

BEFORE THE
DIVISION OF SECURITIES
DEPARTMENT OF FINANCIAL INSTITUTIONS
STATE OF WISCONSIN

In the Matter of
MICHAEL C. LUECK,

PETITION FOR ORDER

Respondent.

File No. S-00012(EX)

The staff of the Enforcement Unit, Registration & Enforcement Section, of the Division of Securities, Department of Financial Institutions, State of Wisconsin has conducted an investigation in this matter pursuant to sec. 551.56, Wis. Stats. and as a result thereof alleges as follows:

1. Sebastian International Enterprises, Inc. ("Sebastian") is a foreign business entity with a last known business address of 1101 Delk Rd, Longwood, FL 32779.
2. Tri-National Development Corporation ("Tri-National") is a foreign business entity with a last known address of 480 Camino Del Rio South, Suite 140, San Diego, CA 92108.
3. Michael C. Lueck ("Lueck") is an individual with a last known home address at 719 Union Ave., Sheboygan, WI 53081
4. At all times material hereto, Lueck was an insurance agent licensed by the Office of the Wisconsin Commissioner of Insurance.
5. During the period of 1998, Lueck, on behalf of Sebastian, offered and sold the promissory notes of Sebastian to at least three persons in Wisconsin.
6. During the period of 1999, Lueck, on behalf of Tri-National, offered and sold the promissory notes of Tri-National to at least three persons in Wisconsin.
7. The promissory notes of Sebastian and Tri-National are securities as defined by sec. 551.02(13), Wis. Stats., and have never been registered for offer and sale in Wisconsin pursuant to Ch. 551, Wis. Stats.
8. Lueck has violated sec. 551.21(1), Wis. Stats., by offering and selling unregistered securities in Wisconsin.
9. In connection with the offer and sale of the securities described above, Lueck transacted business in Wisconsin as an "agent" for Sebastian and Tri-National, as that term is defined by sec. 551.02(2), Wis. Stats.
10. At no time has Lueck been licensed as a securities agent to sell the notes of Sebastian and Tri-National, pursuant to Ch. 551, Wis. Stats.
11. Lueck has violated sec. 551.31(1), Wis. Stats., by transacting business in Wisconsin as a securities agent without a license.
12. On August 4, 1999, the Wisconsin Department of Financial Institutions, Division of Securities, issued Summary Orders of Prohibition and Revocation against Sebastian, et al.

