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

In the Matter of EXCHANGE GROWTH LEAGUE, and TRAVIS W. LUEDKE, Respondents.	PETITION FOR ORDER File No. S-06033(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. Upon information and belief, Exchange Growth League is a foreign business entity with a last known business address of 601 S. Pioneer Way, F-300, Moses Lake, Washington 98837;

2. Upon information and belief, Travis W. Luedke ("Luedke") is an individual, with a date of birth of June 30, 1973, who at all times material hereto has been an owner, officer and/or controlling person of Exchange Growth League, with a last known home address of 1051 S. Garden Drive, Moses Lake, Washington 98837;

3. During the period of 2005, Luedke, on behalf of Exchange Growth League, offered and sold to at least one person in Wisconsin interests in an unspecified scheme of Exchange Growth League to receive a return on investment on money invested by the person;

4. Upon information and belief, investors can play a passive role in the Exchange Growth League scheme with no duties and responsibilities;

5. Upon information and belief, each investor will not be involved in the day-to-day management of the Exchange Growth League scheme, and they do not have the expertise or experience necessary to perform its duties;

6. Since the investors will be involved in a common enterprise with the expectation of profits to be derived from the essential managerial efforts of others, the Exchange Growth League scheme offered and sold by the Respondents are investment contracts as defined by section DFI-Sec. 1.02(6)(a), Wis. Adm. Code, and are therefore securities as defined by sec. 551.02(13), Wis. Stats.;

7. The Exchange Growth League scheme investment contracts have never been registered for offer and sale in Wisconsin pursuant to Ch. 551, Wis. Stats.;

8. All Respondents have violated sec. 551.21(1), Wis. Stats., by offering and selling unregistered securities to a person in Wisconsin; and

9. The staff of the Bureau of Registration & Enforcement wrote to Luedke to request information and documents concerning his securities-related transactions with persons in Wisconsin but to date has not received the information and documents.

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.

3-23-06

Mark E. Dorman — Date
Examiner

3/30/06

David A. Cohen — Date
Supervising Attorney