

STATE OF ILLINOIS  
SECRETARY OF STATE  
SECURITIES DEPARTMENT

\_\_\_\_\_  
IN THE MATTER OF: STEPHEN AMELLA, TRACY )  
N. KARCH, and IBP FUNDING UNLIMITED )  
D/B/A CLUB 45 )  
\_\_\_\_\_ )

Case No.0500234

TEMPORARY ORDER OF PROHIBITION

TO RESPONDENTS:       STEVE AMELLA  
                              3610 S. RIDGELAND AVE.  
                              BERWYN, IL  
                              60402

                              TRACY N. KARCH  
                              3610 S. RIDGELAND AVE.  
                              BERWYN, IL  
                              60402

                              IBP FUNDING UNLIMITED  
                              3610 S. RIDGELAND AVE.  
                              BERWYN, IL  
                              60402

On information and belief, I, Jesse White, Secretary of State for the State of Illinois, through my designated representative, who has been fully advised in the premises by the staff of the Securities Department, Office of the Secretary of State, herein find:

1. Stephen Amella a/k/a Steve Amella (Respondent "Amella" or, collectively with Respondents Tracy N. Karch and IBP Funding Unlimited, "Respondents") is an

individual with a last known address of 3610 S. Ridgeland Avenue in Berwyn, Illinois.

2. Tracy N. Karch (Respondent "Karch" or, collectively with Respondents Amella and IBP Funding Unlimited, "Respondents") is an individual with a last known address of 3610 S. Ridgeland Avenue in Berwyn, Illinois.
3. IBP Funding Unlimited d/b/a Club 45 (Respondent "IBP" or, collectively with Respondents Amella and Karch, "Respondents") is an unincorporated entity controlled by Respondents Amella and Karch.
4. From at least April 2004 to approximately 2006 Respondents offered to the public investments into IBP in the form of "Notes", The Notes issued by IBP promised investors a forty-five percent (45%) return per month.
5. On or around April 16, 2004, Respondents sold a five hundred dollar (\$500.00) Note to at least one resident of Illinois.
6. However, neither Amella nor Karch are registered with the Secretary of State to sell securities in or from Illinois.
7. Furthermore, a search of the Secretary of State's registration records show that IBP was never registered to be sold as securities in or from Illinois.
8. The Notes described in paragraph 4 and 5 (4, 5) are a security, as defined in Section 2.1 of the Act.
9. The activities describes at paragraphs four and five (4, 5), above, constitute the offer and sale of a security as defined in Sections 2.1, 2.5 and 2.5a of the Act.
10. Section 12.A of the Act provides it shall be a violation of the provisions of this Act for any person to offer or sell any security except in accordance with the provisions of this Act.
11. Section 12.D of the Act provides, inter alia, that it shall be a violation for any person to fail to file with the Secretary of State any application, report or document required to be filed under the provisions of the Act or any rule or regulation made by the Secretary of State pursuant to the Act.
12. Respondents failed to file with the Secretary of State an application for registration of the securities described above as required by the Act and that as a result the security was not registered pursuant to Section 5 of the Act prior to its offer in the State of Illinois.

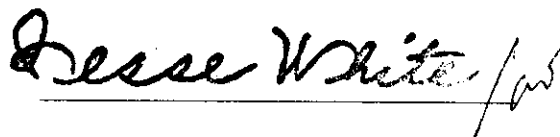
13. By virtue of the foregoing, Respondents Amella and Karch violated Sections 12.A and 12.D of the Act.
14. The aforementioned findings are based upon credible evidence.
15. Section 11.F(2) of the Act provides, *inter alia*, that the Secretary of State may temporarily prohibit the offer or sale of securities by any person, without notice and prior hearing, if the Secretary of State shall deem it necessary to prevent an imminent violation of the Act or to prevent losses to investors that will occur as a result of prior violations of the Act.
16. The entry of this Temporary Order prohibiting Respondents Steven Amella a/k/a Stephen Amella, Tracy N. Karch and IBP Funding Unlimited d/b/a Club 45 from offering or selling securities in the State of Illinois is in the public interest and for the protection of the investing public and is consistent with the purposes intended by the provisions of the Act.
17. The entry of this Temporary Order prohibiting Respondents Stephen Amella a/k/a Steve Amella, Tracy N. Karch and IBP Funding Unlimited d/b/a Club 45 from offering or selling securities in the State of Illinois is in the public interest and for the protection of the investing public and is consistent with the purposes intended by the provisions of the Act.

NOW THEREFORE IT IS HEREBY ORDERED THAT: pursuant to the authority granted by Section 11.F of the Act, Respondents Stephen Amella a/k/a Steve Amella, Tracy N. Karch and IBP Funding Unlimited d/b/a Club 45 his/their managers, officers and directors, agents, employees, affiliates, representatives, successors and assigns are **PROHIBITED** from offering or selling securities in or from this State until the further Order of the Secretary of State.

NOTICE is hereby given that Respondents may request a hearing on this matter by transmitting such request in writing to the attorney of record: Jason Chronopoulos, Illinois Securities Department, 69 West Washington Street, Suite 1220, Chicago, Illinois 60602. Such request must be made within thirty (30) calendar days of the date of entry of the Temporary Order of Prohibition. Upon receipt of a request for hearing, a hearing will be scheduled as soon as reasonably practicable. A request for hearing will not stop the effectiveness of this Temporary Order and will extend the effectiveness of this Temporary Order for sixty days from the date the hearing request is received by the Department.

FAILURE BY ANY RESPONDENT TO REQUEST A HEARING WITHIN THIRTY (30) CALENDAR DAYS AFTER ENTRY OF THIS TEMPORARY ORDER OF PROHIBITION SHALL CONSTITUTE AN ADMISSION OF ANY FACTS ALLEGED HEREIN AND SHALL CONSTITUTE SUFFICIENT BASIS TO MAKE THIS TEMPORARY ORDER OF PROHIBITION FINAL.

ENTERED : This 3<sup>rd</sup> day of April, 2008.

A handwritten signature in black ink that reads "Jesse White" followed by a stylized flourish or initials.

JESSE WHITE  
Secretary of State  
State of Illinois

Jason Chronopoulos  
Enforcement Attorney  
Illinois Securities Department  
69 West Washington Street, Suite 1220  
Chicago, Illinois 60602