

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

**TO: Rockford Group, L.L.C.**  
**www.RockfordGroupllc.com**  
**Michael Conely a.k.a. Mike Conely**  
**Kevin Kline, Esq.**  
**Laura Newman**

80 Broad Street, 5<sup>th</sup> Floor  
New York, NY 10004

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

The California Corporations Commissioner finds that:

1. At all relevant times, Rockford Group, L.L.C. (“Rockford”) is a New York limited liability company with a principal place of business located at 80 Broad Street, 5<sup>th</sup> Floor, New York, New York and doing business in California and throughout the United States by way of the internet at www.RockfordGroupllc.com (“Website”). Rockford is purportedly in the business of raising capital and investing it in a pool of plaintiff personal injury legal cases and claims. The pooled Rockford investments serve as an advance on personal injury legal case winnings and settlements.
2. At all relevant times, Michael Conely, a.k.a. Mike Conely (“Conely”), Kevin Kline, Esq., (“Kline”) and Laura Newman (“Newman”), (collectively, “Representatives”) are representatives of Rockford and individuals who are located at 80 Broad Street, 5<sup>th</sup> Floor, New York, New York, doing business in California. Specifically, Conely represents to others that he is the “vice president of private client services” of Rockford. Kline represents to others that he is a “board member of private client services” of Rockford. Newman represents to others that she is an “administrative assistant of compliance in private client services” and contact for Rockford.
3. Beginning in at least or about 2009, Rockford and Representatives maintained a Website through which Rockford and Representatives offered investment opportunities.
4. Beginning in at least or about 2009, Rockford and Representatives offered and sold securities in the form of investment contracts, specifically known as “Fixed Dividend Contracts”, whereby the investor would invest at least the minimum sum of one thousand dollars (\$1,000.00) with and in

1 Rockford for a period of twelve (12) months yielding at least a fifteen percent (15%) return profit on  
2 monies invested.

3 5. Beginning in at least or about 2009, Rockford and Representatives sold the above described  
4 securities in the State of California to investors by way of the Website and other such means.

5 6. These securities were offered and sold in California in issuer transactions. The Department of  
6 Corporations has not issued a permit or other form of qualification authorizing any person to offer  
7 and sell these securities in California.

8 7. Beginning in at least or about 2009, Rockford and Representatives represented to investors  
9 that Rockford was a profitable “stable” business. Rockford and Representatives also represented that  
10 investors would receive a profitable return on the securities and all monies invested would be easily  
11 returned to investors at anytime after the first three (3) months of investment upon request, in an  
12 effort to entice persons to invest.

13 Based on the foregoing findings, the California Corporations Commissioner finds that the  
14 investment contracts sold by Rockford Group, L.L.C., Michael Conely, a.k.a. Mike Conely, Kevin  
15 Kline, Esq., and Laura Newman, are securities subject to qualification under the California  
16 Corporations Code. These securities are or were offered and sold without being qualified or exempt,  
17 in violation of Section 25110 of the California Corporations Code.

18 Further, the California Corporations Commissioner is of the opinion that the investment  
19 contract were offered or sold in this State by means of a written or oral communication which  
20 included an untrue statement of material fact or omitted to state a material fact necessary to make the  
21 statement made, in the light of the circumstances under which they were made, not misleading, in  
22 violation of section 25401 of the Corporate Securities Law of 1968.

23 Pursuant to section 25532 of the Corporate Securities Law of 1968, Rockford Group, L.L.C.,  
24 Michael Conely, a.k.a. Mike Conely, Kevin Kline, Esq., and Laura Newman are hereby ordered to  
25 desist and refrain from offering or selling or buying or offering to buy any security in the State of  
26 California, including but not limited to investment contracts in the form of Fixed Dividend Contracts,  
27 by means of any written or oral communications which include untrue statements of material facts or  
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1 omits to state a material facts necessary in order to make the statements made, in the light of  
2 circumstances under which they were made, not misleading.

3 Pursuant to Section 25532 of the California Corporations Code, Rockford Group, L.L.C.,  
4 Michael Conely, a.k.a. Mike Conely, Kevin Kline, Esq., and Laura Newman are hereby ordered to  
5 desist and refrain from the further offer or sale in the State of California of securities, including, but  
6 not limited to investment contracts in the form of Fixed Dividend Contracts unless and until  
7 qualification has been made under said law or unless exempt.

8 This Order is necessary, in the public interest, for the protection of investors and consistent  
9 with the purposes, policies, and provisions of the California Corporations Code.

10 Dated: November 10, 2010  
11 Sacramento, California

12 PRESTON DUFAUCHARD  
13 California Corporations Commissioner

14 By \_\_\_\_\_  
15 ALAN S. WEINGER  
16 Deputy Commissioner

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