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FINDINGS OF FACT

Line 21 of page 5 - the address listed for Respondent Carol Ebdon needs to be replaced with the following address: 1101 E. Carmelita Drive, Sierra Vista, Arizona. This is the last known address the Division is aware of for this Respondent.

CONCLUSIONS OF LAW

Line 5 of page 7 - the statutory reference should be changed to A.R.S. § 44-1801(23).

Paragraphs numbered 6, 7 and 8 of page 7 – should each include Respondent Cochise to be consistent with the findings in the Discussion section on page 4, lines 21-28, and page 5, lines 1 and 2, wherein all Respondents were found to have acted as unregistered dealers or salesmen and to have made untrue statements of material fact in relation to the offer and sale of promissory notes. Adding Respondent Cochise to these paragraphs is also consistent with paragraph 10 of the Conclusions of Law (with corrections listed below) and with the third paragraph of the Order on page 8, lines 21-27, wherein Charles Shull and Cochise are assessed a penalty for violating A.R.S. §§ 44-1842 and 44-1991.

Line 2 of page 8 – the reference to “A.A.C. R14-2-308” should be changed to A.A.C. R14-4-308.

Line 8 of page 8 – the second reference to “A.R.S. § 44-1841” should be changed to A.R.S. § 44-1842 to be consistent with Line 25 of page 8 of the Order.

Line 9 of page 8 – the reference to “A.R.S. § 44-1842” should be changed to A.R.S. § 44-1991 to be consistent with Line 25 and 26 of page 8 of the Order.

ORDER

Line 9 page 9 – the reference to “Charles Ebdon” should be changed to Charles Shull.

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...  
...

1 Respectfully submitted this 17<sup>TH</sup> day of April, 2000.

2  
3 **Janet Napolitano**  
Attorney General for the State of Arizona

4 

5 **Anthony B. Bingham**  
Special Assistant Attorney General

6 **Robert A. Zumoff**  
Assistant Attorney General  
7 Attorneys for the Securities Division of the  
8 Arizona Corporation Commission

9  
10 Original and ten copies filed  
11 this 17<sup>th</sup> day of April, 2000 with:

12 Docket Control  
13 Arizona Corporation Commission  
1200 West Washington Street  
14 Phoenix, AZ 85007

15 A copy of the original mailed  
this 17<sup>th</sup> day of April, 2000 to:

16 Jane Rodda  
17 Hearing Officer  
400 W. Congress Street  
18 Tucson, Arizona 85701

19 Charles Shull,  
20 P.O. Box 530400  
Henderson, NV 89053

21 John Ebdon  
22 4814 Equestrian Avenue  
Sierra Vista, Arizona 85650

23 Cochise Financial Corp.,  
24 P.O. Box 530400  
Henderson, NV 89053

25 Carol Ebdon  
26 1101 E. Carmelita Drive  
Sierra Vista, Arizona 85636

1 Daniel Joe Garcia  
2 8823 N. 38<sup>th</sup> Drive  
3 Phoenix, Arizona 85051

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<b>THIS AMENDMENT:</b>			
_____ Passed _____	Passed as amended by _____		
_____ Failed _____	Not Offered _____		_____ Withdrawn

## SECURITIES DIVISION PROPOSED AMENDMENT # 1

TIME/DATE PREPARED:

MATTER: In Re: Shull, Ebdon, Cochise & Garcia

AGENDA ITEM NO.

DOCKET NO: S-003312A; S-03375A

OPEN MEETING DATE 4/25/00

Page 5, line 21

DELETE: "4814 Equestrian Avenue, Sierra Vista, Arizona.

INSERT: 1101 E. Carmelita Drive, Sierra Vista, Arizona.

Page 7, line 5

DELETE: "§ 44-1841(23)."

INSERT: § 44-1801(23).

Page 7, line 14

INSERT: Cochise after "Charles Shull"

Page 7, line 17

INSERT: Cochise after "Charles Shull"

Page 7, line 21

INSERT: Cochise after "Charles Shull"

...

...

Page 8, line 2

DELETE: "A.A.C. R14-2-308"

INSERT: A.A.C. R14-4-308.

Page 8, line 8

DELETE: the second reference to "A.R.S. § 44-1841"

INSERT: § 44-1842

Page 8, line 9

DELETE: "A.R.S. § 44-1842"

INSERT: A.R.S. § 44-1991

Page 9, line 9

DELETE: "Ebdon"

INSERT: Shull.