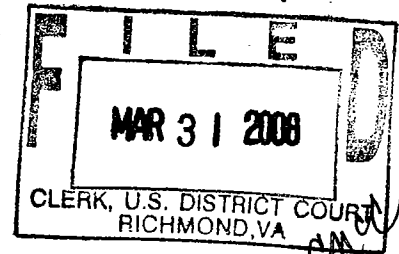


UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division



U.S. COMMODITY FUTURES
TRADING COMMISSION,

Plaintiff,

v.

FOREFRONT INVESTMENTS CORP.,
d/b/a CFG TRADER, and
DONALD AND
BARBARA SNELLGROVE

Defendants

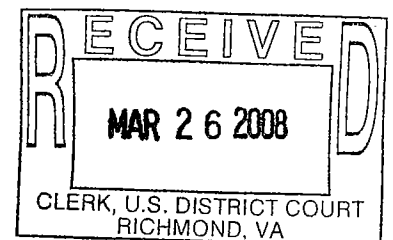
CIVIL ACTION NO. 3:07-CV-00152

**CONSENT ORDER OF PERMANENT INJUNCTION, CIVIL MONETARY PENALTY
AND OTHER EQUITABLE RELIEF AGAINST DEFENDANTS FOREFRONT
INVESTMENT CORP., DONALD AND BARBARA SNELLGROVE**

On March 20, 2007, Plaintiff U.S. Commodity Futures Trading Commission (the "Commission") filed a Complaint against Forefront Investment Corp. ("Forefront") seeking injunctive and other equitable relief for violations of the Commodity Exchange Act, as amended ("Act"), 7 U.S.C. §§ 1 *et seq.* (2002), and Commission Regulations, 17 C.F.R. §§ 1.1 (2007). On July 20, 2007, the Commission filed an Amended Complaint adding Donald Snellgrove and Barbara Snellgrove (collectively the "Snellgroves") as defendants and also seeking injunctive and other equitable relief against them for violations of the Act and Commission Regulations.

I. CONSENTS AND AGREEMENTS

To effect settlement of the matters alleged in the Complaint and the Amended Complaint in this action prior to a trial on the merits or further judicial proceedings, Forefront and the Snellgroves (collectively the "Defendants"):



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1. Consent to the entry of this Consent Order of Permanent Injunction, Civil Monetary Penalty and Other Equitable Relief ("Order");
2. Affirm that they have read and agreed to this Order voluntarily, and that no threat or promise other than as set forth specifically herein, has been made by the Commission or any member, officer, agent or representative thereof, or by any other person, to induce their consent to this Order;
3. Acknowledge service upon them of the summons, Complaint, Amended Complaint and this Order;
4. Consent, for the purposes of settlement, to the jurisdiction of this Court over them and the subject of this action pursuant to Section 6c of the Act, 7 U.S.C. § 13a-1;
5. Admit that venue properly lies with this Court pursuant to Section 6c of the Act, 7 U.S.C. § 13a-1;
6. Waive:
 - a. The entry of findings of fact and conclusions of law;
 - b. All claims that may be available to them under the Equal Access to Justice Act (EAJA), 5 U.S.C. § 504 (2000) and 28 U.S.C. § 2412 (2000), and Part 148 of the Regulations, 17 C.F.R. §§ 148.1, et seq. (2007), relating to, or arising from, this action and any right pursuant to EAJA to seek costs, fees and other expenses relating to or arising from this action;
 - c. Any claim of Double Jeopardy based upon the institution of this proceeding or the entry in this proceeding of any order imposing a civil monetary penalty or any other relief;
 - d. All rights of appeal in this action;

7. Agree that they will not oppose enforcement of the Order on the ground that it fails to comply with Rule 65(d) of the Federal Civil Rules of Civil Procedure and waive any objections based thereon;

8. Consent to the continued jurisdiction of this Court for the purpose of enforcing the terms and conditions of this Order, to assure compliance with this Order, and for any other purposes relevant to this action, even if they now, or in the future, reside outside the jurisdiction; and

9. Each of the Defendants agrees that neither they nor any of their agents or employees under their authority or control shall take any action or make any public statement denying, directly or indirectly, any allegation in the Complaint or the Amended Complaint, or creating, or tending to create the impression that the Complaint, the Amended Complaint or this Order is without a factual basis; provided, however, that nothing in this provision shall affect Defendants' (i) testimonial obligations; or (ii) right to take legal positions in other proceedings to which the Commission is not a party. Defendants shall take all steps necessary to ensure all of their agents and employees comply with this provision.

10. By consenting to the entry of this Order, Defendants neither admit nor deny the allegations contained in the Complaint or the Amended Complaint, except that the Parties acknowledge that this Order is enforceable on its terms without proof of further facts.

II. ORDER FOR PERMANENT INJUNCTION

Based upon and in connection with the foregoing, **IT IS HEREBY ORDERED THAT:**

1. Defendants are permanently restrained, enjoined and prohibited from directly or indirectly:

a. Failing to satisfy the minimum financial requirements for futures commission merchants (“FCMs”) registered with the Commission and members of the National Futures Association, in violation of Section 4(f)(b) of the Act, 7 U.S.C. § 6f(b);

b. Failing to meet minimum financial requirements for FCMs and failing to immediately transfer all customer accounts and cease doing business as a FCM until such time as the firm is able to establish compliance with its minimum financial requirements, in violation of Commission Regulations 1.17(a)(1)(i)(C) and 1.17(a)(4), 17 C.F.R. §§ 1.17(a)(1)(i)(C) and 1.17(a)(4); and

c. Failing to maintain records required a FCM that currently reflect its assets, liabilities and capital, in violation of Section 4f(a)(1) of the Act, and Commission Regulation 1.18.

2. For a period of three years from the date of entry of this Order, Defendants are each permanently restrained, enjoined and prohibited from applying for registration or claiming exemption from registration with the Commission, and engaging in any activity requiring such registration or exemption from registration, except as provided for in Regulation 4.14(a)(9), 17 C.F.R. § 4.14(a)(9) (2007), or acting as a principal (as defined by the NFA Registration Rule 101), agent or any other officer or employee of any person registered, exempted from registration or required to be registered with the Commission, except as provided for in Regulation 4.14(a)(9), 17 C.F.R. § 4.14(a)(9) (2007).

3. The injunctive provisions of this Order shall be binding upon Defendants, upon any person acting in the capacity of officer, agent, servant, or employee of any of the Defendants, and upon any person who receives actual notice of this Order by personal service or otherwise insofar as such person is in active concert or participation with any of the Defendants.

III. ORDER FOR CIVIL MONETARY PENALTY AND OTHER ANCILLARY RELIEF

IT IS HEREBY ORDERED that Forefront shall comply fully with the following terms, conditions and obligations relating to the payment of a civil monetary penalty.

1. Forefront shall pay a civil monetary penalty in the amount of One Hundred Thirty Thousand Dollars (\$130,000), plus post-judgment interest, pursuant to Section 6c of the Act, 7 U.S.C. § 13a-1. This civil monetary penalty is due and owing upon entry of this Order.

2. The civil monetary penalty against Forefront shall be treated as a valid claim against the Receivership of Forefront but subordinated to the payment of all other creditor and customer claims as provided in the Receiver's Final Report to the Court dated February 13, 2008.

3. The Snellgroves shall pay, jointly and severally, a civil monetary penalty in the amount of One Hundred Thirty Thousand Dollars (\$130,000), plus post-judgment interest, pursuant to Section 6c of the Act, 7 U.S.C. § 13a-1. This civil monetary penalty is due and owing upon entry of this Order.

4. The civil monetary penalty against Snellgroves shall be treated as a valid claim against the Receivership of Forefront but subordinated to the payment of all other creditor and customer claims (including the civil monetary payment against Forefront as provided in paragraph 2) as provided in the Receiver's Final Report dated February 13, 2008.

5. Post-judgment interest shall accrue beginning on the date of entry of this Order and shall be determined by using the Treasury Bill rate prevailing on the date of entry of this Order, pursuant to 28 U.S.C. § 1961.

6. Defendants each shall pay their respective civil monetary penalties by electronic funds transfer, U.S. postal money order, certified check, bank cashier's check, or bank money. If

payment is to be made other than by electronic funds transfer, the payment shall be made payable to the Commodity Futures Trading Commission, and send it to the address below:

Commodity Futures Trading Commission, Division of Enforcement
ATTN: Marie Bateman - AMZ-300
DOT/FAA/MMAC
6500 S. MacArthur Blvd.
Oklahoma City, OK 73169
Telephone: 405-954-6569

7. If payment is to be made by electronic funds transfer, the paying Defendant shall contact Marie Bateman or her successor at the above address to receive payment instructions and shall fully comply with those instructions. The paying Defendant shall accompany payment of the penalty with a cover letter that identifies the paying Defendant and the name and docket number of the proceedings. The paying Defendant shall simultaneously transmit copies of the cover letter and the form of payment to the Director, Division of Enforcement, Commodity Futures Trading Commission, Three Lafayette Centre, 1155 21st Street, N.W., Washington, D.C. 20581, and the Chief, Office of Cooperative Enforcement, at the same address.

IV. MISCELLANEOUS PROVISIONS

1. Notices. All notices required by this Order shall be sent by certified mail, return receipt requested, as follows:

- a. Notice to Plaintiff Commission:
Division of Enforcement
Commodity Futures Trading Commission
1155 21st Street, N.W.
Washington, D.C. 20581
- b. Notice to Robert P. McIntosh VSB No. 66113
Assistant United States Attorney
Office of the United States Attorney
1800 Main Street Centre
600 East Main Street
Richmond, Virginia 23219

c. Notice to the Receiver:
Bruce Matson
LeClair Ryan, PC
Riverfront Plaza, East Tower
951 East Byrd Street, 8th Floor
Richmond, VA 23218

2. Successors and Assigns. This Order shall inure to the benefit of and shall bind the parties' successors, assigns, heirs, beneficiaries and administrators.

3. Counterparts. This Order may be executed by the parties in counterparts and by facsimile.

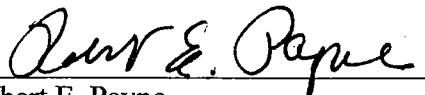
4. Entire Agreement, Amendments and Severability. This Order incorporates all of the terms and conditions of the settlement among the parties. Nothing shall serve to amend or modify this Order in any respect whatsoever, unless: (1) reduced to writing, (2) signed by all parties, and (3) approved by order of the Court.

5. Invalidation. If any provision of this Order, or if the application of any provisions or circumstances is held invalid, the remainder of this Order and the application of the provisions to any other person or circumstance shall not be affected by the holding.

6. Waiver. The failure of any party hereto at any time or times to require performance of any provision hereof shall in no manner affect the right of such party at a later time to enforce the same or any other provision of this Order. No waiver in one or more instances of the breach of any provision contained in this Order shall be deemed to be or construed as a further or continuing waiver of such breach or waiver of the breach of any other provision of this Order.

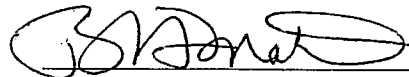
7. Continuing Jurisdiction of this Court. The Court shall retain jurisdiction of this case to assure compliance with this Order and for all other purposes related to this action. **DONE**

AND ORDERED this 28th day of March, 2008.



Robert E. Payne
United States District Judge

Consented to and
Approved for Entry by:

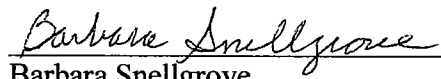
Dated: 2/13/08


Bruce Matson, Receiver for Forefront
Defendant

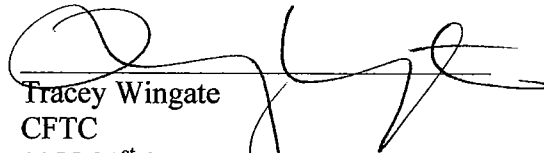
Dated: 2/13/08


Donald Snellgrove
14794 Kelleys Ford Lane
Richmond, Virginia 23060
Defendant

Dated: 2/13/08

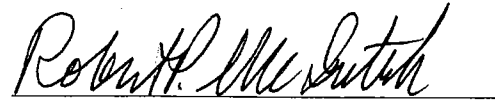

Barbara Snellgrove
14794 Kelleys Ford Lane
Richmond, Virginia 23060
Defendant

Dated: 3/25/08


Tracey Wingate
CFTC
1155 21st Street, N.W.
Washington D.C. 20581
(202) 418-5319(Wingate telephone)
(202) 418-5332 (facsimile)
Counsel for Plaintiff Commission

Consented to and
Approved for Entry by:

Dated: 3-26-2008


Robert P. McIntosh
Office of the United States Attorney
600 E. Main Street, 8th Floor
Richmond, VA 23219
Robert.McIntosh@usdoj.gov

Counsel for Plaintiff Commission