

STATE OF ILLINOIS
SECRETARY OF STATE
SECURITIES DEPARTMENT

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

File No. 0700416

CONSENT ORDER

TO RESPONDENT
LOHMEIER:

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

c/o Pravin Rao
Attorney for Respondent Lohmeier
Perkins Coie LLP
131 S. Dearborn St. – Suite 1700
Chicago, IL 60603-5559

WHEREAS, Respondent John H. Lohmeier (“Lohmeier”) executed a Stipulation to Enter Consent Order (“Stipulation”), which is incorporated by reference into this Consent Order (“Consent Order”).

WHEREAS, by means of the Stipulation, Respondent Lohmeier has admitted the Illinois Securities Department of the Office of the Secretary of State properly served him with the Notice of Hearing in this proceeding dated September 12, 2007, in accordance with Section 11.F(1) of the Illinois Securities Law of 1953, as amended; has admitted to the jurisdiction of the Secretary of State over his person and over the subject-matter of this proceeding, in accordance with Sections 11.F(1), 8.D-5, 8.E(1)(g), and 12.E of the Illinois Securities Law of 1953, as amended; and has consented to the entry of this Consent Order without admitting or denying the allegations contained in the Stipulation and in this Consent Order.

WHEREAS, the Illinois Secretary of State finds that: the Illinois Securities Department of the Office of the Secretary of State properly served Respondent Lohmeier the Notice of Hearing in this proceeding dated September 12, 2007, in accordance with Section 11.F(1) of the Illinois Securities Law of 1953, as amended (“Act”); the Secretary has personal jurisdiction over the person of Respondent Lohmeier and over the subject-matter of this proceeding, in accordance with Sections 11.F(1), 8.D-5, 8.E(1)(g), and 12.E of the Act.

WHEREAS, by means of the Stipulation, Respondent Lohmeier has neither admitted nor denied the truth of the following allegations, which are contained in Count III of the Notice of Hearing, but acknowledges the allegations shall be adopted as the Secretary of State's Findings of Fact.

WHEREAS, the Secretary of State makes the following Findings of Fact:

COUNT III

False or Misleading Registration Application of Respondent Lohmeier

1. On or about April 25, 2007, Respondent John H. Lohmeier caused an application for Investment Adviser Representative registration to be filed with the Secretary of State that failed to disclose Respondent Lohmeier's role as a managing member of a business known as Locke Haven, LLC.
2. Respondent John H. Lohmeier ("Lohmeier") is a natural person whose residential address is 3211 Washington, Oak Brook, Illinois 60523.
3. Respondent Rebecca Townsend is a natural person whose residential address is 5149 Grand Avenue, Downers Grove, Illinois 60515.
4. Respondent TradeRight Corp., d/b/a TradeRight Securities, Inc. ("TradeRight"), is a corporation organized in Florida. From at least as early as September 2006, and continuing through at least as late as May 2007, TradeRight was registered with the Illinois Secretary of State as a broker-dealer and an investment adviser. Respondent TradeRight's principal place of business is 1003 S.E. 27th Terrace, Cape Coral, Florida 33904. Its other business address is 123 East 9th Street - Suite 1A, Lockport, Illinois 60441.
5. Respondent Michael J. Rukujzo is a natural person whose residential address is 24117 Brown Lane, Plainfield, IL 60544. From at least as early as December 2003, and continuing through at least as late as May 2007, Respondent Rukujzo was president, treasurer, chief executive officer, and Illinois-registered principal of Respondent TradeRight.
6. Respondent George Dragel is a natural person whose residential address is 14109 Yorktown Drive, Orland Park, Illinois 60462. From at least as early as November 2007, and continuing through at least as late as May 2007, Respondent Dragel was corporate secretary of Respondent TradeRight.
7. Respondent Christopher R. Wurtzinger is a natural person whose residential address is 715 North Willard Court, Chicago, Illinois 60622. From at least as early as September

2006, and continuing through at least as late as May 2007, Respondent Wurtzinger was an officer of Respondent TradeRight and its chief compliance officer.

8. Locke Haven, LLC ("Locke Haven"), is a business entity that was organized as a limited liability company in Illinois on or about February 1, 2007. The principal office of the limited liability company is 123 E. 9th Street – Suite 1A, Lockport, Illinois 60441.
9. Enterprise Trust Company ("Enterprise Trust") is a business entity whose office is located at 3305 Spring Mountain Road, Suite 66, Las Vegas, Nevada 89102. From at least as early as September 2006, and continuing through at least as late as May 2007, it also had an office located at 600 Enterprise Drive, Oak Brook, IL 60523.
10. In late 2006, Respondent TradeRight and Enterprise Trust entered into an agreement regarding the purchase of the assets of a California-based broker-dealer named Advisory Financial Consultants, Inc.
11. Respondents Lohmeier and Townsend of Enterprise Trust, and Respondents Rukujzo and Dragel of TradeRight, formed Locke Haven and represented themselves as managing members of Locke Haven from at least as early as December 2006, and continuing through at least as late as January 2007.
12. Respondents Lohmeier, Townsend, Rukujzo, and Dragel used Locke Haven to facilitate the purchase of the assets of Advisory Financial.
13. In or around December 2006, Locke Haven, through the actions of Respondents Lohmeier, Townsend, Rukujzo, and Dragel, executed an asset purchase agreement with Advisory Financial Consultants, Inc.
14. Section 8.D-5 of the Illinois Securities Law of 1953, as amended (815 ILCS 5/1 *et seq.*) ("Act"), provides that an Illinois-registered investment adviser wishing to register an investment adviser representative in the State of Illinois shall file an application with the Secretary of State which the investment adviser representative is required to provide the investment adviser, executed, verified, or authenticated by the investment adviser representative, setting forth information provided in Section 8.D-5 of the Act.
15. Section 130.839 of the Rules and Regulations under the Act (14 Ill. Adm. Code 130.839), provides that an application, properly filed with the Secretary of State in accordance with Section 8.D-5, includes filing a "Uniform Application for Securities Industry Registration or Transfer" ("Form U4") utilizing the Investment Adviser Registration Depository, a computer-based electronic filing system.
16. At all times relevant to this order, Question 13 of the Form U4 asked applicants:

Are you currently engaged in any other business either as a proprietor, partner, officer, director, employee, trustee, agent or

otherwise? If YES, please provide the following details: the name of the other business, whether the business is *investment-related*, the address of the other business, the nature of the other business, your position, title, or relationship with the other business, the start date of your relationship, the approximate number of hours/month you devote to the other business, the number of hours you devote to the other business during securities trading hours, and briefly describe your duties relating to the other business. (Emphasis in original.)

17. Section 8.D-5 of the Act provides that the Form U-4 must be amended within ten days after a change occurs that renders inaccurate any information contained in the initial application.
18. Sometime on or before April 25, 2007, Respondent Lohmeier completed a Form U-4 application for registration as an Investment Adviser Representative that failed to disclose his position as a managing member of Locke Haven.
19. On or about April 25, 2007, Respondent TradeRight, through the actions of Respondents Wurtzinger and Lohmeier, filed the Form U4 application that failed to disclose Respondent Lohmeier's position as a managing member of Locke Haven.
20. Section 12.E of the Act provides that it shall be a violation of the Act for any person to make, or cause to be made, in any application, report, or document filed under the Act or any rule or regulation made by the Secretary of State in accordance with the Act, any statement which was false or misleading with respect to any material fact.
21. By causing Respondent TradeRight to file an application for salesperson registration that failed to disclose Respondent Lohmeier's position as a managing member of Locke Haven, Respondent Lohmeier violated Section 12.E of the Act.

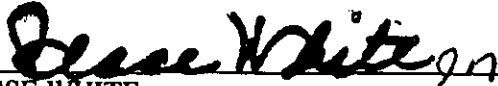
WHEREAS, Respondent Lohmeier acknowledges that the Secretary's Findings of Fact and Conclusions of Law in this order may act as a disqualification in the registration or licensing decisions of any other securities, banking, insurance, or other professional licensing bodies.

WHEREAS, by means of the Stipulation, Respondent Lohmeier, without admitting or denying the allegations in the Stipulation, has agreed to entry by the Secretary of State of a consent order imposing the following terms.

NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

1. Respondent John H. Lohmeier is permanently prohibited from offering or selling any *security* on behalf of any *person* other than himself, to any *person* except a securities exchange; and from acting as an *issuer, controlling person, underwriter, dealer, principal of a dealer, salesperson, investment adviser, principal of an investment adviser, investment adviser representative*, in or from Illinois or involving Illinois residents, as the italicized terms are defined in Sections 2.1, 2.2, 2.3, 2.4, 2.5, 2.5a, 2.6, 2.7, 2.8a, 2.9, 2.11, 2.12a, and 2.12b of the Act.
2. The hearing scheduled for August 20, 2008 is removed from the hearing calendar as to Respondent Lohmeier only.

ENTERED: This 13th day of August, 2008.


JESSE WHITE
Secretary of State
State of Illinois

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