



**In the Matter of**  
*The Securities Act, 1988, S.S. 1988, c. S-42.2*

**and**

**In the Matter of**

**UNIVERSAL FINANCIAL HOLDING CORP.  
DAVID HOWARD BROMBERG  
DANIEL ALAN BROWN  
JOHN THOMAS CIARAMELLA  
JAMES VINCENT EULO  
FIRST LIBERTY INVESTMENT SERVICES, INC.  
GROUP ONE FINANCIAL SERVICES, INC.  
ALLAN KANTER  
STEVE DAVID KNOWLES  
STUART A. MEHLER  
HOWARD S. MILLER  
JASON O'NEILL  
CARL ROBERT SAATHOFF  
MICHAEL HENERY SAVITSKY III  
TREVOR DOUGLAS SEFFREN  
ANDREW N. STERN  
STUART FINANCIAL GROUP INTERNATIONAL INC.  
TRADING CORPORATION OF AMERICA  
JOSEPH VALKO**

**Revocation Order**  
**(Subsection 158)**

WHEREAS Stuart A. Mehler (Mehler) and Stuart Financial Group International Inc. (SFG ) have applied to the Saskatchewan Financial Services Commission (the Commission) for an order pursuant to section 158 of *The Securities Act, 1988* (the Act) revoking a temporary order of the Saskatchewan Securities Commission (the Securities Commission) issued pursuant to subsection 134(3) of the Act dated July 24, 2002 against Mehler, SFG and others (the Temporary Order) as extended by order of the Securities Commission dated August 7, 2002 (the Extending Order);

WHEREAS staff of the Commission (the Staff) represent as follows that:

1. On April 19, 2002 the Securities Commission issued an investigation order under subsection 12(2) of the Act with respect to the trading activity of Universal Financial Holding Corp.(Universal) based upon a complaint from LW of Saskatoon, Saskatchewan (the Investigation Order).

2. At the time of the Temporary Order Universal was a Florida corporation and a non-clearing Futures Commission Merchant located at 3467 N.E. 163 St. North Miami Beach, Florida, 33160.
3. At the time of the Temporary Order SFG was a full-service brokerage firm offering commodity futures, options and managed futures accounts that had the same address in Florida as Universal.
4. Melher resides in the state of Florida and at all relevant times was the president of SFG. Melher and SFG are collectively referred to as the Respondents.
5. On April 23, 2002, during the course of the investigation under the Investigation Order, Victor Pankratz, Deputy Director of Enforcement with the Securities Commission (Pankratz), called a 1-800 telephone number that appeared on Universal's Web site. Pankratz posed as an interested investor, using an alias "Vincent Merker", and he spoke to an individual who identified himself as Stuart Mehler.
6. In the telephone conversation on April 23, 2002, Melher had an extensive discussion with Pankratz about trading futures contracts and options, and he offered to open a trading account for Pankratz. Melher said that he had a close personal relationship with Universal and "cleared though" Universal. Melher went on to say that SFG was licensed to do business in all provinces in Canada as well as the United States.
7. Melher told Pankratz that SFG had a lot of clients in Canada, including a client in Summerberry, Saskatchewan.
8. On July 16, 2002 Pankratz received a letter dated April 29, 2002 addressed to Merker from Melher that included promotional material, including new account documents.
9. As a result of the telephone conversation outlined in paragraphs 6 and 7, and the promotional package referred to in paragraph 8, on July 24, 2002 the Securities Commission issued the Temporary Order which was served on the Respondents by registered mail. On August 7, 2002 the Securities Commission issued the Extending which was served on the Respondents by registered mail.
10. On October 31, 2002 Pankratz received a letter dated August 7, 2002, addressed to Merker from Melher that stated that Melher would have to refuse Merker's "inquiry and solicitation" at this time because his "Series 3 Commodity Registration in the US is not recognized in the province of Saskatchewan, Canada."
11. On February 1, 2003 all of the duties of the Securities Commission under the Act were assigned to the Commission pursuant to *The Saskatchewan Financial Services Commission Assignment Regulations*.
12. By letter dated June 15, 2009, Melher has requested a hearing before the Commission to determine whether the Temporary Order and the Extending Order should be revoked.

13. The Temporary Order and Extending Order are currently in force and effect.
14. The Staff is not aware of any trading activity by Melher in Saskatchewan since April, 2002.
15. The Staff has contacted representatives from the Central Registration Database, the Florida Securities Commission and the National Futures Association in the United States and was informed by all three entities that Mehler has not been involved in any securities related violations that would impact the granting of this relief.

AND WHEREAS the Commission is satisfied that it would not be prejudicial to the public interest to make this Order.

IT IS HEREBY ORDERED pursuant to subsection 158(4) of the Act that the Temporary Order and Extending Order against Mehler and SFG are revoked.

DATED at Regina, Saskatchewan on November 5, 2009.

*“Dave Wild”*

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Dave Wild  
Chair  
Saskatchewan Financial Services Commission