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J. DAVID NAVARRO, Clerk
By MARGARET LUNDQUIST
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Attorneys for the State of Idaho

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT**

**OF THE STATE OF IDAHO, IN AND FOR ADA COUNTY**

| | |
|---|---|
| STATE OF IDAHO, DEPARTMENT OF FINANCE, SECURITIES BUREAU,<br><br>Plaintiff,<br><br>vs.<br><br>JEFFREY DIRK ROBERTS,<br><br>Defendant. | Case No. CV OC 0401016D<br><br>**STIPULATION FOR ENTRY OF JUDGMENT** |

The Department of Finance, State of Idaho, Securities Bureau (Department), Plaintiff, and Jeffrey Dirk Roberts (Roberts), Defendant herein, have agreed to resolve all matters relating to the above-captioned action, pursuant to the following Stipulation. The Department and Roberts hereby stipulate and agree to the following terms and conditions in settlement of this matter:

(1) Roberts neither admits nor denies that he violated the Idaho Securities Act as alleged in Counts One through Three of the Verified Complaint filed by the Plaintiff in this action.

(2) Pursuant to Idaho Code § 30-1442(3), Roberts consents to the Court entering against him the injunction set forth in the Stipulated Judgment and Permanent Injunction, a copy of which is attached hereto as Exhibit A.

(3) Pursuant to Idaho Code § 30-1442(3)(a), Roberts agrees, without admitting or denying liability, that restitution arising from Roberts' alleged violations of the Idaho Securities Act in this action shall be paid pursuant to the sentencing order issued in Ada County Criminal Case No. H0400196.

(4) The Department agrees to forgo any claim for costs, attorney fees, and reimbursement for investigative efforts in this action pursuant to Idaho Code § 30-1442(3)(c), and also agrees to forgo any additional penalties against Roberts related to this action. Roberts agrees to bear all of his own attorney fees and costs related to this action.

DATED this 25 day of March, 2004.

J. D. Roberts
JEFFREY DIRK ROBERTS

APPROVED AS TO FORM AND CONTENT:

DATED this 25 day of March, 2004.

JAMES K. BALL
Attorney for Jeffrey Dirk Roberts

DATED this 28th day of April, 2004.

IDAHO DEPARTMENT OF FINANCE
SECURITIES BUREAU

MARILYN T. CHASTAIN
Bureau Chief

LAWRENCE G. WASDEN
Attorney General

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| STATE OF IDAHO, DEPARTMENT OF FINANCE, SECURITIES BUREAU,<br><br>Plaintiff,<br><br>vs.<br><br>JEFFREY DIRK ROBERTS,<br><br>Defendant. | Case No. CV OC 0401016D<br><br>**STIPULATED JUDGMENT AND PERMANENT INJUNCTION** |

Defendant Jeffrey Dirk Roberts and the Department of Finance, State of Idaho, Securities Bureau (Department), Plaintiff herein, having agreed to resolve all allegations set forth in the Verified Complaint filed in the above-captioned matter by the Stipulation on file herein,

PURSUANT TO THE AFOREMENTIONED STIPULATION, THE COURT HEREBY ORDERS, ADJUDGES AND DECREES as follows:



EXHIBIT A - 1 of 3

INJUNCTIVE RELIEF:

Defendant Jeffrey Dirk Roberts is permanently enjoined from engaging in any acts, practices or omissions which would constitute violations of the Idaho Securities Act, Title 30, Chapter 14, Idaho Code, or any successor act, and in particular, he is permanently enjoined from:

While engaged in or in connection with the offer, sale or purchase of any security in the state of Idaho:

(1) Employing any device, scheme, or artifice to defraud any investors or prospective investors, including specifically:

(a) borrowing money or securities from a customer unless the customer is a broker-dealer, an affiliate, or a financial institution engaged in the business of loaning funds or securities, or immediately family,

(b) misappropriating and converting client investment monies to his own use, and

(c) executing investment transactions which are unauthorized by customers; and

(2) Engaging in any act, practice or course of business which operates, or would operate, as a fraud or deceit upon any person, including specifically those acts listed in ¶ (1)(a) through (c) above.



EXHIBIT A - 2 of 3

RESTITUTION:

Any restitution arising from this action shall be paid pursuant to the sentencing order issued in Ada County Criminal Case No. H0400196.

DATED this _____ day of _____, 2004.

_____
District Judge

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this _____ day of _____, 2004, I served a true and correct copy of the foregoing STIPULATED JUDGMENT AND PERMANENT INJUNCTION by placing the same in the United States Mail, postage prepaid, to:

James K. Ball
MANWEILER, MANWEILER, BREEN & BALL, PLLC
P.O. Box 937
Boise, ID 83701

A. René Martin
Deputy Attorney General
Idaho Department of Finance
700 W. State Street
P.O. Box 83720-0031

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EXHIBIT A - 3 of 3