

NASD OFFICE OF HEARING OFFICERS

DEPARTMENT OF ENFORCEMENT,

Complainant,

v.

PETER RHEE
(CRD No. 2964890),

Respondent.

Disciplinary Proceeding
No. E9B2004049101

Hearing Officer – DRP

DEFAULT DECISION

October 11, 2006

Respondent is barred from association with any NASD member firm in any capacity for violating: (i) NASD Conduct Rule 2110, by engaging in unauthorized trading, and (ii) NASD Procedural Rule 8210 and Conduct Rule 2110, by failing to respond to staff's requests for information and testimony.

David F. Newman, Regional Attorney, Philadelphia, PA (Rory C. Flynn, Washington, DC, and Mark P. Dauer, New Orleans, LA, Of Counsel) for Complainant.

No appearance by or for Peter Rhee.

DECISION

I. Background

On March 1, 2006, the Department of Enforcement filed a three-count Complaint in this proceeding, attached to this Decision as Exhibit A. The Complaint alleges that Respondent Peter Rhee (Respondent or Rhee): (i) effected transactions in the accounts of two customers without their authorization or consent, in violation of NASD Conduct Rule 2110, and (ii) failed to respond to NASD staff's requests for information and testimony, in violation of NASD Procedural Rule 8210 and Conduct Rule 2110. Rhee did not file an Answer to the Complaint.

Accordingly, on May 31, 2006, Enforcement filed a motion for entry of default decision, supported by the declaration of counsel and three exhibits. Rhee did not file a response to the motion. For the reasons set forth below, Enforcement's motion is granted.¹

II. Respondent's Default

On February 27, 2006, Enforcement served the Complaint and Notice of Complaint on Respondent by certified mail sent to Respondent's residential address, as reflected in the Central Registration Depository (the CRD address).² Respondent did not file an Answer.³

On April 4, 2006, Enforcement served the Complaint and Second Notice of Complaint on Respondent by certified mail at the CRD address. As before, Respondent did not file an Answer.⁴

Enforcement complied with Procedural Rule 9134(b)(1) by mailing the Complaint and Notices of Complaint to Respondent's CRD address, thereby providing constructive notice of this proceeding. By failing to file an Answer or otherwise respond to the Complaint, Respondent defaulted. Pursuant to Rules 9215(f) and 9269(a)(2), the allegations in the Complaint are deemed admitted.

III. Jurisdiction

Respondent, who is not currently associated or registered with any NASD member, entered the securities industry in 1997 and was registered with several firms, before joining NASD member GunnAllen Financial, Inc. (GunnAllen) in October 2003. Respondent was

¹ The factual determinations in this Decision are based on the allegations of the attached Complaint, which are deemed admitted, and the declaration and exhibits filed by Enforcement with its motion.

² Respondent's CRD address is [REDACTED].

³ The mail was returned to Enforcement, marked "Other."

⁴ The mail was again returned to Enforcement, marked "Other/Unclaimed."

registered as a general securities representative with GunnAllen until his registration was terminated on March 14, 2005.

Respondent is subject to NASD jurisdiction pursuant to Art. V, Section 4 of NASD's By-Laws, because the Complaint, which was filed within two years of the termination of Respondent's registration with GunnAllen, alleges misconduct that occurred while he was registered, and alleges a failure to comply with requests for information made during the two-year period following the termination.

IV. Findings of Fact and Conclusions of Law

A. Unauthorized Trading

The first cause of the Complaint alleges that from on or about May 7, 2004 through on or about June 25, 2004, Respondent effected a total of 30 transactions in the GunnAllen account of customer DB, without the customer's authorization or consent. The second cause of the Complaint alleges that from on or about December 1, 2003 through on or about January 29, 2004, Respondent effected a total of 73 transactions in the GunnAllen account of customer SM, without the customer's authorization or consent.

Unauthorized trading is defined as "causing the execution of transactions which are unauthorized by customers . . ."⁵ The SEC and NASD have consistently held that "unauthorized trading in a customer's account violates Conduct Rule 2110."⁶

Accordingly, the allegations in the first and second causes of the Complaint, which are deemed admitted, are sufficient to establish, for purposes of this default decision, that Respondent effected unauthorized trades, in violation of NASD Conduct Rule 2110.

⁵ NASD IM-2310-2(b)(4)(iii).

⁶ *Jeffrey B. Hodde*, No. C10010005, 2002 NASD Discip. LEXIS 4, at *13-14 (NAC Mar. 27, 2002) (citations omitted); see also *Robert L. Gardner*, Exchange Act Release No. 35,899, 1995 SEC LEXIS 1532, at *1 n.1 (June 27, 1995); *Keith L. DeSanto*, Exchange Act Release No. 35,860, 1995 SEC LEXIS 1500 (June 19, 1995), *aff'd*, 101 F.3d 108 (2d Cir. 1996).

B. Failure to Respond to Requests for Information

The third cause of the Complaint alleges that Respondent failed to respond to the staff's requests for information pursuant to Procedural Rule 8210. Specifically, the Complaint alleges that, in connection with its investigation of allegations that Respondent effected unauthorized trades, the staff sent a request for information to Respondent by letter dated November 30, 2004. The request was sent by first class and certified mail to Respondent's CRD address.⁷ After the letters were returned to Enforcement, the staff obtained a more current residential address for Respondent from GunnAllen. The firm then updated CRD with Respondent's current residential address (updated CRD address).⁸

The Complaint further alleges that on or about December 7, 2004, the staff sent a request for information to Respondent's updated CRD address by certified and first class mail. Respondent did not respond to the request. On or about January 14, 2005, the staff sent another request for information to Respondent's updated CRD address by certified and first class mail. Respondent provided some of the information requested but failed to supply requested copies of his cell phone records due to a dispute with his cell phone service provider.

According to the Complaint, or about March 7, 2005, the staff sent a letter to Respondent's updated CRD address by first class and certified mail, requesting information and documentation regarding Respondent's efforts to obtain the requested cell phone records. Respondent did not respond to the letter, which requested a reply by March 21, 2005. On March 22, 2005, the staff sent a letter to Respondent's updated CRD address by first class and certified mail, again asking Respondent to provide information and documentation regarding his attempts

⁷ At the time, Respondent's CRD address was [REDACTED].

⁸ The updated address is [REDACTED]. This address was Respondent's CRD address when Enforcement served the Complaint and Notices of Complaint and remains his current CRD address.

to obtain the requested documents. Respondent did not respond to the letter, which requested a reply by April 5, 2005. Both requests were made pursuant to Rule 8210, and the letter dated March 22 advised Respondent that a failure to respond would subject him to disciplinary action.⁹

Finally, the Complaint alleges that on December 13, 2005, the staff sent a letter to Respondent's updated CRD address by first class and certified mail, requesting that he appear in NASD's Philadelphia District Office on December 22, 2005, for an on-the-record interview.¹⁰ Respondent did not appear for the scheduled interview.

Procedural Rule 8210 provides that NASD "staff shall have the right to require a member . . . to provide information . . . and to testify . . . with respect to any matter involved in [an] investigation" Rule 8210 further states that "no . . . person shall fail to provide information . . . pursuant to this Rule." Rule 8210 thus imposes an obligation on members and associated persons to cooperate in NASD investigations.¹¹ Accordingly, members and associated persons have a duty to comply fully and promptly with NASD requests for information.¹² Recipients of information requests are obligated to provide the information requested promptly or explain why they are unable to do so.¹³ NASD is not required to justify its requests.¹⁴ Respondent failed to provide the requested documents or explain his efforts to obtain them. Furthermore, he failed to appear for on-the-record testimony.

⁹ The March 7 and 22 letters sent by certified mail were returned, marked "Other." The first class mailings were not returned.

¹⁰ The December 13 letter sent by certified mail was returned, marked "Other." The first class letter was not returned.

¹¹ *Toni Valentino*, Exchange Act Release No. 49,255, 2004 SEC LEXIS 330, at *14 (Feb. 13, 2004).

¹² *Brian L. Gibbons*, Exchange Act Release No. 37,170, 1996 SEC LEXIS 1291, at *7 (May 8, 1996), *aff'd*, 112 F.3d 516 (9th Cir. 1997).

¹³ *See, e.g., Robert Fitzpatrick*, Exchange Act Release No. 44,956, 2001 SEC LEXIS 2185, at *9-12 & nn. 11 & 16 (Oct. 19, 2001) (holding that NASD alone determines the type of production that it needs) (citation omitted).

¹⁴ *Id.* at *11-12 & n.16.

By mailing the requests for information and testimony to Respondent at his last known residential address as reflected in CRD, the staff complied with Rule 8210(d), and pursuant to that rule, Respondent is deemed to have received them.¹⁵ Thus, the allegations in the third cause of the Complaint, which are deemed admitted, are sufficient to establish, for purposes of this default decision, that Respondent failed to respond to requests for information and failed to appear and provide testimony, in violation of NASD Procedural Rule 8210 and Conduct Rule 2110.

V. Sanctions

For unauthorized transactions, NASD Sanction Guidelines recommend a fine of \$5,000 to \$75,000 and a suspension of 10 business days to one year, or, in egregious cases, a suspension of up to two years or a bar.¹⁶ This case involves more than 100 unauthorized transactions in the accounts of two different customers over a period of several months. The Hearing Officer finds that this is sufficient to establish, for purposes of this default decision, that Respondent's misconduct was quantitatively egregious, and that a bar is therefore warranted.

For failure to respond to requests for information or testimony made pursuant to Rule 8210, a bar is standard.¹⁷ There is no evidence of any mitigating circumstances here that would warrant anything less than a bar. Accordingly, Respondent will also be barred for this violation.

VI. Conclusion

Respondent Peter Rhee effected unauthorized trades in customer accounts, in violation of NASD Conduct Rule 2110, and failed to respond to requests for information and testimony, in violation of NASD Procedural Rule 8210 and Conduct Rule 2110. For these violations,

¹⁵ Furthermore, as evidenced by his partial response to one of the letters, Respondent had actual notice of the staff's request for information, but failed to provide a complete response.

¹⁶ *NASD Sanction Guidelines* at 103 (2006 ed.).

¹⁷ *Id.* at 35.

Respondent is barred from associating with any NASD member firm in any capacity. The bars shall become effective immediately if this Decision becomes the final disciplinary action of NASD.

SO ORDERED.


Dana R. Pisanelli
Hearing Officer

Dated: October 11, 2006
Washington, DC

Copies to: Peter Rhee (*via overnight and first class mail*)
David F. Newman, Esq. (*via electronic and first class mail*)
Mark P. Dauer, Esq. (*via electronic and first class mail*)
Rory C. Flynn, Esq. (*via electronic and first class mail*)

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**PETER RHEE
CRD No. 2964890**

Respondent.

**Disciplinary Proceeding
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Hearing Officer -

COMPLAINT

Upon information and belief, Complainant alleges as follows:

1. On or about March 4, 1998, Peter Rhee ("Rhee") first became registered with NASD as a General Securities Representative.
2. From October 2003 to March 11, 2005, Rhee was registered with GunnAllen Financial Inc. ("GunnAllen"). On or about March 14, 2005, GunnAllen filed a Form U5 with NASD disclosing that Rhee was voluntarily terminated from the firm on March 11, 2005.
3. Rhee is not currently registered or associated with a member of NASD, but remains subject to the jurisdiction of NASD pursuant to Article V, Section 4, of NASD's By-Laws, in that the conduct that is the subject of this complaint occurred while he was associated with GunnAllen and that this action is being brought within two years from the effective date of Rhee's last association with an NASD member.

**FIRST CAUSE OF COMPLAINT
(Unauthorized Trading - Customer D.B.)
NASD Conduct Rule 2110 and IM-2310-2**

4. Paragraphs 1 through 3 are realleged and incorporated herein by reference.

5. On or about February 11, 2004, D.B. opened a securities account at GunnAllen (Account No. [REDACTED]). Rhee was the designated representative for this account.
6. From on or about May 7, 2004 through on or about June 25, 2004, Rhee caused 30 purchase and sales transactions in the account of D.B., as reflected on Schedule A, attached hereto and incorporated by this reference. Rhee effected the transactions without D.B.'s authorization or consent.
7. As a result of this conduct, Rhee violated NASD Conduct Rule 2110 and IM-2310-2.

**SECOND CAUSE OF COMPLAINT
(Unauthorized Trading - Customer S.M.)
NASD Conduct Rule 2110 and IM-2310-2**

8. Paragraphs 1 through 7 are realleged and incorporated herein by reference.
9. On or about November 17, 2003, S.M. opened a securities account at GunnAllen (Account No. [REDACTED]). Rhee was the designated representative for this account.
10. From on or about December 1, 2003 through on or about January 29, 2004, Rhee caused 73 purchase and sales transactions in the account of S.M., as reflected on Schedule B, attached hereto and incorporated by this reference. Rhee effected the transactions without S.M.'s authorization or consent.
11. As a result of this conduct, Rhee violated NASD Conduct Rule 2110 and IM-2310-2.

**THIRD CAUSE OF COMPLAINT
(Failure to Respond to Requests for Information)
NASD Conduct Rule 2110 and Procedural Rule 8210**

12. Paragraphs 1 through 11 are realleged and incorporated by reference.
13. On or about November 30, 2004, pursuant to Procedural Rule 8210, NASD staff sent a letter to Rhee requesting his office and cell phone numbers during the period November 1, 2003 through November 30, 2004, monthly statements for the phone numbers for this

same period, and other information relating to allegations of unauthorized trading, described above in this Complaint. The letter was sent by certified and first class mail to the most current residential address maintained for Rhee by the Central Registration Depository ("CRD"): [REDACTED] (the "CRD address"). The certified and first class letters were returned from this address and were marked, "unable to forward." The November 30, 2004 letter requested that Rhee provide a response by December 21, 2004. Rhee failed to respond to this request.

14. After receiving the returned letters, NASD staff contacted GunnAllen, Rhee's employer, and obtained a more current residential address for Rhee than the CRD address.

GunnAllen then updated CRD with the more current residential address: [REDACTED] (the "updated CRD address").

15. On or about December 7, 2004, pursuant to Procedural Rule 8210, NASD staff sent a second letter to Rhee requesting the same information as in the November 30, 2004 letter. The letter was sent by certified and first class mail to the updated CRD address. The certified letter was returned by the Postal Service and was marked "other"; the first class letter was not returned. The December 7, 2004 letter requested a response by December 28, 2004. Rhee failed to respond to this request.

16. On or about January 14, 2005, pursuant to Procedural Rule 8210, NASD staff sent a third letter to Rhee requesting that he provide the same information as in the November 30, 2004 letter. This request was sent by certified and first class mail to the updated CRD address. On January 20, 2005, Rhee sent a response to NASD staff that provided some of the information requested. Rhee, however, did not provide his phone records as requested. Instead, Rhee claimed he was having "trouble" producing his cell phone

records because of an ongoing dispute with the cell phone provider. Rhee provided no further information or documentation concerning the alleged dispute and how this prevented him from producing the phone records.

17. On or about March 7, 2005 and March 22, 2005, pursuant to Procedural Rule 8210, NASD staff sent two more letters to Rhee requesting that he provide information and documentation concerning his efforts to obtain his cell phone records. Both the March 7 and March 22, 2005 letters were sent by first class and certified mail to the updated CRD address. The March 7, 2005 letter requested a response by March 21, 2005. The March 22 letter requested a response by April 5, 2005, and warned Rhee that a failure to respond would subject him to disciplinary action. The March 7 and March 22 certified letters were returned by the Postal Service and marked "other"; the first class letters sent on those dates were not returned. Rhee did not respond to the requests.
18. On or about December 13, 2005, pursuant to Procedural Rule 8210, NASD staff sent a letter to Rhee requesting his appearance in the Philadelphia District Office on December 22, 2005 for an on-the-record interview ("OTR"). The letter was sent by certified and first class mail to the updated CRD address. The certified letter was returned and was marked "other"; the first class letter was not returned. Rhee failed to appear for the OTR.
19. Such acts, practices and conduct constitute separate and distinct violations of NASD Procedural Rule 8210 and NASD Conduct Rule 2110 by Rhee.

PRAYER FOR RELIEF

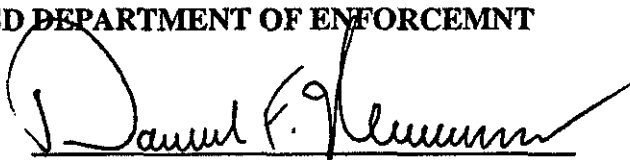
WHEREFORE, Complainant respectfully requests:

- A. Findings of fact and conclusions of law that Rhee committed the violations charged and alleged herein;

- B. An order imposing sanctions upon Rhee in accordance with NASD Rule 8310;
- C. An order requiring Rhee to disgorge fully any and all ill-gotten gains and/or make full restitution, together with interest;
- D. An order imposing such costs of any proceeding as are deemed fair and appropriate under the circumstances in accordance with NASD Rule 8330; and
- E. An order imposing any other fitting sanction.

NASD DEPARTMENT OF ENFORCEMENT

Date: February 27, 2006



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SCHEDULE A TO COMPLAINT NO. E9B2004049101
TRADES IN [REDACTED] ACCOUNT NO. [REDACTED]

Trade Date	Transaction	Qty	Symbol	Price	Amount
05/07/04	Bought	600	RHAT	\$25.06	\$15,036.00
05/16/04	Bought	500	RMBS	\$19.31	\$9,655.00
05/16/04	Bought	500	RMBS	\$19.30	\$9,650.00
05/24/04	Bought	100	GIVN	\$30.88	\$3,088.00
05/24/04	Bought	700	GIVN	\$30.90	\$21,630.00
05/25/04	Bought	1,000	VRTSE	\$25.18	\$25,180.00
06/01/04	Bought	1,000	RMBS	\$18.82	\$18,820.00
06/10/04	Bought	1,500	RMBS	\$17.49	\$26,235.00
06/10/04	Bought	4,425	RMBS	\$17.50	\$77,437.50
06/10/04	Bought	3,275	RMBS	\$17.53	\$57,410.75
06/10/04	Bought	800	RMBS	\$17.55	\$14,040.00
05/10/04	Sold	600	RHAT	\$23.95	\$14,370.00
05/13/04	Sold	500	RMBS	\$19.67	\$9,835.00
05/24/04	Sold	100	RMBS	\$18.25	\$1,825.00
05/24/04	Sold	1,400	RMBS	\$18.24	\$25,536.00
05/25/04	Sold	200	GIVN	\$29.63	\$5,926.00
05/25/04	Sold	100	GIVN	\$29.62	\$2,962.00
05/25/05	Sold	500	GIVN	\$29.55	\$14,775.00
06/01/04	Sold	1,000	VRTSE	\$25.83	\$25,830.00
06/03/04	Sold	1,000	RMBS	\$17.55	\$17,550.00
06/10/04	Sold	1,800	RMBS	\$16.99	\$30,582.00
06/10/04	Sold	600	RMBS	\$16.96	\$10,176.00
06/10/04	Sold	1,100	RMBS	\$16.95	\$18,645.00
06/10/04	Sold	2,532	RMBS	\$16.93	\$42,866.76
06/10/04	Sold	2,968	RMBS	\$16.94	\$50,277.92
06/18/04	Sold	1,650	RFMD	\$7.31	\$12,061.50
06/22/04	Sold	250	RFMD	\$7.27	\$1,817.50
06/25/04	Sold	60	RFMD	\$7.42	\$445.20
06/25/04	Sold	500	RMBS	\$17.09	\$8,545.00
06/25/04	Sold	200	RMBS	\$17.11	\$3,422.00

SCHEDULE B TO COMPLAINT NO. E9B2004049101
TRADES IN [REDACTED] ACCOUNT NO. [REDACTED]

Trade	Transaction	Quantity	Symbol	Price	Amount
12/01/03	Sold	2,500	CDE	\$5.43	\$13,140.86
12/01/03	Sold	3,000	DROOY	\$2.76	\$8,021.11
12/01/03	Sold	2,000	INCY	\$6.32	\$12,280.90
12/03/03	Bought	1,200	GPS	\$21.35	\$26,628.50
12/05/03	Bought	600	TIF	\$42.68	\$26,616.50
12/05/03	Sold	1,200	GPS	\$21.02	\$25,114.31
12/05/03	Sold	500	TIF	\$42.60	\$21,190.50
12/08/03	Bought	500	THOR	\$13.05	\$6,550.00
12/08/03	Bought	700	THOR	\$13.02	\$9,157.50
12/08/03	Bought	800	THOR	\$13.04	\$10,472.00
12/09/03	Bought	1,000	MFST	\$26.53	\$26,538.50
12/09/03	Sold	2,000	THOR	\$13.05	\$25,590.25
12/09/03	Sold	1,000	MSFT	\$26.55	\$26,040.25
12/10/03	Bought	700	VRTS	\$35.70	\$25,998.50
12/10/03	Sold	700	VRTS	\$36.20	\$24,830.31
12/11/03	Sold	1,000	RMBS	\$26.68	\$27,670.15
12/12/03	Bought	2,000	EMC	\$12.85	\$26,708.50
12/12/03	Bought	700	RMBS	\$31.93	\$22,462.30
12/12/03	Sold	2,000	EMC	\$13.00	\$25,790.28
12/15/03	Bought	700	VRTS	\$36.70	\$26,698.50
12/15/03	Sold	2,500	CDE	\$5.05	\$12,315.90
12/15/03	Sold	700	VRTS	\$36.21	\$24,837.31
12/16/03	Bought	800	INTL	\$29.91	\$24,936.50
12/17/03	Bought	1,500	ACTR	\$21.48	\$33,228.50
12/17/03	Sold	300	INTL	\$30.16	\$8,860.07
12/17/03	Sold	500	INTL	\$30.16	\$14,758.29
12/18/03	Bought	1,000	THOR	\$12.52	\$12,928.50
12/18/03	Sold	700	INCY	\$6.30	\$4,261.29
12/18/03	Sold	1,300	INCY	\$6.29	\$7,916.61
12/18/03	Sold	800	TW	\$18.11	\$14,378.82
12/19/03	Bought	800	TW	\$17.90	\$14,828.50
12/19/03	Bought	500	BB	\$51.67	\$26,843.50
12/19/03	Bought	300	RMBS	\$26.56	\$8,174.38
12/22/03	Bought	800	VRTS	\$35.80	\$29,648.50
12/22/03	Sold	500	BB	\$50.58	\$24,780.31
12/22/03	Sold	800	VRTS	\$36.42	\$28,826.12
12/23/03	Bought	2,220	RF Micro	\$9.98	\$22,864.50

Trade	Transaction	Quantity	Symbol	Price	Amount
12/23/03	Sold	1,000	THOR	\$12.39	\$12,180.91
12/26/03	Bought	1,000	RMBS	\$26.28	\$27,288.50
12/26/03	Sold	100	TIF	\$44.34	\$4,325.29
12/29/03	Bought	2,000	THOR	\$12.34	\$25,588.50
12/30/03	Bought	500	BB	\$52.08	\$26,648.50
01/02/04	Bought	700	RMBS	\$30.94	\$22,166.50
01/02/04	Sold	200	RMBS	\$30.87	\$5,945.14
01/02/04	Sold	500	RMBS	\$30.86	\$14,849.34
01/05/04	Sold	700	VRTS	\$37.27	\$24,579.27
01/06/04	Bought	600	INTL	\$32.97	\$20,390.50
01/06/04	Sold	500	BB	\$51.25	\$25,215.30
01/06/04	Sold	600	INTL	\$33.78	\$20,158.54
01/07/04	Sold	900	CSCO	\$26.31	\$23,469.39
01/08/04	Bought	900	CSCO	\$25.19	\$23,179.50
01/08/04	Bought	1,000	AMAT	\$24.04	\$24,848.50
01/09/04	Bought	1,000	SEBL	\$15.60	\$16,108.50
01/09/04	Sold	1,000	AMAT	\$24.43	\$24,120.35
01/13/04	Bought	1,000	AMAT	\$23.74	\$24,448.50
01/13/04	Sold	1,000	SEBL	\$15.16	\$15,050.75
01/14/04	Bought	660	AMAT	\$23.34	\$16,212.90
01/14/04	Bought	700	VRTS	\$39.25	\$27,683.50
01/15/04	Sold	660	AMAT	\$24.11	\$15,503.35
01/15/04	Sold	1,000	AMAT	\$24.13	\$23,720.37
01/20/04	Bought	1,600	SEBL	\$15.12	\$25,200.50
01/22/04	Sold	700	SEBL	\$14.35	\$9,686.02
01/22/04	Sold	900	SEBL	\$14.34	\$12,455.38
01/23/04	Bought	600	VRTS	\$38.16	\$23,707.50
01/23/04	Bought	600	VRTS	\$37.50	\$23,308.50
01/23/04	Sold	600	VRTS	\$37.78	\$22,460.83
01/26/04	Bought	1,500	SEBL	\$13.53	\$20,803.50
01/27/04	Sold	400	SEBL	\$13.71	\$5,430.40
01/27/04	Sold	1,100	SEBL	\$13.70	\$14,914.11
01/29/04	Sold	2,220	RFMD	\$9.99	\$21,068.47
01/29/04	Sold	1,000	RMBS	\$26.22	\$25,310.27
01/29/04	Sold	2,000	THOR	\$12.49	\$24,770.31
02/03/04	Bought	815	SEBL	\$13.19	\$11,097.88