

ALAN G. LANCE
ATTORNEY GENERAL
STATE OF IDAHO

MARY E. HUGHES
Deputy Attorney General
Department of Finance
P.O. Box 83720
Boise, Idaho 83720-0031
Telephone: (208) 332-8092
Facsimile: (208) 332-8098
Idaho State Bar # 2416

**BEFORE THE DIRECTOR OF THE DEPARTMENT OF FINANCE
OF THE STATE OF IDAHO**

STATE OF IDAHO, Department of)	
Finance, Securities Bureau,)	
)	Docket No. 1998-7-109
Complainant,)	
)	FINAL ORDER
vs.)	
)	
INTERNATIONAL CURRENCY)	
MANAGEMENT, L.L.C., and)	
HOWARD W. NEEDLE,)	
)	
Respondents.)	
_____)	

A hearing was held in this matter in December 1998, and a Preliminary Order issued by the presiding officer on April 23, 1999. Respondents petitioned for reconsideration of the Preliminary Order, which petition was denied by the hearing officer on May 7, 1999. Respondents consequently appealed the Preliminary Order and filed an initial brief. Complainant filed a brief in opposition. An Order was issued on June 22, 1999, granting Respondents' request that further briefing and oral

argument be allowed, and a schedule was imposed for those purposes. Counsel for Respondents withdrew their appearance. A copy of the June 22, 1999, Order was served on Respondents. Respondents have not complied with the schedule imposed by that Order, and no further appearance has been made by or on behalf of the Respondents. Accordingly, the Preliminary Order having been reviewed, Respondents' appeal of the Preliminary Order is denied, and it is **HEREBY ORDERED**:

1. That Respondents, their directors, officers, employees, agents and successors shall be and are hereby ordered to cease and desist from, while engaged in or in connection with the offer, sale or purchase of any commodity:

- a. Making any untrue statement of material fact or omitting to state a material fact necessary in order to make the statements made, in light of the circumstances under which they are made, not misleading;
- b. Engaging in any act, practice, or course of business which operates or would operate as a fraud or deceit upon any person;

2. That Respondents, their directors, officers, employees, agents and successors shall be and are hereby ordered to cease and desist from offering or selling commodities or commodity contracts in violation of the Idaho Commodity Code.

3. That Respondents, their directors, officers, employees, agents and successors shall be and are hereby ordered to cease and desist from aiding, abetting, counseling, inducing or causing any other person to engage in any of the types of conduct described in paragraphs 1 or 2 above.

4. That the Respondents, and each of them, shall be and are hereby ordered, pursuant to Idaho Code § 30-1510, to pay a civil penalty in the amount of twenty five thousand dollars (\$25,000.00) within thirty (30) days of the date of this Final Order.

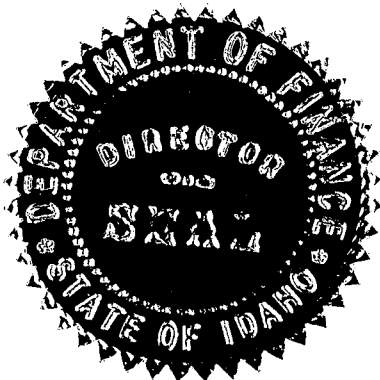
This is a final order of the agency. Pursuant to §§ 67-5270 and 67-5272, Idaho Code, any

party aggrieved by this final order or orders previously issued in this case may appeal this Final Order and all previously issued orders in this case to district court by filing a petition in the district court of the county in which:

- i. A hearing was held,
- ii. The final agency action was taken,
- iii. The party seeking review of the order resides,
- iv. The real property or personal property that was the subject of the agency action is located.

An appeal must be filed within twenty-eight (28) days of the Final Order. See § 67-5273, Idaho Code. The filing of an appeal to district court does not itself stay the effectiveness or enforcement of the order under appeal.

Dated this 27th day of August, 1999.



A handwritten signature in black ink, appearing to read "Gavin M. Gee", written over a horizontal line.

GAVIN M. GEE
Director

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of August, 1999, I caused to be served a true and correct copy of the foregoing FINAL ORDER by the method indicated below, and addressed to the following:

Howard W. Needle
Suite 2006
16711 Collins Avenue
Miami Beach, Florida 33160

U.S. Mail, Postage Prepaid
 Hand Delivered
 Overnight Mail
 Telecopy

International Currency Management, Ltd.
Charlotte House
Charlotte Street
Nassau, Bahamas

U.S. Mail, Postage Prepaid
 Hand Delivered
 Overnight Mail
 Telecopy

Martha L. Cooper
MARTHA L. COOPER