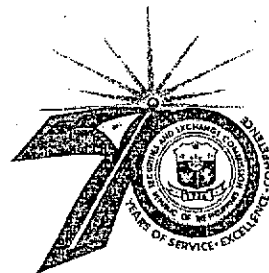


Republic of the Philippines  
Department of Finance  
**Securities and Exchange Commission**  
SEC Bldg. EDSA, Greenhills, Mandaluyong City



CORPORATION FINANCE DEPARTMENT

SEC-CFD ORDER NO. 020  
SERIES OF 2008

IN THE MATTER OF  
**LEGACY HY FUND, INC.**

Violation of Section 17.1 of the Securities  
Regulation Code

X-----X

**ORDER ON PAYMENT OF PENALTY**

The records on file with this Commission show that **Legacy HY Fund, Inc.** failed to file its 2007 2<sup>nd</sup> Quarter Report (SEC Form 17-Q) for the period ended October 31, 2007, within the period prescribed by SRC Rule 17.1(1)(A)(ii).

As a result, the company was ordered to pay a fine of **Eighty Four Thousand Pesos (P84,000.00)**, which it paid on February 18, 2008 as shown by Official Receipt No. 0135799, dated February 18, 2008.

The company is admonished to take all appropriate measures to ensure its faithful and timely compliance with SRC Rule 17.1. Any further violation shall subject the company and/or its responsible officers to heavier penalties as may be provided by law.

**SO ORDERED.**

EDSA, Greenhills, Mandaluyong City, Philippines, February 20, 2008.

  
**JUSTINA F. CALLANGAN**  
Director