

Return Date: NOVEMBER 17, 2009

HOWARD F. PITKIN, BANKING
COMMISSIONER

SUPERIOR COURT

JUDICIAL DISTRICT OF HARTFORD
AT HARTFORD

v.

BLUE COAST FINANCIAL
GROUP, INC., SHAWN HULL,
LINDSAY HULL and
BRIAN FELDERSTEIN

OCTOBER 13, 2009

COMPLAINT

1. The plaintiff is Howard F. Pitkin, the Banking Commissioner of the State of Connecticut (the "Commissioner").

2. The defendants are Blue Coast Financial Group, Inc. ("Blue Coast"), an Arizona corporation with its principal place of business at 2929 North Power Road, Suite C100, Mesa, Arizona 85215; Shawn Hull, an individual, who is a Director and Chief Executive Officer of Blue Coast and whose last known address is 2929 North Power Road, Suite C100, Mesa, Arizona 85125; Lindsay Hull, an individual, who is a Director and President of Blue Coast and whose last known address is 2929 North Power Road, Suite C100, Mesa, Arizona 85125; and Brian Felderstein, an individual, who is the Vice

President of Business Development of Blue Coast, and whose last known address is 2929 North Power Road, Suite C100, Mesa, Arizona 85125.

3. The Commissioner is charged with administering the Connecticut Business Opportunity Investment Act (the "Act"), Conn. Gen. Stat. §§ 36b-60 to 36b-80, inclusive:

4. During the period from at least 2007 to at least 2008, the defendants offered business opportunities including cost recovery and cost saving financial services for sale to purchaser-investors.

5. Pursuant to Conn. Gen. Stat. § 36b-72(c), the Commissioner seeks to enforce the business opportunity registration provisions of the Act, namely Conn. Gen. Stat. § 36b-67.

6. The Commissioner, acting pursuant to Conn. Gen. Stat. § 36b-71, conducted an investigation to determine whether the defendants violated any provision of the Act.

7. The Commissioner's investigation established the following facts:

a. On or about May 2007, the defendant Brian Felderstein, on behalf of the defendant Blue Coast Financial Group, effected the sale of at least one business opportunity to a Connecticut purchaser-investor.

b. The defendant Blue Coast Financial Group was not registered with the Department of Banking ("Department") as a business opportunity pursuant to Conn. Gen. Stat. § 36b-62 from 2007 through 2008.

8. The defendants have violated the Act by selling an unregistered business opportunity or offering to sell unregistered business opportunities during the period from at least 2007 to at least 2008.

9. The defendants' violation of the Act constitutes irreparable harm.

10. Conn. Gen. Stat. § 36b-72 provides the remedy of an injunction and therefore the legal requirement of an inadequate remedy at law is satisfied.

11. The court has jurisdiction over this matter pursuant to Conn. Gen. Stat. §§ 36b-72(c), 51-164s, and 52-1.

PLAINTIFF

RICHARD BLUMENTHAL
ATTORNEY GENERAL

BY: *Dinah J. Bee*
Dinah J. Bee
Assistant Attorney General
Juris No. 421664
55 Elm Street
P.O. Box 120
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Tel: 860 808-5270
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For the plaintiff, please enter the appearance
of Richard Blumenthal, Attorney General, by
Assistant Attorney General Dinah J. Bee,
Juris # 421664, P. O. Box 120, Hartford, CT 06141,
Telephone 860 808-5270, His Attorney.

Dinah J. Bee

Dinah J. Bee
Commissioner of the Superior Court

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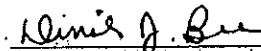
DEMAND FOR RELIEF

WHEREFORE, the plaintiff, pursuant to Conn. Gen. Stat. § 36b-72(c), prays for:

1. An order permanently enjoining the defendant from violating Conn. Gen. Stat. § 36b-60 et seq., the Connecticut Business Opportunity Investment Act;
2. Costs of this proceeding.
3. Such other relief as the court deems appropriate.

PLAINTIFF
RICHARD BLUMENTHAL
ATTORNEY GENERAL

BY:



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Assistant Attorney General
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P.O. Box 120
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OFFICER'S RETURN TO COURT

STATE OF CONNECTICUT:

: ss., Wethersfield

OCTOBER 15, 2009

COUNTY OF HARTFORD :

THEN AND BY VIRTUE HEREOF, AND BY DIRECTION OF THE PLAINTIFF'S ATTORNEY, ON THE 15th DAY OF OCTOBER, 2009 I MADE DUE AND LEGAL SERVICE UPON THE WITHIN NAMED DEFENDANT, **BLUE COAST FINANCIAL GROUP, INC.**, BY LEAVING A VERIFIED TRUE AND ATTESTED COPY OF THE WITHIN ORIGINAL WRIT SUMMONS AND COMPLAINT WITH KAREN ZERN, F.A.O. AT THE OFFICE OF THE BANKING COMMISSIONER, 250 CONSTITUTION PLAZA, HARTFORD, CT, DULY AUTHORIZED TO ACCEPT SERVICE FOR THE WITHIN NAMED DEFENDANT, **BLUE COAST FINANCIAL GROUP, INC.**, PURSUANT TO C.G.S. §36b-62(c).

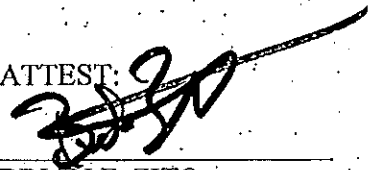
AND ALSO ON THE 15th DAY OF OCTOBER, 2009 I MADE DUE AND LEGAL SERVICE UPON THE WITHIN NAMED DEFENDANT, **SHAWN HULL**, BY LEAVING A VERIFIED TRUE AND ATTESTED COPY OF THE WITHIN ORIGINAL WRIT SUMMONS AND COMPLAINT WITH KAREN ZERN, F.A.O. AT THE OFFICE OF THE BANKING COMMISSIONER, 250 CONSTITUTION PLAZA, HARTFORD, CT, DULY AUTHORIZED TO ACCEPT SERVICE FOR THE WITHIN NAMED DEFENDANT, **SHAWN HULL**, PURSUANT TO C.G.S. §36b-62(c).

AND ALSO ON THE 15th DAY OF OCTOBER, 2009 I MADE DUE AND LEGAL SERVICE UPON THE WITHIN NAMED DEFENDANT, **LINDSAY HULL**, BY LEAVING A VERIFIED TRUE AND ATTESTED COPY OF THE WITHIN ORIGINAL WRIT SUMMONS AND COMPLAINT WITH KAREN ZERN, F.A.O. AT THE OFFICE OF THE BANKING COMMISSIONER, 250 CONSTITUTION PLAZA, HARTFORD, CT, DULY AUTHORIZED TO ACCEPT SERVICE FOR THE WITHIN NAMED DEFENDANT, **LINDSAY HULL**, PURSUANT TO C.G.S. §36b-62(c).

AND ALSO ON THE 15th DAY OF OCTOBER, 2009 I MADE DUE AND LEGAL SERVICE UPON THE WITHIN NAMED DEFENDANT, **BRIAN FELDERSTEIN**, BY LEAVING A VERIFIED TRUE AND ATTESTED COPY OF THE WITHIN ORIGINAL WRIT SUMMONS AND COMPLAINT WITH KAREN ZERN, F.A.O. AT THE OFFICE OF THE BANKING COMMISSIONER, 250 CONSTITUTION PLAZA, HARTFORD, CT, DULY AUTHORIZED TO ACCEPT SERVICE FOR THE WITHIN NAMED DEFENDANT, **BRIAN FELDERSTEIN**, PURSUANT TO C.G.S. §36b-62(c).

THE WITHIN IS THE ORIGINAL WRIT SUMMONS AND COMPLAINT, WITH MY
DOINGS HEREON ENDORSED.

ATTEST:



BRIAN F. ZITO
STATE MARSHAL

FEES:

SERVICE	\$60.00
ENDS	6.40
PAGES	24.00
16 MILES	<u>8.60</u>
TOTAL	\$99.00

Re: Howard F. Pitkin, Banking Commissioner v. Blue Coast Financial Group, Inc., et al
Return Date: November 10, 2009