

RECEIVED
2008 OCT 17 A 3:59
REGISTRATION & DISCLOSURE

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
OFFICE OF HEARING OFFICERS**

**DEPARTMENT OF ENFORCEMENT,
COMPLAINANT,**

v.

**AURA FINANCIAL SERVICES, INC.
[CRD No. 42822]**

AND

**TIMOTHY M. GAUTNEY,
Equity Trader, Financial and Operations
Principal, Municipal Securities
Representative, Registered Operations
Principal, General Securities Principal, and
General Securities Representative
[CRD No. 2552149]**

AND



RESPONDENTS.

Disciplinary Proceeding
No. E052005000702

Hearing Officer: LBB

**ORDER ACCEPTING OFFER
OF SETTLEMENT**

Date: October 16, 2008

INTRODUCTION

Disciplinary Proceeding No. E052005000702 was filed on December 5, 2007, by the Department of Enforcement of the Financial Industry Regulatory Authority ("FINRA") or ("Complainant"). Respondents Aura Financial Services, Inc., Timothy M. Gautney, and [REDACTED] submitted an Offer of Settlement ("Offer") to Complainant on August 15, 2008. Pursuant to NASD Rule 9270(e), the Complainant and the National Adjudicatory Council ("NAC"), a Review Subcommittee of the NAC, or the Office of Disciplinary Affairs ("ODA") have accepted the

000051291 2008

uncontested Offer. Accordingly, this Order now is issued pursuant to NASD Rule 9270(e)(3). The findings, conclusions and sanctions set forth in this Order are those stated in the Offer as accepted by the Complainant and approved by the NAC.

Under the terms of the Offer, Respondents have consented, without admitting or denying the allegations of the Complaint, and solely for the purposes of this proceeding and any other proceeding brought by or on behalf of FINRA, or to which FINRA is a party, to the entry of findings and violations consistent with the allegations of the Complaint, and to the imposition of the sanctions set forth below, and fully understand that this Order will become part of Respondents' permanent disciplinary record and may be considered in any future actions brought by FINRA.

BACKGROUND

Respondent Aura Financial Services, Inc. ("Aura") has been a member of FINRA (f/k/a National Association of Securities Dealers, Inc. or NASD) since April 25, 1997. During all periods mentioned herein, Aura was a registered broker-dealer with the United States Securities and Exchange Commission (the "Commission") and a member of FINRA, which registration and membership remain currently in effect.

Respondent Timothy M. Gautney entered the securities industry on November 7, 1994 as a General Securities Representative with member firm DMG Securities, Inc. During all periods mentioned herein, Gautney was registered with FINRA under Article V of the By-Laws as an Equity Trader, Financial and Operations Principal, Municipal Securities Representative, Registered Operations Principal, General Securities Principal, and General Securities

Representative of Aura Financial Services, Inc., which registrations remain currently in effect.

From April 1997 to present, Gautney has served as the president of Aura.

Respondent [REDACTED] entered the securities industry on September 12, 1997, as a Financial and Operations Principal with Aura. During all periods mentioned herein, [REDACTED] was registered with FINRA under Article V of the By-Laws as a Financial and Operations Principal, which registration remains currently in effect.

FINDINGS AND CONCLUSIONS

It has been determined that the Offer be accepted and that findings be made as follows:

Unsuitable Hedge Fund Transactions

1. During the period from on or about February 26, 2002, to on or about May 13, 2003, Aura, acting through its registered representative Jonathan Fenton,¹ recommended and effected the purchase of limited partnership interests in the hedge funds Futera Advantage Fund L.P. ("Futera") and Hedgers Advantage Fund L.P. ("Hedgers") by public customers AM, AP, and RK, without having reasonable grounds for believing that the recommendations and resultant transactions were suitable for the customers.
2. In addition, during the period from on or about January 25, 2002, to on or about April 2, 2003, Aura, acting through its registered representative Stephen Richmond, recommended and effected the purchase of limited partner interests in the hedge fund

¹ The Office of Hearing Officers entered an order approving an Offer of Settlement with Jonathan Fenton on July 30, 2008. *DOE v. Fenton*, Disciplinary Proceeding No. E052005000702.

Hedgers by public customer RC without having reasonable grounds for believing that the recommendation and resultant transaction was suitable for the customer.²

3. Specifically, Aura's recommendations were unsuitable for the following reasons:

- AP was a sixty-two year-old retired building operations and maintenance supervisor with an annual income of \$46,500 and liquid net worth of \$275,000. He had a stated need for income. His prior investment experience was limited to purchase of his employer's stock and investment in 401(k) program. Based upon Fenton's recommendation, AP invested 73% of his retirement savings in Futera and Hedgers on April 19, 2002. AP had no means of replacing any retirement funds he lost and depended upon the proceeds of his investments to pay his living expenses during retirement. Both hedge funds employed high-risk trading strategies that were unsuitable for an investor requiring protection of principal and guaranteed monthly income. Given AP's financial condition and needs, Fenton had no reasonable basis for recommending these investments by AP in Futera Fund or Hedgers. AP lost a total of \$183,204.11.
- AM was a fifty-nine year-old self-employed certified public accountant with retirement savings of \$675,000 and annual income of \$200,000. At the time she opened a self-directed IRA account at Aura, she indicated that she was on a leave of absence from work. Fenton recommended that she invest \$195,000, or 28% of her retirement savings, in Futera and Hedgers. AM invested \$100,000 in Futera on February 26, 2002 and \$95,000 in Futera on March 20, 2002. AM had no

² The Office of Hearing Officers has entered a judgment for a bar against Richmond for violation of NASD Conduct Rule 3040 and NASD Procedural Rule 8210. *DOE v. Richmond*, Disciplinary Proceeding No. C05050012, (OHO Aug. 22, 2005).

means of replacing any retirement funds she lost and was dependent upon the proceeds of her investments to pay living expenses during retirement. The hedge fund employed high-risk trading strategies that were unsuitable for an investor approaching retirement and seeking to use the funds to provide income during retirement. Given AM's financial condition and needs, Fenton had no reasonable basis for recommending investment by AM in Futera. AM lost the entire investment.

- RK was a fifty-eight year-old self-employed consultant with a net worth of over \$500,000 and annual income between \$100,000 and \$250,000. Based upon Fenton's recommendation, he opened an IRA account with Aura and invested \$19,853.74 in Hedgers on May 13, 2003. Fenton's recommendation was unsuitable because at that time Hedgers was on the verge of financial failure. At the time of the recommendation, Hedgers had lost significant value. In November 2002, the Hedgers account was worth \$83,553.77. Despite subsequent infusions of cash, by March 2003, the Hedgers account was worth only \$48,303.50. The account had lost money through investment losses, through unexplained wire transfers, and through a series of unexplained withdrawals to a homeowners association, to Temple Kormi, and to Home Depot. The account was also subject to almost daily house calls due to margin activity. The recommendation was unsuitable because Fenton knew that Hedgers was failing and could have no reasonable expectation that RK would realize any financial benefit from the investment.

- RC was a fifty-one year-old nurse with an annual income between \$50,000 and \$100,000. Although his new account form stated net worth of \$100,000 to \$250,000, his actual net worth was negative. The entirety of his funds available for retirement was his checking account of less than \$25,000, a \$10,400 variable annuity, and a 401(k) worth between \$3,000 and \$4,000. He opened an IRA account with Aura at the recommendation of Stephen Richmond and invested \$10,400 in Hedgers on September 9, 2002. On his new account form he indicated an investment objective of capital appreciation. Hedgers employed a high-risk trading strategy that was unsuitable for investment of retirement funds. Given RC's financial condition and needs, Aura, acting through Richmond, had no reasonable basis for recommending investment by RC in Hedgers. RC lost the entire investment.
- Each of the customers purchased the limited partnership interests in the hedge funds inside their Individual Retirement Accounts ("IRAs"). Due to the unique tax treatment of income from these hedge funds, ownership of the hedge fund investments are not suitable within IRA accounts where the hedge funds use leverage to purchase securities. Futera and Hedgers both used leverage to purchase investments. When this strategy is used, the investments can generate unrelated business taxable income and cause an IRA that owns interest in the funds to be subject to taxation under Section 512 of the Internal Revenue Code. Consequently, by recommending investment by public customers AM, AP, RK, and RC in the hedge funds through their IRAs, Fenton and Richmond exposed the customers to taxation risk to which they otherwise would have no exposure.

4. Such acts, practices, and conduct constitute separate and distinct violations of NASD Conduct Rules 2310 and 2110 by Aura Financial Services, Inc. and Timothy M. Gautney.

Failure to Supervise Hedge Fund Transactions

5. During the period February 26, 2002 to on or about May 13, 2003, Aura Financial Services, Inc., acting through its president Timothy Gautney, failed to reasonably supervise the sale of hedge fund investments by Jonathan Fenton and Stephen Richmond.
6. Aura was the prime broker for the private placement of Futera and was one of the brokers for Hedgers.
7. Under Aura's written supervisory procedures, Gautney or a designated principal was responsible for supervision of private placements. The procedures do not designate anyone other than Gautney.
8. Gautney's responsibilities specifically included maintenance of procedures concerning client suitability and review of client information including investment experience, occupation, current financial information, investor questionnaire, and the project in which the client is a partner.
9. Gautney conducted no due diligence regarding the private placements of Futera and Hedgers.
10. Not only did Aura, through Gautney, fail to perform due diligence on the hedge funds, but Aura also failed to have any method for principal review of the hedge fund purchases by Aura customers. Although Aura did have procedures for principal review of new account forms, Aura had no procedures to review customer investments made

via journal entries. In each instance involving investment by an Aura customer in either Futera or Hedgers, the initial transaction in the new customer accounts consisted of a large purchase of a limited partnership interest in either Futera or Hedgers. The purchases were accomplished through a letter of authorization sent by Fenton or Richmond to the customer. The form authorized Sterne, Agee, and Leach Inc. (Aura's clearing firm) to purchase limited partnership interests in Futera or Hedgers using funds in the customer's IRA account. The form was signed by the customer and forwarded to Fenton or Richmond. Fenton or Richmond then forwarded the form to a non-registered person in Aura's main office, who then effected the transaction via a journal entry from the customer's account to the account of Futera or Hedgers. Aura had no procedure for supervisory review of these transactions. The transactions were accomplished via a signature from the customer and were entered by a non-associated person. Thus, neither Gautney nor any other Aura principal compared the purchases to the information provided on the account forms to determine suitability.

11. Both funds engaged in transactions that appeared inconsistent with their stated strategies of "capital appreciation" and "achieving high total returns." For instance, Futera routinely transferred large amounts to Hedgers. Within the month of September 2002, Futera transferred to Hedgers over \$26,000 in four separate transactions. In August 2002, Hedgers wire-transferred \$28,448 to a person or entity "Ion Cangea." The general partner issued checks from Hedgers to Sears Roebuck, Home Depot, and a homeowners association, and account records for Hedgers showed numerous cash withdrawals. The Futera transfers were signed by Fenton and the fund manager and were not reviewed by anyone else at Aura.

12. Such acts, practices, and conduct constitute separate and distinct violations of NASD Conduct Rules 2110 and 3010(a) and (b) by Respondents Aura Financial Services, Inc. and Timothy M. Gautney.

Failure to Have Reasonable Written Supervisory Procedures

13. In 2003, in lieu of an actual meeting with each registered representative, the firm planned to discuss compliance with each registered representative over the phone. The firm sent a compliance questionnaire to each registered representative and a form requiring certification that the registered representative had reviewed the compliance manual. The circulation of the questionnaire and certification form did not satisfy the requirement for an annual meeting. Although a phone call to discuss compliance may satisfy the requirement of an annual meeting, Aura had no documentation confirming that each registered representative had attended the annual meeting or participated in a phone call, as required by NASD Conduct Rules 3010(a) and (b).

14. Such acts, practices, and conduct constitute separate and distinct violations of NASD Conduct Rules 3010(a) and (b) and 2110 by Respondent Aura Financial Services, Inc.

Failure to Accurately Report Municipal Securities Transactions

15. During the period from on or about June 1, 2002, through on or about June 30, 2004, Aura failed to accurately report to the MSRB 40 of 40 municipal securities transactions selected from a random sample. The trades at issue are listed in Exhibit A attached to the Complaint. Aura executed a total of 60 municipal securities transactions during the time period. The 40 transactions reviewed were chosen via random sampling. For each of the 40 selected, Aura incorrectly reported transactions conducted on an agency basis

as principal trades, and Aura incorrectly identified the transactions as principal trades on all 40 of the customer confirmations.

16. Aura apparently relied on its clearing firm to determine the capacity of the trades based upon the type of account effecting the transaction. Aura, however, had no systems in place to check whether its municipal trades had been accurately reported, and for two years failed to detect the error. Aura had participated in an Exit Conference with FINRA staff in May 2002 and the resulting Compliance Conference with FINRA (then NASD) in June 2003 in which FINRA cited Aura for failing to report any of its municipal securities transactions. At that time, Aura blamed its clearing firm for the failure. Despite this notice of its clearing firm's shortcomings, Aura did not institute systems to verify accurate reporting.
17. Such acts, practices, and conduct constitute separate and distinct violations of MSRB Rules G-14 and G-15 by Respondent Aura Financial Services, Inc.

Failure to Report Riskless Principal Transactions

18. During the period from on or about March 1, 2004, through on or about May 31, 2004, Aura failed to report through the Automated Transaction Commission Reporting Service any last sale reports or non-tape, non-clearing reports for its riskless principal transactions in Nasdaq securities. For the three-month period, Aura failed to report over 1,458 riskless principal transactions. The trades are listed in Exhibit B attached to the Complaint. The transactions were unreported because Aura failed to activate its Market Participation Identifying Symbol ("MPID"). Aura never verified that its trades were being reported. Furthermore, Aura was on notice of the need to activate its MPID, because it had experienced a similar problem with its municipal trading activation in

2002.

19. Such acts, practices, and conduct constitute separate and distinct violations of NASD Conduct Rules 2110, 4632, 4642 and 5430 by Respondent Aura Financial Services, Inc.

Failure to Accurately Report TRACE-eligible Securities Transactions

20. For TRACE-eligible securities, FINRA staff reviewed the order tickets and confirmations for all reported trades for the period June 1, 2003 through June 30, 2004. Aura reported all customer trades as principal and confirmed the trades to its customers as principal. The firm executed a total of 39 TRACE-eligible securities transactions for the period. In each instance, the trades were incorrectly characterized as principal transactions. The trades at issue are listed in Exhibit C attached to the Complaint.
21. Such acts, practices, and conduct constitute separate and distinct violations of NASD Conduct Rules 2110 and 6230 by Respondent Aura Financial Services, Inc.

Failure to Report Customer Complaints

22. During the period from on or about May 7, 2004, to on or about January 24, 2005, Aura failed to report 14 written customer complaints to FINRA by the fifteenth day of the month following the calendar quarter in which the complaint was received. The customer complaints at issue are listed in Exhibit D attached to the Complaint.
23. Such acts, practices, and conduct constitute separate and distinct violations of NASD Conduct Rules 2110 and 3070(c) by Respondent Aura Financial Services, Inc.

Net Capital Violations

24. During the period from on or about March 1, 2004, through on or about May 18, 2004, Aura received customer checks issued to the firm and failed to promptly forward the customer checks on nine occasions.

25. By receiving checks made payable to itself and by failing to promptly forward customer checks to its clearing firm, Aura became a broker or dealer that receives or holds funds for customers, requiring the firm to maintain a net capital of \$250,000. Aura also became subject to the requirement that it establish a reserve bank account for customer protection.
26. During the entire time period at issue, [REDACTED] was Aura's Financial and Operations Principal.
27. Aura conducted a securities business on the following days:
- March 1, 2004 through March 4, 2004
 - April 2, 2004
 - April 8, 2004 through April 11, 2004
 - May 3, 2004
 - May 10, 2004 through May 16, 2004
 - May 18, 2004
28. For these time periods, Aura's net capital, as computed by FINRA staff, was below the required minimum, as prescribed by SEC Rule 15c3-1.
29. For these time periods, Aura lost its 15c3-3(k)(2)(ii) exemption and was required to have a special reserve account for customers' protection as prescribed by SEC Rule 15c3-3.
30. Aura, in contravention of SEC Rule 15c3-1, engaged in a securities business when the firm's net capital was below the required minimum, as prescribed by SEC Rule 15c3-1. As a consequence, the firm's FOCUS Part IIA Report for the quarter-ending period of March 31, 2004, and its books and records for the period from on or about March 1 2004 through on or about May 18, 2004, were inaccurate. As described above, the inaccuracies resulted from the firm's receipt of customer checks made payable to Aura.

31. Aura, acting through [REDACTED] in contravention of SEC Rule 15c3-3, engaged in a securities business without establishing a reserve bank account or qualifying for an exemption, on the dates set forth in paragraph 27. As described above, the failure to qualify for the exemption resulted from the firm's failure to promptly forward customer checks made payable to Aura.

32. Such acts, practices and conduct constitute separate and distinct violations of SEC Rules 15c3-1, 15c3-3, 17a-3(a)(ii), 17a-5, and 17a-11 and NASD Conduct Rules 3110 and 2110 by Aura Financial Services Inc., and of NASD Conduct Rule 2110 by Respondent [REDACTED]

Based on the foregoing, Respondent Aura Financial Services, Inc. violated NASD Conduct Rules 2110, 2310, 3010(a) and (b), 3070(c), 3110, 4632, 4642, 5430, 6230, and MSRB Rules G-14 and G-15, and SEC Rules 15c3-1, 15c3-3, 17a-3(a)(ii), 17a-5 and 17a-11.

Based on the foregoing, Respondent Timothy M. Gautney violated NASD Conduct Rules 2110, 2310, and 3010 (a) and (b).

Based on the foregoing, Respondent [REDACTED] violated NASD Conduct Rule 2110.

Based on these considerations, the sanctions hereby imposed by the acceptance of the Offer are in the public interest, are sufficiently remedial to deter Respondent from any future misconduct, and represent a proper discharge by FINRA, of its regulatory responsibility under the Securities Exchange Act of 1934.

SANCTIONS

Aura Financial Services, Inc.

An order to pay restitution to the customers listed on Attachment A hereto in the total amount of \$100,000, plus interest at the rate set forth in Section 6621(a)(2) of the Internal Revenue Code, 26 U.S.C. 6621(a)(2), from September 30, 2008, until the date the final restitution payment is made. The schedule for restitution payments by Aura is also set forth on Attachment A hereto. Satisfactory proof of payment of the restitution or of reasonable and documented efforts undertaken to effect restitution shall be provided to FINRA staff no later than 15 days following each payment set forth in Attachment A. If for any reason Aura Financial Services cannot locate any customer identified in Attachment A after reasonable and documented efforts within such period, or such additional period agreed to by the staff, Aura shall forward any undistributed restitution and interest to the appropriate escheat, unclaimed property, or abandoned property fund for the state in which the customer is last known to have resided.

Timothy M. Gautney

An order to pay restitution to the customers listed on Attachment A hereto in the total amount of \$100,000, plus interest at the rate set forth in Section 6621(a)(2) of the Internal Revenue Code, 26 U.S.C. 6621(a)(2), from September 30, 2008, until the date the final restitution payment is made. The schedule for restitution payments by Timothy M. Gautney is also set forth on Attachment A hereto. Satisfactory proof of payment of the restitution or of reasonable and documented efforts undertaken to effect restitution shall be provided to FINRA staff no later than 15 days following each payment set forth in Attachment A. If for any reason Timothy M.

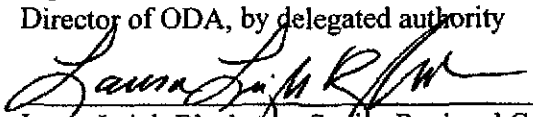
Gautney cannot locate any customer identified in Attachment A after reasonable and documented efforts within such period, or such additional period agreed to by the staff, Gautney shall forward any undistributed restitution and interest to the appropriate escheat, unclaimed property, or abandoned property fund for the state in which the customer is last known to have resided. In addition, a 30 business-day suspension from association with any member of FINRA in any principal capacity is imposed against Timothy M. Gautney.

██████████
A censure and a monetary fine in the amount of \$7,500.00.

Respondents Aura Financial Services, Inc. and Timothy M. Gautney agree to pay the restitution according to the schedule set forth in Attachment A. ██████████ agrees to pay the monetary sanctions upon notice that this Offer has been accepted and that such payment is due and payable. Respondent ██████ has submitted an Election of Payment form showing the method by which he proposes to pay the fine imposed.

The sanctions herein shall be effective on a date set by FINRA staff.

SO ORDERED.

FINRA
Signed on behalf of the
Director of ODA, by delegated authority

Laura Leigh Blackston, Senior Regional Counsel
FINRA, Department of Enforcement
1100 Poydras Street, Suite 850
New Orleans, Louisiana 70163-0802
Phone: 504/522-6527
FAX: 504/522-4077

Attachment A – Restitution Schedule

Aura Financial Services

<u>Payment date</u>	<u>Customer Initials</u>	<u>Total Amount</u>
October 15, 2008	AM	\$12,500 plus \$1,000 interest = \$13,500.00
	AP	\$11,750 plus \$940.00 interest = \$12,690.00
	RC	\$750.00 plus \$60.00 interest = \$810.00
December 31, 2008	AM	\$4,166.66 plus \$333.33 interest = \$4,499.99
	AP	\$3,916.66 plus \$313.33 interest = \$4,229.99
	RC	\$250.00 plus \$20.00 interest = \$270.00
March 31, 2009	AM	\$4,166.66 plus \$333.33 interest = \$4,499.99
	AP	\$3,916.66 plus \$313.33 interest = \$4,229.99
	RC	\$250.00 plus \$20.00 interest = \$270.00
June 30, 2009	AM	\$4,166.66 plus \$333.33 interest = \$4,499.99
	AP	\$3,916.66 plus \$313.33 interest = \$4,229.99
	RC	\$250.00 plus \$20.00 interest = \$270.00
September 30, 2009	AM	\$4,166.66 plus \$333.33 interest = \$4,499.99
	AP	\$3,916.66 plus \$313.33 interest = \$4,229.99
	RC	\$250.00 plus \$20.00 interest = \$270.00
December 31, 2009	AM	\$4,166.66 plus \$333.33 interest = \$4,499.99
	AP	\$3,916.66 plus \$313.33 interest = \$4,229.99
	RC	\$250.00 plus \$20.00 interest = \$270.00
March 31, 2010	AM	\$4,166.66 plus \$333.33 interest = \$4,499.99
	AP	\$3,916.66 plus \$313.33 interest = \$4,229.99
	RC	\$250.00 plus \$20.00 interest = \$270.00
June 30, 2010	AM	\$4,166.66 plus \$333.33 interest = \$4,499.99
	AP	\$3,916.66 plus \$313.33 interest = \$4,229.99
	RC	\$250.00 plus \$20.00 interest = \$270.00
September 30, 2010	AM	\$4,166.66 plus \$333.33 interest = \$4,499.99
	AP	\$3,916.66 plus \$313.33 interest = \$4,229.99
	RC	\$250.00 plus \$20.00 interest = \$270.00
December 31, 2010	AM	\$4,166.66 plus \$333.33 interest = \$4,499.99
	AP	\$3,916.66 plus \$313.33 interest = \$4,229.99
	RC	\$250.00 plus \$20.00 interest = \$270.00

Attachment A – Restitution Schedule

Timothy Gautney

<u>Payment date</u>	<u>Customer Initials</u>	<u>Total Amount</u>
October 15, 2008	AM	\$12,500 plus \$1,000 interest = \$13,500.00
	AP	\$11,750 plus \$940.00 interest = \$12,690.00
	RC	\$750.00 plus \$60.00 interest = \$810.00
December 31, 2008	AM	\$4,166.66 plus \$333.33 interest = \$4,499.99
	AP	\$3,916.66 plus \$313.33 interest = \$4,229.99
	RC	\$250.00 plus \$20.00 interest = \$270.00
March 31, 2009	AM	\$4,166.66 plus \$333.33 interest = \$4,499.99
	AP	\$3,916.66 plus \$313.33 interest = \$4,229.99
	RC	\$250.00 plus \$20.00 interest = \$270.00
June 30, 2009	AM	\$4,166.66 plus \$333.33 interest = \$4,499.99
	AP	\$3,916.66 plus \$313.33 interest = \$4,229.99
	RC	\$250.00 plus \$20.00 interest = \$270.00
September 30, 2009	AM	\$4,166.66 plus \$333.33 interest = \$4,499.99
	AP	\$3,916.66 plus \$313.33 interest = \$4,229.99
	RC	\$250.00 plus \$20.00 interest = \$270.00
December 31, 2009	AM	\$4,166.66 plus \$333.33 interest = \$4,499.99
	AP	\$3,916.66 plus \$313.33 interest = \$4,229.99
	RC	\$250.00 plus \$20.00 interest = \$270.00
March 31, 2010	AM	\$4,166.66 plus \$333.33 interest = \$4,499.99
	AP	\$3,916.66 plus \$313.33 interest = \$4,229.99
	RC	\$250.00 plus \$20.00 interest = \$270.00
June 30, 2010	AM	\$4,166.66 plus \$333.33 interest = \$4,499.99
	AP	\$3,916.66 plus \$313.33 interest = \$4,229.99
	RC	\$250.00 plus \$20.00 interest = \$270.00
September 30, 2010	AM	\$4,166.66 plus \$333.33 interest = \$4,499.99
	AP	\$3,916.66 plus \$313.33 interest = \$4,229.99
	RC	\$250.00 plus \$20.00 interest = \$270.00
December 31, 2010	AM	\$4,166.66 plus \$333.33 interest = \$4,499.99
	AP	\$3,916.66 plus \$313.33 interest = \$4,229.99
	RC	\$250.00 plus \$20.00 interest = \$270.00