

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SUSAN GAFFNEY, in her official capacity
as Inspector General, U.S. Department of
Housing and Urban Development,
451 7th Street, S.W.
Washington, D.C. 20410,

Petitioner,

v.

THE HAMILTON SECURITIES
GROUP, INC., and HAMILTON
SECURITIES ADVISORY
SERVICES, INC.,
7 DuPont Circle, N.W.
Washington, D.C. 20036,

Respondents

Misc. No. _____

FILED UNDER SEAL

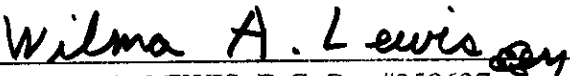
**MOTIONS FOR TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

The Inspector General of the United States Department of Housing and Urban Development ("HUD"), the Petitioner in the above-captioned case, by her undersigned attorneys, hereby moves that this Court enter a temporary restraining order and a preliminary injunction requiring The Hamilton Securities Group, Inc. and Hamilton Securities Advisory Services, Inc., the Respondents herein, to deposit with this Court all original financial records, "non-HUD business" records, backup tapes, and all other materials demanded by the subpoenas issued to Respondents by HUD's Office of Inspector General ("OIG"), pending this Court's decision on the merits of the Inspector General's petition for summary enforcement of those subpoenas, which is being filed simultaneously herewith. Further, the


Inspector General moves that this Court also require Respondents to preserve any and all other records that Respondents have not yet identified as being responsive to the subpoenas.

The grounds for these motions are described in the accompanying memorandum of points and authorities. A proposed Order consistent with the requested relief is also submitted herewith.

Respectfully submitted,



WILMA A. LEWIS, D.C. Bar #358637
United States Attorney



DANIEL F. VAN HORN, D.C. Bar #924092
Assistant United States Attorney

OF COUNSEL:

JUDITH HETHERTON
Counsel to the Inspector General
BRYAN SADDLER
Assistant Counsel to the Inspector General
U.S. Department of Housing and Urban Development
451 7th St., S.W. -- Room 8260
Washington, D.C. 20410
(202) 708-1613