

**THE SECURITIES ACT**

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**Order No. 4054**

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**Sections 148 and 19(5)**

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**February 19, 2003**

**Synergy Alliance, LLC; Synergy Alliance Two, LLC; Synergy Alliance Fourteen, LLC; Synergy Alliance Group, LLC; Synergy Capital Group, LLC; Synergy Equivest Group, LLC; Synergy Financial Corporation; Synergy Investment Corporation, LLC; Larry W. Tanner; Darin R. Knee; Billy Davis; Gerald W. Blerot and Bruce Jeffrey Stewart**

**WHEREAS:**

(A) The Manitoba Securities Commission ("Commission") has received information which indicates that securities of Synergy Alliance, LLC, Synergy Alliance Two, LLC, Synergy Alliance Fourteen, LLC, Synergy Alliance Group, LLC, Synergy Capital Group, LLC, Synergy Equivest Group, LLC, Synergy Financial Corporation, and Synergy Investment Corporation, LLC (collectively referred to as "Synergy Alliance") have been traded and may continue to be in the process of being traded in Manitoba to members of the public by Synergy Alliance, Larry W. Tanner ("Tanner"), Darin R. Knee ("Knee"), Billy Davis ("Davis"), Gerald W. Blerot ("Blerot"), and Bruce Jeffrey Stewart ("Stewart") in contravention of the provisions of The Securities Act ("Act");

(B) None of Synergy Alliance, Tanner, Knee, Davis, Blerot or Stewart are registered under the Act to trade in securities in Manitoba;

(C) No prospectus, preliminary prospectus or notice of intention to trade pursuant to the exemptions in clause 91 of the Regulation to the Act has been filed with the Commission in respect of such trading activity, and no exemption order has been granted by the Commission, in respect of any of the trades in question in the securities of Synergy Alliance;

(D) Information has been received by staff of the Commission whereby Synergy Alliance, Tanner, Knee, Davis, Blerot and Stewart have been and may continue to be promoting the trading of securities in a Synergy Alliance company through an investment proposal whereby the investor provides funds to a Synergy Alliance company and receives shares in return and furthermore whereby the Synergy Alliance company in turn provides funding to a project, which upon completion results in funds back to the Synergy Alliance company with which the Synergy Alliance company then repurchases the shares from the investor at a buy back amount, resulting in a return to the investor of 3:1 or more depending upon the amount initially invested;

(E) The Commission is of the opinion that in view of the foregoing it is in the public interest to make this order and that the holding of a hearing would cause a delay prejudicial to the public interest.

**IT IS ORDERED:**

**1. THAT**, pursuant to section 148 of the Act, all trading in the securities of Synergy Alliance, LLC, Synergy Alliance Two, LLC, Synergy Alliance Fourteen, LLC, Synergy Alliance Group, LLC, Synergy Capital Group, LLC, Synergy Equivest Group, LLC, Synergy Financial Corporation, and Synergy Investment Corporation, LLC shall cease forthwith.

**2. THAT**, pursuant to section 19(5) of the Act, forthwith:

(a) subsections 19(1) and 19(3) of the Act do not, with respect to such of the trades referred to in those subsections, apply to Tanner, Knee, Davis, Blerot and Stewart; and

(b) subsection 19(2) of the Act does not, with respect to such of the securities referred to in that subsection, apply to Tanner, Knee, Davis, Blerot and Stewart.

**3. THAT**, pursuant to sections 148 and 19(6) of the Act, this order shall expire on March 5<sup>th</sup>, 2003, unless extended by further order of the Commission.

**BY ORDER OF THE COMMISSION**

**Director, Legal and Enforcement**