

IN THE MATTER OF THE SECURITIES ACT,  
SNB 2004, c. S-5.5

AND

IN THE MATTER OF

**STRATEGIC ENERGY PARTNERS and  
JIM PALMER  
("Respondents")**

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**ORDER**

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**WHEREAS** Staff of the Commission has filed a Statement of Allegations in this matter in which they seek relief against the Respondents pursuant to section 184 of the *Securities Act*;

**AND WHEREAS** the Commission is satisfied that the said Statement of Allegations, the Affidavit of Ed LeBlanc sworn 9 February 2009 and the Affidavit of Mark McElman sworn 9 February 2009 in support thereof, as well as a Notice of Hearing returnable before the Commission on 25 February 2009 at 10:00 a.m., were all duly served upon the Respondents;

**AND UPON HEARING** Jake van der Laan on behalf of Staff of the Commission at the date and time set for the hearing of this matter;

**AND UPON** no one appearing on behalf of the Respondents at the date and time set for the hearing of this matter;

**AND WHEREAS** based on the evidence submitted by Staff of the Commission, the Commission finds that the Respondents have violated New Brunswick securities law;

**AND WHEREAS** the Commission is of the opinion that it is in the public interest to make this Order;

**NOW THEREFORE IT IS ORDERED THAT:**

- (a) all trading in securities, including but not limited to the solicitation of trades or any acts constituting attempts or acts in furtherance of trading in securities by the Respondents shall cease **permanently** or until such time as the Respondents have established before the Commission that this Order is no longer in the public interest; and

(b) any exemptions in New Brunswick securities law shall not apply to the Respondents **permanently** or until such time as the Respondents have established before the Commission that this Order is no longer in the public interest.

**DATED** at the City of Saint John this 25<sup>th</sup> day of February, 2009.

"original signed by"  
Donne W. Smith, Panel Chair

"original signed by"  
Kenneth Savage, Panel Member

"original signed by"  
Sheldon Lee, Panel Member

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