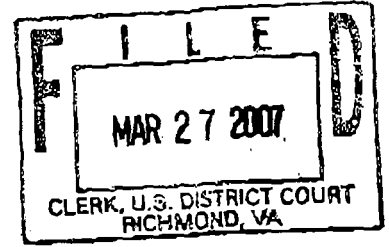


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division



U.S. Commodity Futures Trading Commission,

Plaintiff,

v.

Forefront Investments Corp., d.b.a. CFG Trader.

Defendant.

) Case No.:1:07-CV-0274

) (Under Temporary Seal pursuant
) to Order dated: March 21, 2007)

CONSENT ORDER FOR PRELIMINARY INJUNCTION WITH ASSET FREEZE

Plaintiff, the Commodity Futures Trading Commission ("Commission") and Defendant Forefront Investments Corp. ("Forefront") have consented to the entry of this Order for Preliminary Injunction with Asset Freeze ("Order") without an adjudication of the merits on any issue of fact or law, without waiving any privilege under the Fifth Amendment to the United States Constitution, and without admitting or denying the allegations of the Complaint filed in this action except as to venue and the Court's personal jurisdiction over Defendant which venue and personal jurisdiction Defendant admits. The Court having considered all pleadings, memoranda, declarations, and other exhibits filed with the Court, and now being fully advised in the premises, finds:

1. This Court has jurisdiction over the subject matter of this case pursuant to Section 6c of the Commodity Exchange Act, 7 U.S.C. § 13a-1 (2001) and it also has jurisdiction over Defendant Forefront.

2. There is good cause to believe that Defendant has failed and will continue to fail to meet its minimum adjusted net capital requirements for FCMs registered with the Commission and members of the National Futures Association ("NFA") in violation of Section 4f(b) of the Commodity Exchange Act, as amended ("CEA"), 7 U.S.C. § 6f(b) (2002), and Commission Regulation 4.22(c), 17 C.F.R. § 4.22(c) (2006). In addition, there is good cause to believe that Defendant has failed to maintain records that currently reflect its assets, liabilities and capital in violation of Section 4f(a)(1) of the Act, 7 U.S.C. § 6f(b) (2002), and Commission Regulation 1.18, 17 C.F.R. § 1.18 (2006).

3. This is a proper case for granting a preliminary injunction to preserve the status quo, protect public customers from further loss and damage, remove the danger of violation of the Act, and enable the Commission to fulfill its statutory duties. There is no just reason for delay in entering this Order.

DEFINITIONS

For the purposes of this Order, the following definitions apply:

1. "Assets" means any legal or equitable interest in, right to, or claim to, any real or personal property, including but not limited to chattels, goods, instruments, equipment, fixtures, general intangibles, effects, leaseholds, mail or other deliveries, inventory, checks, notes, accounts, credits, receivables, contracts, insurance policies, and all cash, wherever located, whether in the United States or abroad.

2. The term "document" is synonymous in meaning and equal in scope to the usage of the term in Federal Rule of Civil Procedure 34(a), and includes, but is not limited to, writings, drawings, graphs, charts, photographs, audio and video recordings, computer records, and other data compilations from which information can be obtained and translated, if necessary, through detection devices into reasonably usable form. A draft or non-identical copy is a separate document within the meaning of the term.

3. "Defendant" means Defendant Forefront Investments Corp. and all persons who are acting in the capacity of agents, servants, employees, successors, assigns, or attorneys of Defendant.

RELIEF GRANTED

Prohibited Conduct

I.

IT IS HEREBY ORDERED that Defendant is restrained and enjoined from violating Section 4f(b) of the Commodity Exchange Act, as amended ("CEA"), 7 U.S.C. § 6f(b) (2002), and Commission Regulation 1.17, 17 C.F.R. § 1.17(2006) by operating as an FCM while failing to satisfy its minimum adjusted net capital requirements for FCMs registered with the Commission and members of the NFA.

II.

IT IS FURTHER ORDERED that Defendant is restrained and enjoined from violating Section 4f(a)(1) of the Act, 7 U.S.C. § 6f(b) (2002), and Commission Regulation 1.18, 17 C.F.R. § 1.18 (2006) by failing to maintain records that currently reflect its assets, liabilities and capital.

III.

IT IS FURTHER ORDERED that Defendant is restrained and enjoined from directly or indirectly soliciting or accepting any new customers for commodity futures or commodity options trading or soliciting or accepting any funds from existing customers.

Continued Force and Effect of March 21, 2007 SRO

IV.

IT IS FURTHER ORDERED that the mandates of the Statutory Restraining Order ("SRO") dated March 21, 2007 shall continue with respect to Defendant pending

further order of this Court. Specifically, Defendant shall abide by all obligations of the SRO pertaining to the: (1) asset freeze, (2) directives to financial institutions and others, (3) accounting, (4) maintenance and access to business records of the Defendant, and (6) inspection and copying of books and records of the Defendant. The asset freeze applies to all assets under the control of the Defendant.

Temporary Receiver

V.

IT IS FURTHER ORDERED that:

A. The Commission and Defendant agree to the appointment of Bruce Matson, of LeClair Ryan, PC, as the temporary Receiver for the Defendant's assets and the assets of any affiliates or subsidiaries of the defendant, with the full powers of an equity receiver. The Receiver shall be the agent of this Court in acting as Receiver under this Order,

Subject to the approval of the Court,
B. The Receiver is directed and authorized to accomplish the following:

1. Assume full control of the corporate Defendant and any business entities owned by any Defendant, including but not limited to Forefront, by removing any officer, independent contractor, employee, or agent of a corporate defendant, from control and management of the affairs of the corporate defendant and any business entities owned by any Defendant;
2. Take exclusive custody, control, and possession of all the funds, property, mail and other assets of, in the possession of, or under the control of the Defendant, wherever situated, including but not limited to assets held by Forefront, which include all customer lists

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* 1.A. Secure a bond securing the fidelity and performance of all duties imposed on the Receiver pursuant to this or other orders of the Court, which bond shall be secured by a corporate surety and in a

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and accounts held at Forefront. The Receiver shall have full power to sue for, collect, receive and take possession of all goods, chattels, rights, credits, moneys, effects, land, leases, books, records, work papers, and records of accounts, including computer-maintained information, and other papers and documents of the Defendant, including documents related to customers or clients whose interest are now held by or under the direction, possession, custody or control of the Defendant;

3. Take all steps necessary to secure the business premises of the Defendant;
4. Preserve, hold and manage all receivership assets, and perform all acts necessary to preserve the value of those assets, including without limitation, liquidating, selling, transferring or leasing receivership assets, in order to prevent any loss, damage or injury to customers or clients;
5. Prevent the withdrawal or misapplication of funds entrusted to the Defendant, and otherwise protect the interests of customers, clients, pool participants or investors;
6. Manage and administer the assets of the Defendant by performing all acts incidental thereto that the Receiver deems appropriate, including hiring or dismissing any and all personnel or suspending operations;
7. Collect all money owed to the Defendant;

8. Initiate, defend, compromise, adjust, intervene in, dispose of, or become a party to any actions or proceedings in state, federal or foreign court necessary to preserve or increase the assets of the Defendant or to carry out his or her duties pursuant to this Order;
9. Choose, engage and employ attorneys, accountants, appraisers, and other independent contractors and technical specialists, as the Receiver deems advisable or necessary in the performance of duties and responsibilities under the authority granted by this Order;
10. Issue subpoenas to obtain documents and records pertaining to the receivership, and conduct discovery in this action on behalf of the receivership estate;
11. Open one or more bank accounts as designated depositories for funds of the Defendant. The Receiver shall deposit all funds of the Defendant in such designated accounts and shall make all payments and disbursements from the receivership estate from such accounts; and
12. Make payments and disbursements from the receivership estate that are necessary or advisable for carrying out the directions of, or exercising the authority granted by, this Order. The Receiver shall apply to the Court for prior approval of any payment of any debt or obligation incurred by the Defendant prior to the date of entry of

this Order, except for payments that the Receiver deems necessary or advisable to secure assets of the Defendant.

C. Immediately upon service of this Order upon them, the Defendant and any other person or entity served with a copy of this Order, shall immediately or within such time as permitted by the Receiver in writing, deliver over to the Receiver:

1. Possession and custody of all funds, property, and other assets, owned beneficially or otherwise, wherever situated, of the Defendant, including but not limited to those of customer accounts of Forefront;
2. Possession and custody of documents of the Defendant, including but not limited to, all books and records of accounts, all financial and accounting records, balance sheets, income statements, bank records (including monthly statements, canceled checks, records of wire transfers, and check registers), client lists, title documents and other papers;
3. Possession and custody of all precious metals, other commodities, funds, and other assets being held by or on behalf of the Defendant or on behalf of the Defendant's customers, clients, pool participants or investors;
4. All keys, computer passwords, entry codes, and combinations to locks necessary to gain or to secure access to any of the assets or documents of the Defendant, including but not limited to, access to

the Defendant's business premises, means of communication, accounts, computer systems, or other property; and

5. Information identifying the accounts, employees, properties or other assets or obligations of the Defendant.

D. The Defendant and all other persons or entities served with a copy of this order shall cooperate fully with and assist the Receiver. This cooperation and assistance shall include, but not be limited to, providing any information to the Receiver that the Receiver deems necessary to exercising the authority; providing any password required to access any computer or electronic files in any medium; and discharging the responsibilities of the Receiver under this Order, and advising all persons who owe money to the Defendants that all debts should be paid directly to the Receiver.

E. Except by leave of the Court, during the pendency of the receivership ordered herein, the Defendant and all other persons and entities be and hereby are stayed from taking any action to establish or enforce any claim, right or interest for, against, on behalf of, in, or in the name of, the Defendant, the Receiver, receivership assets, or the Receiver's duly authorized agents acting in their capacities as such, including but not limited to, the following actions:

1. Commencing, prosecuting, litigating or enforcing any suit, except that actions may be filed to toll any applicable statute of limitations;
2. Accelerating the due date of any obligation or claimed obligation, enforcing any lien upon, or taking or attempting to take possession of, or retaining possession of, property of the Defendant or any

property claimed by the Defendant, or attempting to foreclose, forfeit, alter or terminate any of the Defendant's interests in property, whether such acts are part of a judicial proceeding or otherwise;

3. Using self-help or executing or issuing, or causing the execution or issuance of any court attachment, subpoena, replevin, execution or other process for the purpose of impounding or taking possession of or interfering with, or creating or enforcing a lien upon any property, wherever located, owned by or in the possession of the Defendant, or the Receiver, or any agent of the Receiver; and
4. Doing any act or thing to interfere with the Receiver taking control, possession or management of the property subject to the receivership, or to in any way interfere with the Receiver or the duties of the Receiver, or to interfere with the exclusive jurisdiction of this Court over the property and assets of the Defendants

This paragraph does not stay the commencement or continuation of an action or proceeding by a governmental unit to enforce such governmental unit's police or regulatory power.

F. Within 60 days of the date of this Order, the Receiver shall file with this Court and serve the Commission a report outlining the steps taken to identify customers, marshal assets, determine the amount invested by each customer, and the portion of assets available to pay back customers. This report shall also include a statement as to

the estimated time it will take to distribute available assets to customers and wind up the receivership.

G. The Receiver and all personnel hired by the Receiver as herein authorized, including counsel to the Receiver, are entitled to reasonable compensation for the performance of duties pursuant to this Order and for the cost of actual out-of-pocket expenses incurred by them, from the assets now held by, or in the possession or control of, or which may be received by the Defendant. The Receiver shall file with the Court and serve on the parties, including Plaintiff Commission, periodic requests for the payment of such reasonable compensation, with the first such request filed no more than sixty (60) days after the date of this Order. Plaintiff Commission may object to any part of a request within 30 calendar days of service of a request. The Receiver shall not increase the hourly rates used as the bases for such fee applications without prior approval of the Court.

Lifting of the Seal

VI.

IT IS FURTHER ORDERED that the March 20, 2007 Ex Parte Order Temporarily Sealing Entire File is vacated and the seal in this case is hereby lifted.

Service of Order

VII.

IT IS FURTHER ORDERED that copies of this Order may be served by any means, including facsimile transmission, upon any financial institution or other entity or person that may have possession, custody, or control of any documents or assets of Defendant that may be subject to any provision of this Order.

Service on the Commission

VIII.

IT IS FURTHER ORDERED that Defendant shall serve all pleadings, correspondence, notices required by this Order, and other materials on the Commission by delivering a copy to Tracey Wingate, Trial Attorney, Division of Enforcement, Commodity Futures Trading Commission, 1155 21st Street, N.W., Washington, D.C. 20581.

Force and Effect

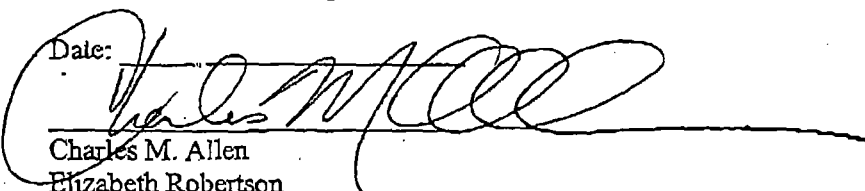
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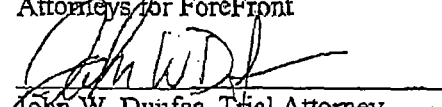
IT IS FURTHER ORDERED that this Order shall remain in full force and effect until further order of this Court, and that this Court retains jurisdiction of this matter for all purposes.

 CE.

Donald Allen Snellgrove, on behalf of Forefront Investments Corp.,
as CEO and controlling person

Date:


Charles M. Allen
Elizabeth Robertson
Attorneys for ForeFront


John W. Dunfee, Trial Attorney
U.S. Commodity Futures Trading Commission

Date:

3/27/07

SO ORDERED, at Richmond, Virginia on this 27th day of March, 2007, at

1:50 p.m.

A TRUE COPY, TESTE:
CLERK, U.S. DISTRICT COURT

BY


DEPUTY CLERK


UNITED STATES DISTRICT JUDGE