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STATE OF CALIFORNIA  
BUSINESS TRANSPORTATION AND HOUSING AGENCY  
DEPARTMENT OF CORPORATIONS

TO: MID Investment Group  
Steve Garnier  
James Davis  
Rodger Postler  
3007 Kingston Road, Suite 143  
Toronto, Canada M1M 1P1

Nexus Trading Group LLC  
736 North Western Ave. #322  
Chicago, Illinois, 60612

**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 MID Investment Group was an open-ended management investment company. The company was organized as a British Virgin Island corporation in December 2001 and was reorganized as a Dominica corporation in 2008. Its principal place of business is allegedly located at 3007 Kingston Road, Suite 143, Toronto, Canada. Nexus Trading Group is identified as the daily manager of funds for MID Investment Group, and is allegedly located at 736 North Western Ave., #322, Chicago, Illinois, 60612.

2. At all relevant times Steve Garnier, James Davis and Rodger Postler were salespersons for MID Investment Group and they represented to potential investors on the internet that for any amount above \$3000 invested with MID Investment Group, monthly interest payments would be made to the investors in amounts ranging from 9.83% to 10.56%. In a press release posted on the internet, it was claimed that the company had been in existence for 15 years, and that it had worked with individuals, large corporations and government agencies. The company claimed to have investment professionals who specialized in developing diversified portfolios to ensure “minimal risk and maximum growth potential.” The contact on the press release online was listed as Rodger Postler.

1           3. After engaging in internet chat with persons representing themselves as MID Investment  
2 Group (i.e. James Davis and Steve Garnier), a California investor was provided with a letter of  
3 recommendation from a firm identifying themselves as Chartered Certified Accountants by the firm  
4 name of Hoffman and Partners. The address of the firm given was 22 Hanover St. in Roseau, the  
5 capital of the Caribbean island of Dominica. A subsequent search discovered that in fact there is no  
6 22 Hanover St. in Roseau. A further search would later confirm that the Kingston Road address in  
7 Toronto was the address of a mail box drop.

8           4. Prior to the discoveries about the false addresses, on September 7, 2011, the California  
9 investor wired \$30,000 to an account in the name of Nexus Trading Group LLC, with an account at a  
10 bank in Cincinnati. One month later, on October 7, 2011, the investor received a fund disbursement  
11 check in the amount of \$2,295.40. On October 11, 2011, the investor wired another \$30,000 to a  
12 bank in Hickory Hill, Illinois to invest with MID Investment Group.

13           5. An online account for the investor purported to show that a fund disbursement had been  
14 sent to the investor in the amount of \$5366.13. Despite repeated requests, that check never arrived.  
15 MID Investment Group provided the investor with a wire confirmation number by Citibank, but it  
16 was later discovered that this confirmation number was a fake.

17           6. The interests offered or sold to the California investor in MID Investment Group were  
18 securities in the form of investment contracts involving investments in an investment fund, and were  
19 offered or sold in this state in an issuer transaction. The California Corporations Commissioner is of  
20 the opinion that the securities in MID Investment Group are subject to qualification under the  
21 California Corporate Securities Law of 1968 and are being or have been offered or sold without being  
22 qualified in violation of Corporations Code section 25110.

23           7. The California Corporations Commissioner is of the opinion that the securities in MID  
24 Investment Group were offered or sold in this state by means of oral or written communications  
25 which included an untrue statement of a material fact or omitted to state a material fact necessary in  
26 order to make the statements made, in the light of the circumstances under which they were made, not  
27 misleading, in violation of section 25401 of the Corporate Securities Law of 1968.

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1 Pursuant to section 25532 of the Corporate Securities Law of 1968, Rodger Postler, James  
2 Davis, Steve Garnier, MID Investment Group and Nexus Trading Group LLC are hereby ordered to  
3 desist and refrain from the further offer or sale in the State of California of securities, including but  
4 not limited to investments in any investment fund, unless and until said securities have been qualified  
5 under the law, or are exempt.

6 Pursuant to section 25532 of the Corporate Securities Law of 1968, Rodger Postler, James  
7 Davis, Steve Garnier, MID Investment Group and Nexus Trading Group LLC are hereby ordered to  
8 desist and refrain from offering or selling any security in the State of California, including but not  
9 limited to investments in any investment fund, by means of any written or oral communication which  
10 include an untrue statement of a material fact or omits to state a material fact necessary in order to  
11 make the untrue statements made, in the light of the circumstances under which they were made, not  
12 misleading.

13 This Order is necessary, in the public interest, for the protection of investors and consistent  
14 with the purposes, policies, and provisions of the Corporate Securities Law of 1968. This Order shall  
15 remain in full force and effect until further order of the California Corporations Commissioner.

16 Dated: March 6, 2012  
17 Los Angeles, California

18 JAN LYNN OWEN  
19 California Corporations Commissioner

20  
21 By \_\_\_\_\_  
22 ALAN S. WEINGER  
23 Deputy Commissioner  
24 Enforcement Division  
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