Case: 1:02-cv-05206 Document #: 7 Filed: 10/24/02 Page 1 of 31 PageID #:46

United Stays District Court, Northern District of Illinois

Name of Assigned Judge or Magistrate Judge			John W.	Darrah	Sitting Judge if Other than Assigned Judge		
CASE NUMBER		BER	02 C 5206 DATE		10/24/20	02	
	CASE TITLE		SECURITIES AND EXCHANGE COMMISSION vs. JOSEPH SIDORYK				
MO	rion:		he f <u>o</u> llowing box (a) he motion being pres		the motion, e.g., plaintiff, defer	ndant, 3rd party plaintiff, and (b) s	state briefly the nature
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DOC	CKET ENTR	RY:			·		
(1)		Filed motion	on of [use listing	; in "Motion" box a	bove.]		
(2)		Brief in su	pport of motion	iue			
(3)		Answer bri	ef to motion due	Reply to	answer brief due	•	
(4)		Ruling/Hearing on set for at					
(5)		Status hearing[held/continued to] [set for/re-set for] on set for at					
(6)		Pretrial conference[held/continued to] [set for/re-set for] on set for at					
(7)		Trial[set for/re-set for] on at					
(8)		[Bench/Jury trial] [Hearing]] held/continued to	at		
(9)		This case i ☐ FRCP4(e and without costs[by/as P41(a)(1)		
(10)	■ Equitab	Other d ole Relief	ocket entry]	Enter Final Jud	dgment And Order	Of Permanent Injuncti	ion And Other
				'			
(11)		[For furthe	r detail see orde	r attached to the ori	iginal minute order.]		
	No notices rec	quired, advise	d in open court.			0.00	Document
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Notices mailed by judge's staff.		taff.			OCT 2 5 2002		

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Copy to judge/magistrate judge.

Notified counsel by telephone. Docketing to mail notices.

Mail AO 450 form.

Minute Order Form (06/9)

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date mailed notice Date/time received in central Clerk's Office

mailing deputy initials



UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

SECURITIES AND EXCHANCE	E COMMISSION))
	Plaintiff,	Case No. 02C 5206
٧.	(Judge John W. Darrah
JOSEPH SIDORYK, GARY L. TODD CAMP and THOMAS J.	•)))
	Defendants.)))

FINAL JUDGMENT AND ORDER OF PERMANENT INJUNCTION AND OTHER EQUITABLE RELIEF

Plaintiff Securities and Exchange Commission ("Plaintiff Commission"), having filed a Complaint for Permanent Injunction and Other Equitable Relief ("Complaint") in this matter and Defendants Joseph Sidoryk ("Defendant Sidoryk"), Gary L. Camp ("Defendant Gary Camp), Todd Camp, ("Defendant Todd Camp") and Thomas J. Siska ("Defendant Siska"), have in their Consent and Stipulations (attached as Exhibits 1, 2, 3 and 4 respectively, and incorporated herein), acknowledged receipt of the Complaint and admitted the personal jurisdiction of this Court over them and over the subject matter thereof, and without admitting or denying the allegations of the Complaint, except as to jurisdiction, and without trial, argument or adjudication of any facts or law herein, consented to the entry of this Final Judgment and Order of Permanent Injunction and Other Equitable Relief ("Final Judgment"). Plaintiff Commission and Defendants Sidoryk, Gary Camp, Todd Camp and Siska have each waived the entry of findings of fact and conclusions of law, as provided by Rule 52 of the Federal Rules of Civil

Procedure. The Court having jurisdiction over the parties and the subject matter hereof, and being fully advised in the premises:

I.

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the Defendants Sidoryk, Gary Camp, Todd Camp and Siska, their officers, agents, servants, employees, attorneys and those persons in active concert or participation with any of the foregoing who receive actual notice of this Final Judgment, by personal service or otherwise, and each of them, be and are hereby permanently restrained and enjoined from, in the offer or sale of any securities, by the use of any means or instruments of transportation or communication in interstate commerce or by the use of the mails, directly or indirectly, employing any device, scheme or artifice to defraud, in violation of Section 17(a)(1) of the Securities Act of 1933 ("Securities Act") [15 U.S.C. § 77q(a)(1)].

II.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the

Defendants Sidoryk, Gary Camp, Todd Camp and Siska, their officers, agents, servants,
employees, attorneys and those persons in active concert or participation with any of the
foregoing who receive actual notice of this Final Judgment, by personal service or
otherwise, and each of them, be and are hereby permanently restrained and enjoined
from, in the offer or sale of any securities by the use of any means or instruments of
transportation or communication in interstate commerce or by use of the mails, directly or
indirectly, obtaining money or property by means of any untrue statement of a material
fact or any omission to state a material fact necessary in order to make the statements
made, in light of the circumstances under which they were made, not misleading, or

engaging in any transaction, practice, or course of business which operates or would operate as a fraud or deceit upon the purchaser, in violation of Sections 17(a)(2) and 17(a)(3) of the Securities Act [15 U.S.C. §§ 77q(a)(2) and 77q(a)(3)].

III.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that

Defendants Sidoryk, Gary Camp, Todd Camp and Siska, their officers, agents, servants, employees, attorneys and those persons in active concert or participation with any of the foregoing who receive actual notice of this Final Judgment, by personal service or otherwise, and each of them, be and hereby are permanently restrained and enjoined from, directly or indirectly, in connection with the purchase or sale of any security, by the

use of any means or instrumentality of interstate commerce, or of the mails, or of any

A. employing any device, scheme or artifice to defraud; or

facility of any national securities exchange:

- B. making any untrue statement of material fact or omitting to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading; or
- C. engaging in any act, practice or course of business which operates or would operate as a fraud or deceit upon any person, in violation of Section 10(b) of the Securities Exchange Act of 1934 ("Exchange Act") [15 U.S.C. §78j(b)] and Rule 10b-5 [17 C.F.R. §240.10b-5] thereunder.

IV.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that:

1) Defendant Sidoryk shall pay disgorgement in the amount of \$25,559.94, plus prejudgment interest of \$4,020.62, for a total of \$29,580.56, representing the amount of losses avoided from certain conduct alleged in Complaint; 2) Defendant Todd Camp shall pay disgorgement in the amount of \$15,343.75, plus prejudgment interest of \$2,196.07, for a total of \$17,539.82, representing certain realized and unrealized gains from the conduct alleged in the Complaint; and 3) Defendant Siska shall pay disgorgement in the amount of \$4,256.25, plus prejudgment interest of \$609.16 for a total of \$4,865.41, representing the amount of losses avoided from certain conduct alleged in Complaint. These payments shall be made within thirty (30) days of the entry of this Final Judgment. The payment of the disgorgement and prejudgment interest shall be made payable to the Registry of the Court for the U.S. District Court for the Northern District of Illinois, by United States Postal money order, certified check, bank cashier's check or bank money order. A copy of the money order or check shall be sent to Jennifer L. Klebes, Division of Enforcement, Securities and Exchange Commission, 175 W. Jackson Boulevard, Suite 900, Chicago, IL 60604. The Clerk of the Registry of the Court shall deposit these payments into an interest-bearing account and shall deduct from the account any fee authorized by the Judicial Conference of the United States.

V.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, pursuant to Section 21A of the Exchange Act [15 U.S.C. §78u-1], within sixty (60) days of the entry of this Final Judgment: 1) Defendant Sidoryk shall pay to the U.S. Treasury a civil

money penalty in the amount of \$45,159.94; 2) Defendant Gary Camp shall pay to the U.S. Treasury a civil money penalty in the amount of \$14,850.00; 3) Defendant Todd Camp shall pay to the U.S. Treasury a civil money penalty in the amount of \$15,343.75; and 4) Defendant Siska shall pay to the U.S. Treasury a civil money penalty in the amount of \$4,256.25. Such payments shall be: A) made by United States Postal money order, certified check, bank cashier's check or bank money order; B) made payable to the Securities and Exchange Commission; C) hand-delivered or mailed to the Comptroller, Securities and Exchange Commission Operations Center, 6432 General Green Way, Stop 0-3, Alexandria, VA 22312; and D) submitted under cover letter that identifies Joseph Sidoryk, Gary Camp, Todd Camp and Thomas J. Siska, respectively, as a defendant in this matter, the case number of this matter, and a copy of which cover letter and money order or check shall be sent to Jennifer L. Klebes, Division of Enforcement, Securities and Exchange Commission, 175 West Jackson Boulevard, Suite 900, Chicago, IL 60604.

VI.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the attached Consents and Stipulations of Defendants Joseph Sidoryk (Exhibit 1), Gary Camp (Exhibit 2), Todd Camp (Exhibit 3) and Thomas J. Siska (Exhibit 4), be and hereby are, incorporated herein with the same force and effect as if fully set forth herein.

VII.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that this Court shall retain jurisdiction of this matter for all purposes, including, among other things: the implementation and enforcement of the terms and conditions of all orders and decrees that may be entered by this Court, and the Defendants' consents and stipulations attached

hereto and incorporated herein, or to entertain any suitable application or motion for additional relief within the jurisdiction of this Court.

VIII.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that there being no just cause for delay, the Clerk of the Court is hereby directed to enter this Final Judgment.

JOHNW. DARRAH, JUDGE United States District Court

DATED: October 24 2002

EXHIBIT 1

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

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		A CONTRACTOR TO THE CONTRACTOR	

SECURITIES AND EXCHANGE	E COMMISSION)	
I	Plaintiff,)	Case No.
v.)	
JOSEPH SIDORYK, GARY L. C TODD CAMP and THOMAS J. S	•	MACESTA
I	Defendants.)	MACRETALITY

CONSENT AND STIPULATION OF DEFENDANT JOSEPH SIDORYK

- A. Defendant Joseph Sidoryk ("Defendant Sidoryk"):
- 1. Acknowledges service upon him of the Complaint for Permanent
 Injunction and Other Equitable Relief ("Complaint") of Plaintiff Securities and Exchange
 Commission ("Plaintiff Commission") in this action, enters a general appearance, admits
 the jurisdiction of this Court over him and over the subject matter hereof, and waives the
 filing of an Answer;
- 2. Without admitting or denying the allegations of the Complaint, except as to jurisdiction, which is admitted, hereby voluntarily consents to the entry of the attached Final Judgment and Order of Permanent Injunction and Other Equitable Relief ("Final Judgment") against him without further notice;
- 3. Enters into this Consent and Stipulation ("Consent") voluntarily and acknowledges that no threats, offers, promises or inducements of any kind whatsoever have been made by the Plaintiff Commission or anyone else in consideration of this Consent;

- 4. Waives any right he may have to appeal from the Final Judgment;
- Understands that the terms of the Final Judgment are enforceable through contempt proceedings;
- 6. Agrees that he will not oppose enforcement of the Final Judgment on the ground that it fails to comply with Rule 65(d) of the Federal Rules of Civil Procedure and waives any objections based thereon;
- 7. Agrees that he does not and will not oppose the validity of the attached Final Judgment on any jurisdictional ground;
- 8. Waives service upon him of the Final Judgment and agrees that the entry of the Final Judgment by the Court and filing with the Clerk in the United States District Court for the Northern District of Illinois will constitute notice to him of the terms and conditions of such Final Judgment; and
- 9. Agrees that the Court shall retain jurisdiction of this matter for all purposes.
- B. Plaintiff Commission and Defendant Sidoryk agree that this Consent shall be incorporated by reference into the Final Judgment with the same force and effect as if fully set forth therein.
- C. Plaintiff Commission and Defendant Sidoryk waive the entry of findings of fact and conclusions of law pursuant to Rule 52 of the Federal Rules of Civil Procedure.
- D. Defendant Sidoryk agrees and undertakes to disgorge \$25,559.94, representing the amount of losses avoided from certain conduct alleged in the Complaint, plus prejudgment interest of \$4,020.62, for a total of \$29,580.56, within thirty (30) days of the entry of the Final Judgment. Payment of the disgorgement and the prejudgment interest shall be made payable to

the Registry of the Court for the U.S. District Court for the Northern District of Illinois, by
United States Postal money order, certified check, bank cashier's check or bank money order. A
copy of the money order or check shall be sent to Jennifer L. Klebes, Division of Enforcement,
Securities and Exchange Commission, 175 W. Jackson Boulevard, Suite 900, Chicago, IL
60604.

- E. Defendant Sidoryk agrees and undertakes, pursuant to Section 21A of the Securities Exchange Act of 1934 [15 U.S.C. §78u-1], within sixty (60) days of the entry of the Final Judgment, to pay a civil money penalty in the amount of \$45,159.94 to the United States Treasury. Such payment shall be: (A) made by United States Postal money order, certified check, bank cashier's check or bank money order; (B) made payable to the Securities and Exchange Commission; (C) hand-delivered or mailed to the Comptroller, Securities and Exchange Commission, Operations Center, 6432 General Green Way, Stop 0-3, Alexandria, VA 22312; and (D) submitted under cover letter that identifies Joseph Sidoryk as a defendant in this matter, the case number of this matter, a copy of which cover letter and money order or check shall be sent to Jennifer L. Klebes, Division of Enforcement, Securities and Exchange Commission, 175 W. Jackson Boulevard, Suite 900, Chicago, IL 60604.
- F. Defendant Sidoryk understands and agrees to comply with the Plaintiff
 Commission's policy "not to permit a defendant or respondent to consent to a judgment or order
 that imposes a sanction while denying the allegations in the complaint or order for proceedings."
 (17 C.F.R. §202.5(e)). In compliance with this policy, Defendant Sidoryk agrees not to take any
 action or to make or permit to be made any public statement denying, directly or indirectly, any
 allegation in the Complaint or creating the impression that the Complaint is without factual basis.

 If Defendant Sidoryk breaches this agreement, the Plaintiff Commission may petition the Court

to vacate the Final Judgment and restore this case to its active docket. Nothing in this provision affects Defendant Sidoryk's testimonial obligations or right to take legal positions in litigation in which the Plaintiff Commission is not a party.

- G. Defendant Sidoryk acknowledges and agrees that this proceeding and his Consent are for the purposes of resolving this proceeding only, in conformity with the provisions of 17 C.F.R. 202.5(f), and do not resolve, affect, or preclude any other proceedings which may be brought against him. Consistent with the provisions of 17 C.F.R. 202.5(f), Defendant Sidoryk waives any claim of Double Jeopardy based upon the settlement of this proceeding, including the imposition of any remedy or civil penalty herein. Defendant Sidoryk acknowledges that the Court's entry of a permanent injunction may have collateral consequences under federal or state law and the rules and regulations of self-regulatory organizations, licensing boards, and other regulatory organizations. Such collateral consequences include, but are not limited to, a statutory disqualification with respect to membership or participation in, or association with a member of, a self-regulatory organization. This statutory disqualification has consequences that are separate from any sanction imposed in an administrative proceeding.
- H. Defendant Sidoryk hereby waives any rights under the Equal Access to Justice Act, the Small Business Regulatory Enforcement Fairness Act of 1996 or any other provision of law to pursue reimbursement of attorney's fees or other fees, expenses or costs expended by Defendant Sidoryk to defend against this action. For these purposes, Defendant Sidoryk agrees that Defendant Sidoryk is not the prevailing party in this action since the parties have reached a good faith settlement.

I. Defendant Sidoryk agrees that the Final Judgment may be presented by the Plaintiff Commission to the Court for signature and entry without further notice.

Dated: June 28, 2002

Joseph Sidoryk

Swom before me this 28 day of lune, 2002

NOTARY PUBLIC

My Commission expires:

OFFICIAL SEAL.
SUZANNE R HENNESSEY
NOTARY PUBLIC, STATE OF ILLINGIS
MY COMMISSION EXPRESIDATIONS

Jennifer L. Klebes

An Attorney for Plaintiff Securities and Exchange Commission 175 W. Jackson Boulevard, Suite 900 Chicago, Illinois 60604 Telephone: (312) 353-7390

Klipes

Dated: 7/23 , 2002

EXHIBIT 2

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

SECURITIES AND EXCHANG	E COMMISSION) }
	Plaintiff,	Case No. 02C 5206
v.	, ,	Judge John W. Darrah
JOSEPH SIDORYK, GARY L. (TODD CAMP and THOMAS J.)))
	Defendants.)))

CONSENT AND STIPULATION OF DEFENDANT GARY L. CAMP

- A. Defendant Gary L. Camp ("Defendant Gary Camp"):
- 1. Acknowledges service upon him of the Complaint for Permanent
 Injunction and Other Equitable Relief ("Complaint") of Plaintiff Securities and Exchange
 Commission ("Plaintiff Commission") in this action, enters a general appearance, admits
 the jurisdiction of this Court over him and over the subject matter hereof, and waives the
 filing of an Answer;
- 2. Without admitting or denying the allegations of the Complaint, except as to jurisdiction, which is admitted, hereby voluntarily consents to the entry of the attached Final Judgment and Order of Permanent Injunction and Other Equitable Relief ("Final Judgment") against him without further notice;
- 3. Enters into this Consent and Stipulation ("Consent") voluntarily and acknowledges that no threats, offers, promises or inducements of any kind whatsoever have been made by the Plaintiff Commission or anyone else in consideration of this Consent;

- 4. Waives any right he may have to appeal from the Final Judgment;
- Understands that the terms of the Final Judgment are enforceable through contempt proceedings;
- 6. Agrees that he will not oppose enforcement of the Final Judgment on the ground that it fails to comply with Rule 65(d) of the Federal Rules of Civil Procedure and waives any objections based thereon;
- 7. Agrees that he does not and will not oppose the validity of the attached Final Judgment on any jurisdictional ground;
- 8. Waives service upon him of the Final Judgment and agrees that the entry of the Final Judgment by the Court and filing with the Clerk in the United States District Court for the Northern District of Illinois will constitute notice to him of the terms and conditions of such Final Judgment; and
- 9. Agrees that the Court shall retain jurisdiction of this matter for all purposes.
- B. Plaintiff Commission and Defendant Gary Camp agree that this Consent shall be incorporated by reference into the Final Judgment with the same force and effect as if fully set forth therein.
- C. Plaintiff Commission and Defendant Gary Camp waive the entry of findings of fact and conclusions of law pursuant to Rule 52 of the Federal Rules of Civil Procedure.
- D. Defendant Gary Camp agrees and undertakes, pursuant to Section 21A of the Securities Exchange Act of 1934 [15 U.S.C. §78uA], within sixty (60) days of the entry of this Final Judgment, to pay a civil money penalty in the amount of \$14,850.00 to the United States Treasury. Such payment shall be: (A) made by United States Postal money order, certified

check, bank cashier's check or bank money order; (B) made payable to the Securities and Exchange Commission; (C) hand-delivered or mailed to the Comptroller, Securities and Exchange Commission, Operations Center, 6432 General Green Way, Stop 0-3, Alexandria, VA 22312; and (D) submitted under cover letter that identifies Gary L. Camp as a defendant in this matter, the case number of this matter, a copy of which cover letter and money order or check shall be sent to Jennifer L. Klebes, Division of Enforcement, Securities and Exchange Commission, 175 W. Jackson Boulevard, Suite 900, Chicago, IL 60604.

- E. Defendant Gary Camp understands and agrees to comply with the Plaintiff Commission's policy "not to permit a defendant or respondent to consent to a judgment or order that imposes a sanction while denying the allegations in the complaint or order for proceedings." (17 C.F.R. §202.5(e)). In compliance with this policy, Defendant Gary Camp agrees not to take any action or to make or permit to be made any public statement denying, directly or indirectly, any allegation in the Complaint or creating the impression that the Complaint is without factual basis. If Defendant Gary Camp breaches this agreement, the Plaintiff Commission may petition the Court to vacate the Final Judgment and restore this case to its active docket. Nothing in this provision affects Defendant Gary Camp's testimonial obligations or right to take legal positions in litigation in which the Plaintiff Commission is not a party.
- F. Defendant Gary Camp acknowledges and agrees that this proceeding and his Consent are for the purposes of resolving this proceeding only, in conformity with the provisions of 17 C.F.R. 202.5(f), and do not resolve, affect, or preclude any other proceedings, which may be brought against him. Consistent with the provisions of 17 C.F.R. 202.5(f), Defendant Gary Camp waives any claim of Double Jeopardy based upon the settlement of this proceeding, including the imposition of any remedy or civil penalty herein. Defendant Gary Camp

acknowledges that the Court's entry of a permanent injunction may have collateral consequences under federal or state law and the rules and regulations of self-regulatory organizations, licensing boards, and other regulatory organizations. Such collateral consequences include, but are not limited to, a statutory disqualification with respect to membership or participation in, or association with a member of, a self-regulatory organization. This statutory disqualification has consequences that are separate from any sanction imposed in an administrative proceeding.

G. Defendant Gary Camp hereby waives any rights under the Equal Access to Justice Act, the Small Business Regulatory Enforcement Fairness Act of 1996 or any other provision of law to pursue reimbursement of attorney's fees or other fees, expenses or costs expended by Defendant Gary Camp to defend against this action. For these purposes, Defendant Gary Camp agrees that Defendant Gary Camp is not the prevailing party in this action since the parties have reached a good faith settlement.

Plaintiff Commission to the Court for signa	ture and entry without further notice.
Dated:	Mary L. Camp
Sworn before me this <u>27</u> day of Septamber, 2002	
Colmun Smith	"OFFICIAL SEAL" DEANNA SMITH Notary Public, State of Illinois My Commission Expires 7-28-2005
NOTARY PUBLIC	

Defendant Gary Camp agrees that the Final Judgment may be presented by the

Jennifer L. Klebes
Attorney for Plaintiff
U.S. Securities and Exchange Commission
175 W. Jackson Boulevard, Suite 900
Chicago, Illinois 60604

Telephone: (312) 353-7390

Dated: October 22, 2002

My Commission expires: 7/28/05

H.

EXHIBIT 3

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS **EASTERN DIVISION**

	e cagen
Carini, Luiz (d. J., 1868)	
020	

JUL 23 2002

SECURITIES AND EXC	CHANGE COMMISSION))	A GO A	
	Plaintiff,) Case No.		
v.)		
JOSEPH SIDORYK, GA TODD CAMP and THO)	gere i de la companya de la company Anno de la companya d	
	Defendants.) MAG		to a constant of the factor of

CONSENT AND STIPULATION OF DEFENDANT TODD CAMP

Defendant Todd Camp: Α.

- 1. Acknowledges service upon him of the Complaint for Permanent Injunction and Other Equitable Relief ("Complaint") of Plaintiff Securities and Exchange Commission ("Plaintiff Commission") in this action, enters a general appearance, admits the jurisdiction of this Court over him and over the subject matter hereof, and waives the filing of an Answer;
- 2. Without admitting or denying the allegations of the Complaint, except as to jurisdiction, which is admitted, hereby voluntarily consents to the entry of the attached Final Judgment and Order of Permanent Injunction and Other Equitable Relief ("Final Judgment") against him without further notice;
- 3. Enters into this Consent and Stipulation ("Consent") voluntarily and acknowledges that no threats, offers, promises or inducements of any kind whatsoever have been made by the Plaintiff Commission or anyone else in consideration of this Consent;

- 4. Waives any right he may have to appeal from the Final Judgment;
- 5. Understands that the terms of the Final Judgment are enforceable through contempt proceedings;
- 6. Agrees that he will not oppose enforcement of the Final Judgment on the ground that it fails to comply with Rule 65(d) of the Federal Rules of Civil Procedure and waives any objections based thereon;
- 7. Agrees that he does not and will not oppose the validity of the attached Final Judgment on any jurisdictional ground;
- 8. Waives service upon him of the Final Judgment and agrees that the entry of the Final Judgment by the Court and filing with the Clerk in the United States District Court for the Northern District of Illinois will constitute notice to him of the terms and conditions of such Final Judgment; and
- 9. Agrees that the Court shall retain jurisdiction of this matter for all purposes.
- B. Plaintiff Commission and Defendant Todd Camp agree that this Consent shall be incorporated by reference into the Final Judgment with the same force and effect as if fully set forth therein.
- C. Plaintiff Commission and Defendant Todd Camp waive the entry of findings of fact and conclusions of law pursuant to Rule 52 of the Federal Rules of Civil Procedure.
- D. Defendant Todd Camp agrees and undertakes to disgorge \$15,343.75, representing the realized and unrealized gains from certain conduct alleged in the Complaint, plus prejudgment interest of \$2,196.07, for a total of \$17,539.82, within thirty (30) days of the entry of the Final Judgment. Payment of the disgorgement and the prejudgment interest shall be

made payable to the Registry of the Court for the U.S. District Court for the Northern District of Illinois, by United States Postal money order, certified check, bank cashier's check or bank money order. A copy of the money order or check shall be sent to Jennifer L. Klebes, Division of Enforcement, Securities and Exchange Commission, 175 W. Jackson Boulevard, Suite 900, Chicago, IL 60604.

- E. Defendant Todd Camp agrees and undertakes, pursuant to Section 21A of the Securities Exchange Act of 1934 [15 U.S.C. §78u-1], within sixty (60) days of the entry of the Final Judgment, to pay a civil money penalty in the amount of \$15,343.75 to the United States Treasury. Such payment shall be: (A) made by United States Postal money order, certified check, bank cashier's check or bank money order; (B) made payable to the Securities and Exchange Commission; (C) hand-delivered or mailed to the Comptroller, Securities and Exchange Commission, Operations Center, 6432 General Green Way, Stop 0-3, Alexandria, VA 22312; and (D) submitted under cover letter that identifies Todd Camp as a defendant in this matter, the case number of this matter, a copy of which cover letter and money order or check shall be sent to Jennifer L. Klebes, Division of Enforcement, Securities and Exchange Commission, 175 W. Jackson Boulevard, Suite 900, Chicago, IL 60604.
- F. Defendant Todd Camp understands and agrees to comply with the Plaintiff Commission's policy "not to permit a defendant or respondent to consent to a judgment or order that imposes a sanction while denying the allegations in the complaint or order for proceedings." (17 C.F.R. §202.5(e)). In compliance with this policy, Defendant Todd Camp agrees not to take any action or to make or permit to be made any public statement denying, directly or indirectly, any allegation in the Complaint or creating the impression that the Complaint is without factual basis. If Defendant Todd Camp breaches this agreement, the Plaintiff Commission may petition

the Court to vacate the Final Judgment and restore this case to its active docket. Nothing in this provision affects Defendant Todd Camp's testimonial obligations or right to take legal positions in litigation in which the Plaintiff Commission is not a party.

- G. Defendant Todd Camp acknowledges and agrees that this proceeding and his Consent are for the purposes of resolving this proceeding only, in conformity with the provisions of 17 C.F.R. 202.5(f), and do not resolve, affect, or preclude any other proceedings which may be brought against him. Consistent with the provisions of 17 C.F.R. 202.5(f), Defendant Todd Camp waives any claim of Double Jeopardy based upon the settlement of this proceeding, including the imposition of any remedy or civil penalty herein. Defendant Todd Camp acknowledges that the Court's entry of a permanent injunction may have collateral consequences under federal or state law and the rules and regulations of self-regulatory organizations, licensing boards, and other regulatory organizations. Such collateral consequences include, but are not limited to, a statutory disqualification with respect to membership or participation in, or association with a member of, a self-regulatory organization. This statutory disqualification has consequences that are separate from any sanction imposed in an administrative proceeding.
- H. Defendant Todd Camp hereby waives any rights under the Equal Access to

 Justice Act, the Small Business Regulatory Enforcement Fairness Act of 1996 or any other

 provision of law to pursue reimbursement of attorney's fees or other fees, expenses or costs

 expended by Defendant Todd Camp to defend against this action. For these purposes, Defendant

 Todd Camp agrees that Defendant Todd Camp is not the prevailing party in this action since the

 parties have reached a good faith settlement.

Defendant Todd Camp agrees that the Final Judgment may be presented by the

Plaintiff Commission to the Court for signa	ture and entry without further notice.
Dated:	Todd Camp
Sworn before me this 10 day of July , 2002	
NOTARY PUBLIC	"OFFICIAL SEAL" SCOTT W. MORRIS COMMISSION EXPERTS 16/23/03
My Commission expires: 6/3/03	<u></u>

lennifer L. Klebes

An Attorney for Plaintiff Securities and Exchange Commission 175 W. Jackson Boulevard, Suite 900 Chicago, Illinois 60604 Telephone: (312) 353-7390

Dated: 7/23 ,2002

I.

EXHIBIT 4

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

JUL	23	2002
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		Compression and the contract of		the second second
SECURITIES AND EX	XCHANGE COMMISSION)	at No anima	
	Plaintiff,) Case No.	020	
	v.))	Big Ming and Hope I games a second of the large Mark was the Table I all the large of the large	77 - 78 m - 3
JOSEPH SIDORYK, GARY L. CAMP, TODD CAMP and THOMAS J. SISKA)))		and the second seco
	Defendants.)		

CONSENT AND STIPULATION OF DEFENDANT THOMAS J. SISKA

- A. Defendant Thomas J. Siska ("Defendant Siska"):
- 1. Acknowledges service upon him of the Complaint for Permanent
 Injunction and Other Equitable Relief ("Complaint") of Plaintiff Securities and Exchange
 Commission ("Plaintiff Commission") in this action, enters a general appearance, admits
 the jurisdiction of this Court over him and over the subject matter hereof, and waives the
 filing of an Answer;
- 2. Without admitting or denying the allegations of the Complaint, except as to jurisdiction, which is admitted, hereby voluntarily consents to the entry of the attached Final Judgment and Order of Permanent Injunction and Other Equitable Relief ("Final Judgment") against him without further notice;
- 3. Enters into this Consent and Stipulation ("Consent") voluntarily and acknowledges that no threats, offers, promises or inducements of any kind whatsoever have been made by the Plaintiff Commission or anyone else in consideration of this Consent;

- 4. Waives any right he may have to appeal from the Final Judgment;
- 5. Understands that the terms of the Final Judgment are enforceable through contempt proceedings;
- 6. Agrees that he will not oppose enforcement of the Final Judgment on the ground that it fails to comply with Rule 65(d) of the Federal Rules of Civil Procedure and waives any objections based thereon;
- 7. Agrees that he does not and will not oppose the validity of the attached Final Judgment on any jurisdictional ground;
- 8. Waives service upon him of the Final Judgment and agrees that the entry of the Final Judgment by the Court and filing with the Clerk in the United States District Court for the Northern District of Illinois will constitute notice to him of the terms and conditions of such Final Judgment; and
- 9. Agrees that the Court shall retain jurisdiction of this matter for all purposes.
- B. Plaintiff Commission and Defendant Siska agree that this Consent shall be incorporated by reference into the Final Judgment with the same force and effect as if fully set forth therein.
- C. Plaintiff Commission and Defendant Siska waive the entry of findings of fact and conclusions of law pursuant to Rule 52 of the Federal Rules of Civil Procedure.
- D. Defendant Siska agrees and undertakes to disgorge \$4,256.25, representing the amount of losses avoided from certain conduct alleged in the Complaint, plus prejudgment interest of \$609.16, for a total of \$4,865.41 within thirty (30) days of the entry of the Final Judgment. Payment of the disgorgement and the prejudgment interest shall be made payable to

the Registry of the Court for the U.S. District Court for the Northern District of Illinois, by United States Postal money order, certified check, bank cashier's check or bank money order. A copy of the money order or check shall be sent to Jennifer L. Klebes, Division of Enforcement, Securities and Exchange Commission, 175 W. Jackson Boulevard, Suite 900, Chicago, IL 60604.

- Exchange Act of 1934 [15 U.S.C. §78u-1], within sixty (60) days of the entry of the Final Judgment, to pay a civil money penalty in the amount of \$4,256.25 to the United States Treasury. Such payment shall be: (A) made by United States Postal money order, certified check, bank cashier's check or bank money order; (B) made payable to the Securities and Exchange Commission; (C) hand-delivered or mailed to the Comptroller, Securities and Exchange Commission, Operations Center, 6432 General Green Way, Stop 0-3, Alexandria, VA 22312; and (D) submitted under cover letter that identifies Thomas J. Siska as a defendant in this matter, the case number of this matter, a copy of which cover letter and money order or check shall be sent to Jennifer L. Klebes, Division of Enforcement, Securities and Exchange Commission, 175 W. Jackson Boulevard, Suite 900, Chicago, IL 60604.
- F. Defendant Siska understands and agrees to comply with the Plaintiff
 Commission's policy "not to permit a defendant or respondent to consent to a judgment or order
 that imposes a sanction while denying the allegations in the complaint or order for proceedings."

 (17 C.F.R. §202.5(e)). In compliance with this policy, Defendant Siska agrees not to take any
 action or to make or permit to be made any public statement denying, directly or indirectly, any
 allegation in the Complaint or creating the impression that the Complaint is without factual basis.

 If Defendant Siska breaches this agreement, the Plaintiff Commission may petition the Court to

vacate the Final Judgment and restore this case to its active docket. Nothing in this provision affects Defendant Siska's testimonial obligations or right to take legal positions in litigation in which the Plaintiff Commission is not a party.

- G. Defendant Siska acknowledges and agrees that this proceeding and his Consent are for the purposes of resolving this proceeding only, in conformity with the provisions of 17 C.F.R. 202.5(f), and do not resolve, affect, or preclude any other proceedings which may be brought against him. Consistent with the provisions of 17 C.F.R. 202.5(f), Defendant Siska waives any claim of Double Jeopardy based upon the settlement of this proceeding, including the imposition of any remedy or civil penalty herein. Defendant Siska acknowledges that the Court's entry of a permanent injunction may have collateral consequences under federal or state law and the rules and regulations of self-regulatory organizations, licensing boards, and other regulatory organizations. Such collateral consequences include, but are not limited to, a statutory disqualification with respect to membership or participation in, or association with a member of, a self-regulatory organization. This statutory disqualification has consequences that are separate from any sanction imposed in an administrative proceeding.
- H. Defendant Siska hereby waives any rights under the Equal Access to Justice Act, the Small Business Regulatory Enforcement Fairness Act of 1996 or any other provision of law to pursue reimbursement of attorney's fees or other fees, expenses or costs expended by Defendant Siska to defend against this action. For these purposes, Defendant Siska agrees that Defendant Siska is not the prevailing party in this action since the parties have reached a good faith settlement.

Commission to the Court for signature and entry without further notice.

Defendant Siska agrees that the Final Judgment may be presented by the Plaintiff

Dated:	Thomas J. Siska
Sworn before me this 2/et day of MAY, 2002	THOMAS S. STOKE
NOTARY PUBLIC	"OFFICIAL SEAL" GAIL GHILARDUCCI NOTARY PUBLIC STATE OF ILLINOIS
My Commission expires: $7-13-26$	My Commission Expires 07/13/2005

An Attorney for Plaintiff Securities and Exchange Commission 175 W. Jackson Boulevard, Suite 900 Chicago, Illinois 60604

Telephone: (312) 353-7390

Dated: 7/23, 2002

I.