BEFORE THE
DEPARTMENT OF FINANCIAL INSTITUTIONS
DIVISION OF SECURITIES
STATE OF WISCONSIN

In the Matter of
INTERNATIONAL CURRENCY CONSULTANTS,
INC., FRED SCHOENFELD, ROBERT MATHIS,
and ALEX MARCUCCI,

Respondents.

PETITION FOR ORDER
(SUMMARY)

File S-99084(EX)

The staff of the Enforcement Unit, Registration & Enforcement Section, of The Division of Securities, Department of Financial Institutions, State of Wisconsin has conducted an investigation in this matter pursuant to sec. 551.56, Wis. Stats., and as a result thereof alleges as follows:

1. **International Currency Consultants, Inc.** ("ICC") is a foreign business entity with a last known business address at 4800 North Federal Highway, Suite 104B, Boca Raton, FL 33431.

2. **Fred R. Schoenfeld** ("Schoenfeld") is an adult individual with a last known business address at 4800 North Federal Highway, Suite 104B, Boca Raton, FL 33431.

3. **Robert Mathis** ("Mathis") is an adult individual with a last known business address at 4800 North Federal Highway, Suite 104B, Boca Raton, FL 33431.

4. **Alex Marcucci** ("Marcucci") is an adult individual with a last known business address at 4800 North Federal Highway, Suite 104B, Boca Raton, FL 33431.

5. At all times material hereto, Schoenfeld was an agent of ICC.

6. At all times material hereto, Mathis was an agent of ICC.

7. At all times material hereto, Marcucci was an agent of ICC.

8. During October of 1998, Marcucci, on behalf of ICC, offered to at least one person in Wisconsin the opportunity to invest with ICC in the interbank foreign exchange market (the “forex market”).

9. Investors are required to sign a Trading Authorization Power of Attorney providing ICC and its agents full trading discretion over the investors’ funds in his account.

10. Since the investment is in a common enterprise with the expectation of profit to be derived through the essential managerial efforts of someone other than the investor, the investment offered by the Respondents in an investment contract pursuant to DFI-Sec 1.02(6)(a), Wis. Adm.Code and is a security under sec. 551.02(13), Wis. Stats.

11. The investment contract security offered by the Respondents has not been registered for offer or sale in Wisconsin pursuant to Ch. 551, Wis. Stats.

12. Respondents have violated sec. 551.21, Wis. Stats., by offering unregistered securities in Wisconsin.
13. At no time was Schoenfeld licensed as a securities agent in Wisconsin pursuant to Ch. 551.

14. At no time was Mathis licensed as a securities agent in Wisconsin pursuant to Ch. 551.

15. At no time was Marcucci licensed as a securities agent in Wisconsin pursuant to Ch. 551.

16. Schoenfeld has violated sec. 551.31(1), Wis. Stats., by transacting business in Wisconsin while not licensed as securities agent.

17. Mathis has violated sec. 551.31(1), Wis. Stats., by transacting business in Wisconsin while not licensed as securities agent.

18. Marcucci has violated sec. 551.31(1), Wis. Stats., by transacting business in Wisconsin while not licensed as securities agent.

19. ICC has violated sec. 551.31(1), Wis. Stats., by employing unlicensed agents to represent them in Wisconsin.

20. ICC has violated sec. 551.31(1), Wis. Stats., by acting as an unlicensed broker-dealer in Wisconsin.

THEREFORE, the staff of the Enforcement Unit petitions the Administrator for the issuance of the attached order.

DATED this 10 day of February, 2000.

Kathryn L. Denton
Examiner
Enforcement Unit

David A. Cohen
Supervising Attorney
Enforcement Unit