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STATE OF CALIFORNIA
BUSINESS, TRANSPORTATION AND HOUSING AGENCY
DEPARTMENT OF CORPORATIONS

TO: Pentultimate Associates, LLC
dba Pentultimate Associates Financial Services
9630 Bruceville Road
Suite No. 106-111
Elk Grove, CA 95757

Gold Ribbon Financial
9245 Laguna Springs Drive, Suite 200
Elk Grove, CA 95758

David J. Ribeiro
4304 46th Ave.
Sacramento, CA 95824

DESIST AND REFRAIN ORDER
(For violations of sections 25110 and 25401 of the Corporations Code)

The California Corporations Commissioner finds that:

1. Pentultimate Associates, LLC is doing business as Pentultimate Associates Financial Services (“Pentultimate”), with a reported business address of 9630 Bruceville Road, Suite 106-111, Elk Grove, California 95757.
2. David J. Ribeiro (“Ribeiro”) holds himself out to prospective investors as the CEO and Director of Investment Operations for Pentultimate.
3. Gold Ribbon Financial (“Gold Ribbon”) is an entity with a reported business address of 9245 Laguna Springs Drive, Suite 200, Elk Grove, California 95758. Ribeiro is a control person of Gold Ribbon.
4. Gold Ribbon and Pentultimate are currently advertising investments on craigslist.com to California investors. Both entities use the same investment offering language in their postings.
5. Gold Ribbon and Pentultimate offer foreign currency trading via a “Credit Union Co-Op Account” with a return of up to two-hundred and seventy six percent (276%) per year.

1 6. These investments are securities under the California Corporate Securities Law of 1968
2 (“CSL”) and were offered or sold in this state in an issuer transaction.

3 7. The Department of Corporations has not issued a permit or other form of qualification
4 authorizing any person to offer or sell these securities in this state.

5 8. In connection with these offers or sales, Pentultimate, Gold Ribbon, and Ribeiro omitted
6 material facts, including that the Texas State Securities Board issued an Emergency Cease and Desist
7 Order to Gold Ribbon, Pentultimate, and Ribeiro on May 8, 2009, as a result of unregulated offers of
8 securities, and that Ribeiro is currently on probation in California as a result of a felony charge of
9 grand theft.

10 The California Corporations Commissioner is of the opinion that the “Credit Union Co-Op”
11 foreign exchange accounts offered by Pentultimate, Gold Ribbon, and Ribeiro are securities subject
12 to qualification under the California Corporate Securities Law of 1968 (“CSL”) and are being or have
13 been offered or sold without being qualified or exempt, in violation of section 25110 of the CSL.
14 The California Corporations Commissioner is of the further opinion that securities were offered or
15 sold by means of written or oral communications that failed to include material facts that were
16 necessary in order to make the statements made, in light of the circumstances under which they were
17 made, not misleading, in violation of section 25401 of the Corporations Code.

18 Pursuant to section 25532 of the CSL, Pentultimate Associates, LLC, doing business as
19 Pentultimate Associates Financial Services, Gold Ribbon Financial, and David J. Ribeiro are hereby
20 ordered to desist and refrain from the further offer or sale in the State of California of securities,
21 including but not limited to investment contracts in the form of foreign exchange investments via
22 “Credit Union Co-Op Accounts” or otherwise, unless and until qualification has been made under
23 said law or unless exempt. In addition, Pentultimate Associates, LLC, doing business as
24 Pentultimate Associates Financial Services, Gold Ribbon Financial, and David J. Ribeiro are hereby
25 ordered to desist and refrain from offering or selling securities, including but not limited to
26 investment contracts in the form of foreign exchange accounts, in this state by means of any written
27 or oral communication which includes an untrue statement of a material fact or omits to state a
28 material fact necessary in order to make the statements made, in light of the circumstances under

1 which they are made, not misleading.

2 This Order is necessary, in the public interest, for the protection of investors and consistent
3 with the purposes, policies, and provisions of the CSL.

4 Dated: September 2, 2009
5 Los Angeles, California

PRESTON DuFAUCHARD
California Corporations Commissioner

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8 By _____
ALAN S. WEINGER
9 Deputy Commissioner
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