

1 PRESTON DuFAUCHARD
California Corporations Commissioner
2 ALAN S. WEINGER (CA BAR NO. 86717)
Acting Deputy Commissioner
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Senior Corporations Counsel
4 Department of Corporations
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7 BEFORE THE DEPARTMENT OF CORPORATIONS
8 OF THE STATE OF CALIFORNIA
9

10 In the Matter of THE CALIFORNIA) FILE NO. ALPHA
11 CORPORATIONS COMMISSIONER,)
12 Complainant,) OAH Case NO.: 2006020810
13 vs.) STIPULATION TO DESIST AND REFRAIN
14 ROBIN KYU CHO and CITI TRAVELERS) ORDER THAT ROBIN KYU CHO AND CITI
15 INSURANCE MANAGEMENT, a.k.a. CITI) TRAVELERS INSURANCE MANAGEMENT,
16 TRAVELERS INSURANCE AND) a.k.a. CITI TRAVELERS INSURANCE AND
17 SCHOLARSHIP MANAGEMENT,) SCHOLARSHIP MANAGEMENT DESIST
18 Respondents.) AND REFRAIN FROM THE OFFER AND
19) SALE OF UNQUALIFIED, NON-EXEMPT
20) SECURITIES IN VIOLATION OF
21) CORPORATIONS CODE SECTION 25110
22) AND FROM MISREPRESENTING AND
23) OMITTING MATERIAL FACTS IN
24) CONNECTION WITH THE OFFER AND
25) SALE OF SECURITIES IN VIOLATION OF
26) CORPORATIONS CODE SECTION 25401
27)
28)

24 IT IS HEREBY STIPULATED BY AND BETWEEN RESPONDENTS ROBIN KYU CHO
25 and CITI TRAVELERS INSURANCE MANAGEMENT, a.k.a. CITI TRAVELERS INSURANCE
26 AND SCHOLARSHIP MANAGEMENT (“RESPONDENTS”), AND PRESTON DuFAUCHARD,
27 THE CALIFORNIA CORPORATIONS COMMISSIONER (COMMISSIONER), AS FOLLOWS:

28 WHEREAS, on January 24, 2006, the COMMISSIONER issued a Desist and Refrain Order

1 against RESPONDENTS for: 1) the sale of securities that were in the opinion of the
2 COMMISSIONER unqualified, non-exempt securities in violation of Corporations Code section
3 25110; and 2) the misrepresentation and omission of material facts in connection with the offer and
4 sale of securities that were in the opinion of the COMMISSIONER in violation of Corporations
5 Code section 25401. Attached hereto as **Exhibit A** and incorporated by reference is a true and
6 correct copy of the Desist and Refrain Order dated January 24, 2006 (“ORDER”).

7 WHEREAS, Respondents, without admitting or denying such charges, seek to resolve the
8 concerns of the COMMISSIONER by entering into this Stipulation regarding the ORDER.

9 NOW, THEREFORE, the parties hereby stipulate and agree as follows:

10 1. Respondents hereby acknowledge that the COMMISSIONER is ready, willing and
11 able to grant a hearing in relation to the ORDER, which Respondents have a right to.
12 Respondents hereby voluntarily waive their right to a hearing in relation to the ORDER for
13 violations of Corporations Code section 25110, for selling unqualified, non-exempt securities and for
14 violations of Corporations Code section 25401, for misrepresenting and omitting material facts in
15 connection with the offer and sale of securities;

16 2. Respondents acknowledge that pursuant to Corporations Code section 25255,
17 remedies for future violations of the California Corporate Securities Law of 1968 (“CSL”)
18 (Corporations Code section 25000, et seq.) are not exclusive and may be sought and employed in
19 any combination to enforce that law. Therefore, it is further stipulated that this agreement does not
20 preclude the COMMISSIONER from seeking additional remedies against Respondents for future
21 violations of the ORDER or any law under the COMMISSIONER’S jurisdiction not related to this
22 investigation. These remedies include, but are not limited to, administrative actions, civil injunctive
23 and ancillary relief and making a criminal referral pursuant to California law;

24 3. [Intentionally omitted]
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4. Respondents enter into this Stipulation voluntarily and without coercion and acknowledge that no promises, threats or assurances have been made by the COMMISSIONER or any officer, or agent thereof, about this Stipulation; and

5. Respondents and the COMMISSIONER agree that this Stipulation may be executed in one or more separate counterparts, each of which when so executed, shall be deemed an original. Such counterparts shall together constitute and be one and the same instrument.

Dated: PRESTON DUFAUCHARD
California Corporations Commissioner

By _____
ALAN S. WEINGER
Acting Deputy Commissioner

Dated: By _____
ROBIN CHO, an individual

Dated: By _____
ROBIN CHO, on behalf of CITI TRAVELERS INSURANCE
MANAGEMENT, a.k.a. CITI TRAVELERS INSURANCE
AND SCHOLARSHIP MANAGEMENT

APPROVED AS TO FORM AND CONTENT:

By _____
Raymond H. Aver, Esq.
Attorney for RESPONDENTS

Dated: