

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

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In the Matter of  
DYNAMIC REVOLUTION SDN BHD,  
SWISS MUTUAL FUND 1948 S.A. a/k/a SWISSCASH,  
DENNIS BUCK,  
AMIR BIN HASSAN,  
KELVIN CHOO MUN HOE,  
TODD O'NEAL,  
CONRAD A. SCHWOCHA and  
ALBERT LEE KEE SIEN,

PETITION FOR ORDER

File No. S-08016(EX)

Respondents,

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

1. Dynamic Revolution SDN BHD ("Dynamic Revolution") is a foreign business entity with a last known business address of Lot A7-9, Level 9, Signature Office, Mid Valley Boulevard, Lingkaran Syed Putra, Kuala Lumpur, Malaysia;
2. Swiss Cash Mutual Fund 1948 S.A., a/k/a SwissCash ("SwissCash"), is a foreign business entity with last known business addresses of 280 Madison Avenue, 912 – 9<sup>th</sup> Floor, New York, New York 10016 and PO Box 2342, Roseau, Commonwealth of Dominica, West Indies;
3. Dennis Buck ("Buck") is an individual who at all times material hereto has been an agent of Dynamic Revolution, SwissCash, Hassan, Hoe and Sien, with a last known business address of 5500 Hidden Horse Way, Groveland, Florida 34736;
4. Amir Bin Hassan, ("Hassan") is a Malaysian citizen who at all times material has been an owner, officer and/or controlling person of SwissCash, with a last known residence address of 19, Jalan Juara 2/1, Taman Juara Jaya, 43300 Sri Kembangan, Selangor, Malaysia;
5. Kelvin Choo Mun Hoe ("Hoe") is a Malaysian citizen who at all times material has been an owner, officer and/or controlling person of Dynamic Revolution and SwissCash with a last known residence address of No. 15, Jalan 60/26, Taman Sri Rampai, Setapak 53300 Kuala Lumpur, Malaysia;
6. Todd O'Neal ("O'Neal") is an individual who at all times material hereto has been an agent of Dynamic Revolution, SwissCash, Hassan, Hoe, and Sien, with a last known business address of 5500 Hidden Horse Way, Groveland, FL 34736;
7. Conrad A. Schwocha ("Schwocha") is an individual who at all times material hereto has been an agent of Dynamic Revolution, SwissCash, Hassan, Hoe, Sien, Buck and O'Neal with a last known business address of 1301 Sundown Drive, Aurora, Illinois 60506-5810;

8. Albert Lee Kee Sien ("Sien"), is a Malaysian citizen who at all times material has been an owner, operator and/or controlling person of Dynamic Revolution and SwissCash with a last known residence address of D3-6, Apartment Orchid, Jalan Cemara, Taman Bukit Serdang, Section 13, 43300 Seri Kembangan, Selangor, Malaysia;
9. Upon information and belief, during 2007, Schwocha, on behalf of Dynamic Revolution, SwissCash, Hassan, Hoe, Sien, Buck, and O'Neal, offered and sold to at least eight persons in Wisconsin investment interests totaling over \$60,000 in which the investors were to receive repayment of principal at a certain high rate of interest in a short period of time;
10. According to the SwissCash website, "...With SwissCash you will be able (sic) to triple your money in a short period of time. Earning 4-6 figures monthly is possible with Swisscash. After registration you have 2 weeks to deposit US\$ 1'000 (sic) and US\$ 30 for the activation fee. If you can't afford this, it's ok to deposit just \$100 as a Swiss Cash test member, naturally with the same great SIP increasing interest. Swiss Cash has been proven to continue paying out to every single investor. Everybody has been paid 100% since early 2005 without any delay. We are in the midst of a rare confluence of events – don't hesitate there is a great future ahead of you. Be a Swisscash Millionaire now – it has never been as easy as with Swiss Cash! ...";
11. According to findings of the Securities Commission of the government of Malaysia, Sien was the chief executive director of Dynamic Revolution. Sien and Hoe were both directors and registered holders of 50,000 shares each, out of the total paid-up share capital of 100,000 shares issued by Dynamic Revolution;
12. According to findings of the Securities Commission of the government of Malaysia, Hoe was a director and shareholder of Dynamic Revolution, and at all times material hereto, was its chief programmer, was involved in the creation of websites for Dynamic Revolution's clients, and was a joint signatory to Dynamic Revolution's bank account in Malaysia;
13. Investors play a passive role in SwissCash with no duties and responsibilities and no involvement in the day-to-day management of SwissCash, since they are not allowed to be involved in management, they do not have the expertise or experience necessary to perform management duties, and there are too many investors for each to have any meaningful input;
14. 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 investments offered and sold by the Respondents are investment contracts as defined by DFI-Sec. §1.02(6)(a), Wis. Adm. Code, and are therefore securities as defined by § 551.02(13), Wis. Stats.;
15. The SwissCash investment contracts have never been registered for offer and sale in Wisconsin pursuant to Ch. 551, Wis. Stats.;
16. All Respondents have violated § 551.21(1), Wis. Stats., by offering and selling unregistered securities in Wisconsin;
17. In connection with the offers and sales of the securities described above, Schwocha transacted business in Wisconsin as an "agent" for Dynamic Revolution, SwissCash, Hassan, Hoe, Buck, O'Neal and Sien, as that term is defined by § 551.02(2), Wis. Stats.;
18. At no time has Schwocha been licensed as a securities agent pursuant to Ch. 551, Wis. Stats.;

