

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

In the Matter of  
ITRADENOW.COM CORP.,

PETITION FOR ORDER

Respondent.

File No. S-03136(EX)

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

1. ITRADEnow.com Corp. ("ITNC") is a foreign business entity with a last known business address of 5340 N Federal Hwy., Ste. 106 Lighthouse Pt., FL 33064.
2. Lazar A. Kauderer (DOB 5/26/74; CRD #4292055) ("Kauderer") is an individual who at all times material hereto was a COO of ITNC, with a last known residence address of 3019 Brighton 5<sup>th</sup> St., Brooklyn, NY 11235-6407.
3. During the period of May, 2003, Kauderer, on behalf of ITNC, offered, but did not sell, the private placement preferred stock of ITNC to at least one person in Wisconsin.
4. The stock of ITNC is a security as defined by sec. 551.02(13), Wis. Stats., and has never been registered for offer and sale in Wisconsin pursuant to Ch. 551, Wis. Stats., and does not qualify for an exemption from registration.
5. ITNC violated sec. 551.21(1), Wis. Stats., by offering unregistered securities in Wisconsin.
6. In connection with the offer of the securities described above, Kauderer transacted business in Wisconsin as an "agent" for ITNC, as that term is defined by sec. 551.02(2), Wis. Stats.
7. At no time material hereto has Kauderer been licensed as a securities agent pursuant to Ch. 551, Wis. Stats.
8. ITNC violated sec. 551.31(2), Wis. Stats., by employing an unlicensed agent to represent them in Wisconsin.

Therefore, the staff of the Bureau of Registration & Enforcement petitions the Administrator of the Division of Securities for the issuance of the attached Order pursuant to Ch. 551, Wis. Stats.

  
Susan A. Kittel Moore      1/7/04  
Legal Assistant      Date  
Enforcement Unit

  
David A. Cohen      1/6/04  
Supervising Attorney      Date  
Enforcement Unit