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NANCY SWEENEY
CLERK DISTRICT COURT

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FILED
BY K. J. LINDEEN
DEPUTY

Attorneys for the Petitioner

MONTANA FIRST JUDICIAL DISTRICT COURT
LEWIS AND CLARK COUNTY

Monica J. Lindeen, State Auditor and Ex-
Officio, Montana Securities Commissioner,

Petitioner,

v.

Richard Converse and DC Tax Service, Inc.

Respondents.

Cause No.: ADV-2015-117

**MOTION TO HOLD RESPONDENT
IN CONTEMPT**

The Montana State Auditor, Commissioner of Securities and Insurance (Commissioner), by and through Special Assistants Attorney General Brett O'Neil and Jennifer Hudson, hereby petition this Court to hold Richard Converse (Respondent) in contempt for violations of the preliminary injunction ordered by this Court on March 6, 2015, restraining the respondent from "engaging in securities practices in the state of Montana."

The Petitioner alleges that the Respondent violated the terms of the preliminary injunction through the following activities:

1. On March 23, 2015, an elderly woman from Plano, Texas, was contacted by a friend who had originally put her in contact with the Respondent. This friend informed the elderly woman that the Respondent needed investors to fill out new account forms for Victorious Financial and mail them to 100 Sharon Drive, Great Falls, Montana, as soon as possible. The new account forms closely follow the prior Fidelity forms and request that the account holder provide their name, address, social security number, and other personal information. The woman was told that if she did not get this form to Mr. Converse as soon as possible that she may lose her investment when the Iraqi Dinar is revalued.

2. On March 20, 2015, a gentleman who has invested with Victorious Financial in the past contacted the Petitioner's office to report that his wife had given the Respondent two cashier's checks totaling \$16,000 in exchange for a promissory note that is now past due. The Respondent represented to the wife that the money would go towards Victorious' operating costs. The promissory notes were executed before the preliminary injunction was issued and are now past due.

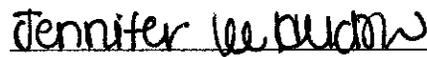
3. On March 17, 2015, a gentleman contacted the Petitioner's office with concerns regarding investments his elderly father and uncle were making through Victorious Financial. The Respondent had solicited \$10,000 cash payments from the father and uncle in order to open offshore trading accounts. The father was able to be convinced to abandon his plan to pay the Respondent, but it is believed that the uncle drove to Montana from out-of-state in order to deliver his \$10,000 cash payment.

4. On February 27, 2014, a gentleman contacted the Petitioner's office to report that the Respondent had solicited him for a cash investment in Yen on February 25, 2015. This occurred after the Respondent was being temporarily restrained from performing any securities transactions.

5. On February 20, 2015, the Respondent opened a bank account with US Bank. Despite the Temporary Restraining Order being in effect, the Respondent deposited at least 19 checks, cash, and money orders that were related to Victorious Financial and Iraqi Dinar purchases.

The Petitioner hereby respectfully requests that the Court set a hearing for Respondent to give reason, if any exists, why he should not be found in contempt of court.

DATED this 25th day of March, 2015.



JENNIFER HUDSON

Attorney for the CSI

Special Assistant Montana Attorney General