

MELANIE SENTER LUBIN,  
Securities Commissioner  
for the State of Maryland

Plaintiff,

v.

LIBERTY TRADE INTERNATIONAL, INC.,

and

DAVID M. ROBINSON,

Defendants.

\* IN THE  
\* CIRCUIT COURT FOR  
\* BALTIMORE COUNTY

\* Civil Action No. 03-C-<sup>06-003194</sup>~~98-40248~~

\* \* \* \* \*

**ORDER GRANTING A PRELIMINARY INJUNCTION,  
CONTINUING THE RECEIVERSHIP FOR  
LIBERTY TRADE INTERNATIONAL, INC. AND DAVID M. ROBINSON  
AND GRANTING OTHER RELIEF**

Upon consideration of the Securities Commissioner's Motion for Preliminary Relief, and upon consideration of the evidence and arguments presented in court, the Court grants the Commissioner's motion. The Court being advised of the basis of the Commissioner's motion and good cause for granting the motion shown, the Court finds that this Order is necessary to prevent the risk of further loss of investor funds, to marshal assets for the benefit of investors, to protect the public interest and to avoid the harm that will result from a continuing violation of the Maryland Securities Act.

**Recitals**

1. Plaintiff Securities Commissioner for the State of Maryland ("Commissioner") commenced this action by filing in the Circuit Court for Baltimore County a complaint against Liberty Trade International, Inc. and David M. Robinson (the "defendants") at the same time that

**FILED APR 03 2006**

the Commissioner filed a Motion for Temporary Restraining Order, Asset Freeze, Appointment of a Receiver and Other Emergency Relief.

2. The Court granted the Commissioner's motion and on March 24, 2006, entered an Order Temporarily Enjoining Defendants, Freezing Assets of Liberty Trade International, Inc. ("LTI") and David M. Robinson ("Robinson"), Appointing a Receiver and Granting Other Relief.

3. The Complaint alleges that defendants offered and sold securities in violation of the registration and antifraud provisions of the Maryland Securities Act, Corporations and Associations Article, Title 11, Annotated Code of Maryland (1999 Repl. Vol. and Supp.2004) (the "Act"), and seeks appointment of a receiver, a permanent injunction, restitution, civil monetary penalties and other relief pursuant to section 11-702(b) of the Act.

4. The Complaint also alleges that defendants operated a fraudulent investment program by selling short term promissory notes that could be repaid only by using funds from other investors. According to the Complaint, Robinson failed to tell investors that he has been convicted of fraud in both state and federal courts, and falsely represented that he is a lawyer and that he took no compensation from the company.

5. This Court has jurisdiction over the subject matter of this proceeding.

6. This Court has personal jurisdiction over the defendants pursuant to section 6-102 of the Courts and Judicial Proceedings Article, Maryland Courts and Judicial Proceedings Code Annotated (1998 Repl. Vol. and Supp. 2005). Venue is proper in this Court pursuant to section 6-201 of that Article.

7. The Court concludes that the Commissioner is likely to succeed on the merits of

her claims, and that there is good basis for the Commissioner's motion for a preliminary injunction and continuation of the receivership. There will be irreparable harm from continuing violations of the Securities Act if Liberty Trade International, Inc. and David M. Robinson are not enjoined from selling unregistered securities and fraudulently selling promissory notes. Investors are also likely to suffer irreparable harm if the receivership does not continue. The receivership is necessary to assist the Commissioner in the recovery of investor funds. If the receivership is not continued, Liberty Trade International, Inc. and David M. Robinson may continue to raise funds from investors through fraudulent means, to disburse those funds preferentially, and to dissipate funds that would otherwise be available for restitution to investors.

The Court finds that this Order is necessary to protect the public interest.

THEREFORE, it is this \_\_\_\_\_ day of April, 2006, at \_\_\_\_\_ m. hereby, ORDERED:

1. That the Commissioner's motion be and hereby is granted.
2. That defendants Liberty Trade International, Inc. and David M. Robinson, and their officers, directors, agents, servants, employees, successors and assigns and all persons in active concert or participation with them who receive actual notice of such Order by personal service or otherwise (the "Restrained Entities"), are restrained and enjoined from directly or indirectly engaging in acts and practices that violate sections 11-501, 11-401, 11-402, and 11-301 of the Maryland Securities Act.
3. That the Restrained Entities immediately cease and desist from transacting securities or investment advisory business, including but not limited to any offer or sale of promissory notes or other interests in real estate.

4. That the Restrained Entities are restrained and enjoined from receiving, using, damaging, destroying, transferring, or disbursing in any manner whatsoever, any funds or other assets of Liberty Trade International, Inc. and David M. Robinson including, but not limited to, books, computers and all other forms of records; assets in personal and business bank and brokerage accounts; real estate or any interest in real property; and any items purchased with funds from Liberty Trade International, Inc., except by transferring such funds, items or other assets to the plaintiff or the Receiver appointed in this proceeding.

5. That the Enjoined Entities turn over to the Receiver appointed in this proceeding all funds, other assets and records of Liberty Trade International, Inc. and David M. Robinson including, but not limited to, books, computers and records, assets in bank and brokerage accounts, all real estate or other interests in real property, and any items purchased with funds from Liberty Trade International, Inc.

6. More specifically, that all the assets of Liberty Trade International, Inc. and David M. Robinson including all items and assets purchased with funds from Liberty Trade International, Inc., wherever located and however titled, be turned over to the Receiver within 24 hours of this Order, including but not limited to:

Accounts at the Bank of America, including accounts ## 003939694911, 003924195894, 003924195797, 003923451526;

Accounts at M&T Bank, including account # 9840918628;

Accounts at Wachovia Bank, including any accounts of Alfred Addae or any of his companies or entities, holding funds on behalf of Liberty Trade International, Inc.;

Jewelry, including but not limited to jewelry purchased at Connell Jewelry and Gold Valley;

Furniture, pictures and furnishings, including but not limited to those purchased at Gardiners Furniture, Offenbacher's, the Roomstore, Shofer's;

Collectibles, including but not limited to those purchased at Keepsakes & Collectibles; Computers; and

Interests in real property, including but not limited to any interest in real property on attached Exhibit A.

7. That Raymond J. Peroutka, Jr., 1637 Thames Street, Baltimore, MD 21231, continue as Receiver for Liberty Trade International, Inc. and David M. Robinson with all authority granted to a receiver under Title 13 of the Maryland Rules, Md. Code Ann. (2006) and specifically the authority immediately to identify, gather, receive, take control of, manage day-to-day, account to the Court for, liquidate and distribute Liberty Trade International, Inc.'s and David M. Robinson's assets.

8. That the Receiver is authorized to take whatever steps are necessary and appropriate to recover assets for the benefit of investors, including the right to file claims against those who are responsible for any loss to investors, have received preferential payments or fraudulent conveyances, may be insiders of the defendants and have received investor funds without a legitimate claim to the funds. The Receiver may negotiate and settle these claims with the Court's approval.

9. That Raymond J. Peroutka, Jr. is hereby authorized to employ InvoTex, Inc. as accountants and investigators to assist him in his duties as Receiver.

10. That the Receiver have possession and control of the business offices of LTI located at 2 East Rolling Crossroads, Suite 251, Baltimore, Maryland 21228, and, within two hours of this Order, have access to the LTI business office at 7208 Bogley Road, Suite 202,

Baltimore, Maryland 21244.

11. That all persons, including but not limited to the following enumerated entities and individuals, who received any goods, funds, interests in real property or other items and assets paid for out of funds from LTI's investors turn over to the Receiver within 24 hours of receiving notice of this Order all such goods, funds, interests in real property or other items and assets:

Synergy Marketing Associates, Inc., Kweku Swanzy Parker, and Newport Shores Mortgage, at 9017 Red Branch Rd., Suite G, Columbia, MD 21045 or 1 Corporate Drive, 10451 Mill Run Circle, Suite 400, Owings Mills, MD 21117;

Spencer Arrington, at 9 Wood Valley Court, Reisterstown, MD 21236, or 3301 Benson Ave., Baltimore, MD 21227-1001;

Alfred Addae, Fox Street Development, and K. Assare, at 2511 Highland Golf Course Drive, SE, Conyers, GA 30013-1976, or P.O. Box 361976, Decatur, GA 30036;

Michael Cox, at 17624 Gettysburg Way, Hagerstown, MD 21740;

Alice M. Cox, 1046 the Terrace, Hagerstown, MD 21742;

Cannelita Hackett, at 7208 Bogley Road, Suite 202, Baltimore, Maryland 21244;

Ruby Robinson, at 3715 Ednor Rd., Baltimore, MD 21218;

Tamiko MacDonald at the Estates, 8 Estates Court, #5101, Pikesville, MD 21208, or the Red Run Apartments, Owings Mills, MD 21117; and

Denise Deleaver.

12. That the Commissioner may amend the Complaint in this case to name as defendants any persons who she has reason to believe participated in violations of the Act.

13. That all actions, other than this action, against Liberty Trade International, Inc., David M. Robinson and the Receiver be stayed.

14. That the requirement that plaintiff or the Receiver post a bond in this matter be waived.

15. That this order continue, unless modified by further order of this Court, until a final resolution of this case.

16. That fifteen true test copies of the Order be released to the Commissioner for delivery to the Custodian of the Records for the banks and for the Receiver.

Date: April 3, 2006 at 9<sup>50</sup> AM. o'clock

Peter Conway  
Judge of the Circuit Court

**True Copy Test**  
SUZANNE MENCH, Clerk  
For [Signature]  
Assistant Clerk

**EXHIBIT A**

**Receivership Interests in Real Estate**

848 Fox St., Atlanta GA 30318
5272 & 5280 Poplar Springs Rd. Stone Mountain, GA 30083
11355 Panhandle Rd, Hampton, GA 30228; Jonesboro GA 30236; Lot 129 of 6 District, Clayton Co.
7119 Sir Charles Ct, Riverdale GA 30296. Clayton Co
281 Wood Sage Dr. Riverdale GA 30274. Clayton Co
288 Wood Sage Dr. Riverdale GA 30274, Clayton Co
366 Bradford Cove, Fairborn GA 30213, Fulton Co.
7 lots in Phillips Ave. (##1909, 1915, 1921, 1927, 1933, 1939, 1940) East Point, GA 30344
21 or 22 lots, Fairburn, Fulton Co., GA
49 lots, Union City, Fulton Co., GA
50 lots, Lovejoy, Clayton Co., GA
Lake property
9331 Owings Choice Ct., Owings Mills, MD 21117