

I.

FINDINGS OF FACT

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3 1. Palmer is, and has been at all relevant times, a resident of Idaho and the owner
4 and president of Trigon.

5 2. Neither Palmer nor Trigon is registered or exempt from registration in Idaho as a
6 broker-dealer, broker-dealer agent, investment advisor, or investment advisor representative
7 pursuant to Sections 30-14-401, 30-14-402, 30-14-403, and 30-14-404 of the Idaho Uniform
8 Securities Act (2004).

9 3. Since at least January 3, 2007, Palmer solicited and accepted funds from Idaho
10 residents to purportedly be used by Palmer to invest on behalf of investors. Palmer told some
11 investors that the funds would be used to buy and sell large futures contracts involving
12 commodities or securities, including, but not limited to, the S&P 500 Index, when in fact, their
13 funds were used for other purposes, including, but not limited to, paying fictitious returns to
14 other investors and personal expenses, including the construction of a new home.

15 4. Palmer told some investors that investors' funds were pooled in a hedge fund and
16 that he directed the hedge fund's investments to create profits for investors, when in fact, their
17 funds were used for other purposes, including, but not limited to, paying fictitious returns to
18 other investors and personal expenses, including the construction of a new home.

19 5. The amount of funds received by Palmer from investors between January 3, 2007
20 and December 31, 2008, is at least \$20 million dollars. The total amount of funds received by
21 Palmer has not been established as of the date of this Consent Order.

22 6. Although some funds may have been pooled and invested in futures contracts, a
23 substantial amount of investors' funds were used for other purposes not disclosed to or
24 authorized by investors, including, but not limited to, personal expenditures by Palmer.

IV

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AGREEMENT AND ACKNOWLEDGEMENT

THEREFORE, on the basis of the Findings of Fact, Conclusions of Law, and Respondent's agreement to the entry of this Consent Order, the Director finds that the following remedies are appropriate and in the public interest:

1. Respondents agree to permanently cease and desist from violating the Idaho Uniform Securities Act (2004), including the immediate cessation of selling or accepting funds for any of the investments described above or any other investment.

2. Respondents agree to not, now or in the future, provide any investment advice or sell securities in or from Idaho unless registered as a securities broker-dealer, agent, investment adviser, or investment adviser representative with the state of Idaho.

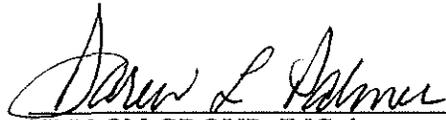
3. Respondents agree and acknowledge that this Consent Order is intended primarily to cease the activities described above that violate the Act and to preserve investor assets and mitigate investor losses. Respondents also acknowledge that the Department may issue additional orders in the future to establish restitution, civil penalties, other violations, or for any other purpose authorized by the Act related to this investigation.

4. Respondents waive notice and opportunity for a hearing under I.C. § 30-14-604(b) and (c), and under the contested case provisions of the Idaho Administrative Procedures Act, I.C. § 67-5240 et. seq.

AGREED TO and ACKNOWLEDGED this 27 day of JANUARY, 2009

Daren L. Palmer
DAREN L. PALMER

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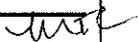

TRIGON GROUP, INC. by
DAREN L. PALMER


MARILYN T. CHASTAIN
Bureau Chief, Securities Bureau
Department of Finance
State of Idaho

IT IS SO ORDERED

DATED this 27th Day of January, 2009.

STATE OF IDAHO
DEPARTMENT OF FINANCE


GAVIN M. GEE, Director 



CONSENT ORDER TO CEASE AND DESIST

PROOF OF SERVICE

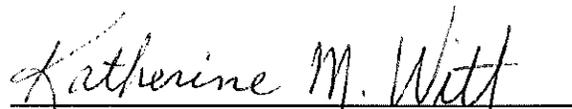
I HEREBY certify that I have this day served the foregoing Consent Order to Cease and Desist and Acknowledgement, Docket 2009-7-02 upon all parties of record in this proceeding, by mailing a copy thereof, properly addressed, with postage prepaid to:

Mitchell R. Barker
1000 South Roosevelt Street
Boise ID 83705

and

Wade J. Skalsky
LibertyBell Law Group
245 E. Olive Ave 4th Flr
Burbank, CA 91502

DATED At Boise, Idaho, this 27th day of January, 2009.


KATHERINE M. WITT