

DISTRICT COURT
TWIN FALLS CO, IDAHO
FILED
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BY _____
CLERK
DEPUTY

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ATTORNEY GENERAL

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**IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT
OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS**

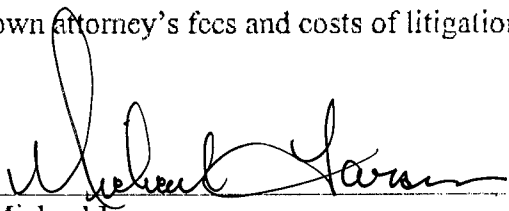
STATE OF IDAHO, Department)	
of Finance,)	
)	Civil No. CV -00-1784
Plaintiff,)	
)	STIPULATION FOR
vs.)	JUDGMENT AND
)	PERMANENT INJUNCTION
AGRICULTURAL SERVICES OF AMERICA,)	
INC., a Wyoming corporation;)	
AGRICULTURAL INVESTMENTS OF)	
AMERICA, INC., a Wyoming corporation;)	
GREGORY S. DABNEY; RUSSELL R.)	
GRAHAM; and PAUL GRANT,)	
)	
Defendants.)	
)	

COMES NOW the Plaintiff, by and through counsel, and Defendants Agricultural Services of America, Inc. and Agricultural Investments of America, Inc. (herein "Defendants") by and through counsel, in order to avoid prolonged litigation, to stipulate and agree as follows:

1. The Complaint on file herein states a cause of action for injunctive relief against Defendants.

- 2. Defendants neither admit nor deny the violations alleged in the Complaint.
- 3. Defendants agree that the Judgment and Permanent Injunction attached hereto as "Exhibit A" may be entered, and Defendants hereby consent to the entry thereof.
- 4. Said Judgment and Permanent Injunction shall constitute a final resolution of all issues presented in Plaintiff's Complaint as to Defendants, and may be presented to the Court immediately or at any time convenient to the Court, without the necessity of findings of fact or conclusions of law or further pleadings or proceedings in this matter.
- 5. All stipulating parties shall bear their own attorney's fees and costs of litigation.

May 30, 2001
Date



Michael Larsen
Deputy Attorney General
Counsel for Plaintiff
State of Idaho, Department of Finance

Agricultural Services of America, Inc.

May 25, 01
Date =

By: 

Title: Director

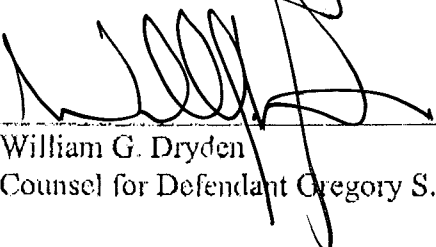
Agricultural Investments of America, Inc.

May 25, 01
Date

By: 

Title: Director

May 29, 2001
Date



William G. Dryden
Counsel for Defendant Gregory S. Dabney

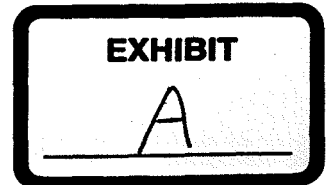
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STATE OF IDAHO, Department)	
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AGRICULTURAL SERVICES OF AMERICA,)	
INC., a Wyoming corporation;)	
AGRICULTURAL INVESTMENTS OF)	
AMERICA, INC., a Wyoming corporation;)	
GREGORY S. DABNEY; RUSSELL R.)	
GRAHAM; and PAUL GRANT,)	
)	
Defendants.)	
)	

It appearing to the Court that Defendants Agricultural Services of America, Inc. and Agricultural Investments of America, Inc. (herein "Defendants"), in the Stipulation for Judgment and Permanent Injunction filed with the Court, have admitted that the Complaint states a cause of action for injunctive relief under the Idaho Securities Act and have agreed and consented to the



entry of judgment granting a permanent injunction against them, and have waived the necessity of findings of fact and conclusions of law with respect thereto, and the Court being fully advised in the premises:

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that:

1. Defendants are permanently enjoined from engaging in any acts, practices or omissions which would constitute violations of the Idaho Securities Act, and in particular, is permanently enjoined from:
 - A. Selling or offering for sale nonexempt securities in any form in the State of Idaho until such time as such securities have been registered with the Idaho Department of Finance, in accordance with Title 30, Chapter 14, Idaho Code;
 - B. Transacting securities business in the State of Idaho until such time as Defendants have become registered as a broker-dealer, or salesman for a broker-dealer or issuer, with the Idaho Department of Finance, in accordance with Title 30, Chapter 14, Idaho Code;
 - C. While engaged in or in connection with the offer, sale, or purchase of any security:
 - (1) Employing any device, scheme or artifice to defraud,
 - (2) Making any untrue statement of material fact, or omitting to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they are made, not misleading, and
 - (3) Engaging in any act, practice or course of business which operates or would operate as a fraud or deceit upon any person.

- D. Aiding, abetting, counseling, inducing or causing any other person to engage in any of the types of conduct described in paragraphs A, B, and C above.
2. Defendants are prohibited from claiming the availability of, using, or offering to sell securities under, any exemptions under the Idaho Securities Act without receiving the prior written consent of the Director.
 3. Defendants shall restore to each person in interest any consideration which may have been acquired or transferred in violation of the Idaho Securities Act, and specifically but not limited to, the amounts and persons identified in the "Restitution Exhibit" attached hereto in the total amount of \$649,882.20.
 4. This Judgment and Permanent Injunction shall serve as a final resolution of all issues presented in Plaintiff's Complaint as to Defendants Agricultural Services of America, Inc. and Agricultural Investments of America, Inc.

DATED this ____ day of _____ 2001.

Honorable Daniel B. Meehl
District Judge