

I.

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Defendant Tedford and his agents, servants, employees, attorneys, and those persons in active concert or participation with him who receive actual notice of this Judgment by personal service or otherwise, and each of them, be and hereby are permanently enjoined from violating Section 17(a) of the Securities Act of 1933 (“Securities Act”)[15 U.S.C. §§ 77q(a)] by using any means or instruments of transportation or communication in interstate commerce, or by using the mails, directly or indirectly:

- a. to employ any device, scheme, or artifice to defraud, or
- b. to obtain money or property by means of any untrue statement of a material fact or any omission to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading, or
- c. to engage in any transaction, practice, or course of business which operates or would operate as a fraud or deceit upon a purchaser,

in connection with the offer or sale of any security.

II.

IT IS FURTHER ORDERED that Defendant Tedford and his agents, servants, employees, attorneys, and those persons in active concert or participation with him who receive actual notice of this Judgment by personal service or otherwise, and each of them, be and hereby are permanently enjoined from violating Section 10(b) of the Securities Exchange Act of 1934 (“Exchange Act”)[15 U.S.C. § 78j(b)], and Rule 10b-5 [17 C.F.R. § 240.10b-5] promulgated

thereunder, directly or indirectly, by the use of any means or instrumentality of interstate commerce, or of the mails, or of any facility of any national securities exchange:

- a. employing any device, scheme, or artifice to defraud;
- b. making any untrue statement of a material fact or omitting to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading; or
- c. engaging in any act, practice, or course of business which operates or would operate as a fraud or deceit upon any person,

in connection with the purchase or sale of any security.

III.

IT IS FURTHER ORDERED that Defendant Tedford pay disgorgement in the amount of \$32,800.00, plus prejudgment interest thereon in the amount of \$16,789.32. Based upon Tedford's sworn representation in his Statement of Financial Condition dated April 12, 2000, and submitted to the Commission, payment of all but \$10,000.00 of the disgorgement is waived and payment of prejudgment interest is waived contingent upon the accuracy and completeness of his Statement of Financial Condition.

IV.

IT IS FURTHER ORDERED that based upon Tedford's sworn representations in his Statement of Financial Condition dated April 12, 2000, and submitted to the Commission, the Court is not ordering him to pay a civil penalty pursuant to Section 20(d) of the Securities Act and Section 21(d)(3) of the Exchange Act. The determination not to impose a civil penalty and to partially waive payment of the disgorgement and waive prejudgment interest thereon is

contingent upon the accuracy and completeness of his Statement of Financial Condition. If at any time following the entry of this Final Judgment the Commission obtains information indicating that Tedford's representations to the Commission concerning his assets, income, liabilities, or net worth were fraudulent, misleading, inaccurate or incomplete in any material respect as of the time such representations were made, the Commission may, at its sole discretion and without prior notice to Tedford, petition this Court for an order requiring Tedford to pay the full amount of disgorgement, prejudgment and post-judgment interest thereon, and a civil penalty. In connection with any such petition, the only issues shall be whether the financial information provided by Tedford was fraudulent, misleading, inaccurate or incomplete in any material respect as of the time such representations were made, and the amount of civil penalty to be imposed. In its petition, the Commission may move this Court to consider all available remedies, including, but not limited to, ordering Tedford to pay funds or assets, directing the forfeiture of any assets, or sanctions for contempt of this Final Judgment, and the Commission may also request additional discovery. Tedford may not, by way of defense to such petition, challenge the validity of his Consent or the Final Judgment, contest the allegations in the Complaint filed by the Commission, contest the amount of disgorgement and interest, or assert that disgorgement or the payment of a civil penalty should not be ordered.

V.

IT IS FURTHER ORDERED that payment by Tedford of the disgorgement, as provided in Paragraph III above, shall be made:

- (a) in full within ten days of the date of this order;

- (b) into this Court's registry by certified check or money order drawn to the order of "Clerk, United States District Court, District of Columbia," noting on the face of the check the caption and civil action number of this case, whereupon the Clerk of this Court, or the Financial Deputy Clerk, shall deposit such funds into an interest-bearing account (the "Account") with the Court Registry Investment System ("CRIS"). Such payments shall be under cover of a letter that identifies Gary C. Tedford, the caption and case number of this action, and the name of the Court;
- (c) simultaneously with payment, copies of such checks or money orders and accompanying cover letter shall be transmitted to Paul Berger, Esq., Assistant Director, Securities and Exchange Commission, Division of Enforcement, 450 5th Street, N.W., Washington, D.C. 20549-0702, and shall be forwarded under cover of letter containing the Commission's file number (HO-3155);
- (d) the Account shall be held by the CRIS until further order of the Court, and distributed pursuant to a Court-approved plan to be proposed by the Commission, but in no event shall the money disgorged revert, directly or indirectly, to the defendants, or to the heirs or assigns of the defendants;
- (e) interest earned on the Account shall be credited to the Account and shall thereafter be treated in the same manner as principal; and
- (f) the Clerk of the Court is directed without further order to deduct from the income earned on the investment a fee, not exceeding that authorized by the Judicial

Conference of the United States and set by the Director of the Administrative Office at or equal to 10% of the income earned in the investment so held.

Any funds paid by Defendants shall be distributed pursuant to a plan to be submitted by the Commission for the Court's approval.

VI.

IT IS FURTHER ORDERED that Defendant Tedford, at the Commission's request, on reasonable notice and without service of a subpoena, provide discovery and testify truthfully at any deposition and at any civil judicial or administrative proceeding related to the Complaint filed herein or any allegations therein and any continuing civil litigation or proceeding based hereon or related to any other proceeding brought by the Commission as a result of this proceeding.

VII.


IT IS FURTHER ORDERED that the annexed Consent of Defendant Tedford is incorporated in this Order by reference with the same force and effect as if fully set forth herein.

VIII.

There being no cause for delay, the Clerk of the Court is directed, pursuant to Rule 54(b) of the Federal Rules of Civil Procedure, to enter this Final Judgment forthwith.

So ordered.

Washington, D.C.
20 day of July, 2010



Richard W. Roberts
United States District Judge