illinois 60606. The information on this website is provided solely for general education and information purposes and therefore should not be considered complete, precise, or current.

Many of the matters discussed are subject to detailed rules, regulations, and statutory provisions which should be referred to for additional detail and are subject to changes that may not be fully reflected in the website information. No statement within the website should be construed as a recommendation to buy or sell a security or to provide investment advice.

Order Now!

Success

"It's All In The Word"

By

Terrence G. LeGall

A guide to understanding the success **GOD** has destined for you.
This book is one of the most important books you'll ever read.
It will discuss the **Self-Imposed Barriers** that keep us from the
success **GOD** intended for us.
ex:(**Behavior, Habits, Lack of Discipline, and more...**)

Success

"It's All In The Word"

(Companion Workbook)

A resource to maximize your understanding and execution of
the valuable information presented in the book.
The workbook will show you where you are as well as help
you create a personal roadmap to where you should be.

COMING SOON

My Journey

**A Personal Development Journal To Document Your
Personal Growth**

A personal resource to guide you on your journey to achieve your best.

Terrence G. LeGall
Phone: 1-(908)-448-1222

George Searight II
Phone: 1-(732)-904-2156

Kashano Simmons
Phone: 1-(908)-347-8100

Email: tlegall@aol.com

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*New
Century
Investor*

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*New Member Forms
Your Future Is Waiting*

Your Financial Freedom Is Our Goal

Account Authorization

Brokerage account number: _____

Brokerage Name: _____

I _____ hereby, give authorization to *New Century Investor* "Sales Consultants" to make the selected change (s). This form requires signatures of both the Account Holder (s) and the Sales Consultant in order for the action to take affect and will stay in effect until further notice.

_____ Place trades on behalf of the *New Century Investor* member and follow up to these trades.
Initial, if using this option

_____ Revoke trading and all access to my account.
Initial, if using this option

INVESTING INVOLVES RISK. Past results are not an indication of future results. All information is based on historical data and future projections. You could lose all or part of your investment. We are participating in the equity (stock) market. There are no guarantees. "Our goal is **FINANCIAL FREEDOM**".

Print Individual Account Holder's Name: _____

Authorized Individual Signature: _____ Date: _____

Print Joint Account Holder's Name: _____

Authorized Joint Signature: _____ Date: _____

Print Sales Consultant Name: _____

Sales Consultant Signature: _____ Date: _____

New Century Investors "We Invest In You"

Primary Account Holder Information

Name: _____ Yearly Salary: _____

Address: _____

City: _____ State: _____ Zip code: _____

Day Phone# (____) _____ Work# (____) _____ Fax: (____) _____

Evening Phone# _____ Social Security Number _____-____-_____

Email Address: _____ Dependents: _____

Date of Birth ____/____/____ Marital Status** Single Divorced Married Widowed

Mailing address (if different from Primary) _____

Employer: _____ Occupation: _____

Address: _____ Nature of Business: _____

City: _____ State: _____ Zip code: _____ Years Employed: _____

Tax Bracket: 0 to 5 % 30 to 45% 15 to 30% Over 45%

Employment Status: Employed Student Retired Unemployed Years employed _____

Joint Application Information

Name: _____ Occupation: _____ Yearly Salary: _____

Years Employed: _____ Cell Phone#(____) _____ Work#(____) _____ ext # _____

Social Security Number: _____-____-_____ Email Address: _____ Dependents: _____

Date of Birth: ____/____/____ Marital Status** Single Divorced Married Widowed

Employer: _____ Occupation: _____

Address: _____ City _____ State _____ Zip Code _____

Tax Bracket: [] 0 to 15% [] 15 to 30% [] 30 to 45% [] over 45%

Employment Status: [] Employed [] Retired [] Student [] Unemployment

New Century Investor "We Invest In You"

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Home Phone#: () _____ Work Phone #: () _____ ext.: _____

Cellular Phone: () _____ Email Address: _____

Payment Options:

- Annual Lump sum = \$595.00 (40% discount)
- Monthly = \$85.00 x 12 = \$1,020.00
- 6 Months (Semi-Annual) = \$395.00 (20% discount)
- 3 Months (Quarterly) = \$220.00 (10% discount)
- Annual Subscription Renewal = \$1,000.00

- \$5,200.00 (Per Year) - PREMIER LEVEL SERVICE
Minimum Investment Amount \$50,000.00

Your Subscription May Be Tax Deductible

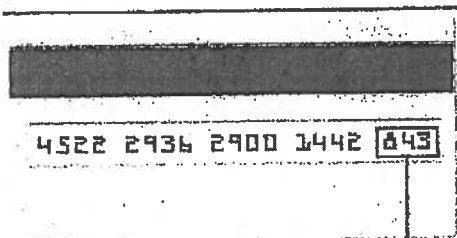
Total Amount Paid: \$ _____ Date: _____
(Please Make Checks Payable To New Century Investor)

- Check or Money Order Master Card American Express
- Cash Discover Card Visa

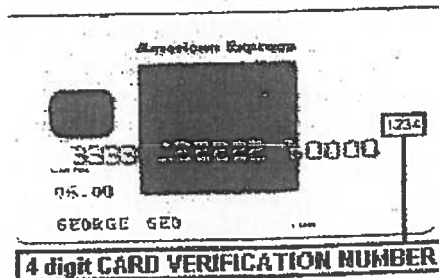
Card Number: _____ Expiration Date: _____ Security Code: _____

Visa, Mastercard, or Discover, it is a 3 or 4 digit code to the right of your account # on the back of the card. American Express is a 5 digit code on either the back or front of card

Member Authorization: _____ Authorization #: _____
(Signature Required) (Credit Card Transaction)



3 digit card verification number



4 digit CARD VERIFICATION NUMBER

Your Financial Freedom Is Our Goal

Topics:

Success, It's All In The Word: *A guide to understanding the success God has destined for you.* This textbook/workbook package is one of the most important you will ever read. It will discuss the self-imposed barriers such as behavior, habits and more that keep us from the success GOD has intended for us as well as create a personal roadmap to where you should be.

Coming Soon!

Prosperity, Abundant Living In All It's Glory.

Marriage: The Importance and responsibility of creating a family.

Parenting, The greatest gift and responsibility GOD gave Man.

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- Investment Clubs
- Business

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BUDGETING

A Budget Analysis will be performed to assess your personal monthly situation. Through review of your information, it is determined whether Debt Management is needed. Your counselor will provide suggestions to help you manage your monthly budget program. Our monthly budget guide will help guide you.

FINANCIAL EDUCATION

Novadebt is dedicated to consumer education. We provide counseling sessions, workshops, and educational material in many areas such as:

- Budgeting
- Tracking Your Expenses
- Understanding Your Credit Report
- Reading your Credit Card Statements
- Dealing with Collection Agencies
- Purchasing a Car
- Controlling Your Expenses
- Buying a Home
- Reverse Mortgages
- Planning for your Financial Future
- Debit Cards
- Mortgage Applications
- Saving for College
- Credit Card Fraud
- Re-Establishing Your Credit
- Fair Debt Collection Act
- Secured Credit Cards

And many more...

DEBT MANAGEMENT PLAN

You and your counselor may decide that a Debt Management Plan is the best solution for you. Enrollment into our Debt Management Plan is FREE. We consolidate all of your credit cards, personal loans and medical bills into one, lower monthly payment to Novadebt. Creditor interest charges, late fees and penalties may be reduced or eliminated.

Novadebt deals directly with your creditors to arrange an affordable payment plan for you. There is no additional borrowing or bankruptcy. We prepare creditor statements at home, so you can monitor your accounts. We send you a simple monthly statement and reminder of when your next payment to Novadebt is due.

Novadebt provides ongoing counseling at no cost to you. Our caring Client Guidance Department is here to help solve your financial problems along the way. Our Client Services Department is available to assist you with handling your accounts on the Debt Management Program.

HOUSING COUNSELING

Novadebt also provides housing counseling services. If you are interested in buying a home in the future, a certified housing counselor is available to help you through the home buying process. If you are having trouble making your mortgage payments, we also have certified housing counselors available to help you come up with a solution that suits your needs. We may be able to negotiate possible repayment plans with your lenders, if that is in your best interest.

CUTTING EXPENSES

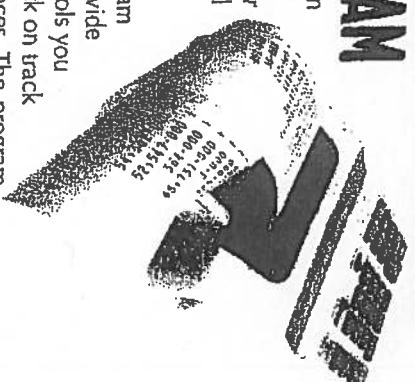
SAVING FOR RETIREMENT

BUDGETING

CREDIT CARD BILLS

PERSONAL FINANCIAL PROGRAM

Another program that Novadebt now offers is our Personal Financial Program. This program is a 12 month program designed to provide you with the tools you need to get back on track with your finances. The program includes an initial credit report review by one of our certified credit counselors as well as a final credit report review to track your progress. The Personal Financial Program also includes enrolling in the "Credit When Credit is Due" course. Upon successful completion of this course, you will be registered in a national database, you will be able to have a positive statement notated on your credit report and will be able to take advantage of lender incentives. You will also receive a Budget Smart CD and will enroll in another course called "Make Your Move." This course will provide you with information about the home buying process and how to prepare for owning your own home. Counseling and material on several other financial topics will also be provided to you, if you and your counselor decide that the Personal Financial Program will work for you.





About the Founder

- Terrence G. LeGall has worked in the Financial Services Industry since 1980.
- An investor since 1975, he built a multi million dollar portfolio using options, stocks, bonds and real estate



Fold Here

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New Century Investor

2005

January	February	March	April
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New Century Investor

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New Century Investor

Consultant's Name: _____

OUR GOAL IS FINANCIAL FREEDOM

MEMBER BENEFITS

REFERRED BY:

ABOUT NEW CENTURY INVESTOR

An Investment Research and Financial Information Company
Founded May 1996 in Corona, CA

- WHAT WE DO
- CREATE WEALTH
 - REDUCE TAXES
 - FINANCIAL EDUCATION
 - MONEY MANAGEMENT

- WHAT YOU DO:
- FAITH
 - FOCUS
 - PATIENCE
 - DISCIPLINE

Use the profits to build you a multi-million dollar retirement account, educate your children, make home repairs, go on family vacations, buy a new vehicle or splurge on the finer things in life.

Money saving tips
Investing tips
Tax saving tips and other financial information

"Rich people plan for three generations, poor people plan for Saturday Night"

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\$595.00

Annual Renewal Fee:

\$1,000

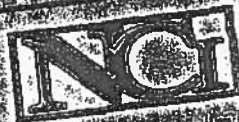
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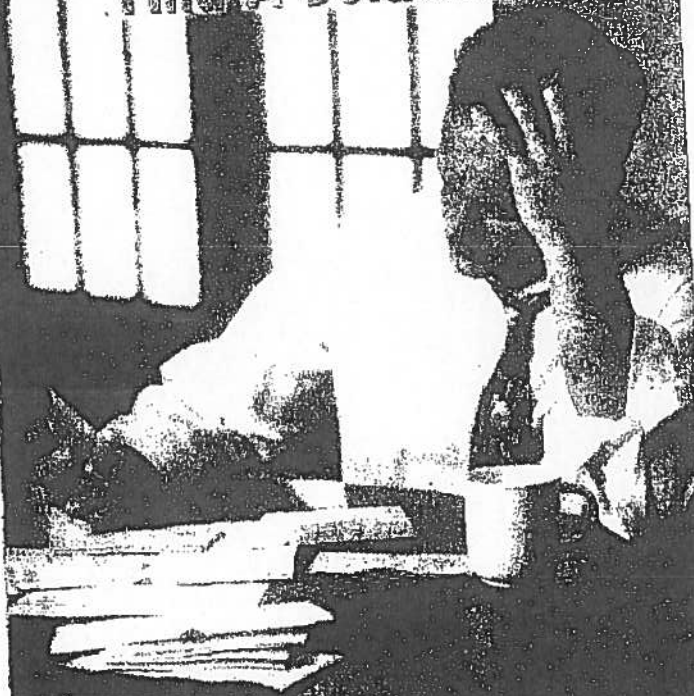


OUR GOAL IS FINANCIAL FREEDOM™

10000
Drive
LL 37031

Terrence G. LeGall
Chairman / CEO

Let Us Help You
Find A Solution!



novadebt

A Garden State Consumer Credit Counseling Organization

novadebt

is a nonprofit social service agency licensed, bonded, and recognized by the United States Government as a charitable organization under 501 (c)(3) of the IRS Code.

novadebt

is a nonprofit management service agency providing credit counseling, budgeting, housing counseling, and financial education.

Our counselors have your financial situation assessed by our Certified Credit Counselors. Your counselor will review all of your financial information to develop a plan to help you get back on the road to financial stability.

novadebt

Our Debt Management Plan services approximately 100,000 accounts per month, and deals with over 23,000 clients throughout the country.

When you call you have to take the first step to get out from under your means/picking up the phone and calling the people who can help. Contact Novadebt, the agency you

CONSULTATIONS

- Your free, confidential consultation can be done in one of our office locations or by phone, in the privacy of your own home.
- We have Certified Credit Counselors available 24 hours a day, 7 days a week.
- Same day office appointments.
- Caring professional staff.
- No complicated applications.
- TDD services for the deaf.
- Referrals to other organizations that can help resolve related problems.

So call today for a free, confidential, and no obligation consultation...

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A Garden State Consumer Credit Counseling Organization

The Agency You Can Trust!

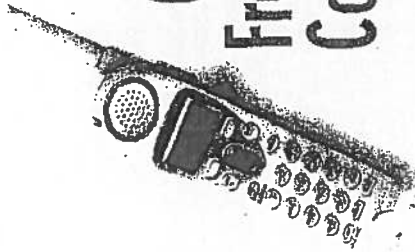
Main Office:

225 Willowbrook Road
Freehold, New Jersey 07728
1-800-99-BILLS
www.novadebt.org

Other Office Locations:

FORKED RIVER, NJ; WOODBRIDGE, NJ
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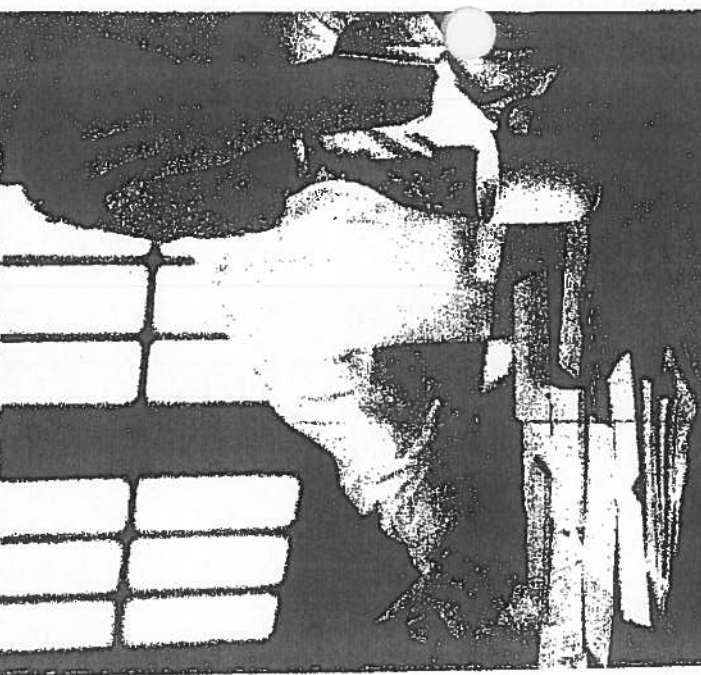


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Recognized by the United States Government
as a charitable organization under
501 (c) (3) of the IRS Code.



**Debt
Problems?
Let Us Help You
Find A Solution!**



novadebt

EXHIBIT C

CVT-RTT C

<p style="text-align: right;">38</p> <p>1 it does appear that he has supplied an 2 application. 3 Q. And just to get it on record here, you 4 submitted this application when? 5 A. The end of April of '06. 6 Q. And why did you send in this 7 application? 8 A. Mr. Cronin, the previous investigator, 9 sent me a package in the mail and the application 10 was included because when he visited me, he 11 indicated that I needed to fill it out and I sent 12 it in at that time. 13 Q. Do you remember that meeting with Mr. 14 Cronin? 15 A. Yes, I do. It was in my office and if 16 I remember correctly, it was March of last year. 17 Q. Did you discuss -- did you and Mr. 18 Cronin discuss the requirements for being 19 registered as an IA, an investment advisor, in New 20 Jersey? 21 A. Not in depth, he just indicated he 22 would send me the application and he said the 23 rules are now that you have to have Series 65 and 24 something else, I can't remember the numbers, it 25 was two other numbers he mentioned but Series 65</p>	<p style="text-align: right;">40</p> <p>1 the Series 65 but he sent the package in the mail 2 to me. 3 Q. After your initial meeting? 4 A. Yes. 5 Q. At the end of your initial meeting, 6 did he tell you that he was going to be sending 7 you this packet? 8 A. Yes. 9 Q. Did he say anything about you 10 continuing your New Century business even though 11 you weren't registered? 12 A. No, the only thing said to me is we 13 have to get this taken care of and I will work 14 with you to get this resolved because there was 15 some other issues involved, too, with the meeting, 16 Mr. Acuna, A-c-u-n-a, concerning investment 17 dollars. So those are the two things we 18 discussed. Then I came here because when I got 19 the notice, it says you need to show up to the 20 office such and such a time, such and such a date. 21 When I came here -- as a matter of fact, it was 22 the first deposition. When I came, they seemed 23 surprised that I came even though the order said I 24 should come. 25 So I gave them some paperwork</p>
<p style="text-align: right;">39</p> <p>1 was one of the requirements or if you are a CFP or 2 had a Series 7. So he indicated he would send me 3 the package. When I got it, I filled it out and 4 sent it back and in the meantime, I requested the 5 software for the online study for the Series 65. 6 Q. Did you receive it? 7 A. Yes, I have been using the software, 8 studying it and doing the trial test and 9 everything because I took the trial test and was 10 having difficulty with some of it so I didn't take 11 the test. I never sat for the exam. 12 Q. So when Mr. Cronin was talking to you 13 about the requirements for registering, did you 14 have a discussion with him about whether or not 15 you met the criteria for being an investment 16 advisor in New Jersey? 17 A. Not to my knowledge. 18 Q. So in that initial conversation, did 19 he ever show you a copy of our statute or a copy 20 of instructions showing when you have to register? 21 A. No. He just said, in the package I 22 got, it was very thick and I read that, the 23 package, and it indicated based on the dollar 24 amount or the clients, what you had to do. And 25 based on that, I was studying for the test to take</p>	<p style="text-align: right;">41</p> <p>1 pertaining to the things that I was asked for on 2 the list and he said they will get back to me in 3 terms of when to come. We had a May meeting, 4 which was canceled, he called the office and 5 canceled, and while I was -- at the meeting I had 6 with him, I said I will work in getting whatever 7 stuff I can get from California and get the 8 records, what we needed to satisfy this, and my 9 understanding or my impression, I should say, was 10 that I have to go to school, get the license, the 11 Series 65, but in the interim, I sent in the 12 application to register myself and the company as 13 investment advisors. I hadn't been given a 14 specific date or time frame of what had to be 15 done. 16 Q. And when you sent in the application 17 at the end of April, did you ever receive any 18 reply from the bureau? 19 A. No. Months went by so I didn't -- 20 then everything else, I'm working, I was told I 21 had to come in October so the October meeting, I 22 got a letter saying I had to come in October and 23 something happened -- oh, October I was sick and I 24 never called and said I was sick so then I was 25 sending in stuff as I was getting it and then</p>

1 while I was away, in November, that's when he came
2 to the office and they left another order for the
3 subpoena saying that this had to be taken care of
4 at the company.

5 Q. When do you plan on taking your Series
6 65?

7 A. The next test date is March 7th.

8 Q. And you have not yet to date taken it?

9 A. No. I'm trying the dumb test, I
10 didn't feel comfortable enough to go take it. You
11 think you understand the stuff and then when you
12 read the stuff -- I'm simple terminology, simple
13 ways but some of the terminology was giving me a
14 difficult time. I was getting 72, 73, that wasn't
15 enough. I thought I should go at night to get a
16 passing grade. I never took it officially. I
17 have the disk which I study from on the computer.

18 So the next time, I plan to take it, I
19 plan to take it in March because I'm going to go
20 to school, I found a school in New York, they have
21 an actual three day classroom so I will go to New
22 York at the Kaplan School in New York and sit
23 there because I need to go in the classroom.

24 Q. So from the time that you and Mr.
25 Cronin first had a conversation last March and now

1 care with my sister-in-law, taking care of my
2 mother-in-law, who has Alzheimer's, so she just
3 kind of like worked a few hours a day while the
4 kids were in school.

5 Q. So approximately six months go by and
6 you decide to start working again?

7 A. After I got my head right, cleared up,
8 then I felt I was ready to go back to work. In
9 the meanwhile, people were calling me and I was
10 saying I can't do this right now but I had some
11 people I helped in California and they were in
12 some trades and the trades were very profitable so
13 I was saying go ahead and sell, take your profits,
14 you know, it made sense but I wasn't really doing
15 anything for those six months. I didn't know what
16 to do with myself.

17 Q. So when you decided you were ready to
18 go back to work, how did you begin working with
19 New Century Investor?

20 A. I started working from home because I
21 had the computer, which I brought from California,
22 and I decided okay, I will go back to work and
23 even though I wasn't really working per se, I
24 would still keep up with the market, see what was
25 going on just for myself, and once I decided to go

1 or let's say right before your court appearance in
2 December, did you continue with New Century
3 business?

4 A. Yes.

5 Q. Advising clients in terms of accepting
6 fees in exchange for giving advice as to what to
7 buy and sell?

8 A. Yes.

9 Q. New Century, you come to New Jersey in
10 2002. Do you immediately set up offices here?

11 A. No. For six months, I was just
12 getting myself together from the debacle in
13 California. I was in a state of depression and I
14 did not do anything. I stayed home, went to
15 church sometimes and I went to California twice
16 because I had one vehicle there and one vehicle --
17 I had no vehicles here so I went to California and
18 drove one of the vehicles back in March of '03 and
19 then we were able to ship the other vehicle at the
20 same time and the kids were going to school. My
21 wife worked part-time.

22 Q. What does your wife do?

23 A. She works with me now in the office
24 but at that time she was working, you know,
25 different part-time jobs and helping at the day

1 back to work, then I had about maybe five or six
2 people in California and a friend of mine who is a
3 pastor in New Brunswick, his son wanted to invest
4 and so it was like show me what you do so we
5 started talking and in the process of talking, we
6 put together this package which was off the
7 website and I gave a package to Mr. Cronin, I
8 mixed the information on the website with some
9 basic stuff so we can give people information as
10 to how the process really works because my biggest
11 fear was I don't want anybody to think they are
12 going to come in and get rich tomorrow so I have
13 to put together a package that was sensible. You
14 have to understand this is the way you live, you
15 have to invest continuously but at the same time,
16 build for your future and still have fun so I put
17 together a package.

18 So we put together this package, my
19 friend's son --

20 Q. Whose name is?

21 A. George Searight.

22 Q. W-r-i-g-h-t?

23 A. No, S-e-a-r-i-g-h-t. There is no W.

24 Q. George Searight?

25 A. George Searight.

1 A. I'm sorry, \$14.95, a commission for
2 the trade.
3 Q. So it's \$14.95 per trade?
4 A. Per trade, right.
5 Q. So I just want to backtrack just a
6 little bit. So a client contacts you and decides
7 they want to engage your services. What is your
8 fee structure?
9 A. The fee structure is, I call it
10 subscription based model but it's \$595 for the
11 year, \$595 for the year and the fee is scaled
12 depending on how much money you are working with
13 and all the services are included, investing, tax
14 preparation, budgeting, marriage counseling,
15 anything to do with people's lives so the fee is a
16 flat fee per year. That fee they can mail by
17 check, credit card, whatever way they want to,
18 their choice, and then they can decide how they
19 want to pay it, monthly, six months, whatever it
20 is. It's very flexible.
21 Q. You said it's scaled for how much
22 money you are managing so what is the scale?
23 A. \$595, it goes up to \$1,000, \$1,200.
24 We look at -- you tell me how much money you are
25 going to work with. If you have, let's say,

1 \$300,000, then you have to get more trades, which
2 are more work, you make more money. So that's why
3 it's a scaled fee and it runs anywhere between
4 three percent and ten percent.
5 Q. So for a million dollars, you are
6 getting \$10,000 and that's a yearly fee?
7 A. Right. That includes everything, the
8 taxes, the budgeting, everything.
9 Q. Is this fee structure listed on the
10 website?
11 A. No, that's in the package. The
12 website is being redone. This website is since
13 '01 or '02 and the person who did it, I can't find
14 him. And so we are doing a new website over but
15 the package that I gave has everything. The
16 package I gave Mr. Cronin, that's the current
17 information.
18 MS. FISCHER: I think I have one of
19 those. I just want to mark this as state's
20 Exhibit 1.
21 (Whereupon the document was received
22 and marked S-1 for identification.)
23 Q. Take a look at this and tell me if
24 this is what you were just speaking about.
25 A. Yes.

1 Q. So you can just keep that for
2 reference right now. Is this the package that you
3 send out to the clients when they engage your
4 services?
5 A. Yes.
6 Q. Can you tell us what it contains?
7 A. It has the contact information, the
8 address, information about me, benefits.
9 Q. Just to clarify, the member benefits
10 that you described, are they the same regardless
11 of how much money you have under management?
12 A. No, they vary.
13 Q. So the more money you have, the more
14 benefits you get, I assume?
15 A. The more trades you get. You get more
16 trades. With the more money, there is more
17 contact so the trades will be much faster. The
18 fees, information about a book we were thinking
19 about writing, account authorization, account
20 order information, fee page and the ways to pay
21 for the services.
22 Q. What is the account authorization
23 form?
24 A. That's -- what happened with this was
25 sometimes people get the trades and they don't get

1 to the computers fast enough so they end up asking
2 me can you make these trades for me. So I have to
3 have the form to give me permission to do trades
4 on their behalf, sometimes we do this. That's all
5 we do. Everything else, they have to handle it.
6 Q. So basically, this form, you give it
7 to the client and if they want you to, you can go
8 in, let's say they are using Options Xpress, you
9 can go into their Options Xpress account and do
10 trades or their behalf?
11 A. Trade for them, exactly.
12 Q. Does that mean your name goes on the
13 accounts?
14 A. No, it's simply they give me
15 permission to make the trades for them so they
16 give me the password, they say can you make these
17 trades for me and I do that. When the trade is
18 executed, the trade, the email goes to them saying
19 this was executed so they know, I will call them
20 and say I made the trades for them, they log into
21 the account and they will see the trade there.
22 It's still their account and still their name on
23 the account only.
24 Q. So a client gets this packet and they
25 sign up and then you said that they give you two

1 Q. Is it your goal when you bring the
2 independent contractors on board with New Century
3 to eventually get them to be able to render
4 financial advice to clients?

5 A. Yes.

6 Q. And has an independent contractor ever
7 gotten to that level?

8 A. No, because I indicated to them when
9 we started everything has to come through me and
10 they didn't have enough experience. There have
11 been a couple of cases where I was told that
12 somebody gave advice, the person called me and
13 asked me if this is what we should be doing, that
14 person immediately, I said you can't do this.

15 Right now there is nobody working with me because
16 I said you guys, we have to get this license. So
17 they don't want to go to school to get their
18 license, now they say I'm going to school to get
19 my license, so right now I'm the only person along
20 with my wife Susan that handled it.

21 Q. You are currently engaged in the
22 advising business, as well?

23 A. I'm not advising anybody right now
24 since this stuff, I'm just dealing with the taxes
25 and stuff. But there were people that would ask

1 me what do I do with this trade, I say you know
2 what to do.

3 Q. When did you discontinue your advising
4 business?

5 A. Last year.

6 Q. Can you be a little more specific?

7 A. November last year.

8 Q. So before the court date, the court
9 date of December 6th of 2006?

10 A. Yes, before the court date. I was
11 away in November and when I got back, Mr. Cronin
12 had come to the office, left off the package and I
13 read the information and I just put everything on
14 hold right then and there.

15 Q. And it has not -- your period of
16 discontinuing your advising business has not
17 ended, you are still just doing your tax
18 preparation as of today?

19 A. Right, the taxes and the budgeting and
20 stuff like that, the other things we were doing.

21 Q. During the break, I had Mr. McElgunn
22 go to our registration section to confirm that we
23 were in receipt of your application to be
24 registered here and the registration section
25 informed us that we have not received your

1 application. So do you have a copy of -- I know
2 along with the application, you said that you had
3 submitted --

4 A. A cashier's check, yes.

5 Q. Do you have a copy of that, of when it
6 was submitted?

7 A. I would have to look for it. I kept
8 the package separately and that cashier's check
9 has to be somewhere. It was a money order, it was
10 a stub from the money order. I have to look for
11 it and find that.

12 MR. MC ELGUNN: Could it have been
13 under a different name other than New Century at
14 the time when you submitted it?

15 THE WITNESS: It would have been under
16 my name, Terrence LeGall, nothing other than
17 Terrence LeGall.

18 MR. MC ELGUNN: Terrence LeGall?

19 THE WITNESS: Yes, nobody else.

20 MR. MC ELGUNN: If you say you sent
21 it, we will look for it and see if we can come up
22 with it.

23 THE WITNESS: That's the original with
24 the attached.

25 MR. MC ELGUNN: Was it addressed to

1 somebody's attention here?

2 THE WITNESS: I can't remember. If it
3 was, it would have been Mr. Cronin, that was the
4 one person I sent stuff to. I was bringing stuff
5 or mailing stuff.

6 BY MS. FISCHER:

7 Q. As a result of your conversation with
8 Mr. Cronin in March and then the subsequent
9 mailing of the application packet to you, were you
10 in agreement that according to our statute, that
11 you are acting as an investment advisor and should
12 therefore be registered?

13 A. Yes. That's why I sent it in right
14 away, after I spoke to him. But I never had a
15 time frame but I said let me get this in right
16 away when the package came.

17 Q. You do recognize under our statute,
18 you are acting as an investment advisor?

19 A. Yes.

20 MR. MC ELGUNN: Do you understand that
21 you need the proper licenses, also?

22 THE WITNESS: Absolutely. Right after
23 that, we got everything, we started studying,
24 absolutely.

<p style="text-align: right;">78</p> <p>1 BY MS. FISCHER: 2 Q. But as of April, between April and 3 November, you were still continuing your advisory 4 business? 5 A. Yes, because he never said I had to 6 get this right way. He said he would work with 7 me. The fact that I have people's money at risk, 8 it was okay, I will study and get the license, 9 keep helping the people, dealing with the 10 situation because I didn't think it was something 11 that -- a major -- in other words, I wasn't afraid 12 that I was going to be put in jail or something 13 like that because I had all these people's money 14 at risk now. So I'm like I can't up and leave 15 them here just like that so I continued helping 16 them while I was studying, to be quite honest. 17 Q. How much do you pay your independent 18 contractors when they get business? 19 A. They get between ten percent and 30 20 percent of the fee. 21 Q. Depending on the value -- 22 A. Of the client, right. That fee 23 includes investing, budgeting, financial 24 education, whatever is required, everything is 25 included and the taxes and everything was included</p>	<p style="text-align: right;">80</p> <p>1 invest. 2 Q. And when was this, approximately? 3 A. It was between 1998 and 2000, sometime 4 in those years. 5 Q. So was she -- did she become a client 6 of New Century Investor that was in California? 7 A. No, she just wanted to invest and so I 8 recommended to her, I recommended her to a guy we 9 were dealing with at Morgan Stanley by the name of 10 Anthony Lee, who was a broker in California and 11 who also handled my account and my father-in-law's 12 account at that time. 13 Q. So I'm a little confused. How do you 14 differentiate between a person like Ms. Acuna, who 15 comes to you and says I want to invest, and then 16 you just refer her to Morgan Stanley and that's it 17 and a client who comes to you and says I want to 18 invest and then you say okay, well, here is my fee 19 structure and you know, this is what I do and I 20 think this would be a good fit for you? 21 A. At that time, there was no New Century 22 Investor operating the way it operates today, 23 there was no New Century Investor because I was 24 simply investing and helping people in terms of 25 insurance and annuities so there was no New</p>
<p style="text-align: right;">79</p> <p>1 in there. So what we would do, we will take a 2 percentage for taxes, they get paid a percentage 3 and the rest, we paid Susan and whoever else, they 4 got a percentage of that at the end of the year, 5 they got a 1099. 6 Q. I'd like to talk a little bit about 7 Miss Acuna that we had mentioned earlier. How did 8 you meet Miss Acuna? 9 A. She was introduced to me by a long 10 time friend and church member at my 11 father-in-law's church, a Janice Richardson, and 12 this is when I was living back in California and 13 flying back and forth to my father-in-law when he 14 was ill, she came to the house in Linden and we 15 talked a few times about investing because she had 16 this money. She had this money and she was having 17 some issues, if I remember correctly, with her 18 spouse and kids so she wanted to put this money 19 away and invest it so we had a few meetings, 20 myself, her and my father-in-law. At that time, 21 he was still doing okay. We talked about 22 investing. Janice Richardson recommended to her 23 that, you know, she talk to me. 24 When we met, we just talked and after 25 the third meeting, she decided that she wanted to</p>	<p style="text-align: right;">81</p> <p>1 Century Investor, there was Family Seven with my 2 wife's family. So any referrals and business that 3 I got, people knew we invested so when she came to 4 me and said I want to invest this money, I said I 5 don't invest this money for you, this is what I do 6 and this is the person who can do it for you so 7 she invested the money and we contacted Anthony 8 Lee and he got everything rolling for her and he 9 gave me a \$75 referral fee for referring her in 10 the form of a restaurant gift certificate. That's 11 what happened. 12 Q. What was the nature of the investment? 13 A. The first set of moneys went into a 14 brokerage account for her and to my recollection, 15 she was put in I think Home Depot or some stocks 16 and that money was there with Morgan Stanley. 17 Q. And how much was that? 18 A. I think it was \$20,000. 19 Q. And I'm assuming there is a second set 20 of moneys? 21 A. Right. After that, a few months 22 later, the stock did real well, she was happy, she 23 said I have some more money. If I remember, 24 either she sold the house or she got some money 25 from someplace, I can't remember exactly. So we</p>

EXHIBIT D

EXHIBIT D

11:29 AM
11/29/06

New Century Investor
Customer Contact List
November 29, 2006

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Customer	Phone	Street1	Street2	City	State
Abney, Amanda	917 412-8361 home	420 Miontauk Ave		Brooklyn	NJ
Acuna, Claudia	973 466-5085 h	15 Helen Place		Newark	NJ
Agard, Beverly-Ann	212 963-9928 x7116 ...	Grand Central Station		New York	NJ
Aji, Sameeh	201 434-1939 home	11 Hancock Lane		Willingboro	NJ
Allen, Crystal	732 297-5740	98 Sapphite Lane		Franklin Park	NJ
Andrews, Eric	908 755-6437 home	921 Post Drive		Plainfield	NJ
Anglin, Rupert & Lougene	732 246-3951 h	877 Fox Meadow Rd		N. Brunswick	NJ
Archie, Nola & Roland	845 897-3393 h	9 Kratch Circle		Wappingers Falls	NY
Arrington, Alfred	908 962-6871 h	809 E. 3rd Street		Plainfield	NJ
Banks, David & Sharon		718 Bordentown Ave		South Amboy	NJ
Barnett, Joseph	908 313-1047 c	2251 Sherman Ave		Woodside	NY
Bateman, Branda	908 495-0982 c	2702 Madaline Dr.		Avenel	NJ
Bell, Melonie	732 752-5476 h	131 Tanglewood Dr.		Madison	VA
Belton, Lillian	732 331-8744 h	46 Reading Road		Piscataway	NJ
Bennett, Denise	908 553-5751	1278 Salem Rd		Edison	NJ
Bigams, Shelly	732 316-1251 h	24 Buttonwood Dr.		Plainfield	NJ
Birs, Greg & Stacy	973 242-1333 h	43 Rutgers Dr		Parlin	NJ
	609 641-2633 h	110 S. Hampden Ct		Newark	NJ
		44-47 George St		Pleasantville	NJ
		82 Ayers Ct	P.O. Box #12	Springfield Gardens	NY
		1950 Stratford Ave	Apt 2B	Teaneck	NJ
		1348 George Street		Neptune	NJ
		1045 Grove Ave		Plainfield	NJ
		698 E. 24th Street		Edison	NJ
		75 West 119th St		Paterson	NJ
		1227 E. Front St Ap...		Konigs	NY
		48 Clark Street		Plainfield	NJ
		987 Hyson Rd		Hillside	NJ
				Jackson	NJ
				Hyattsville	MD
				Baltimore	MD
				Ft. Washington	MD
				Bronx	NY
				Paterson	NY
				Roselle Park	NJ
				S. Plainfield	NJ
				Franklin Park	NJ
				South Plainfield	NJ
				St. Petersburg	FL
				Oroville	NJ
				Roselle	NJ
				Elizabeth	NJ
				Brooklyn	NY
				Rahway	NJ
				Matawan	NJ

11:30 AM
11/29/06

New Century Investor Customer Contact List November 29, 2006

Customer	Phone	Street1	Street2	City	State
Clark, Norma	732 233-9797 c	5 Roanoke Rd		Matawan	NJ
Cleaves, Renee	862 262-9409 c	173 Columbus Drive		Franklin Park	NJ
Coleman, Reginald	201 317-7858 c	55 Park End Place		East Orange	NJ
Crawford, Diane	732 442-3891 h	593 Charles St		Perth Amboy	NJ
Cruz, Elizabeth, & Gibb, Gregory	732 248-8380 c	15 Piedmont Rd		Edison	NJ
Cunningham, Paula	517 321-4442 w	1625 Sagebrush		Lansing	MI
Currey, Lawrence & Karen	732 227-0807	309 Green Hill Man...		Franklin Park	NJ
Daniels, April	732 310-3496 c	169 Chestnut St		Avenel	NJ
Darden, Bruce		323 Gill Lane Apr 6A		Iselin	NJ
Derguste, Valerie	917 549-6447 c	635 E. 14th Street a...		New York	NY
Davis, Selicia	973 414-6288 h	235 Mt. Vernon Ave...		Orange	NJ
Dean, Carlton		141 Vermont Ave	2nd fl	Newark	NJ
Dillard, Steven & Heard, Theresa		375 Park Ave		Perth Amboy	NJ
Dixon, Otilla	732 485-8356	160 E. 95th Street		Brooklyn	NJ
Dorisime, Ralph	917 626-6971 c	1364 E. 58th St		Brooklyn	NY
Dorisime, Samuel	917 495-3753 c	1364 E. 58th Street		Brooklyn	NY
Dorisime, Yves	718 209-4116 h	144 Coconut Street		Brooklyn	NY
Duckett Jr, Lonnie	671 707-2038	1 Sycamore Lane		Brentwood	NY
Eatmon, Kelli	732 819-0518 h	1249 Cameron Ave.		Piscataway	NY
Ejiochi, Ugochukwu	908 654-4469 h	929 Franklin Ave		Plainfield	NJ
Ejiochi, Ugochukwu	908 812-0219	1130 Chestnut Street		South Plainfield	NJ
Eliscand, Maryse	908 656-4660	4414 Foster Ave		Roselle	NJ
Ernest, Freddy	718 462-1985 h	8C Colletti Terrace		Brooklyn	NY
Examilotis, Rose	732 331-2097 c	103 Harding Avenue		Jamsburg	NJ
Feliciano, Ralph	973 253-0314 h	501 Mountainview Dr		Clifton	NJ
Figueroa, Julia	908 380-6881 C	514 Magie Ave		North Plainfield	NJ
Fisher, Debora	973 202-5302	428 East 28th Stree...		Elizabeth	NJ
Fisher, Tara	973 279-0479 h	1 Foothills Drive		Paterson	NJ
Foster, Florine & Zachary	732 651-8260 h	129 Prospect Ave. ...		South River	NJ
Franklin, Robin & Gina	732 692-9421	1122 1st Avenue		Dunellen	NJ
Gabrieli, Allen	908 433-4167 c	2502 8th Avenue		Asbury Park	NJ
Gaines, Edward	212 865-0349 h	1155 Livingston Ave		New York	NJ
Garcia, Sonia	732 247-3763 h	5 Cecilia Place		N. Brunswick	NY
Garry, David	908 490-0573 h	113 Burkley Place		Fanwood	NJ
Garvin, Craig	908 277-1737	20 Johnson Rd		Vauxhall	NJ
Garvin, William	732 249-2309 e	15 Piedmont Rd		Somerset	NJ
Gibbs, Gregory	732 246-8380 h	51 Schmidt Lane 25B		Edison	NJ
Gonzalez, Zarita	732 801-8543 c	3114 Town Cir S		N. Brunswick	NJ
Goodman, Devin & Shaunette	609 433-4077 c	10 Rosalind Circle		Lawrenceville	NJ
Goodman, Lisa	856 262-3066 h	5665 Derby Court #...		Sicklerville	NJ
Goodwin, Torie	571 594-2498 c	1325 West Sixth St		Alexandria	VA
Graham, Anthony & Martha	908 251-5560	p. o. box 6684		Piscataway	NJ
Graham, Henry	623 793-2138 h	722 Harrison Place		Altadena	CA
Grant, Janice	908 494-6722 cher	51 Birch Street		Linden	CA
Gray Jr., Floyd & Sancha	732 541-4050	226 Marsh Place		Carteret	NJ
Gray, Barry	704 969-7044	5607 Buitonwood Ct		Plainfield	NJ
Gray, Sonya	732 668-3838 c	4760 Obispo Ave		Monmouth Junction	NJ
Groce, Odessa	562 425-2637 h	1161 East 80th Street		Lakewood	NJ
Gurbs, Janelle	347 623-6143 c	691 Sheridan Ave		Brooklyn	CA
Hair, Tahira	908 668-0193 h			Plainfield	NY

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Customer	Phone	Street1	Street2	City	State
Harrison, Brandon	732 599-8440	210 Pine Valley Ter		Easton	PA
Hayes, Lisa	609 532-1219 c	49 Voseck Ct		Lawrenceville	NJ
Haywood, Dexter & Deborah	516 432-8107	840 Shore Rd	Apt. #6J	Long Beach	NY
Henderson, Kent & Shannon	732 297-5778 h	3 Garretson Dr		Franklin Park	NJ
Hendley, Dwayne	908 862-7542 h	1405 Clinton St		Linden	NJ
Hester Jr, Alvin	908 756-0657 h	504 Richmond St		Plainfield	NJ
Hester, Ezra & Judith	908 822-1227 h	32 Raymond Avenue		Plainfield	NJ
Hibbert, Barrington	908 755-0394 h	110 Remington Ave		Plainfield	NJ
Hinton, James	973 670-5246	27 Hancock Dr		W Milford	NJ
Hollis, Nathan & Althea	703 371-6621 c	2005 Quaker Street A		Alexandria	VA
Holmes, Alicia	908 405-1221 althea c	1287 Regency Place		S. Plainfield	NJ
Hope, Donna	973 233-0315 h	140 South Mountain...		Montclair	NJ
Hope, Lesley	646 706-8985 c	2932 Gunther Ave PH		Bronx	NJ
Howard, Siladrene	646 588-8888	1000 W. 15th St		Philadelphia	PA
Ireland, Lakesha	908 629-0530 h	1004 Salem Avenue		Hillside	NJ
Jackson, Adrienne	973 375-8961 h	181 Eastern Parkw...		Newark	NJ
Jackson, Michael	732 846-1001 h	67 Newport Ave		Somerset	NJ
Jean-Claude Marjorie	201 897-4558 d	36 Marshall St		Paterson	NJ
Jefferson, Keith	718 968-3225 w	2810 Ave L		Brooklyn	NJ
Jefferson, John	732 433-4479 c	841 E Milton Ave		Rahway	NJ
Jemey, Gans	973 714-1038 h	35 Merrie Trail		Deerfield	NJ
Johnson, Brenda	646 308-9647	274 Bonnet Place		Green	NJ
Johnson, John	440 437-8747 h	442 E Main St		Orwell	OH
Johnson, Katherine	732 227-5572 w	507 Summit Drive		Point Pleasant	NJ
Johnson, Sonia & Cedric	973 420-5589 c	33 Field Place		Newark	NJ
Johnson, Tiffany	908 226-9554 h	112 Hill Hollow Rd		S. Plainfield	NJ
Johnson, Timothy	601 619-2781 h	677 Raleigh Dr. Apt.		Magee	MS
Jones, Arremy	908 512-6476	609 Ravine Road		Plainfield	NJ
Jones, Ashley E	281 748-6064	6831 Westwood Court		Houston	TX
Jones, Austin		309 Green Hill Man		Franklin Park	NJ
Jones, Patricia		667 Lake Circle	Unit 40C	Ej. Paso	TX
Jones, Ryan	732 754-9643 h	401 Route 22		Plainfield	NJ
Just Us Ladies Investing	973 207-4154 c	164 W Valley Brook...		Califon	NJ
Kelly, Darrell & Wayne	973 278-0318	c/o Darnee Owens...	693 20th Ave	Paterson	NJ
Kelly, Darrell	732 735-5220 c	41 Drake Rd		Somerset	NJ
Kemp, James	918 662-0538	130 Creek Crossing		Gardner	NC
Keshi, Joseph	732 220-0143 h	175 Comstock		New Brunswick	NJ
Kirkwood, Sonja	732 438-0410	58 Foxtail Lane		Monmouth Junction	NJ
Knox, Ida	848 228-0281 c	42 Winston Drive		Somerset	NJ
Knox, Ida	973 674-2019 h	410 Prospect St	Apt G8	East Orange	NJ
LaForest, Guillaume	661 255-3268	8900 W. 15th St		Vallejo	CA
LaMont, Julie	484 812-5215 c	187 E 18th Street		Charler	PA
Lee, Dennis	718 969-2301 h	161-51 Jewel Ave		Flushing	NY
Lee, Dennis	908 294-0875 c	1228 E. St. George		Linden	NJ
Leslie Lester		254 W. Powell Dr		Princeton	AZ
Lewin, Robert		320 Jackson Ave		Scotch Plains	NJ
Lewis, Joseph & Zina	973 450-1155 w	476 Joralemon St	Unit H1	Belleville	NJ
Lewis, Zina	973 523-1043 h	468 East 34th Street		Paterson	NJ
Lewis, Zina	607 388-2729 h	9787 Bode Rd		Kennett	PA

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Lewler, Desmond		17 Elmwood Place		Newark	NJ
Lubin, Evens & Louise	974-532-4466 c	171 Forest Avenue		Mount Vernon	NY
Lubniewski, Michael & Bonnie		137 Rues Lane		E. Brunswick	NJ
Luniqu, Rose	732 227-5741 wm	93 Lafayette Ave		Milltown	NJ
Malloy, Sandra	908 351-5204 h	135 Jacques Street		Elizabeth	NJ
Malloy, Shosh	908 756-4811 h	1231 Randolph Rd		Plainfield	NJ
Mangiam, Joshua & Louy	908 789-8144 h	1231 Randolph Rd		Plainfield	NJ
Massey, Dashaun	480 767-7739	6882 Peninsula Ct		Plano	TX
Massey, Desmond	973 920-8941 c	17 Elmwood Place		Newark	NJ
Massey, Margaret	973 280-7185	17 Elmwood Place		Newark	NJ
Massey, Michael	973 592-9580 c	17 Elmwood Place		Newark	NJ
Matos, Anawilda	973 878-2547	17 Elmwood Place		Newark	NJ
Matthews, Janet	908 220-8490 c	707 N Broad St		Elizabeth	NJ
Matthews, Pauline	201 562-0605	197 Myrtle Ave		Jersey City	NJ
McCoy, James	201 424-3462 c	197 Myrtle Ave		Jersey City	NJ
McCoy, Katrina	973 926-5897 h	1488 Stanley Terrace		Hillside	NJ
McCoy, Karen	609 668-0021 c	7348 Rudderow Ave		Pennsauken	NJ
McGehee, Sean	609 337-3300 w	11 Newark Drive		North Babylon	NY
McKeithen, Vondalyn	718 791-4800 x 22 w	25 Ambassador Way		Jackson	NJ
McMilan, Clifton	609 433-3561 c	49 Voseck Ct		Lawrenceville	NJ
McMillian, Leroy	908 405-3249 h	1819 Myrtle Ave		Plainfield	NJ
Melendez, Miguel	732 828-7807 h	171 Handy Street		Ne Brunswick	NJ
Melendez, Miguel	917 822-8822	31 Missonelle Ct		Hawthorne	NJ
Melendez, Miguel	845 742-7292 w	99 MacArthur Ave		Sayreville	NJ
Melendez, Miguel	908 723-5974 h	118-02 179 St		St Albans	NY
Melendez, Miguel	973 750-5676 h	400 RTE 211 E #366		Middletown	NY
Miller, Glen	248 417-6369 c	6224 Woodland Dr		Grand Blanc	MI
Miller, Theresa & Steve	517 881-5974 c	1535 Wellington Rd		Lansing	MI
Minter, Cherie	908 553-0323 c	1019 Thorn Street		Rahway	NJ
Minter, Cynthia	732 669-1105 c	959 Lafayette St		Elizabeth	NJ
Moore, Dontrell	732 803-1509 c	211 Broadway		Keyport	NJ
Moore, Miarrette	908 419-0860 c	323 Siles Street		Vauxhall	NJ
Morgan Jr, Raymond	908 561-4447 h	1290 Cambridge Ave		Plainfield	NJ
Muhammad, Todd & Sajdah	646 342-6642 c	405 Summit Ave		Jersey City	NJ
Mwangi, Muthoni	201 862-0453	30 Englewood Ave	Apt # 3C	Teaneck	NJ
Myles, Tynisha	201 332-5535	32 Mt. Pleasant Ave		W. Paterson	NJ
Myrick, Tyeshia & Koi, Kirk	917 892-5384 h	277 Danforth Ave		Jersey City	NJ
Nichols, Davaul	908 531-6847 c	898 Bushwick Ave		Brooklyn	NY
Newman, Christopher	973 678-4658 w	357 W. end Ave		Elizabeth	NJ
Nichol, Christopher	973 207-6135 c	715 Berkeley Ave		Orange	NJ
Nichol, Rosalind	973 674-6008 h	715 Berkeley Ave		Orange	NJ
Nichol, Shirley	718 884-5768 h	715 Nichol Avenue		Orange	NJ
Norflis, Mark	908 667-0764	3555 Oxford Ave A		Orange	NJ
Norflis, Mark	908 667-0764	288 Westside Ave		Brooklyn	NY
Page, Liston	908 405-9773	185 Wall Ave		Peepack	NJ
Parham, Shellce	973 452-9443 c	925 W. 8th St		Patterson	NJ
Patrick, Kyle	908 230-5933 c	456 Perry Dr		Plainfield	NJ
Patterson, Angela	908 623-0941 c	2808 Kent Place		North Brunswick	NJ
Perkins, Rashawn		1121 Myrtle Avenue		Hillsborough	NJ
Perkins, Rashawn				Plainfield	NJ

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Person, Evangeline	973 416-1987 h	612 Lyons Avenue		Irvington	NJ
Peteet III, Emory	732 246-2431 h	99 N. Lawrence A...		Somerset	NJ
Petifriere, Bertillon	908 322-5753 h	1710 Mountain Ave...		Scotch Plains	NJ
Phillips, Caryn		3 Washington Square	Apt 140	New York	NJ
Pierre, Cynthia	305 962-4429	p.o. 80X 52		Princeton	NJ
Pincham, Todd & Michele	908 355-1511 h	11904 Fairwood Drive		Brooklyn	MD
Pinkston, Arrell	301 385-7511 h	10304 Weishire Dr.		Upper Marlboro	MD
Pitts, Kyle	314 222-4468 w	102 S 18th St		Belleville	IL
Plummer, Stephen	973 592-5579	PO Box 6633		Somerset	NJ
Polikarpou, Basilious	908 346-0827 c	925C E. Front St.		Plainfield	NJ
Privott, Calvin	201 697-3837 c	50 R Arcadia Rd		Hackensack	NJ
Rai, Angie	908 413-5863	1003 West 5th St		Plainfield	NJ
Randolph, Mark	973 466-4008 w	2805 Madaline Dr.		Avenel	NJ
Reddick, Lakisha	973 463-3315 c	1500 Noble Avenue...		Brooklyn	NY
Reid, Brenda	609 413-5268	2203 Greenwood Dr...		Lindenwold	NJ
Reyes, Danny & Rosario, Elba	973 223-6974 c	100 Underwood Str...		Newark	NJ
Reyes, Gilberto & Rosa	908 834-5843	216 W. 8th Street		Plainfield	NJ
Reyes, Libri 1	908 361-8165 c	1145 W. 5th st		Plainfield	NJ
Rhodes, Charles & Zeida	732 648-7018	1145 West 5th St		Plainfield	NJ
Rhodes, Todd & Mary	856 459-0815 h	19 A Middlesex villa...		Middlesex	NJ
Richardson, Allen	973 923-8022 h	1470 Bridgeton Mill...		Millville	NJ
Richardson, David	908 474-0648 h	879 Hunterdon Street		Newark	NJ
Richardson, Vondett	732 729-0998 h	1411 Clinton Street		Linden	NJ
Robinson, Carl	973 277-9919 c	327 Edpas Rd		New Brunswick	NJ
Robinson, Donella	908 835-8364 h	315 Leland Ave		Plainfield	NJ
Robinson, Rhonda	610 349-3525	117 Wayne St.		Washington	NJ
Robinson, Rhonda	908 347-8100	730 East 25th Street		Chester	PA
Ross, Monty	732 567-2689	2316 Stack Rd		Monroe	NC
Ruiz, Melissa	201 424-9723 c	4208 Apple Tree La...		Larsing	MI
Salon, Yvette	908 276-3477 h	5 Haney Ave		Neptune	NJ
Sanders, Courtney & Manchuria White	609 835-0282 h	157 West 33rd St.		Bayonne	NJ
Sanders, Terrence & Gerlie	646 654-4667	419 Orange Ave		Cranford	NJ
Santos, Jose	212 537-8002 w	11 Holiday Lane		Willingboro	NJ
Sarfaty, Robert & Anette	917 613-5387 w	40 Coventry Circle		Piscataway	NJ
Sass, Marion	908 679-3760 w	286 South Street		Manhattan	NY
Saunders, Teressa & Michael	308 865-5100 h	579 Fisk Place		N. Plainfield	NJ
Savage, Milton	338 335-9939	1143 Clawson Ct		Plainfield	NJ
Scipio, Leon	215 732-5077 w	1507 Caldwell St		Greensboro	NC
Searight, Erica	301 868-5294 h	410 Brown Street		Greensboro	NC
Searight, William & Denise	908 448-1222	5603 Patagonia Ct		Philadelphia	PA
Simmons, Charifayna	732 235-7748	10 Butler Rd		Clinton	MD
Simmons, Elliott	908 213-5505 c	1503 Stauben Drive		Franklin Park	NJ
Simmons, Zachary	973 727-0504	833 W. 14th Street...		Franklin Park	NJ
Simms-Jackson, Beverly	908 377-2893 c	142 Crawford St		New York	NY
Simpkins, Rakia	973 445-9195	1203 W. 5th Street		East Orange	NJ
	267 253-0816 c	1314 Chetwynd		Plainfield	NJ
	201 463-0287 c	8 Eiridge Place		Plainfield	NJ
		43 Wilson Pl Apt 6		Willingboro	NJ
				Roselle	NJ

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Slaughter, Linda & Keith	347 581-2786 E	506 W. 145 Street		New York	NY
Smith III, Robert	908 889-8260	21 Roosevelt Ave		Fanwood	NJ
Smith Jr, John	908 917-7804 c	4220 Birchwood Ct.		North Brunswick	NJ
Smith, Jasmine	908 693-0055	431 E. 4th Street		Roselle	NJ
Smith, Joshin & Alnisa	908 925-8313 h	1202 McCandless St		Linden	NJ
Smith, Lois-Tresia	908 688-5158	2820 Reid Street		Union	NJ
Smith, Xavier	908 400-3980	661 W. 8th St		Plainfield	NJ
Sobczak, Sallie	732 545-4099 h	228 Beignets Lane		Somerses	NJ
St. Clair, Dorian	908 874-4839	5607 Cypress Dr 202		Hyattsville	MD
Stevens, Nicholas	908 755-5768 h	112 3D Bluebird Dr		Hillsborough	NJ
Strothers, Danielle	703 626-5759	1234 Watchung Ave		Plainfield	NJ
Strothers, Danielle	908 679-3702 W	388 St. Johns Place		Brooklyn	NY
Styles, Sarah	732 485-7177 c	7513 Mangold-Court		Alexandria	VA
TenJ	908 757-6499	719 Hillside Ave		Plainfield	NJ
Thomas, Farha	732 247-7113 h	18 Bocker Street		Somerses	NJ
Thomas, Jacquetta	732 424-6193	609 Ravine Rd		Plainfield	NJ
Thomas, Lisa	908 461-4641 c	25 Bennett St		Freehold	NJ
Thomas, Roderick	732 512-7799 c	2 Ruscombe Court		Willingboro	NJ
Thompson, Kwamara	973 464-9208 c	2 Kelly Street		Parlin	NJ
Tolbert, Tasha M.	908 672-8822 c	31 Carroll St		Trenton	NJ
Toure, Mohamed	862 368-6308 c	55 E. Park Street		E. Orange	NJ
Turner, Phillip & Carol	609 871-3121	456 Perry Dr		North Brunswick	NJ
Turner, Valerie & Wana	901 773-8833 h	754 Scotland Rd #L4		Orange	NJ
Iyas, Michael	732 317-2693 h	56 Primrose Lane		Willingboro	NJ
Valcin, Paulama	917 301-5980 c	3804 Devil Tree Court		Hyattsville	MD
Walker, Doreen	908 659-3677 w	312 Pegasus Rd		Piscataway	NJ
Ward, Henrietta	973 374-8966h	33 Ramapo Rd		Garnerville	NY
Weather Spoon, Earnest	570 629-5786	1915 Maple Ave		Evansston	IL
Webb, Marsha & Gantard	609 532-1512 c	128 Columbia Ave 1...		Newark	NJ
Webb, Tiara	973 454-8602 mc	49 Olympia Terrace		Irvington	NJ
Weems, Simone	973 655-1676 h	Route 1 Spring St.		Elizabeth	NJ
Whitlock, Kyle	917 509-6469 c	218 Euclid Ave		Trenton	NJ
Wilcox, Eric	908 222-3430 h	474 Shearer Ave.		Union	NJ
Wilkinson, Latanya	718 284-7843	2 Hilltop Place		Montclair	NJ
Williams, Clive & Brenda	917 217-7622 c	26 Stevens Ave		Old Bridge	NJ
Williams, Kimberlee	732 942-1894 h	1300 Rock Avenue ...		N. Plainfield	NJ
Williamson, Lolita	856 904-8983	118-31 57th St Apt.		Jamaica	NY
Willis, Kareem	908 337-4754 c	20 Westminster Rd		Brooklyn	NY
Willis, Lachau	423 299-1130 c	18 S. Oxford Street		Brooklyn	NY
Willis, Jean	732 662-1003	316 Clearstream Ro...		Jackson	NJ
Zaimor, Rox	347 683-6750 h	6542 Grant Ave		Pennsauken	NJ
		650 Harrison St		Rahway	NJ
		410 Prospect St		East Orange	NJ
		63 Seymour Ave	#F2	Newark	NJ
		PO Box 84	1st Floor	Carleer	NJ
		12245 W. 10th Place		Newark	NJ
		8230 Burring Fores...		Springfield	VA
		1364 E. 58th St		Brooklyn	NY

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About the Founder/Editor

Terrence G. LeGall

- Over 20 years experience in the Financial Services Industry.
- An investor for over 20 years and built a multi million dollar portfolio using of stocks, bonds and real estate.
- President/CEO of LeGall Financial an Insurance/Investment Company
- Featured in Black Enterprise Magazine - October 1990 money issue.(How One A \$2.3 million Nest Egg)
- Appeared on The Tim Reid Show (of TV hit shows WKRP in Cincinnati and FR PLACE) and Daphne Reid Show (of TV hit show FRESH PRINCE OF BELAIR w Smith) - Dec 1990 in Baltimore, Maryland.
- Featured in USA TODAY newspaper on March 27th, 1991 in the money section (Investment Club pays off).
- Hosted financial seminars in many states including New York, New Jersey, Pe Illinois, Nevada and California.
- Independent Consultant to groups on how to start an investment club or corp
- Provides insurance protection for many families in the event of the death of t earner and using insurance as a vehicle to pay estate taxes.
- The editor is an individual investor and is not registered as a securities broke an investment adviser either with the U.S. Securities and Exchange Commiss state securities regulatory authority.

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Email: newcenturyinvestor@newcenturyinvestor.com

Mailing address: 923 N. Wood Avenue, Linden, NJ 07036

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to [flegall@aol.com](#)
date Dec 4, 2007 11:12 AM
subject Your services
mailed-by gmail.com

Mr. Legall/New Century Investor:

I sent this email yesterday afternoon, but I believe something may have happened, as it in my sent folder, so I wanted to make sure you received it.

I am new to the Northern New Jersey area and was searching online for someone to give some financial advice when I came across your website.

I am interested to speak to you further about your services and whether they would be for my particular investment goals/current portfolio.

I would appreciate the opportunity speak with you about whether or not you are currently taking on new clients.

Thank you in advance for any help you could give and I look forward to hearing from you.

Sincerely,
Ms. Claire Fraser

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date Dec 4, 2007 4:39 PM
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terrence legall

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ANNE MILGRAM,)	SUPERIOR COURT OF NEW
Attorney General of New Jersey,)	JERSEY
on behalf of VINCENT J. OLIVA,)	CHANCERY DIVISION: GENERAL
Chief of the New Jersey)	EQUITY
Bureau of Securities,)	UNION COUNTY
)	
Plaintiff,)	DOCKET NO. _____
)	
v.)	
)	
NEW CENTURY INVESTOR, Inc., a)	
New Jersey Corporation, and)	
TERRENCE LEGALL, individually)	Civil Action
and as principal of New)	
Century Investor,)	
)	
Defendants.)	

**BRIEF IN SUPPORT OF PLAINTIFF'S APPLICATION FOR AN ORDER TO
SHOW CAUSE AND PRELIMINARY INJUNCTIVE RELIEF**

ANNE MILGRAM
ATTORNEY GENERAL OF NEW JERSEY
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Deputy Attorney General
On the Brief

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PRELIMINARY STATEMENT

Plaintiff, Vincent J. Oliva, Chief of the New Jersey Bureau of Securities (the "Bureau Chief"), submits this brief pursuant to N.J.S.A. 49:3-69(a)(2) and R. 4:52-1, and in support of plaintiff's application for an Order to Show Cause and preliminary injunctive relief to stop defendants' ongoing violation of the New Jersey Uniform Securities Law (1997), N.J.S.A. 49:3-47 to 76 (the "Securities Law"). Plaintiff seeks an order: (1) preliminarily enjoining and restraining defendants New Century Investor, Inc. and Terrence LeGall ("defendants") from directly or indirectly offering or selling investment advice or other financial planning services pending final disposition of this matter; (2) ordering defendants to immediately remove from the Internet any web site defendants have posted or caused to be posted offering investment advice or other financial planning services and preliminarily enjoining defendants from posting or causing to be posted the same or similar web site(s) pending final disposition of this matter; and (3) enjoining and restraining defendants from destroying or concealing any documents, books, records, or other materials, including electronically-stored information, related to this matter.

STATEMENT OF FACTS

In or around March 2006, while investigating a complaint the New Jersey Bureau of Securities (the "Bureau") received regarding defendant Terrence LeGall ("LeGall"), Bureau Investigator John Cronin discovered a web site located at URL newcenturyinvestor.com. (Fischer Cert.¹ ¶ 4-5). Newcenturyinvestor.com indicated to Investigator Cronin that LeGall was acting as the President and CEO of an investment advisory service titled New Century Investor, Inc. ("NCI"). (Fischer Cert. ¶ 5). Upon discovery of the web site, Investigator Cronin checked the Bureau's records and found that neither LeGall nor New Century Investor were registered with the Bureau in any capacity. (Fischer Cert. ¶ 5). On March 30, 2006, Investigator Cronin traveled to the NCI office in Linden, New Jersey to interview LeGall in person. (Fischer Cert. ¶ 6).

During the March 30, 2006 interview, LeGall confirmed that he was in the business of providing investment advice to clients for a fee. (Fischer Cert. ¶ 6). Investigator Cronin then advised LeGall of the Securities Law's

¹ "Fischer Cert." refers to the Certification of New Jersey Bureau of Securities Investigator Pamela M. Fischer, submitted in support of plaintiff's application for an order to show cause and preliminary injunctive relief.

registration requirements related to investment advisers. LeGall responded that he would take the necessary steps to complete registration with the Bureau. Id. Several days after the interview, in early April 2006, Investigator Cronin mailed an Investment Adviser Registration Packet to LeGall, enclosing the forms necessary to apply for registration with the Bureau. (Fischer Cert. ¶ 7). Although LeGall later acknowledged having received the packet, he did not complete and return the forms provided. (Fischer Cert. ¶¶ 7, 9).

Following resolution of the Bureau's subpoena enforcement proceedings against LeGall in late 2006, Bureau Investigator Pamela Fischer deposed LeGall on February 5, 2007. (Fischer Cert. ¶ 9). During the deposition, LeGall admitted that he had continued his investment adviser activities from the time of the March 30, 2006 interview, when he was advised that his activity required registration with the Bureau and instructed to complete registration. Id. LeGall testified that he discontinued his investment adviser activities after the Bureau filed a subpoena enforcement action against him in November 2006, and that he intended to sit for the necessary exam (administered by the Financial Industry Regulatory Authority) to qualify for registration with the Bureau as an investment adviser. Id.

During the February 5, 2007 deposition, LeGall stated that he formed NCI in 2001 while he was living in California, and that he began to operate NCI from New Jersey beginning in March 2003. (Fischer Cert. ¶ 10). LeGall also identified a set of materials - which outline NCI's investment advice and financial planning services and include new client application forms - as those materials he presents to potential clients. Id.

NCI charges a minimum annual "subscription fee" of \$595.00 to each new customer. (Fischer Cert. ¶ 13). The amount of the annual fee for NCI's services increases depending upon the amount of money a customer seeks to invest. Id. The annual fee may be as much as 10% of the amount of money for which each client seeks advice or planning services. Id. NCI's subscription fee entitles each client to multiple services, including advice regarding stocks to purchase, advice regarding when to sell stocks purchased, broker-dealer recommendations, tax preparation and advice, various reports and newsletters containing financial information and advice, and a personal financial check-up. (Fischer Cert. ¶ 14).

LeGall solicits clients, among other methods, through NCI's web site, newcenturyinvestor.com. Newcenturyinvestor.com provides detailed information

regarding NCI's investment advisory services and fees, subscription forms, contact information for NCI's office, a field for users to submit contact information to NCI electronically, and an "Investment Dictionary." (Fischer Cert. ¶¶ 15, 16). The web site also lists LeGall's experiences and accolades in the "Financial Services Industry." Id. Much of the information found at newcenturyinvestor.com matches the information found in the materials LeGall confirmed during his investigative deposition as those he provides to new NCI clients. (Fischer Cert. ¶¶ 10, 16). Since NCI began operating from New Jersey in or around March 2003, LeGall has provided investment advice and other financial planning services to approximately 300 individuals and families, the majority of whom are New Jersey residents. (Fischer Cert. ¶ 18).

To date, the Bureau has not received complete application materials from LeGall or NCI seeking registration in connection with providing investment advisory services. (Fischer Cert. ¶¶ 20, 23). The web site located at newcenturyinvestor.com remains functional on the Internet and the site continues to solicit new investment advice and financial services clients. (Fischer Cert. ¶ 21). On December 4, 2007, Investigator Fischer, posing as a potential client, sent an e-mail message to

LeGall inquiring about financial advice and the opportunity to speak with him regarding her investment goals. (Fischer Cert. ¶ 22). LeGall promptly responded to Investigator Fischer's message, stating that she should provide her phone number so that the two of them could discuss her becoming a new client. (Fischer Cert. ¶ 22). LeGall continues to solicit new clients and operate NCI as an investment advice and financial planning service while not registered with the Bureau. (Fischer Cert. ¶¶ 22, 23).

LEGAL ARGUMENT

POINT I

DEFENDANTS ARE ACTING AS UNREGISTERED INVESTMENT ADVISER AND UNREGISTERED INVESTMENT ADVISER REPRESENTATIVE IN VIOLATION OF THE SECURITIES LAW

"Investment adviser" is defined in the Securities Law at N.J.S.A. 49:3-49(g), which states:

(i) any person who for direct or indirect compensation, engages in the business of advising others, either directly or through publications or writings, as to the value of securities or the advisability of investing in, purchasing, selling or holding securities, or who, for compensation and as a part of a regular business, issues or promulgates analyses or reports concerning securities and (ii) any financial planner or other person who provides investment advisory services to others for compensation and as part of a business or who holds himself out as providing investment advisory services to others for compensation.

N.J.S.A. 49:3-49(g)(1)(i) and (ii) (emphasis added).

NCI's services squarely meet the foregoing broad and unambiguous definition of "investment adviser." Defendants admittedly provide most, if not all, of the services set forth at N.J.S.A. 49:3-49(g), including advising clients on the purchase and sale of securities, both through personal contact and publications, providing various financial planning services to clients, and advertising NCI on radio and Internet as an investment advisory service.

N.J.S.A. 49:3-49(s) defines "investment adviser representative" as any person associated or employed with an investment adviser, other than clerical staff, who does any of the following: (a) provides advice regarding securities directly to clients or makes determinations regarding securities recommendations or securities advice; (b) manages clients' accounts or portfolios; (c) offers and negotiates the sale of investment advisory services; or (d) supervises an investment adviser representative. See N.J.S.A. 49:3-49(s). LeGall's activities on behalf of NCI conclusively render him an investment adviser representative pursuant to the definition set forth at N.J.S.A. 49:3-49(s). LeGall acts as the President and Chief Executive Officer of NCI and actively provides

advisory services directly to NCI's clients. LeGall also personally solicits clients and negotiates the selling price of NCI's services.

Investment advisers and investment adviser representatives are required to register with the Bureau pursuant to N.J.S.A. 49:3-56(a), which states "[i]t shall be unlawful for any person to act as a broker-dealer, agent, investment adviser or investment adviser representative in this State unless that person is registered or exempt from registration under this act[.]" (emphasis added). The securities industry is an area of commerce particularly vulnerable to abuse and fraud. See Mayflower Securities Co. v. Bureau of Securities, 64 N.J. 85, 89 (1973) (assessing the appropriate penalty for appellant's failure to comply with the registration requirements of the Securities Law). The industry must, therefore, be subject to careful governmental regulation "to assure that those who engage in the business meet high standards in the interest of protection of the public." Id. The New Jersey Supreme Court recognized the "obvious" purpose of registration with the Bureau as facilitation of Bureau investigation and examination of whether a business is in compliance with the law governing its operation. See id. at 89.

The Securities Law provides a series of exemptions to registration as an investment adviser. Those exemptions are tied to the exceptions to the definition of "investment adviser," as well as to the number of clients an investment adviser serves, the clientele's place of residence, and whether the investment adviser is already registered with the Bureau as a broker-dealer or with the United States Securities and Exchange Commission (the "SEC") pursuant to federal securities law. See N.J.S.A. 49:3-49(g); see also N.J.S.A. 49:3-56(g) and (i).

For those investment advisers like NCI, who squarely meet the Securities Law's definition of "investment adviser" and are not registered with the Bureau as a broker-dealer or with the SEC pursuant to federal law, the only available exemption from registration with the Bureau applies if the investment adviser does not have more than five (5) clients during a consecutive 12-month period who are New Jersey residents. See N.J.S.A. 49:3-56(g)(1) and (2).² Defendants are not entitled to the exemption because the majority of NCI's approximately 300 clients are New Jersey residents. Defendants are required to register with

²An investment adviser representative is not entitled to exemption from registration unless the investment adviser with whom the representative is employed or associated is also entitled to exemption. See N.J.S.A. 49:3-56(j).

the Bureau and have been acting unlawfully for nearly five years by failing to do so. Significantly, the burden of proving an exemption from registration lies with the person who is claiming the exemption. N.J.S.A. 49:3-56(d). Should defendants claim that they are entitled to an exemption, defendants must present evidence forming the basis for such exemption. See id.; see also Cola v. Terzano, 129 N.J. Super. 47, 57 (Law Div. 1974) (finding that a sale of stock violated the Securities Law where there was ample evidence that the stock was unregistered and no proof was offered as to the availability of an exemption from registration); Securities and Exchange Commission v. Ralston Purina Co., 346 U.S. 119, 126, 73 S. Ct. 981, 985, 97 L. Ed. 1494, 1500 (1953).

POINT II

PLAINTIFF IS ENTITLED TO PRELIMINARY INJUNCTIVE RELIEF BASED ON THE PRIMA FACIE SHOWING THAT DEFENDANTS HAVE VIOLATED THE SECURITIES LAW AND CONTINUE TO ACT IN VIOLATION OF THE SECURITIES LAW

As set forth above, and in the Certification of Investigator Fischer, plaintiff presents overwhelming evidence that defendants are conducting an investment advisory service in violation of the Securities Law. The

Securities Law provides for injunctive relief to stem violations of its provisions. N.J.S.A. 49:3-69 states:

If it appears to the bureau chief that any person has, or directly or indirectly controls another person who has engaged in, is engaging in, or is about to engage in any act or practice constituting a violation of any provision of this act ... the bureau chief may take, in addition to any other enforcement actions available under this act and in the bureau chief's discretion, either or both of the following actions:

...

Have an action brought by the Attorney General in the Superior Court on the bureau chief's behalf to enjoin the acts or practices to enforce compliance with this act or any rule or order hereunder. Upon a proper showing, a permanent or temporary injunction, restraining order, or writ of mandamus shall be granted and a receiver or conservator may be appointed for the defendant or the defendant's assets.

N.J.S.A. 49:3-69(a) and (a)(2).

N.J.S.A. 49:3-69 further specifies that if the court finds that a person has violated any provision of the Securities Law, it may enjoin such person from continuing the act or practice which constitutes the violation. See N.J.S.A. 49:3-69(b). Well beyond a *prima facie* showing, plaintiff has shown that defendants admit to operating an investment advisory service and that defendants flagrantly continue to act in violation of the Securities Law by failing to register with the Bureau.

This Court restated the standard for preliminary injunctive relief in 2006, instructing that the movant must demonstrate the following: (1) the relief is necessary to prevent irreparable harm; (2) a settled legal right supports movant's claim; (3) the material facts are uncontroverted (also stated as a preliminary or *prima facie* showing of a reasonable probability of ultimate success on the merits); and (4) the balance of equities weighs in favor of granting injunctive relief. B & S Limited, Inc. v. Elephant and Castle International, Inc., 388 N.J. Super. 160, 167 (Ch. Div. 2006) (citing Crowe v. DeGioia, 90 N.J. 126, 132-34 (1982)). This Court has distinguished, however, between applications for injunctive relief brought under statutory authority and applications brought pursuant to the equity power of this Court alone. See Hoffman v. Garden State Farms, Inc., 76 N.J. Super. 189 (Ch. Div. 1962) (finding that a showing of irreparable harm was not required where plaintiff sought preliminary injunctive relief based on statutory authority and habitual violation of the relevant statute). Because the Securities Law provides express statutory authority for injunctive relief, plaintiff is not required to demonstrate that injunctive relief is necessary to prevent irreparable harm. See id. The potential for defendants' continued violation of the

Securities Law amounts to irreparable public injury per se. See Matawan Regional Teachers Ass'n v. Matawan-Aberdeen Regional Board of Education, 212 N.J. Super. 328, 335 (Law Div. 1986).

While defendants may have the opportunity to make an argument based in equity, there is no authority for the concept that plaintiff, as the official charged with bringing action to enforce the Securities Law, must demonstrate that a preliminary injunction will not cause defendants undue hardship. The Securities Law is the settled legal basis for plaintiff's action and request for preliminary injunctive relief. Further, the Bureau Chief has demonstrated a high probability of ultimate success in this straightforward and undeniable case of failure to comply with statutory law. See Matawan Regional Teachers Ass'n, supra, 212 N.J. Super. at 335 (stating that where injunctions are creatures of statute, the only necessary showing is a violation of the statute).

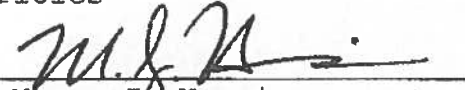
CONCLUSION

For all of the foregoing reasons, plaintiff respectfully requests that the Court grant its application for an order to show cause and preliminary injunctive relief.

Respectfully submitted,

ANNE MILGRAM
ATTORNEY GENERAL OF NEW JERSEY
On behalf of Vincent J. Oliva
Chief of the New Jersey Bureau
Securities

By:


Megan J. Harris
Deputy Attorney General

Dated: December 20, 2007

It is on this _____ Day of _____, 20__
ORDERED that defendants New Century Investor ("NCI") and
Terrence LeGall ("LeGall") appear and show cause before the
Superior Court at the Union County Courthouse, 2 Broad Street,
Elizabeth, New Jersey at _____ O'clock a.m. / p.m. or as soon
thereafter as counsel can be heard, on the _____ day of
_____ 20__, why an Order should not be issued:

- A. Preliminarily enjoining and restraining defendants NCI and LeGall from directly or indirectly offering or selling investment advice or other financial planning services pending final disposition of this matter;
- B. Ordering defendants to immediately remove from the Internet any web site defendants have posted or caused to be posted offering investment advice or other financial planning services and preliminarily enjoining defendants from posting or causing to be posted the same or similar web site(s) to the Internet pending final disposition of this matter;
- C. Enjoining and restraining defendants NCI and LeGall from destroying or concealing any documents, books, records, or other materials, including electronically-stored information, related to this matter; and
- D. Granting such other relief as the court deems

equitable and just.

And it is further ORDERED that:

1. A copy of this Order to Show Cause, Verified Complaint, legal memorandum and any supporting affidavits or certifications submitted in support of this application be served upon the defendants personally or _____ within ____ days of the date hereof, in accordance with R. 4:4-3 and R. 4:4-4, this being original process.

2. The plaintiff must file with the court its proof of service of the pleadings on the defendants no later than three (3) days before the return date.

3. Defendants shall file and serve a written response to this Order to Show Cause and the request for entry of injunctive relief and proof of service by _____ 20___. The original documents must be filed with the Clerk of the Superior Court in the county listed above. A list of these offices is provided. You must also send a copy of your opposition papers directly to Judge _____, whose address is _____ New Jersey. You must also send a copy of your opposition papers to the plaintiff's attorney whose name and address appears above, or to the plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file your opposition and

pay the required fee of \$_____ and serve your opposition papers on your adversary, if you want the court to hear your opposition to the injunctive relief the plaintiff is seeking.

4. The plaintiff must file and serve any written reply to the defendants' order to show cause opposition by _____ 20____. The reply papers must be filed with the Clerk of the Superior Court in the county listed above and a copy of the reply papers must be sent directly to the chambers of Judge _____.

5. If defendants do not file and serve opposition to this order to show cause, the application will be decided on the papers on the return date and relief may be granted by default, provided that the plaintiff files a proof of service and a proposed form of order at least three (3) days prior to the return date.

6. If the plaintiff has not already done so, a proposed form of order addressing the relief sought on the return date (along with a self-addressed return envelope with return address and postage) must be submitted to the court no later than three (3) days before the return date.

7. Defendants take notice that the plaintiff has filed a lawsuit against you in the Superior Court of New Jersey. The verified complaint attached to this Order to Show Cause states

the basis of the lawsuit. If you dispute this complaint, you, or your attorney, must file a written answer to the complaint and proof of service within 35 days from the date of service of this order to show cause; not counting the date you received it. These documents must be filed with the Clerk of the Superior Court in the county listed above. A list of these offices is provided. Include a \$_____ filing fee payable to the "Treasurer State of New Jersey." You must also send a copy of your Answer to the plaintiff's attorney whose name and address appear above, or to the plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve your Answer (with the fee) or judgment may be entered against you by default. Please note: Opposition to the Order to Show Cause is not an Answer and you must file both. Please note further: if you do not file and serve an Answer within 35 days of this Order, the Court may enter a default against you for the relief plaintiff demands.

8. If you cannot afford an attorney, you may call the Legal Services office in the county in which you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

9. The Court will entertain argument, but not testimony, on the return date of the Order to Show Cause, unless the court and parties are advised to the contrary no later than _____ days before the return date.

J.S.C.

ATLANTIC COUNTY: Deputy Clerk of the Superior Court Civil Division, Direct Filing 1201 Bacharach Blvd., First Fl. Atlantic City, NJ 08401	LAWYER REFERRAL (609) 345-3444 LEGAL SERVICES (609) 348-4200
BERGEN COUNTY: Deputy Clerk of the Superior Court Case Processing Section, Room 119 Justice Center, 10 Main St. Hackensack, NJ 07601-0769	LAWYER REFERRAL (201) 488-0044 LEGAL SERVICES (201) 487-2166
BURLINGTON COUNTY: Deputy Clerk of the Superior Court Central Processing Office Attn: Judicial Intake First Fl., Courts Facility 49 Ranocas Rd. Mt. Holly, NJ 08060	LAWYER REFERRAL (609) 261-4882 LEGAL SERVICES (609) 261-1088
CAMDEN COUNTY: Deputy Clerk of the Superior Court Civil Processing Office 1st Fl., Hall of Records 101 S. Fifth St. Camden, NJ 08103	LAWYER REFERRAL (856) 964-4520 LEGAL SERVICES (856) 964-2010
CAPE MAY COUNTY: Deputy Clerk of the Superior Court 9 N. Main Street Box DN-209 Cape May Court House, NJ 08210	LAWYER REFERRAL (609) 463-0313 LEGAL SERVICES (609) 465-3001
CUMBERLAND COUNTY: Deputy Clerk of the Superior Court Civil Case Management Office Broad & Fayette Sts., P.O. Box 615 Bridgeton, NJ 08302	LAWYER REFERRAL (856) 662-6207 LEGAL SERVICES (856) 451-0003
ESSEX COUNTY: Deputy Clerk of the Superior Court 50 West Market Street Room 131 Newark, NJ 07102	LAWYER REFERRAL (973) 622-6207 LEGAL SERVICES (973) 624-4500
GLOUCESTER COUNTY: Deputy Clerk of the Superior Court Civil Case Management Office Attn: Intake First Fl., Court House 1 North Broad Street, P.O. Box 129 Woodbury, NJ 08096	LAWYER REFERRAL (856) 848-4589 LEGAL SERVICES (856) 848-5360
HUDSON COUNTY: Deputy Clerk of the Superior Court Superior Court, Civil Records Dept. Brennan Court House- 1st Floor 583 Newark Ave. Jersey City, NJ 07306	LAWYER REFERRAL (201) 798-2727 LEGAL SERVICES (201) 792-6383
HUNTERDON COUNTY: Deputy Clerk of the Superior Court Civil Division 65 Park Avenue Flemington, NJ 08822	LAWYER REFERRAL (908) 735-2611 LEGAL SERVICES (908) 782-7879
MERCER COUNTY: Deputy Clerk of the Superior Court Local Filing Office, Courthouse 175 S. Broad Street, P.O. Box 8086 Trenton, NJ 08660	LAWYER REFERRAL (609) 585-6200 LEGAL SERVICES (609) 685-6249

MIDDLESEX COUNTY:
Deputy Clerk of the Superior Court
Administration Building
Third Floor
1 Kennedy Sq., P.O. Box 2633
New Brunswick, NJ 08903-2633

LAWYER REFERRAL
(732) 828-0053
LEGAL SERVICES
(732) 249-7600

MONMOUTH COUNTY:
Deputy Clerk of the Superior Court
Court House
71 Monument Park
P.O. Box 1269
Freehold, NJ 07728-1269

LAWYER REFERRAL
(732) 431-6644
LEGAL SERVICES
(732) 866-0020

MORRIS COUNTY:
Deputy Clerk of the Superior Court
Civil Division
30 Schuyler Pl., P.O. Box 910
Morristown, NJ 07960-0910

LAWYER REFERRAL
(973) 287-5882
LEGAL SERVICES
(973) 285-8911

OCEAN COUNTY:
Deputy Clerk of the Superior Court
Court House, Room 119
118 Washington Street
Toms River, NJ 08754

LAWYER REFERRAL
(732) 240-3666
LEGAL SERVICES
(732) 341-2727

PASSAIC COUNTY:
Deputy Clerk of the Superior Court
Civil Division
Court House
77 Hamilton St.
Paterson, NJ 07505

LAWYER REFERRAL
(973) 278-9223
LEGAL SERVICES
(973) 345-7171

SALEM COUNTY:
Deputy Clerk of the Superior Court
92 Market St., P.O. Box 16
Salem, NJ 08079

LAWYER REFERRAL
(856) 935-6828
LEGAL SERVICES
(856) 451-0003

SOMERSET COUNTY:
Deputy Clerk of the Superior Court
Civil Division Office
New Court House, 3rd Fl.
P.O. Box 3000
Somerville, NJ 08876

LAWYER REFERRAL
(908) 685-2323
LEGAL SERVICES
(908) 231-0840

SUSSEX COUNTY:
Deputy Clerk of the Superior Court
Sussex County Judicial Center
43-47 High Street
Newton, NJ 07860

LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 383-7400

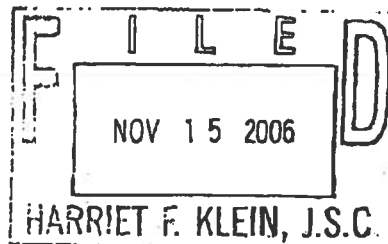
UNION COUNTY:
Deputy Clerk of the Superior Court
1st Fl., Court House
2 Broad Street
Elizabeth, NJ 07207-6073

LAWYER REFERRAL
(908) 363-4715
LEGAL SERVICES
(908) 364-4340

WARREN COUNTY:
Deputy Clerk of the Superior Court
Civil Division Office
Court House
413 Second Street
Belvidere, NJ 07823-1500

LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 475-2010

STUART RABNER
ATTORNEY GENERAL OF NEW JERSEY
124 Halsey Street, 5th Floor
P.O. Box 45029
Newark, NJ 07101
Attorney for Plaintiff



By: Megan J. Harris
Deputy Attorney General
(973) 648-3730

FRANKLIN L. WIDMANN,
Chief of the New Jersey
Bureau of Securities,

Plaintiff,

v.

TERRENCE G. LEGALL,

Defendant.

) SUPERIOR COURT OF NEW JERSEY
) CHANCERY DIVISION: GENERAL
) EQUITY
) ESSEX COUNTY
) DOCKET NO. C-355-04

Civil Action

ORDER TO SHOW CAUSE

This matter being brought before the Court by Stuart Rabner, Attorney General of New Jersey, attorney for Franklin L. Widmann, Chief of the New Jersey Bureau of Securities, Deputy Attorney General Megan J. Harris appearing, seeking ex parte relief by way of summary action pursuant to R. 4:67-1(a) and R. 4:67-2(a), based upon the facts set forth in the Verified Complaint filed herewith, and the Court having determined that this matter may be commenced by order to show cause as a summary proceeding pursuant to N.J.S.A. 49:3-68(c) and R. 1:9-6(b) and (c) and for good cause shown:

IT IS on this 15th day of November, 2006

ORDERED that defendant Terrence G. LeGall ("LeGall" or "defendant") appear and show cause on the 6th day of December, 2006, before the Superior Court of New Jersey

at the Wilentz Justice Complex, 212 Washington Street, 8th Floor, Newark, New Jersey, at 10:00 a.m. ~~4:00~~ or as soon thereafter as counsel can be heard, why judgment should not be entered:

A. Directing LeGall to respond to New Jersey Bureau of Securities Subpoena 5507 and produce all documents requested therein within seven (7) days of such order;

B. Enjoining the destruction of any records or documents which relate in any manner to Plaintiff's Verified Complaint and which are in LeGall's possession, custody, or control;

C. Directing LeGall to comply with New Jersey Bureau of Securities Subpoena 5610 and appear before the Bureau to give testimony relating to the matter under investigation within thirty (30) days of such order;

D. Enjoining LeGall and any agent or employee of LeGall or New Century Investor from offering or selling investment advice or securities until LeGall has fully complied with Subpoenas 5507 and 5610 and all provisions of the New Jersey Uniform Securities Law (1997) N.J.S.A. 49:3-47 et. seq.; and

E. Granting such other relief as the court may deem just and equitable.

And it is further ORDERED that:

1. A copy of this Order to Show Cause, Verified Complaint, supporting Certification, and Brief be served upon defendant within 5 days of the date hereof in accordance with R. 4:4-3 and R. 4:4-4, this being original process.

2. Plaintiff must file with the court his proof of service of the pleadings on defendant no later than three (3) days before the return date.

3. Defendant shall file and serve a written answer [an answering affidavit or a motion returnable on the return date set above] to this Order to Show Cause and the relief requested in the

Verified Complaint and proof of service of the same by December 1, 2006.

The answer [answering affidavit or appropriate motion], must be filed with the Clerk of the Superior Court in the county listed above and a copy of the papers must be sent directly to the chambers of Judge Harriet F. Klein.

4. Plaintiff must file and serve any written reply to the defendant's Order to Show Cause opposition by December 4, 2006. The reply papers must be filed with the Clerk of the Superior Court in the county listed above and a copy of the reply papers must be sent directly to the chambers of Judge Harriet F. Klein.

5. If the defendant does not file and serve opposition to this Order to Show Cause, the application will be decided on the papers on the return date and relief may be granted by default, provided that plaintiff files a proof of service and a proposed form of order at least three (3) days prior to the return date.

6. If Plaintiff has not already done so, a proposed form of order addressing the relief sought on the return date (along with a self-addressed return envelope with return address and postage) must be submitted to the court no later than three (3) days before the return date.

7. Defendant take notice that plaintiff has filed a lawsuit against you in the Superior Court of New Jersey. The Verified Complaint attached to this Order to Show Cause states the basis of the lawsuit. If you dispute this complaint, you, or your attorney, must file a written answer [answering affidavit or a motion returnable on the return date set above] and proof of service before the return date of the Order to Show Cause. These documents must be filed with the Clerk of the Superior Court in the county listed above. A list of these offices is provided. Include a \$ 135- filing fee payable to the "Treasurer State of New Jersey." You must also send a copy of your answer

[answering affidavit or motion] to plaintiff's attorney whose name and address appear above. A telephone call will not protect your rights; you must file and serve your answer [answering affidavit or motion] with the fee or judgment may be entered against you by default.

8. If you cannot afford an attorney, you may call the Legal Services office in the county in which you live. A list of these offices is provided. If you do not have an attorney or are not eligible for free legal assistance you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

9. The court will entertain argument, but not testimony, on the return date of the Order to Show Cause, unless the court and parties are advised to the contrary no later than 5 days before the return date.



HARRIET F. KLEIN J.S.C. J.S.C.