

BEFORE THE STATE AUDITOR
AND COMMISSIONER OF INSURANCE
HELENA, MONTANA

| | | |
|---------------------------------------|---|-------------------------|
| IN THE MATTER OF: |) | CASE NO. C-03-27-06-210 |
| QUADRA PAY LAND, LLC |) | |
| Adams & Ewing, LLC (registered agents |) | |
| 3225 McLeod Drive, Suite 110 |) | |
| Las Vegas, NV 89121, |) | |
| |) | |
| EAVENSON FAMILY, LP, |) | |
| MICHAEL EAVENSON, general partner |) | |
| EDITH ODELL EAVENSON, general |) | |
| partner, |) | |
| |) | |
| KUHN FAMILY, LP |) | |
| ADAMS & EWING, LLP (registered agents |) | |
| CHARLES KUHN, general partner, and |) | |
| WILLIAM KUHN, general partner |) | |
| Respondent. |) | |

ORDER FOR DEFAULT AND PERMANENT CEASE AND DESIST ORDER

The Commissioner, having reviewed the Department's Motion, finding no objection and good cause, hereby enters the following:

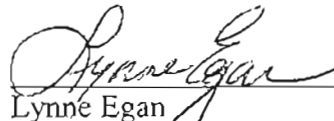
ORDER

Ordering the Temporary Cease and Desist Order against Quadra Pay Land, LLC; Eavenson Family LP; Estate of Michael Eavenson and Edith Eavenson become permanent, prohibiting respondents from the following:

1. Any act, practice, or course of business that operate or would operate as a fraud or deceit upon any person, in violation of §30-10-301, MCA;
2. Any act that constitutes an untrue statement of material fact of the omission of such a material fact, in violation of §30-10-301, MCA;
3. Any act that constitutes promotion of an illegal pyramid scheme pursuant to §30-10-202, MCA; and

4. Any securities transactions in unregistered securities pursuant to §30-10-202, MCA;
and
5. Any securities transactions while respondents are unregistered to conduct securities
business pursuant to §30-10-201, MCA.

SO ORDERED this 3rd day of July 2006.



Lynne Egan
Deputy Securities Commissioner (Acting)

CERTIFICATE OF SERVICE

I hereby certify that I mailed a true and correct copy of the foregoing Order for Default and Permanent Ceast and Desist Order to the following persons by depositing the same in the U.S. Mail on this 3rd day of July, 2006.

TO: Adams & Ewing LLC
P. Thomas Adams
3960 Howard Hughes Parkway Center
Suite 500
Las Vegas, NV 89109

Eavenson Family LP
Edith Eavenson
118 Walkerloop
Springville TN 38256



State Auditor's Office