

**UNITED STATES OF AMERICA**  
**Before the**  
**SECURITIES AND EXCHANGE COMMISSION**  
**September 10, 2004**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-11640**

**In the Matter of**

**Allen Andrescu, Richard  
Brower, Mark Coates, Tejbir  
Singh, and Vikram Randhawa,**

**Respondents.**

**ORDER INSTITUTING PUBLIC  
ADMINISTRATIVE PROCEEDINGS AND  
NOTICE OF HEARING PURSUANT TO  
SECTION 15(b) OF THE SECURITIES  
EXCHANGE ACT OF 1934**

**I.**

The Securities and Exchange Commission (“Commission”) deems it appropriate and in the public interest that public administrative proceedings be, and hereby are, instituted pursuant to Section 15(b) of the Securities Exchange Act of 1934 (“Exchange Act”) against Allen Andrescu (“Andrescu”), Richard Brower (“Brower”), Mark Coates (“Coates”), Tejbir Singh (“Singh”), and Virkam Randhawa (“Randhawa”) (collectively, the “Respondents”).

**II.**

After an investigation, the Division of Enforcement alleges that:

**A. Respondents**

1. **Andrescu**, age 30, was the Chief Executive Officer (“CEO”) and sole owner of Renaissance Capital Management, Inc., (“Renaissance Capital”), a broker-dealer, from at least October 1997 to March 1999. Andrescu also identified himself as either the CEO or President of NNPD Escrow. From 1994 to 1997, Andrescu was, successively, a registered representative of Continental Broker-Dealer Corp. (“Continental”), Gruntal & Company, A.S. Goldman & Co., First Cambridge Securities Corp., L.B. Saks, Inc. (“L.B. Saks”), Baxter Banks & Smith, LTD, Renaissance Capital, First Montauk Securities Corp. (“First Montauk”), Sunpoint Securities Inc. (“Sunpoint”), and Lloyd Wade Securities Inc. (“Lloyd Wade”), all registered broker-dealers.

Andrescu lives in Merrick, New York. Andrescu holds a series 7 license, and held a series 63 license, which expired in 1994.

2. **Brower**, age 30, was a registered-representative of Continental Broker Dealer Corp. from December 1999 to December 2000. From May 1997 to June 1998, while employed by Renaissance Capital, Brower was a registered representative of First Montauk, Sunpoint, and Lloyd Wade, all broker-dealers registered with the Commission. From October 1993 to December 1996, before working at Renaissance Capital, Brower was a registered representative of Continental Broker-Dealer Corp., Bishop Allen, Inc., and R.T.G. Richards and Company, Inc., all registered broker-dealers. Brower lives in Merrick, New York and holds series 7 and series 63 licenses.

3. **Coates**, age 32, was a registered representative of Global Capital Securities Corp., a registered broker-dealer from June 2000 to March 2001. From February 1998 to June 2000, Brower was a registered representative at New Times Securities Services, Inc., and Wolff Investment Group Inc. From May 1997 to January 1998, while working at Renaissance Capital, Coates was successively a registered representative of First Montauk, Sunpoint, and Lloyd Wade. Between February 1994 and May 1997, before working at Renaissance Capital, Coates was a registered representative of Continental, Bishop Allen, GKN Securities Corp., and L.B. Saks. Coates lives in Hempstead, New York and holds series 4, series 7, and series 63 licenses.

4. **Randhawa**, age 33, previously lived in Albertson, New York. From June 1997 to October 1997, while at Renaissance Capital, Randhawa was a registered representative of First Montauk and then Sunpoint. From February 1994 to June 1997, before his employment at Renaissance Capital, Randhawa was a registered representative of Continental. Randhawa holds series 7 and series 63 licenses.

5. **Singh**, age 26, according to the NASD's Central Registration Depository, is also known by the names "Raj Nanvaan," "Richard Powers" and "Raj Anderson." Singh used the name Raj Nanvaan when speaking with investors. From July 1998 to March 2000, Singh was a registered representative and branch manager of Baxter Banks' branch office in Flushing, New York. From February 1998 to June 1998, while at Renaissance Capital, Singh was a registered representative of Lloyd Wade. From December 1997 to January 1998, before his employment at Renaissance Capital, Singh was a registered representative of Bernard, Lee & Edwards, Inc., a registered broker-dealer. Singh lives in West Babylon, New York and holds series 7, series 24, and series 63 licenses.

## **B. Relevant Entity**

**Renaissance Capital** was incorporated in New York in April 1997 and was a registered broker-dealer. Until April 1999, Renaissance Capital had offices in Farmingdale, New York. From July 1998 to June 1999, Renaissance Capital was a registered branch office of Baxter, Banks. At different times between April 1997 and July 1998, Renaissance Capital was a registered branch office of three other registered broker-dealers: First Montauk, Sunpoint, and Lloyd Wade.

### **C. Injunctive Action**

1. The Commission filed SEC v. Renaissance Capital Management, Inc., et al., 00 Civ. 1848 (E.D.N.Y.) (“Injunctive Action”), alleging, inter alia: (a) that from at least October 1997 to at least March 1999, Respondents induced the investing public to buy at least \$2.4 million worth of shares of stock issued by NNPD Textiles, Inc. (“NNPD”), a now-defunct New York corporation that was in the business of manufacturing sweaters; (b) that Respondents solicited investors through a series of false or misleading statements including, inter alia, that NNPD would be imminently conducting an IPO and investors could resell their private placement shares at a substantial profit; and (c) that Respondents distributed offering memoranda to investors even though Respondents knew or were reckless in not knowing that the offering memoranda contained material misstatements and omissions. The Commission’s complaint charged that the Respondents violated Sections 5 and 17(a) of the Securities Act of 1933 and Section 10(b) of the Exchange Act.

2. On April 17, 2001, the United States District Court for the Eastern District of New York granted the Commission’s motion for summary judgment against Andrescu and Randhawa in the Injunctive Action, which, inter alia: (a) permanently enjoined Andrescu and Randhawa from future violations of Sections 5(a), 5(c), and 17(a) of the Securities Act of 1933 (“Securities Act”) and Section 10(b) of the Exchange Act, and Rule 10b-5 thereunder; (b) ordered Andrescu to disgorge \$1,599,722 of ill-gotten gains derived from his fraudulent conduct, plus \$277,969 in pre-judgment interest, and pay a civil penalty in the amount of \$100,000; and (c) ordered Randhawa to disgorge \$278,330 of ill-gotten gains derived from his fraudulent conduct, plus \$48,363 in pre-judgment interest, and pay a civil penalty in the amount of \$100,000.

3. On March 29, 2003, the district court in the Injunctive Action granted the Commission’s application for summary judgment against Brower, Coates, and Singh, the remaining defendants, which, inter alia, permanently enjoined each of them from future violations of Sections 5(a), 5(c), and 17(a) of the Securities Act and Section 10(b) of the Exchange Act, and Rule 10b-5 thereunder. On October 31, 2003, the district court in the Injunctive Action ordered the following monetary relief: Brower was ordered to disgorge \$105,250 of ill-gotten gains derived from his fraudulent conduct, plus \$53,536.53 in pre-judgment interest, and pay a civil penalty in the amount of \$105,520; Coates was ordered to disgorge \$26,650 of ill-gotten gains derived from his fraudulent conduct, plus \$13,423.34 in pre-judgment interest, and pay a civil penalty in the amount of \$26,650; and Singh was ordered to disgorge \$10,000 of ill-gotten gains derived from his fraudulent conduct, plus \$4,273.26 in pre-judgment interest, and pay a civil penalty in the amount of \$10,000.

### **III.**

In view of the allegations made by the Division of Enforcement, the Commission deems it necessary and appropriate and in the public interest that public administrative proceedings be instituted to determine:

A. Whether the allegations set forth in Section II are true and, in connection therewith, to afford each of the Respondents an opportunity to establish any defenses to such allegations;

B. What, if any, remedial action is appropriate and in the public interest against each of the Respondents pursuant to Section 15(b) of the Exchange Act including, but not limited to disgorgement and civil penalties pursuant to Section 21B of the Exchange Act.

#### IV.

**IT IS ORDERED** that a public hearing for the purpose of taking evidence on the questions set forth in Section III hereof shall be convened at a time and place to be fixed and before an Administrative Law Judge to be designated by further order as provided by Rule 200 of the Commission's Rules of Practice, 17 C.F.R. § 201.200.

**IT IS FURTHER ORDERED** that each Respondent shall file an Answer to the allegations contained in this Order within twenty (20) days after service of this Order, as provided by Rule 220 of the Commission's Rules of Practice, 17 C.F.R. § 201.220.

If any Respondent fails to file the directed answer, or fails to appear at a hearing after being duly notified, the Respondent may be deemed in default and the proceedings may be determined against him upon consideration of this Order, the allegations of which may be deemed to be true as provided by Rules 155(a), 220(f), 221(f) and 310 of the Commission's Rules of Practice, 17 C.F.R. §§ 201.155(a), 201.220(f), 221(f), and 201.310.

This Order shall be served forthwith upon each of the Respondents personally or by certified mail.

**IT IS FURTHER ORDERED** that an Administrative Law Judge shall issue an initial decision no later than 210 days from the date of the service of this Order, pursuant to Rule 360(a)(2) of the Commission's Rules of Practice.

In the absence of an appropriate waiver, no officer or employee of the Commission engaged in the performance of investigative or prosecuting functions in this or any factually related proceeding will be permitted to participate or advise in the decision of this matter, except as witness or counsel in proceedings held pursuant to notice. Since this proceeding is not "rule making" within the meaning of Section 551 of the Administrative Procedure Act, it is not deemed subject to the provisions of Section 553 delaying the effective date of any final Commission action.

For the Commission, by its Secretary, pursuant to delegated authority.

Jonathan G. Katz  
Secretary