

State of Missouri
Office of Secretary of State

Case No. AP-10-06

IN THE MATTER OF:

PARAGON FINANCIAL GROUP, INC.;
EK MARKETING, INC.;
BRIAN EKASALA, CRD # 2294855; and
SUSAN GARRARD

Respondents

Serve Paragon Financial Group, Inc. at:
16955 SW 286th Street
Homestead, Florida 33030

Serve EK Marketing, Inc. at:
10551 Barkley Street, Suite 106,
Overland Park, Kansas 66212; or at:
4110 Emerald Vis,
Lake Worth, Florida 33030

Serve Brian Ekasala at:
4110 Emerald Vis,
Lake Worth, Florida 33461

Serve Suzan Garrard at:
16955 SW 286th Street
Homestead, Florida 33030

**ORDER TO CEASE AND DESIST AND ORDER TO SHOW CAUSE WHY CIVIL
PENALTIES AND COSTS SHOULD NOT BE IMPOSED**

On February 1, 2010, the Enforcement Section of the Securities Division of the Office of Secretary of State (the "Enforcement Section"), through the Securities Division's Deputy Chief Counsel, Roumen Manolov, submitted a Petition for Order to Cease and Desist and Order to Show Cause Why Civil Penalties and Costs Should Not Be Imposed. After reviewing the petition, the Commissioner issues the following findings of fact, conclusions of law and order:

I. FINDINGS OF FACT

1. Paragon Financial Group, Inc. ("PFG"), is a Kansas corporation with a last known business address of 10551 Barkley Street, Suite 106, Overland Park, Kansas 66212. After failing to file an annual report, the corporation was forfeited on July 15, 2007.
2. PFG's current mailing address is listed as 16955 SW 286 ST, Homestead, Florida 33030.
3. PFG purportedly engaged in the business of commodity trading.
4. PFG registered as an introducing broker on November 16, 2004, with the National Futures Association ("NFA"). PFG withdrew its registration with NFA on August 21, 2008.
5. EK Marketing, Inc. ("EKM"), is a Kansas corporation with a last known business address of 10551 Barkley Street, Suite 106, Overland Park, Kansas 66212.
6. Suzan Garrard ("Garrard") is the sole shareholder and president of PFG and has a last known address of 16955 SW 286th Street, Homestead, Florida 33030.
7. Brian Ekasala ("Ekasala") is the registered resident agent of PFG in Missouri with a last known business address of 10551 Barkley Street, Suite 106, Overland Park, Kansas 66212.
8. Ekasala had been an associated person registered with NFA since 1993 and an associated person of PFG from November 16, 2004 until August 15, 2008, when he withdrew his registration with NFA.
9. Ekasala was previously registered as a securities agent in Missouri through the Central Registration Depository System ("CRD") and has a CRD number of 2294855. Ekasala has not been registered as an agent in Missouri since December 31, 2002.

10. Ekasala is the owner and registered agent of EKM.
11. As used in this Petition, the term "Respondents" refers to Ekasala, Garrard, PFG, and EKM.
12. Sometime in early 2007, a forty-five (45) year-old Missouri resident from St. Louis ("MR1") received an unsolicited telephone call from Ekasala.
13. During this call, Ekasala told MR1 that PFG was a commodities company that purchases, sells, and trades commodities.
14. MR1 decided to open a trading account through PFG and traded in commodities for approximately three months before closing the account.
15. Prior to closing MR1's commodities account, Ekasala offered MR1 an investment opportunity in PFG. Among other things, Ekasala told MR1 that:
 - a. if MR1 invested in PFG, MR1's funds would be used as working capital in PFG;
 - b. MR1 would receive interest at the rate of sixteen and one half percent (16.5%) on a one hundred thousand dollars (\$100,000) investment;
 - c. PFG would issue MR1 a promissory note on MR1's investment; and
 - d. MR1 would receive eleven (11) monthly installment payments and one (1) balloon payment for the remaining balance of the promissory note on the twelfth month.
16. In March of 2007, MR1 issued three checks payable to PFG for the total amount of one hundred thousand dollars (\$100,000) (the "March 2007 Investment"): a check dated March 27, 2007, for the amount of twenty thousand dollars (\$20,000); a check dated March 27, 2007, for the amount of thirty thousand dollars (\$30,000); and a check dated March 29, 2007, for the amount of fifty thousand dollars (\$50,000).
17. On May 1, 2007, PFG issued a promissory note (the "May Note") to MR1. It states, among other things, the following:

"FOR VALUE RECEIVED, Paragon Financial Group, Inc., a Kansas Corporation ("Debtor"), promises to pay to [MR1], ("Holder") the principal sum of One-hundred Thousand Dollars and no cents (\$100,000) plus interest at the rate of 16.5% per year ("Monies Due"), in lawful money of the United States of America. The monies due shall be paid in installments as set forth in "Schedule A" attached hereto."
18. Attached to the May Note was a document titled "Schedule A", which provided an outline of MR1's deposits, date of deposits, amount of principal investment, rate of investment, term of investment, and a twelve (12) month payout schedule.
19. Under the terms of the May Note, beginning June 1, 2007, monthly installments in the amount of one thousand three hundred seventy five dollars (\$1,375) were to be paid to MR1, and a final payment in the amount of one hundred one thousand three hundred seventy five dollars (\$101,375) was due on May 1, 2008.
20. The May Note was signed by Garrard.
21. On June 7, 2007, MR1 received a check in the amount of one thousand three hundred seventy five dollars (\$1,375) from PFG as his first installment payment. /p>
22. After the first installment payment, MR1 invested another twenty thousand dollars (\$20,000) in PFG on June 14, 2007 (the "June 2007 Investment"), which was to be used as working capital.
23. MR1 did not receive a promissory note for this transaction but records obtained during the investigation indicate that the funds were deposited in a bank account held in the name of PFG.
24. Ekasala told MR1 that, for his June 2007 Investment, MR1 would receive monthly installment payments similar to the ones under the promissory note dated May 1, 2007.
25. MR1 received the following installment payments from PFG as a result of MR1's March 2007 Investment:
 - a. one thousand three hundred seventy five dollars (\$1,375) received on July 5, 2007;
 - b. one thousand three hundred seventy five dollars (\$1,375) received on September 11, 2007;
 - c. one thousand three hundred seventy five dollars (\$1,375) received on or September 19, 2007;
 - d. one thousand three hundred seventy five dollars (\$1,375) received on November 21, 2007;
 - e. one thousand three hundred seventy five dollars (\$1,375) received on November 28, 2007; and

- f. two thousand seven hundred fifty dollars (\$2,750) received on March 27, 2008.
26. After March 27, 2008, MR1 stopped receiving payments from PFG and called Ekasala to inquire about the discontinued installment payments. Among other things, Ekasala stated that:
- PFG was experiencing difficulties;
 - PFG needed additional funds to help correct difficulties in PFG;
 - MR1 should “invest more money to make more money;” and
 - MR1's additional investment would help PFG “to get back on their feet.”
27. On May 19, 2008, MR1 invested another twenty thousand dollars (\$20,000) in PFG (the “May 2008 Investment”), which was to be used to improve PFG's business.
28. MR1 did not receive a promissory note for this transaction but records obtained during the investigation indicate that the funds were deposited in a bank account held in the name of PFG.
29. Ekasala told MR1 that, for the May 2008 Investment, MR1 would receive monthly installment payments similar to the ones under the promissory note dated May 1, 2007.
30. Ekasala also encouraged MR1 to invest in EKM. Among other things, Ekasala told MR1 that:
- EKM was a separate entity not directly affiliated with PFG;
 - if MR1 invested ten thousand dollars (\$10,000) in EKM, it would help recover MR1's losses on MR1's investments in PFG; and
 - MR1's investment in EKM would be used to assist PFG in hiring personnel.
31. Ekasala assured MR1 that MR1 would not lose his investment of ten thousand dollars (\$10,000) in EKM since MR1 was not investing in PFG and EKM was a separate entity.
32. On June 17, 2008, MR1 wrote a check to EKM in the amount of ten thousand dollars (\$10,000) for an investment in EKM (the “EKM Investment”).
33. MR1 did not receive a promissory note for this transaction but records obtained during the investigation indicate that the funds were deposited in a bank account held in the name of EKM.
34. On July 17, 2008, MR1 received a letter (the “Delay Letter”) from PFG that stated the following:

[MR1]

Please let this letter serve as notification that there will be a delay in Paragon Financial Group, Inc's (“PFG”) ability to honor its present financial obligation to you.

As you are aware, there has been a significant decline in investing and spending in a general sense across the Nation [sic] and this decline has caused investors to be reluctant to spend or invest any disposable income they may have. Essentially, investors are in a holding pattern. This decline in spending/investing has caused PFG to downsize its operations due to the financial struggle it is constantly contending with.

PFG is acknowledging its current position regarding debt to you and it remains PFG's intention to honor that obligation. However, PFG is seeking a forbearance [sic] on that obligation for an unspecified time.

Any further information may be obtained from:

Very truly yours,

By: Suzan J. Garrard /s/
Printed Name: Suzan J. Garrard

35. Upon the receipt of the Delay Letter, MR1 immediately attempted to contact PFG's office and Ekasala.
36. MR1 spoke with Garrard and requested the return of his investments. Among other things, Garrard told MR1 that she was only the shareholder of PFG and PFG was run by Ekasala.
37. Also, sometime in the fall of 2008, MR1 spoke with Ekasala and during the phone conversation, among other things, Ekasala stated that:

- a. he was not responsible for MR1's losses because he was only a president of PFG;
 - b. Garrard should be held responsible since she was the owner of PFG; and
 - c. Ekasala could not help MR1 recover MR1's investments because Ekasala had left PFG and was employed with another company.
38. To date, MR1 has not received the return of his principal on any of his investments.
39. Information obtained during the investigation shows that MR1's investments in PFG in the amount of one hundred forty thousand dollars (\$140,000) were placed in an account in Country Club Bank in the name of PFG.
40. Records obtained from Country Club Bank indicated that on April 4, 2007, after the deposit of MR1's March 2007 Investment of one hundred thousand dollars (\$100,000), the total balance of the account was one hundred ten thousand three hundred eighty five dollars (\$110,385).
41. The records show that the following payments were made out of the account to four different individuals without any subsequent deposits in the account:
- a. A payment in the amount of twelve thousand two hundred fifty dollars (\$12,250) for "loan repayment" on April 4, 2007, and a payment in the amount of twelve thousand two hundred fifty dollars (\$12,250) for "final loan payoff" on April 18, 2007;
 - b. A payment in the amount of two thousand three hundred fifty dollars (\$2,350) for "note payment" on April 6, 2007;
 - c. A payment in the amount of eleven thousand dollars (\$11,000) for "note payment and interest in full" on April 17, 2007; and
 - d. A payment in the amount of twenty five thousand (\$25,000) for "note payment" on April 11, 2007.
42. Records obtained from Country Club Bank indicate that, after MR1's investments were commingled with other funds on May 21, 2007, at least eleven (11) more individuals received payments totaling at least one hundred one thousand seven hundred fifty dollars (\$101,750) from the same account.
43. The memo lines of the checks payable to these eleven (11) individuals reveal the following: "[month] note pymt," "loan," "[month/year] int," "note payment interest," "repay," "interest pymt on note," "payback on loan," "loan repayment," and "final note payoff."
44. Records obtained by the Division indicate that both Ekasala and Garrard are signatories on the Country Club Bank account.
45. A forty-eight (48) year-old Missouri resident from St. Louis ("MR2"), was a friend of MR1 and learned of the investment opportunity in PFG from MR1. MR2 telephoned Ekasala and during the phone call Ekasala told him that, among other things, MR2's money would be used to "loan out to borrowers and the borrower of funds would pay back at a higher interest rate."
46. According to MR2, Ekasala was "a smooth talker" and drove from Kansas City to St. Louis to meet with MR2 and discuss the investment.
47. On September 15, 2007, MR2 invested fourteen thousand dollars (\$14,000) in PFG. MR2 received a promissory note, which, among other things, provided the following:
- "FOR VALUE RECEIVED, Paragon Financial Group, Inc., a Kansas Corporation ("Debtor"), promises to pay to [MR2], ("Holder") the principal sum of Fourteen Thousand Dollars and no cents (\$14,000) plus interest at the rate of 16% per year ("Monies Due"), in lawful money of the United States of America. The monies due shall be paid in installments as set forth in "Schedule A" attached hereto."
48. The promissory note was signed by Garrard.
49. Records obtained from Country Club Bank indicate that MR2's investment in PFG of fourteen thousand dollars (\$14,000) was placed in PFG's account at Country Club Bank.
50. MR2 never received installment payments from PFG.
51. On one occasion Ekasala paid MR2 four hundred dollars (\$400) in cash and later mailed MR2 two gold coins (Gold Eagle coins) in lieu of interest payments. Ekasala explained to MR2 that the coins were from PFG's reserves.
52. On July 1, 2008, MR2 received a copy of the Delay Letter.
53. MR2 called the office of PFG on several occasions to inquire about his investment and was told by an office assistant that "there would be a delay in paying him back."

54. Several months after MR2's investment in PFG, Ekasala informed MR2 Ekasala was leaving PFG and going to work for another company.
55. As of January 25, 2009, MR2 has not received any interest payments or the return of his principal.
56. On March 16, 2009, Garrard, in response to a letter of inquiry by the Division, denied any responsibility in connection with PFG's investment activities. Among other things, Garrard stated:

“Please be advised that I have no knowledge of the information you are requesting. I acted solely as the office administrator for the business [sic] Brian Ekasala solicited all business for PFG Inc. I have no knowledge of any business practices for EK Marketing. That business was also promoted by Brian Ekasala”

57. To date, Respondents Ekasala, PFG, and EKM have not responded to any of the inquiries.

II. STATUTORY PROVISIONS

58. Section 409.1-102(28), RSMo. (Cum. Supp. 2009), defines a security in part: “as a note; stock; treasury stock; security future; bond; debenture; evidence of indebtedness; certificate of interest or participation in a profit-sharing agreement; investment contract.”
59. Section 409.1-102(28)(D), RSMo. (Cum. Supp. 2009), defines “investment contract” as “an investment in a common enterprise with the expectation of profits to be derived primarily from the efforts of a person other than the investor and a “common enterprise” means an enterprise in which the fortunes of the investor are interwoven with those of either the person offering the investment, a third party, or other investors.”
60. Section 409.1-102(26), RSMo. (Cum. Supp. 2009), defines “sale” to include, “every contract of sale, contract to sell, or disposition of, a security or interest in a security for value.” That same section defines “offer to sell” as “every attempt or offer to dispose of, or solicitation of an offer to purchase, a security or interest in a security for value.”
61. Section 409.3-301, RSMo. (Cum. Supp. 2009), states:

It is unlawful for a person to offer or sell a security in this state unless:

 - (1) The security is a federal covered security;
 - (2) The security, transaction, or offer is exempted from registration under sections 409.2-201 to 409.2-203; or
 - (3) The security is registered under this act.
62. Under Section 409.4-402(a), RSMo. (Cum. Supp. 2009), it is unlawful for an individual to transact business in this state as an agent unless the individual is registered under this act as an agent or exempt from registration.
63. Section 409.5-501, RSMo. (Cum. Supp. 2009), states:

It is unlawful for a person, in connection with the offer, sale, or purchase of a security, directly or indirectly:

 - (1) To employ a device, scheme, or artifice to defraud;
 - (2) To make an untrue statement of a material fact or to omit to state a material fact necessary in order to make the statement made, in the light of the circumstances under which it is made, not misleading; or
 - (3) To engage in an act, practice, or course of business that operates or would operate as a fraud or deceit upon another person.
64. Section 409.5-503(a), RSMo. (Cum. Supp. 2009), reads in part, “[i]n a[n] . . . administrative proceeding under this act, a person claiming an exemption, exception, preemptions, or exclusion has the burden to prove the applicability of the claim.”
65. Section 409.6-601(a), RSMo. (Cum. Supp. 2009), provides that the Missouri Securities Act of 2003 “shall be administered by the commissioner of securities”
66. Section 409.6-604(a), RSMo. (Cum. Supp. 2009), states:

If the commissioner determines that a person has engaged, is engaging, or is about to engage in an act, practice, or course of business constituting a violation of this act or a rule adopted or order issued under this act . . . the commissioner may:

 - (1) Issue an order directing the person to cease and desist from engaging in the act, practice, or course of business or to take other action necessary or appropriate to comply with this act
67. Section 409.6-604(b), RSMo. (Cum. Supp. 2009), states:

An order under subsection (a) is effective on the date of issuance If a person subject to the order does not request a hearing and none is ordered by the commissioner within thirty days after the date of service of the order, the order becomes final as to that person by operation of law.

68. Section 409.6-604(d), RSMo. (Cum. Supp. 2009), states:

In a final order under subsection (c), the commissioner may impose a civil penalty up to one thousand dollars for a single violation or up to ten thousand dollars for more than one violation.

69. Section 409.6-604(e), RSMo. (Cum. Supp. 2009), states:

In a final order, the commissioner may charge the actual cost of an investigation or proceeding for a violation of this act These funds may be paid into the investor education and protection fund.

III. CONCLUSIONS OF LAW

Multiple Violations of Offering and Selling Unregistered, Nonexempt Securities

70. Paragraphs 1 through 69 are incorporated by reference as though fully set forth herein.

71. Respondents offered and sold securities as those terms are defined in Sections 409.1-102(26) and (28), RSMo. (Cum. Supp. 2009).

72. At all times relevant, records maintained by the Commissioner of Securities contained no registration, granted exemption or notice filing indicating status as a "federal covered security" for the investments offered and sold by Respondents.

73. Respondents violated Section 409.3-301, RSMo. (Cum. Supp. 2009), when they offered and sold securities in Missouri without these securities being (1) a federal covered security; (2) exempt from registration under Sections 409.2-201 or 409.2-202, RSMo. (Cum. Supp. 2009); or (3) registered under the Missouri Securities Act of 2003.

74. Respondents' actions in offering or selling securities that were not registered, exempt or a federal covered security constitute an illegal act, practice, or course of business and thus such actions are subject to the commissioner's authority under Section 409.6-604(a), RSMo. (Cum. Supp. 2009).

Multiple Violations of Transacting Business as an Unregistered Agent

75. Paragraphs 1 through 69 are incorporated by reference as though fully set forth herein.

76. At all times relevant, records maintained by the Missouri Commissioner of Securities contained no registration or granted exemption for Respondents Ekasala and Garrard to transact business as an agent in the State of Missouri.

77. Ekasala and Garrard violated Section 409.4-402(a), RSMo. (Cum. Supp. 2009), when they offered or sold securities in the State of Missouri without being registered or exempt from registration as an agent.

78. Respondent Akasala and Respondent Garrard's actions in transacting business as an unregistered agent constitute an illegal act, practice, or course of business and thus such actions are subject to the commissioner's authority under Section 409.6-604(a), RSMo. (Cum. Supp. 2009).

Multiple Violations of Employing an Unregistered Agent

79. Paragraphs 1 through 69 are incorporated by reference as though fully set forth herein.

80. PFG and EKM employed agents who transacted business on behalf of PFG and EKM. These activities constitute transacting business in the State of Missouri.

81. PFG and EKM have not registered any agents in the State of Missouri.

82. PFG and EKM violated Section 409.4-402(d), RSMo. (Cum. Supp. 2009), when they employed unregistered agents who transacted business in the State of Missouri.

83. Respondent PFG and Respondent EKM's actions in employing an unregistered agent constitute an illegal act, practice, or course of business and thus such actions are subject to the commissioner's authority under Section 409.6-604(a), RSMo. (Cum. Supp. 2009).

Multiple Violations of Making an Untrue Statement or Omitting to State Material Facts in Connection with the Offer or Sale of a Security

84. Paragraphs 1 through 69 are incorporated by reference as though fully set forth herein.

85. In connection with the offer or sale of securities to MR1 and MR2, Respondent Ekasala omitted to state material facts

necessary in order to make statements made, in light of the circumstances under which they were made, not misleading, including, but not limited to, the following:

- a. the securities were not registered in Missouri;
 - b. Ekasala was not registered to sell securities in Missouri;
 - c. investor funds were used to pay debt owed to other individuals
 - d. the intended use for invested funds;
 - e. the risks associated with the investment;
 - f. any background and financial information regarding Ekasala;
 - g. any background and financial information on Garrard;
 - h. any background and financial information on PFG; and/or
 - i. any background and financial information on EKM.
86. In connection with the offer or sale of securities to MR1, Respondent Ekasala made untrue statements of material facts, including, but not limited to, the following:
- a. MR1's funds would be used as working capital in PFG;
 - b. MR1 would receive interest at the rate of sixteen and one half percent (16.5%) on a one hundred thousand dollars (\$100,000) investment;
 - c. MR1 would receive eleven (11) monthly installment payments and one (1) balloon payment for the remaining balance of the promissory note on the twelfth month.
 - d. Ekasala was not responsible for MR1's losses because he was only a president of PFG; and
 - e. MR1 would not lose his investment of ten thousand dollars (\$10,000) in EKM since he was not investing in PFG and EKM was a separate entity.
87. Respondent Ekasala violated Section 409.5-501(2), RSMo. (Cum. Supp. 2009), when he made untrue statements of material fact, or when he omitted to state material facts necessary to make statements made not misleading, in connection with the offer, sale or purchase of a security.
88. Respondent Ekasala's actions in making untrue statements of material fact or omitting to state material facts constitute an illegal act, practice, or course of business and thus such actions are subject to the commissioner's authority under Section 409.6-604(a), RSMo. (Cum. Supp. 2009).
89. This order is in the public interest and consistent with the purposes intended by the Missouri Securities Act of 2003. See Section 409.6-605(b), RSMo. (Cum. Supp. 2009).

IV. ORDER

NOW THEREFORE, it is hereby ordered that Respondents, their agents, employees and servants, and all other persons participating in or about to participate in the above-described violations with knowledge of this order are prohibited from:

- A. violating or materially aiding in any violation of Section 409.3-304, RSMo. (Cum. Supp. 2009), by offering or selling any securities as defined by Section 409.1-102(28), RSMo. (Cum. Supp. 2009), in the State of Missouri unless those securities are registered with the Securities Division of the Office of the Secretary of State in accordance with the provisions of Section 409.3-304, RSMo. (Cum. Supp. 2009);
- B. violating or materially aiding in any violation of Section 409.4-402, RSMo. (Cum. Supp. 2009), by transacting business as an unregistered agent;
- C. violating or materially aiding in any violation of Section 409.4-402, RSMo. (Cum. Supp. 2009), by employing an unregistered agent; and
- D. violating or materially aiding in any violation of Section 409.5-501, RSMo. (Cum. Supp. 2009), by, in connection with the offer or sale of securities, making an untrue statement of a material fact or omitting to state a material fact necessary in order to make the statement made, in the light of the circumstances under which it is made, not misleading.

IT IS FURTHER ORDERED that, pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), the Commissioner will determine whether to grant the Enforcement Section's petition for an imposition of a civil penalty of up to ten thousand dollars

(\$10,000) against each Respondent, for multiple violations of Section 409.3-301, RSMo. (Cum. Supp. 2009), in a final order, unless Respondents request a hearing and show cause why the penalty should not be imposed.

IT IS FURTHER ORDERED that, pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), the Commissioner will determine whether to grant the Enforcement Section's petition for an imposition of a civil penalty of up to ten thousand dollars (\$10,000) against each of Respondent Ekasala and Respondent Garrard, for multiple violations of Section 409.4-402(a), RSMo. (Cum. Supp. 2009), in a final order, unless Respondent Ekasala and Respondent Garrard request a hearing and shows cause why the penalty should not be imposed.

IT IS FURTHER ORDERED that, pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), the Commissioner will determine whether to grant the Enforcement Section's petition for an imposition of a civil penalty of up to ten thousand dollars (\$10,000) against each of Respondent PFG and Respondent EKM, for multiple violations of Section 409.4-402(d), RSMo. (Cum. Supp. 2009), in a final order, unless Respondent PFG and Respondent EKM request a hearing and shows cause why the penalty should not be imposed.

IT IS FURTHER ORDERED that, pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2009), the Commissioner will determine whether to grant the Enforcement Section's petition for an imposition of a civil penalty of up to ten thousand dollars (\$10,000) against Respondent Ekasala for multiple violations of Section 409.5-501(2), RSMo. (Cum. Supp. 2009), in a final order, unless Respondent Ekasala requests a hearing and shows cause why the penalty should not be imposed.

IT IS FURTHER ORDERED that, as the Enforcement Section has petitioned for an award for the costs of the investigation against Respondents in this proceedings, the commissioner will issue a final order, pursuant to Section 409.6-604(e), RSMo. (Cum. Supp. 2009), awarding an amount to be determined after review of evidence submitted by the Enforcement Section, unless Respondents request a hearing and show cause why such award should not be made.

SO ORDERED:

WITNESS MY HAND AND OFFICIAL SEAL OF MY OFFICE AT JEFFERSON CITY, MISSOURI THIS 18TH DAY OF FEBRUARY, 2010.

ROBIN CARNAHAN
SECRETARY OF STATE

(Signed/Sealed)
MATTHEW D. KITZI
COMMISSIONER OF SECURITIES

□
State of Missouri
Office of Secretary of State

Case No. AP-10-06

IN THE MATTER OF:

PARAGON FINANCIAL GROUP, INC.;
EK MARKETING, INC.;
BRIAN EKASALA, CRD # 2294855; and
SUSAN GARRARD

Respondents

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Serve Suzan Garrard at:
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NOTICE

TO: Respondents and any unnamed representatives aggrieved by this Order:

You may request a hearing in this matter within thirty (30) days of the receipt of this Order pursuant to Section 409.6-604(b), RSMo. (Cum. Supp. 2008), and 15 CSR 30-55.020.

Within fifteen (15) days after receipt of a request in a record from a person or persons subject to this order, the Commissioner will schedule this matter for a hearing.

A request for a hearing must be mailed or delivered, in writing, to:

**Matthew D. Kitz, Commissioner of Securities
Office of the Secretary of State, Missouri
600 West Main Street, Room 229
Jefferson City, Missouri, 65102.**

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of February, 2010, copies of the foregoing Order and Notice in the above styled case was **mailed by certified U.S. Mail, postage prepaid, to:**

Paragon Financial Group, Inc.
16955 SW 286th Street
Homestead, Florida 33030

EK Marketing, Inc. at:
10551 Barkley Street, Suite 106,
Overland Park, Kansas 66212;

And: 4110 Emerald Vis,
Lake Worth, Florida 33030

Brian Ekasala
4110 Emerald Vis,
Lake Worth, Florida 33461

Suzan Garrard
16955 SW 286th Street
Homestead, Florida 33030

And hand delivered to:

Roumen Manolov
Deputy Chief Counsel
Securities Division

John Hale, Specialist