



OCC ALERT

Comptroller of the Currency
Administrator of National Banks

Subject: Securities Law Violations	Description: Unregistered Securities and Unlicensed Security Sales
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TO: Chief Executive Officers of All National Banks; All State Banking Authorities; Chairman, Board of Governors of the Federal Reserve System; Chairman, Federal Deposit Insurance Corporation; Conference of State Bank Supervisors; Deputy Comptrollers (districts); Assistant Deputy Comptrollers; District Counsel and Examining Personnel

RE: Architects of Wine, Grand Cayman, Cayman Islands

The Office of the Comptroller of the Currency (OCC) has received information regarding enforcement actions taken by multiple state regulatory authorities against the above-referenced entity for the sale of unregistered securities using unlicensed persons. A copy of a recent cease-and-desist order issued by the State of Arkansas Securities Department is attached for your information.

Be advised that banks may be approached to open a deposit account in which the sales proceeds of unregistered investments are deposited and then wired out of the country. Banks should exercise caution and perform appropriate due diligence prior to opening such deposit accounts. Be further advised that, as additional enforcement actions are taken against the entities involved, new company names are being used to engage in the same activities.

To date, the following entities have been identified:

Architects of Wine, Ltd, Caledonian House, 69 Dr. Roy's Drive, P.O. Box 1043, GT Georgetown, Grand Cayman, Cayman Islands, BWI;

Seed International, Ltd., 174 South Church Street, P.O. Box 1778, GT Grand Cayman, Cayman Islands, BWI, formerly known as Churchill Associates at the same address; and,

Ocean International Marketing, Ltd., De Leuve, Schiedamsedijk 42, 3011 ED Rotterdam, The Netherlands, formerly known as Heros Global Marketing, Ltd., of the same address.

Any information that you have concerning this matter should be brought to the attention of your state securities regulator or the U.S. Securities and Exchange Commission, as appropriate.

Any questions or comments regarding this alert or information that you feel should be brought to the OCC's attention may be sent to:

Mail: Office of the Comptroller of the Currency
Enforcement & Compliance Division, MS 8-10
250 E Street, SW, Washington, DC 20219
Fax: (202) 874-5301
Internet: <http://www.occ.treas.gov>
E-mail: occalertresponses@occ.treas.gov

Brian C. McCormally
Director
Enforcement & Compliance Division

Attachment: [State of Arkansas Securities Department Cease and Desist Order](http://www.occ.gov/static/news-issuances/alerts/2004/alert-2004-18-cd-order.pdf)
[<http://www.occ.gov/static/news-issuances/alerts/2004/alert-2004-18-cd-order.pdf>]