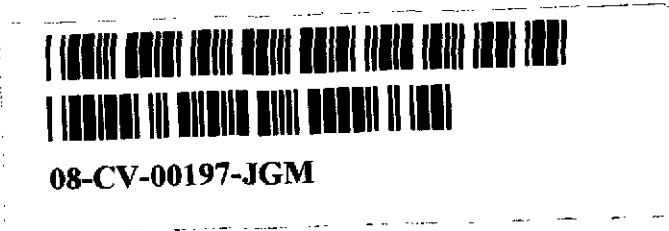


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FILED
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AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY



**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

vs.

**STRATEGIC MANAGEMENT &
OPPORTUNITY CORPORATION;
ROBERT J. PRATT, and JEFFREY A.
BROMMER,**

Defendants.

Case No.: C 08-197 JLR

~~PROPOSED~~ **FINAL JUDGMENT,
PERMANENT INJUNCTION AND OTHER
RELIEF AS TO DEFENDANT JEFFREY A.
BROMMER**

JLR

The Securities and Exchange Commission having filed a Complaint and defendant Jeffrey A. Brommer ("Defendant Brommer") having entered a general appearance; consented to the Court's jurisdiction over him and the subject matter of this action; consented to the entry of this Final Judgment without admitting or denying the allegations of the Complaint (except as to jurisdiction); waived findings of fact and conclusions of law; and waived any right to appeal from this Final Judgment:

Final Judgment as to Defendant Brommer

-1-

SECURITIES AND EXCHANGE COMMISSION
5670 WILSHIRE BLVD., 11TH FLOOR
LOS ANGELES, CA 90036
TEL: (323) 965-3998, FAX: (323) 965-3908

I.

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that Defendant Brommer and Defendant Brommer's agents, servants, employees, attorneys, and all persons in active concert or participation with them who receive actual notice of this Final Judgment by personal service or otherwise are permanently restrained and enjoined from violating, directly or indirectly, Section 10(b) of the Securities Exchange Act of 1934 ("Exchange Act"), 15 U.S.C. § 78j(b), and Rule 10b-5 promulgated thereunder, 17 C.F.R. § 240.10b-5, by using any means or instrumentality of interstate commerce, or of the mails, or of any facility of any national securities exchange, in connection with the purchase or sale of any security:

(a) to employ any device, scheme, or artifice to defraud;

(b) to make any untrue statement of a material fact or to omit to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading; or

(c) to engage in any act, practice, or course of business which operates or would operate as a fraud or deceit upon any person.

II.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that Defendant Brommer is permanently barred from participating in an offering of penny stock, including engaging in activities with a broker, dealer, or issuer for purposes of issuing, trading, or inducing or attempting to induce the purchase or sale of any penny stock. A penny stock is any equity security that has a price of less than five dollars, except as provided in Rule 3a51-1 under the Exchange Act, 17 C.F.R. 240.3a51-1.

III.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that Defendant Brommer is liable for disgorgement of \$24,916.00, representing profits

Final Judgment as to Defendant Brommer

-2-

SECURITIES AND EXCHANGE COMMISSION
5670 WILSHIRE BLVD., 11TH FLOOR
LOS ANGELES, CA 90036
TEL: (323) 965-3998, FAX: (323) 965-3908

1 gained as a result of the conduct alleged in the Complaint, together with
2 prejudgment interest thereon in the amount of \$1,084.14, for a total of \$26,000.14.
3 Defendant Brommer shall satisfy this obligation by paying \$26,000.14 within ten
4 (10) business days after entry of this Final Judgment by certified check, bank
5 cashier's check, or United States postal money order payable to the Securities and
6 Exchange Commission. The payment shall be delivered or mailed to the Office of
7 Financial Management, Securities and Exchange Commission, Operations Center,
8 6432 General Green Way, Mail Stop 0-3, Alexandria, Virginia 22312, and shall be
9 accompanied by a letter identifying Jeffrey A. Brommer as a defendant in this
10 action; setting forth the title and civil action number of this action and the name of
11 this Court; and specifying that payment in made pursuant to this Final Judgment.
12 Defendant Brommer shall pay post-judgment interest on any delinquent amounts
13 pursuant to 28 U.S.C. § 1961.

14 IV.

15 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that
16 Defendant Brommer shall pay a civil penalty in the amount of \$40,000.00 pursuant
17 to Section 21(d)(3) of the Exchange Act, 15 U.S.C. § 78u(d)(3). Defendant
18 Brommer shall make this payment within ten (10) business days after entry of this
19 Final Judgment by certified check, bank cashier's check, or United States postal
20 money order payable to the Securities and Exchange Commission. The payment
21 shall be delivered or mailed to the Office of Financial Management, Securities and
22 Exchange Commission, Operations Center, 6432 General Green Way, Mail Stop 0-
23 3, Alexandria, Virginia 22312, and shall be accompanied by a letter identifying
24 Jeffrey A. Brommer as a defendant in this action; setting forth the title and civil
25 action number of this action and the name of this Court; and specifying that
26 payment in made pursuant to this Final Judgment. Defendant Brommer shall pay
27 post-judgment interest on any delinquent amounts pursuant to 28 U.S.C. § 1961.

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V.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the Consent is incorporated herein with the same force and effect as if fully set forth herein, and that Defendant Brommer shall comply with all of the undertakings and agreements set forth herein.


VI.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that this Court shall retain jurisdiction of this matter for the purposes of enforcing the terms of this Final Judgment.

VII.


There being no just reason for delay, pursuant to Rule 54(b) of the Federal Rules of Civil Procedure, the Clerk is ordered to enter this Final Judgment forthwith and without further notice.

Presented by:



Carol Lally
SECURITIES & EXCHANGE COMMISSION
Los Angeles Regional Office
5670 Wilshire Boulevard, 11th Floor
Los Angeles, California 90036

Dated this 15th day of April, 2008.



UNITED STATES DISTRICT JUDGE