

1 PRESTON DuFAUCHARD
California Corporations Commissioner
2 ALAN S. WEINGER
Acting Deputy Commissioner
3 ALEX CALERO (SBN: 238389)
Corporations Counsel
4 DEPARTMENT OF CORPORATIONS
1350 Front Street, Room 2034
5 San Diego, California 92101
Telephone: (619) 525-4044
6

7 Attorneys for Complainant

8 BEFORE THE DEPARTMENT OF CORPORATIONS
9 OF THE STATE OF CALIFORNIA

10	In the Matter of)	
)	
11	THE CALIFORNIA CORPORATIONS)	STIPULATION TO AMENDED DESIST AND
12	COMMISSIONER,)	REFRAIN ORDER FOR VIOLATIONS OF
)	CALIFORNIA CORPORATIONS CODE
13	Complainant,)	SECTION 25110
)	
14	v.)	
)	
15	SHANNON K. RODRIGUEZ,)	
)	
16	Respondents.)	
)	

17
18 IT IS HEREBY STIPULATED BY AND BETWEEN RESPONDENT SHANNON K.
19 RODRIGUEZ (“RODRIGUEZ”), AND THE CALIFORNIA CORPORATIONS COMMISSIONER
20 (“COMMISSIONER”), AS FOLLOWS:

21 WHEREAS, on October 23, 2007, the COMMISSIONER issued a Desist and Refrain Order
22 against Ball Print Technologies, Inc., Jack Turner, Mark Campbell, Steven Fiorentino, Tony Magee,
23 Julia Newbern and RODRIGUEZ for: (1) the offer and sale of securities that were, in the opinion of
24 the COMMISSIONER, unqualified and non-exempt in violation of California Corporations Code
25 section 25110; and (2) the misrepresentation and omission of material facts in connection with the
26 offer and sale of securities that were in the opinion of the COMMISSIONER in violation of
27 Corporations Code section 25401. Attached hereto as **Exhibit A** and incorporated by reference is a
28 true and correct copy of the Desist and Refrain Order dated October 23, 2007.

1 On March 20, 2009, pursuant to this Stipulation, the COMMISSIONER issued an Amended
2 Desist and Refrain Order pertaining to RODRIGUEZ. Attached hereto as **Exhibit B** and
3 incorporated by reference is a true and correct copy of the Amended Desist and Refrain Order.

4 WHEREAS, RODRIGUEZ, without admitting or denying the finding in the Amended Desist
5 and Refrain Order, seeks to resolve the concerns of the COMMISSIONER by entering into this
6 Stipulation.

7 NOW, THEREFORE, the parties hereby stipulate and agree as follows:

8 1. RODRIGUEZ hereby admits to the jurisdiction of the COMMISSIONER over her
9 person and over the subject matter of this proceeding;

10 2. RODRIGUEZ hereby consents to entry of the Amended Desist and Refrain Order;

11 3. RODRIGUEZ hereby waives her right to a hearing on this matter, provided for by
12 California Corporations Code section 25532, subdivision (d). Further, RODRIGUEZ waives her
13 right to any and all judicial review of this matter, including that provided by California Code of Civil
14 Procedure section 1094.5;

15 4. The COMMISSIONER rescinds the Desist and Refrain Order issued on October 23,
16 2007, as it pertains to RODRIGUEZ but not for the other respondents;

17 5. RODRIGUEZ hereby agrees that the Amended Desist and Refrain Order is a public
18 document and shall remain in full force and effect until further order of the COMMISSIONER;

19 6. RODRIGUEZ acknowledges that pursuant to California Corporations Code section
20 25255, remedies for violations of the California Corporate Securities Law of 1968 (California
21 Corporations Code section 25000 et seq.) are not exclusive and may be sought and employed in any
22 combination to enforce that law. Therefore, RODRIGUEZ further agrees that this Stipulation does
23 not preclude the COMMISSIONER from seeking additional remedies against RODRIGUEZ for
24 violating the Amended Desist and Refrain Order or any law under the COMMISSIONER's
25 jurisdiction;

26 7. RODRIGUEZ acknowledges that nothing in this Stipulation shall preclude the
27 COMMISSIONER, or his agents or employees, to the extent authorized by law, from assisting or
28 cooperating in any investigation and/or action brought by any other federal, state or county agency;

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

8. RODRIGUEZ enters into this Stipulation voluntarily and without coercion and acknowledges that no promises, threats or assurances have been made by the COMMISSIONER or any officer, or agent thereof, about this Stipulation; and

9. RODRIGUEZ and the COMMISSIONER agree that this Stipulation may be executed in one or more separate counterparts, each of which when so executed, shall be deemed an original. Such counterparts shall together constitute and be one and the same instrument.

Dated: March 20, 2009

SHANNON K. RODRIGUEZ

Dated: March 23, 2009

PRESTON DuFAUCHARD
California Corporations Commissioner

By _____
ALAN S. WEINGER
Acting Deputy Commissioner