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

In the Matter of MARTIN S. RUBIN, L. ANTHONY GRANT, PATRICK DANAN and METRO GROUP INTERNATIONAL, INC.,	PETITION FOR ORDER (SUMMARY)
Respondents.	File S-00152(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. Martin S. Rubin ("Rubin") is an individual, with a last known business address of 3042 North Federal Highway, Suite #200, Fort Lauderdale, FL 33306.

2. L. Anthony Grant ("Grant") is an individual, with a last known business address of 3042 North Federal Highway, Suite #200, Fort Lauderdale, FL 33306.

3. Patrick Danan ("Danan") is an individual, with a last known residence address of 5432 NE 21st Terrace, Fort Lauderdale, FL 33308 and business address of 3042 North Federal Highway, Suite #200, Fort Lauderdale, FL 33306.

4. Metro Group International, Inc. ("Metro") is a foreign corporation, with a last known business address of 3042 North Federal Highway, Suite #200, Fort Lauderdale, FL 33306.

5. Grant is an individual who at all times material hereto has been Chief Executive Officer of Metro.

6. Rubin is an individual who at all times material hereto has been Executive Vice President of Metro.

7. Danan is an individual who at all times material hereto has been Vice President of Development of Metro.

8. Daniel J. Krueger ("Krueger") is an individual, who at all times material hereto has been an "agent" of Metro.

9. On May 13, 1999, Krueger, on behalf of Metro, offered to at least one person in Wisconsin the opportunity to invest by way of a Promissory Note in Metro ("Note")

10. The Note offered to the person in Wisconsin in the amount of $25,000, stated it would pay interest at twelve (12) percent annually, with interest payable quarterly at three (3) percent on the first day of the months of January, April, July and October with the first interest payment on October 1, 1999.

11. On July 24, 1999, Krueger, on behalf of Metro, offered to the same person in Wisconsin the opportunity to invest by way of a second Promissory Note in Metro ("Note2").

12. The Note2 offered to the person in Wisconsin in the amount of $25,000, stated it would pay interest at twelve (12) percent annually, with interest payable quarterly at three (3) percent on the first day of the months of January, April, July and October with the first interest payment on October 1, 1999.

13. Both of the Notes identified in paragraphs 10 and 12 above stated the Notes had a maturity date of January 1, 2000.

14. The Notes are now in default, and after requesting repayment by telephone and letter, the person in Wisconsin has not received principal or interest on either of the Notes.

15. Upon information and belief, Krueger was paid a commission for soliciting investors in Wisconsin and, therefore, was acting as a "securities agent" of Metro.

16. Upon information and belief, there is no such suite at the address given above in paragraph 4 and the business located at that address is known as "The Beachcomber."

17. The "Notes" described in paragraphs 10 and 12 above constitute securities as that term is defined in sec. 551.13(a), Wis. Stats.

18. The securities described in paragraphs 10 and 12 above have never been registered for offer and sale in Wisconsin pursuant to Ch. 551, Wis. Stats.

19. Respondents have violated sec. 551.21(1), Wis. Stats., by offering unregistered securities in Wisconsin.

20. In connection with the offers of the securities described above, Respondents have transacted business as a "broker-dealer" in Wisconsin as that term is defined in sec. 551.02(3), Wis. Stats.

21. At no time material hereto was Metro licensed as a broker-dealer in Wisconsin pursuant to Ch. 551, Wis. Stats.

22. Metro violated sec. 551.31, Wis. Stats., by transacting business in Wisconsin as a broker-dealer when not licensed to do so.

23. In connection with the offers of the securities described above, Krueger transacted business in Wisconsin as an "agent," for Metro, as that term is defined by sec. 551.02(2), Wis. Stats.

24. At no time material hereto was Krueger licensed as a securities agent in Wisconsin pursuant to Ch. 551, Wis. Stats.

25. Metro has violated sec. 551.31(2), Wis. Stats., by employing an unlicensed agent to represent them in Wisconsin.

Therefore, the staff of the Enforcement Unit petitions the Administrator of the Division of Securities for the issuance of the attached order pursuant to Ch. 551, Wis. Stats.

Kathryn L. Denton 8/24/00

Kathryn L. Denton Date
Examiner
Enforcement Unit

8/24/00

David A. Cohen Date
Supervising Attorney
Enforcement Unit