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California Corporations Commissioner  
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9 BEFORE THE DEPARTMENT OF CORPORATIONS  
10 OF THE STATE OF CALIFORNIA

12 In the Matter of the Accusation of ) CASE NO.  
13 THE CALIFORNIA CORPORATIONS ) FILE NO. 122599/130215  
14 COMMISSIONER, ) **ORDER BARRING KIRK S. WRIGHT**  
15 Complainant, ) **FROM ANY POSITION OF**  
16 v. ) **EMPLOYMENT, MANAGEMENT OR**  
17 INTERNATIONAL MANAGEMENT ) **CONTROL OF ANY INVESTMENT**  
18 ASSOCIATES, LLC, INTERNATIONAL ) **ADVISER, BROKER-DEALER OR**  
19 MANAGEMENT ASSOCIATES ADVISORY ) **COMMODITY ADVISER PURSUANT TO**  
20 GROUP, LLC, and KIRK S. WRIGHT, as an ) **CORPORATIONS CODE SECTION 25232.1**  
21 individual, )  
Respondents. )

22 TO: Kirk S. Wright  
23 International Management Associates, LLC  
24 International Management Associates Advisory Group, LLC  
25 1899 Powers Ferry Road, Ste. 160  
Atlanta, GA, 30339

26 1. On May 9, 2007 the Department of Corporations for the State of California  
27 (“Department”) brought an action in order to bar Respondent Kirk S. Wright (“Wright”) from any  
28 position of employment, management or control of any investment adviser, broker-dealer or  
commodity adviser pursuant to Corporations Code section 25232.1. A hearing was not requested on

1 this matter within 30 days of service as required, and the time period has expired to request a  
2 hearing.

3         2. International Management Associates, LLC, (“IMA”) is a limited liability company  
4 formed in Virginia, with a principal place of business in Atlanta, Georgia, and with an office at 6701  
5 West Center Drive, Ste. 950, Los Angeles, CA 90045. In June 2003 IMA was first certified with the  
6 California Department of Corporations as an investment adviser. IMA is owned and controlled by  
7 Wright and others. According to its Form ADV, dated January 25, 2006, IMA had \$166.6 million in  
8 funds under management in five hedge funds it manages and advises.

9         3. International Management Associates Advisory Group, LLC, (“IMA Advisory”) is a  
10 limited liability company formed in Georgia with a principal place of business in Atlanta, Georgia,  
11 and with an office at 6701 West Center Drive, Ste. 950, Los Angeles, CA 90045. In December 2004  
12 IMA Advisory was first certified with the California Department of Corporations as an investment  
13 adviser. IMA Advisory is owned and controlled by Wright and others. According to IMA  
14 Advisory’s Form ADV, dated January 25, 2006, it had \$18.3 million in funds under management.

15         4. On February 27, 2006 the Securities and Exchange Commission (“SEC”) filed a  
16 Complaint, Civil Action No. 1 06-CV-0438, in the United States District Court for the Northern  
17 District of Georgia, against Wright, IMA, IMA Advisory, and others, alleging that they had been  
18 fraudulently providing investors with quarterly statements that misrepresented the amount of assets  
19 in various accounts, misrepresented the rates of return obtained by the respective funds, and failed to  
20 disclose to investors that virtually all funds had been dissipated. On March 6, 2006 the District  
21 Court issued a temporary restraining order and order to show cause against all defendants. Wright,  
22 IMA, IMA Advisory and others entered into a Consent Order and pursuant thereto on March 10,  
23 2006 the District Court entered an Order granting a preliminary injunction, freezing assets, and  
24 appointing a receiver. On February 9, 2007, following testimony by the receiver, the District Court  
25 entered a default judgment as to Wright and ordered a permanent injunction and disgorgement of  
26 \$17,019,510, representing profits gained as a result of the conduct alleged in the Complaint. On  
27 March 2, 2007 the SEC issued an Order instituting administrative proceedings to determine other  
28 appropriate remedial sanctions against Wright in light of the February 9, 2007 permanent injunction.

1           5.       Since the filing of the Complaint referenced in the above paragraph, the securities  
2 administrators of at least two States (including Maryland and Massachusetts) have suspended or  
3 revoked the registration of IMA as an investment adviser or Wright as an investment adviser  
4 representative.

5           6.       California Corporations Code section 25232.1 provides that a Commissioner may bar  
6 from any position of employment, management or control of any investment adviser, broker-dealer  
7 or commodity adviser, if it is in the public interest and for actions of the investment adviser, or one  
8 or more of its officers or controlling persons, as specified in Corporations Code section 25232  
9 subdivision (c), specifically for court ordered injunctions in connection with Investment Adviser  
10 activity, and subdivision (d), specifically for orders of the SEC and other States relating to the  
11 revocation of investment adviser and investment adviser representative registrations.

12           The Commissioner finds that each of the above enumerated matters provide an independent  
13 basis under California Corporations Code section 25232.1, justifying the issuance of an Order  
14 barring Kirk S. Wright from any position of employment, management or control of any investment  
15 adviser, broker-dealer or commodity adviser. Based upon the foregoing, the Commissioner finds it  
16 is in the public interest to bar Kirk S. Wright from any position of employment, management or  
17 control of any investment adviser, broker-dealer or commodity adviser.

18           NOW THEREFORE, GOOD CAUSE SHOWING, IT IS HEREBY ORDERED that Kirk S.  
19 Wright is barred in the State of California from any position of employment, management or control  
20 of any investment adviser, broker-dealer or commodity adviser pursuant to Corporations Code  
21 section 23232.1 for acts committed as specified in Corporations Code section 25232 subdivisions (c)  
22 and (d). This order and bar is effective immediately.

23  
24 Dated: August 13, 2007

PRESTON DuFAUCHARD  
California Corporations Commissioner

25  
26  
27 By: \_\_\_\_\_  
ALAN S. WEINGER  
Lead Corporations Counsel  
28 Enforcement Division