

State of Missouri
Office of Secretary of State

Case No. AP-05-22

IN THE MATTER OF:

SKAMP INVESTMENTS LLC;
DONALD SCHNURE;
BROWN ASSOCIATES INTERNATIONAL;
INTERNATIONAL FINANCIAL AND
INVESTMENT ADVISORS; and
TED BROWN a/k/a T. R. BROWN,

Respondents.

FINAL ORDER TO CEASE AND DESIST

The Commissioner enters a final order as to Respondents Brown Associates International, International Financial and Investment Advisors, and Ted Brown a/k/a T.R. Brown, in the above-styled proceeding after having reviewed and considered the pleadings, the record on file, and the Request for Final Order of the Enforcement Section of the Securities Division.

PROCEDURAL BACKGROUND

1. On August 11, 2005, the Enforcement Section of the Securities Division submitted a Petition for an Order to cease and Desist that requested an order, a civil penalty and costs of investigation in the above-styled matter.
2. On August 17, 2005, the Commissioner of Securities issued an Order to Cease and Desist and Order to Show Cause why a Civil Penalty and Costs Should not be Imposed.
3. On September 12, 2005, Respondents Skamp Investments LLC and Donald Schnure requested a hearing on this matter. Although Respondents Brown Associates International, International Financial and Investment Advisors, and Ted Brown a/k/a T.R. Brown did not request a hearing, on September 21, 2005, the Commissioner granted a hearing for all Respondents and scheduled the same for November 23, 2005. He ordered each of them to file an Answer by October 25, 2005.
4. On October 27, 2005, a pre-hearing conference was held between the Enforcement Section and Respondent Ted Brown appearing on his own behalf as well as on behalf of Respondents Brown Associates International and International Financial and Investment Advisors
5. On November 22, 2005, counsel for Respondents Skamp Investments LLC and Donald Schnure and the Enforcement Section of the Securities Division submitted a joint request to the Commissioner for a Final Order, and Payment of Penalty and Costs.
6. Respondents Ted Brown, Brown Associates International, and International Financial and Investment Advisors failed to file an Answer with the Commissioner. Respondents Ted Brown, Brown Associates International, and International Financial and Investment Advisors failed to attend the hearing on November 23, 2005.
7. On November 23, 2005, the Commissioner entered a Final Order as to Respondents Skamp Investments LLC and Donald Schnure ordering the Respondents to cease and desist the conduct alleged by the Enforcement Section in its Petition and to jointly pay a \$10,000 fine and \$772 for these respondents' proportionate share of the cost of the investigation.

ORDER

NOW, THEREFORE, IT IS HEREBY ORDERED that the Findings of Fact and Conclusions of Law in the Commissioner's Order of August 17, 2005, are incorporated herein and these Finding and Conclusions and Order are FINAL as to Respondents Ted Brown, Brown Associates International, and International Financial and Investment Advisors.

IT IS FURTHER ORDERED that these Respondents shall each pay a civil penalty of four thousand dollars (\$4,000) in this proceeding representing a one thousand dollar fine (\$1,000) for each of the violations set forth in Counts V, VI, VII and VIII of the Petition. Respondents shall each pay the \$4,000 no later than December 31, 2005. These amounts shall be made payable to the State of Missouri, and the Secretary of State shall forward these funds to the state treasury for the benefit of county and township school funds as provided in Article IX, Section 7 of the Constitution of Missouri. If Respondents fail to make said payments, the Enforcement Section is hereby ordered to refer this matter to the Office of the Attorney General for collection proceedings.

IT IS FURTHER ORDERED that these Respondents shall each pay their proportionate share of the costs of the investigation in this matter by December 31, 2005, in the amount of \$240 for each respondent. This amount shall be payable to the Missouri Secretary of State's Investor Education and Protection Fund.

SO ORDERED:

WITNESS MY HAND AND OFFICIAL SEAL OF MY OFFICE AT JEFFERSON CITY, MISSOURI THIS 14TH DAY OF DECEMBER, 2005.

ROBIN CARNAHAN
SECRETARY OF STATE

(Signed/Sealed)
DAVID B. COSGROVE
COMMISSIONER OF SECURITIES

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of December, 2005,
a copy of the foregoing order was mailed by certified U.S.
Mail, postage prepaid, to the Respondents' attorney in this matter.

Beth Perkins
Administrative Aide