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

TO: Robert C. Brown, Jr.
Trebor Co.
Trebor Investment Co
316 Georgia St.
Vallejo, CA 94590

DESIST AND REFRAIN ORDER
(For violations of section 25110 of the Corporations Code)

The California Corporations Commissioner finds that:

1. Robert C. Brown, Jr. (“Brown”) is an individual residing in California at various locations, including 316 Georgia St., Vallejo, CA 94590.
2. Trebor Co. and Trebor Investment Co. (“Trebor”) are business names used by Brown in the offer and sale of securities described below, and have been located at the same address above.
3. From 2003 to at least 2006, Brown offered and sold securities in California in the form investment contracts to investors. Some of these have been described as “14-Month Agreements,” promising 100% profits within 14 months. Others have been sold as “24-Month High Yield Agreements,” promising 21-30% profits every four months. Brown has represented that he has special expertise in stock market investing, and would use investors’ money to generate profits in the stock market. The investment contracts have sometimes also been characterized by Brown as loans, the proceeds of which will be used by Brown for investing in the stock market. Money from investors has been paid to “Trebor Co.” Brown and Trebor have failed to pay profits as promised and have failed to return principal upon request and upon the purported maturity date of the investment

1 contracts, e.g., 14 months or 24 months in the cases of the agreements described above. In addition to
2 Brown, investors have often communicated with a person named Mack McConnell regarding the
3 status of their investment.

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

7 Based upon the foregoing findings, the California Corporations Commissioner is of the
8 opinion that the transactions described above are investment contracts and are securities subject to
9 qualification under the California Corporate Securities Law of 1968 (California Corporations Code
10 section 25000 et seq.) and are being or have been offered or sold without being qualified in violation
11 of Corporations Code section 25110. Pursuant to section 25532 of the Corporate Securities Law of
12 1968, Robert C. Brown, Jr., Trebor Co., and Trebor Investment Co. are hereby ordered to desist and
13 refrain from the further offer or sale in the State of California of securities, including but not limited
14 to investment contracts, unless and until qualification has been made under the law or unless exempt.

15 This Order is necessary, in the public interest, for the protection of investors and consistent
16 with the purposes, policies, and provisions of the Corporate Securities Law of 1968.

17 Dated: April 16, 2008

18 Los Angeles, California

19 PRESTON DuFAUCHARD
20 California Corporations Commissioner

21 By _____
22 ALAN S. WEINGER
23 Lead Corporations Counsel
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