

STATE OF ALABAMA
ALABAMA SECURITIES COMMISSION

IN THE MATTER OF:)
)
CARUBA INTERNATIONAL, LLC)
TRADEWIND HOLDING COMPANY)
TRADEWINDS INVESTMENTS, INC.)
IVAN F. SHEW-A-TJON)
(AKA IVAN F. SHEW)) NO. CD-2005-0005
STANLEY SHEW-A-TJON)
DARRYL REASON)
LUTHER CARSON)
RUDOLPH ROBLES)
JOEL WILLIFORD)
SHELLY FEARSON)
GWENDOLYN LONG)
GERALDINE SMITH)
MIKE NOWELL)

RESPONDENTS)

CEASE AND DESIST ORDER

The Alabama Securities Commission ("Commission"), having the power to administer and provide for the enforcement of all provisions of Title 8, Chapter 6, Code of Alabama 1975, the Alabama Securities Act, upon due consideration of the subject matter hereof, and having confirmed information of the offer and sale of securities into, within, or from the State of Alabama, has determined as follows:

RESPONDENTS

1. CARUBA INTERNATIONAL, LLC ("CARUBA"), with a business address of 1802 N. University Drive, Suite 102-337, Plantation, FL 33322, is an inactive Florida limited liability company not registered with the Alabama Secretary of State.

2. TRADEWIND HOLDING COMPANY ("TRADEWIND"), AVV, with business addresses of P. O. Box 3067, Piedra Plat, Oranjestad Aruba, Dutch

Caribbean, and 8930 W. State Road 84, #301, Davie, FL 33324-4456, is a foreign corporation not registered with the Alabama Secretary of State.

3. TRADEWINDS INVESTMENTS, INC. ("TRADEWINDS"), with a business address of 13001 Southwest 28th Place, Davie, FL 33330, is an active Florida corporation not registered with the Alabama Secretary of State.

4. IVAN F. SHEW-A-TJON (AKA IVAN F. SHEW) ("SHEW"), with a home address of 10874 Hawks Vista Street, Plantation, FL 33324-8208, is represented to be the manager, owner and President/CEO of CARUBA.

5. STANLEY SHEW-A-TJON ("SHEW-A-TJON"), with business addresses of P. O. Box 3067, Piedra Plat, Oranjestad Aruba, Dutch Caribbean; 8930 W. State Road 84, #301, Davie, FL 33324-4456; and 13001 Southwest 28th Place, Davie, FL 33330, is represented to be an agent for CARUBA, TRADEWIND and TRADEWINDS.

6. DARRYL REASON, ("REASON"), with a business address of 1802 N. University Drive, Suite 102-337, Plantation, FL 33322, is represented to be an agent for CARUBA.

7. LUTHER CARSON ("CARSON"), with a home address of 82 Waterview Road, St. Matthews, SC 29135, is represented to be an agent for CARUBA, TRADEWIND and TRADEWINDS.

8. RUDOLPH ROBLES, ("ROBLES"), with a business address of P. O. Box 3067, Piedra Plat, Oranjestad Aruba, Dutch Caribbean, is represented to be the managing director of TRADEWIND.

9. JOEL WILLIFORD ("WILLIFORD"), with a home address of 725 Placid Drive, Montgomery, AL 36117, is represented to be an agent for CARUBA.

10. SHELLY FEARSON ("FEARSON"), with a home address of 707 Sandy Ridge Court, Montgomery, AL 36117, is represented to be an agent for CARUBA.

11. GWENDOLYN LONG ("LONG"), with a business address of Alabama State University, 915 South Jackson Street, Montgomery, AL 36104, is represented to be an agent for CARUBA.

12. GERALDINE SMITH ("SMITH"), with a business address of Alabama State University, 915 South Jackson Street, Montgomery, AL 36104, is represented to be an agent for CARUBA.

13. MIKE NOWELL ("NOWELL"), with a home address of 3 Walford Place, Dothan, AL 36301, is represented to be an agent for CARUBA.

STATEMENT OF FACTS

14. The Commission is in receipt of information that CARUBA, TRADEWIND and TRADEWINDS engaged in the offer and/or sale of securities, to wit: investment contracts entitled "High Yield Private Placements" with a minimum investment of \$1,000 and return on investment of 7-120 percent annually, to Alabama residents.

15. The Commission is in receipt of documents that CARUBA, TRADEWIND and TRADEWINDS engaged in the solicitation of securities, specifically "hedge funds," "securities, both newly issued and on the secondary market," "commercial paper (mortgages, notes, repurchase agreements)," and "discounted bonds, treasury bills and banker's acceptances." Furthermore, CARUBA, TRADEWIND and TRADEWINDS engaged in solicitation of securities in the capacity of an investment advisor, investment advisor agent and/or securities agent providing "investment advisory services," "investment management services," "aggregate the purchase or sale of any security," "effect transactions for its own account in

the same investments purchased or sold...," "responsible for the custody of such securities and other assets."

16. Further investigation indicates that SHEW, SHEW-A-TJON, REASON, CARSON, ROBLES, WILLIFORD, FEARSON, LONG, SMITH and NOWELL have solicited and/or effected securities transactions, in the form of investment contracts offering high yield private placement investments, to Alabama residents.

17. A review of the files of the Registration Division of the Alabama Securities Commission found no registration with the Commission pursuant to Sections 8-6-3 through 8-6-8 of the Alabama Securities Act, nor a claim for exemption under Section 8-6-10 or 8-6-11 of the Act for the RESPONDENTS or for the securities being offered and sold.

CONCLUSIONS OF LAW

18. RESPONDENTS are not registered as securities agents or broker dealers in the state of Alabama. The sale of securities by an unregistered dealer or agent in the state of Alabama is a violation of Section 8-6-3(a), Code of Alabama 1975.

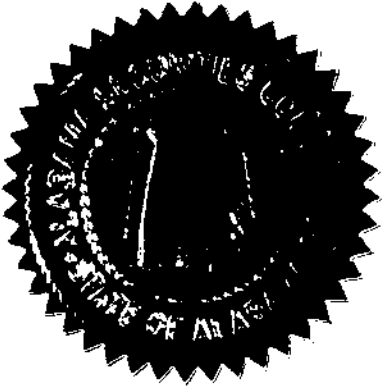
19. The securities of CARUBA, TRADEWIND and TRADEWINDS are neither registered nor exempt from registration in the state of Alabama. The sale of unregistered securities in the state of Alabama is a violation of Section 8-6-4, Code of Alabama 1975.

This Order does not prevent the Alabama Securities Commission from seeking such other civil or criminal remedies that are available to it under the Act.

This Order is appropriate in the public interest for the protection of investors and is consistent with the purposes of the Act.

ACCORDINGLY, IT IS HEREBY ORDERED that RESPONDENTS **CEASE AND DESIST** from further offers or sales of any security into, within or from the State of Alabama.

Entered at Montgomery, Alabama, this 14th day of March, 2005



ALABAMA SECURITIES COMMISSION
770 Washington Street, Suite 570
Montgomery, Alabama 36130-4700
(334) 242-2984

BY:

A handwritten signature in black ink, appearing to read "J. P. Borg", is written over a horizontal line. The signature is fluid and cursive.

JOSEPH P. BORG
Director