

IN THE MATTER OF THE *SECURITIES ACT*,
S.N.B. 2004, c. S-5.5, AS AMENDED

AND IN THE MATTER OF

FIRST ALLIANCE MANAGEMENT INC.
and TED FREEDMAN
(Respondents)

STATEMENT OF ALLEGATIONS
(of Staff of the New Brunswick Securities Commission)

1. First Alliance Management Inc. ("FAM") is a corporation incorporated under the laws of Panama and purports to have a head office in Panama City, Panama.
2. Ted Freedman ("Freedman") purports to be an agent or employee of FAM.
3. Freedman, on behalf of FAM, solicited a New Brunswick resident by telephone (cold call), email and internet, to trade in securities, namely options in gold and other precious metals.
4. Neither FAM nor Freedman are registered to trade in securities in New Brunswick.
5. FAM has ties to an entity named Secure One Investment Group, an entity that the Saskatchewan Financial Services Commission cease-traded on 5 March 2008.
6. It is in the public interest to remove FAM and Freedman from the capital markets in New Brunswick pursuant to section 184(1) of the *Securities Act*, S.N.B. 2004, c. S-5.5, as amended (the "*Securities Act*").

Relief Sought

Motion

7. Staff seeks a temporary order pursuant to section 184(5), section 184(1)(c)(ii) and section 184(d) of the *Securities Act*, that the Respondents shall cease trading in all securities, and that any exemptions under New Brunswick securities law do not apply to the Respondents.
8. The grounds for this motion are that the Respondents have recently solicited trading that involves transferring investment money outside of Canada, and that the time

required to hold a hearing could be prejudicial to the public interest.

9. On the motion Staff will rely on the affidavit of Ed LeBlanc sworn on 20 October 2008.

Hearing

10. Staff seeks an order pursuant to section 184(1)(c)(ii) of the *Securities Act* that the Respondents shall cease trading in all securities.
11. Staff seeks an order pursuant to section 184(1)(d) of the *Securities Act* that any exemptions in New Brunswick securities law do not apply to the Respondents.

DATED at the City of Saint John this 21st day of October 2008.

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