

Inc., The Net Worth Group, Inc., TNT Office Supply, Inc., Sovereign Capital Investments, S.A. and The Liberty Establishment, Inc. and Joshua Tree Group LLC (collectively "Defendants") and Relief Defendants Banner Shield LLC, Hospitality Management Group, Inc., Creative Wealth Ventures, LLC and JTA Enterprises (collectively "Relief Defendants") and would respectfully show the Court as follows:

I. Summary

1. This matter involves an ongoing fraudulent "high yield investment program" or "prime bank" scheme. The Defendants and their associated entities have offered and sold investments totaling possibly as much as \$36 million in purported foreign and international bank deposit programs (collectively, "Bank Deposit programs") to hundreds of investors throughout the United States.

2. Defendants entice investors by promising monthly returns of four to 12 percent, with "no risk" to their investment principal. Investors are also promised and paid "intermediary fees" for referring new investors.

3. In fact, the Bank Deposit programs do not exist and Defendants are conducting a massive "Ponzi" scheme with all of the investor funds commingled among various Correll-controlled accounts, and the "investment returns" paid to investors from the proceeds of more recent investors.

4. It now appears that the "Ponzi" scheme may have collapsed. The promised monthly returns have not been paid to the investors since September 2005. Correll and others have falsely advised complaining investors that the Commission has frozen their bank accounts as a

“necessary step” in the process of “registering” the Bank Deposit programs in accord with the federal securities laws. Other investors have been told that the funds have been frozen under provisions of the Patriot Act.

5. Although investors are no longer receiving payments, during the week of November 21, 2005, at least one of the accounts controlled by Correll was still receiving new investor deposits.

6. By reason of these activities, Defendants have violated Sections 5(a), 5(c) and 17(a) of the Securities Act of 1933 (“Securities Act”) [15 U.S.C. §§ 77e(a), 77e (c) and 77q(a)], Section 10(b) of the Securities Exchange Act of 1934 (“Exchange Act”), [15 U.S.C. §78j(b)] and Rule 10b-5 thereunder, [17 C.F.R. § 240.10b-5]. The Commission, in the interest of protecting the public from any further fraudulent activity, brings this action against Defendants Travis E. Correll, individually and d/b/a Horizon Establishment, Gregory W. Thompson, Harry Robinson “Robbie” Gowdey, individually and d/b/a Atlas and Jericho Productions, Dwight J. Johnson, Neulan D. Midkiff, Travis Correll & Co., Inc., The Net Worth Group, Inc., TNT Office Supply, Inc., Joshua Tree Group LLC seeking temporary, preliminary and permanent injunctive relief, disgorgement of illicit profits, plus accrued prejudgment interest and a civil monetary penalty. Additionally, the Commission is seeking permanent injunctive relief, disgorgement of illicit profits, plus accrued prejudgment interest and a civil monetary penalty from Defendants Grant Cardno, Sovereign Capital Investments, S.A. and The Liberty Establishment, Inc. Further, the Commission is seeking disgorgement, plus prejudgment interest, from Relief Defendants, entities to which Defendants have without consideration diverted investor funds. Finally, the

Commission seeks an asset freeze against Defendants Travis E. Correll, individually and d/b/a Horizon Establishment, Gregory W. Thompson, Harry Robinson "Robbie" Gowdey, individually and d/b/a Atlas and Jericho Productions, Dwight J. Johnson, Neulan D. Midkiff, Travis Correll & Co., Inc., The Net Worth Group, Inc., TNT Office Supply, Inc., Joshua Tree Group LLC and each Relief Defendant, an accounting and other incidental relief, including the appointment of a receiver to take possession of certain Defendants' and each Relief Defendants' assets so that investor assets will not be further dissipated.

II. Jurisdiction

7. The Commission brings this action pursuant to the authority conferred upon it by Section 20(b) of the Securities Act [15 U.S.C. §77t(b)] and Section 21(d) of the Exchange Act [15 U.S.C. §78u(d)] to enjoin Defendants from future violations of the federal securities laws and to obtain disgorgement of ill-gotten gains, plus prejudgment interest. The Commission seeks the imposition of civil penalties pursuant to Section 20(d) of the Securities Act [15 U.S.C. §77t(d)] and Section 21(d) of the Exchange Act [15 U.S.C. §78u(d)]. The Commission is also seeking disgorgement, plus prejudgment interest, from the Relief Defendants, regarding all funds derived, directly or indirectly, from the Defendant's fraudulent conduct.

8. This Court has jurisdiction over this action pursuant to §22(a) of the Securities Act [15 U.S.C. §77v(a)] and §27 of the Exchange Act [15 U.S.C. §78(aa)] and Title 28 U.S.C. §1331. Defendants, directly and indirectly, made use of the mails and of the means and instrumentalities of interstate commerce in connection with the acts, practices and courses of business described in this *Complaint*.

9. Venue is proper because many of the transactions, acts, practices and courses of business described below occurred within the jurisdiction of the Eastern District of Texas.

III. Defendants

10. Travis E. Correll, age 29, a resident of Atlanta, claims to be a business consultant doing business as Horizon Establishment in connection with the World Bank programs. Correll asserted his Fifth Amendment Privilege in response to the Commission's subpoenas for documents and testimony. Correll is not registered with the Commission in any capacity.

11. Travis Correll & Co., Inc. ("TC&Co") is a Georgia corporation with its principal place of business located in Suwanee, Georgia that claims to be a "a diversified investment company." TC&Co. is not registered with the Commission in any capacity.

12. The Net Worth Group, Inc. ("Net Worth Group"), a Georgia corporation with its principal place of business in Atlanta, was established on May 25, 2005. Correll, Net Worth Group's registered agent, is also a signatory on its bank account. Net Worth Group is not registered with the Commission in any capacity.

13. Gregory W. Thompson, age 52, resides in San Antonio, Texas, and is the president and director of TNT. Thompson asserted his Fifth Amendment Privilege in response to the Commission's subpoenas for documents and testimony. Thompson is not registered with the Commission in any capacity.

14. TNT Office Supply, Inc. ("TNT"), is a Texas incorporated office supply company located in San Antonio. TNT's bank account, which is used to pool investor funds and to pay investment returns, is controlled by Thompson. TNT has refused to produce any documents in

response to the Commission's subpoena. TNT is not registered with the Commission in any capacity.

15. Harry Robinson "Robbie" Gowdey, age 53, resides in Frisco, Texas, and is doing business as Atlas and Jericho Productions in connection with the World Bank programs. From June 1983 through December 1988, Gowdey was an associated person with various Commission registered broker-dealers and held Series 6, Series 22, Series 24, Series 39, Series 62 and Series 63 securities licenses. On October 3, 1989, the NASD revoked Gowdey's registration for his failure to pay fines and costs relating to its complaint against him. Gowdey asserted his Fifth Amendment Privilege in response to the Commission's subpoenas for documents and testimony. Gowdey is not registered with the Commission in any capacity.

16. Dwight J. Johnson, age 61, resides in Garland, Texas, and is Thompson's uncle. Johnson asserted his Fifth Amendment Privilege in response to the Commission's subpoenas for documents and testimony. Johnson is not registered with the Commission in any capacity, and has no disciplinary history.

17. Grant Cardno, age unknown, is believed to be a resident of Norfolk Island, a territory of the Commonwealth of Australia. Cardno is not registered with the Commission in any capacity.

18. Sovereign Capital Investments, S.A. ("Sovereign"), is a purported international business corporation, apparently under Cardno's control, and located on Norfolk Island. Sovereign is not registered with the Commission in any capacity.

19. The Liberty Establishment Inc. (“Liberty”) is purported to be registered in the British Virgin Islands for “Service to Humanitarian Ideals.” It is apparently under Cardno’s control and located on Norfolk Island. Liberty is not registered with the Commission in any capacity.

20. Neulan D. Midkiff, age 63, resides in Forest Lake, Minnesota. He is not registered with the Commission in any capacity.

21. Joshua Tree Group, LLC (“Joshua Tree”), with an address in Carson City, Nevada, is a limited liability company. Its members are Nuelan Midkiff and his wife, Donna Midkiff. Joshua Tree is not registered with the Commission in any capacity.

IV. Relief Defendants

22. Banner Shield LLC was a Nevada limited liability company until its charter was revoked on October 1, 2002. Gowdey and his wife, Dianna Gowdey, were listed as its members. Bank records show that from July 2004 through October 2005, Banner Shield received nearly \$450,000 from TNT. Banner Shield is not registered with the Commission in any capacity.

23. Hospitality Management Group, Inc. is a Nevada corporation with its principal place of business in Las Vegas, Nevada. Between July 2004 and October 2005, Hospitality Management Group received over \$3.8 million from TNT and from bank accounts controlled by Correll. Hospitality Management is not registered with the Commission in any capacity.

24. Creative Wealth Management LLC is a Burnsville, Minnesota limited liability company that, from July 2004 through October 2005, received over \$2.6 million from TNT and

from bank accounts controlled by Correll. Creative Wealth Management is not registered with the Commission in any capacity.

25. JTA Enterprises, Inc. is a sole proprietorship located in Denville, New Jersey. Between July 2004 and September 2005, JTA received over \$2.1 million from TNT and from bank accounts controlled by Correll. JTA Enterprises is not registered with the Commission in any capacity.

V. Statement of Facts

A. The Fraudulent Bank Deposit Programs

1. Correll and Cardno's "Trading" Program

26. Since at least July 2004, Correll, through Horizon Establishment, has offered and sold interests in Bank Deposit programs to hundreds of investors.

27. In his sales pitch, Correll claims that he has access to investment in programs involving the overnight trading of bank-issued notes. Correll tells prospective investors that he sends the funds, usually in increments of \$5 million to \$10 million, to Cardno, who he refers to as the "trader" and who purportedly has contracts with the banks to participate in the purported trading programs.

28. Cardno has visited the United States several times over the course of the fraudulent scheme. During those visits, he has met with investors, usually accompanied by Correll. In these investor meetings, Cardno stated that individuals who wanted to invest \$1 million or more could invest directly through him.

29. Correll and Cardno portray themselves as “good Christians” and philanthropists who donate to charitable causes, typically associated with churches and other religious organizations.

30. Correll and Cardno tell investors that their principal is not at risk because it is deposited in a reserve bank account, where, according to them, it remains intact.

31. Correll represents to investors that the programs pay a monthly return of 5 to 10 percent beginning 45 to 70 days after receipt of the principal.

32. In addition to the monthly returns, Correll promises intermediary fees to investors for inducing other investors to invest in the programs.

33. The term of the purported Bank Deposit programs ranges anywhere from four to 12 months, with most of the programs having 12-month terms.

34. Some investors received calendars from Correll highlighting the dates upon which they would receive their monthly payments.

35. To participate in the Bank Deposit programs, investors typically execute a One Year Funds Management Agreement (“Agreement”). The Agreement, on Horizon Establishment’s letterhead, identifies Sovereign as the “manager” of the funds. Pursuant to the Agreement, Liberty is appointed “Trustee,” and Sovereign is authorized to engage traders and facilitate and effect all types of securities transactions.

36. The Agreement additionally promises that the investors’ funds “always stay in a state of non-depletion.” Correll and Cardno repeatedly assure investors that their investment principal will remain safe.

37. In April 2005, Correll, in lieu of Horizon Establishment, began using TC&Co. and Net Worth Group as conduits for investor proceeds; and thereafter, investors' funds were sent to bank accounts in the name of TC&Co. or Net Worth Group. Some of the funds were then forwarded to the Horizon Establishment account.

38. In the spring of 2005, Correll advised investors that Cardno would be "retiring" and that Correll would become the "trader." Correll told investors that, as a consequence of this change, the returns might initially be lower, but that after a short period of time, the returns would probably increase to a level higher than before the change.

2. Thompson, Johnson & Gowdey's "Loan" Program

39. Since approximately July 2004, Thompson, Johnson and Gowdey have raised approximately \$36 million from hundreds of investors, all deposited into TNT accounts, for purported "investment" in Bank Deposit programs.

40. Although investors' funds were initially sent to TNT, virtually all of the funds were eventually transferred to various Horizon Establishment bank accounts controlled by Correll.

41. Thompson, Johnson and Gowdey market the programs orally, by phone or, more typically, in one-on-one meetings; however, on at least one occasion, they arranged for a luncheon with Correll and approximately 25 current and prospective investors in the Dallas area. During this luncheon, Correll discussed the Bank Deposit programs.

42. Much like Correll and Cardno, Thompson, Johnson and Gowdey describe in their sales pitch a "private banking investment opportunity" in which investor funds are "pooled" and

then forwarded to Correll, the “money manager,” who transfers the funds to Cardno, a New Zealand resident.

43. Their explanation of how returns are generated however, differs from the one offered by Correll and Cardno. They claim that Cardno has an exclusive arrangement with “The World Bank” or other major international banks to participate in “loan programs.” More specifically, they tell the investors that Cardno deposits investor funds into offshore reserve accounts; that international banks leverage the value of these accounts tenfold, by pledging the funds as collateral for loans to Third World countries.

44. Thompson, Johnson and Gowdey represent to the investors that these loans earn substantial profits that are then shared with the investors in the form of monthly returns, and as further enticement offer that the investors can earn “intermediary fees” by referring other investors.

45. To lend an air of legitimacy to TNT’s operation, Thompson, who controls TNT, includes “Forms 1099 MISC” with TNT’s monthly investor returns.

46. Thompson, Johnson and Gowdey tell prospective investors that their investment principal remains intact, that the program generates monthly returns of four to 12 percent, and that, over the last four to five years, investors have not failed to receive their monthly payments.

47. Thompson, Johnson and Gowdey convinced some investors, who had previously sent money directly to Correll, that they would earn higher returns if they rolled-over or invested new funds through TNT. They claimed that, because TNT brought in so many investors, it could negotiate a “better deal” with Correll.

3. Midkiff and Joshua Tree

48. Nuelan Midkiff is a member of Joshua Tree, a limited liability company located in Carson City, Nevada. Midkiff induced individuals to invest in the Bank Deposit programs touted by Correll.

49. Midkiff received a referral fee for his efforts, and bank records reflect that approximately \$2.55 million flowed into Correll-controlled bank accounts from two Joshua Tree accounts.

C. Representations about the Bank Deposit Programs are False

50. Representations made to investors by Cardno, Correll, Thompson, Gowdey, Johnson and Midkiff about the Bank Deposit programs are materially false and misleading. Most notably, none of the investors' funds have been transferred offshore to Cardno or to any other individual or entity for use in a trading program.

51. Representations made to the investors by Cardno, Correll, Thompson, Gowdey, Johnson and Midkiff concerning the nature of their purported investment returns are materially false and misleading. Payments did not derive from earnings, as claimed, but rather were merely distributions from the funds of other investors.

52. Most fundamentally, Cardno, Correll, Thompson, Gowdey, Johnson and Midkiff fail to disclose the existence of their investment programs and fail to disclose the true source of returns to investors.

E. Relief Defendants receive funds from the Fraud

53. Banner Shield received over \$450,000; Hospitality Management received over \$3.8 million; Creative Wealth received over \$2.6 million; and JTA Enterprises received over \$2.1 million from accounts controlled by Correll without any apparent consideration.

F. Defendants' Recent Fraudulent Actions

54. Defendants' Bank Deposit programs apparently have recently collapsed. The last monthly payments to investors were made in September 2005.

55. Since payments stopped, Correll and other defendants, in response to investor complaints, have falsely claimed that the Commission has frozen their bank accounts as part of the normal process of "registering" the Bank Deposit programs under regulations of the federal securities laws. Correll has made no attempt to register any securities offering or class of securities with the Commission.

56. Correll has told a different story to other investors, falsely advising that their funds have been frozen under provisions of the Patriot Act.

57. As recently as November 18, 2005, Correll has claimed that the investors' principal remains safely deposited "offshore" with the Royal Bank of Canada ("RBC"). In fact, although Horizon Establishment and other Correll controlled entities have accounts with a subsidiary of RBC, these accounts are located in Atlanta and have combined balances of less than \$8,000.

58. Finally, as of November 22, 2005, bank records of Net Worth Group show that Correll is still raising money and has raised at least \$100,000 in the last two weeks.

CLAIMS

FIRST CLAIM

Violations of Section 10(b) of the Exchange Act and Rule 10b-5 thereunder

Plaintiff Commission repeats and incorporates paragraphs 1 through 68 of this *Complaint* by reference as if set forth *verbatim*.

59. Defendants, directly or indirectly, singly or in concert with others, in connection with the purchase and sale of securities, by use of the means and instrumentalities of interstate commerce and by use of the mails (a) has employed devices, schemes and artifices to defraud, (b) has made untrue statements of material facts and have omitted to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading and (c) has engaged in acts, practices and courses of business which operate as a fraud and deceit upon purchasers, prospective purchasers and other persons.

60. As a part of and in furtherance of his scheme to defraud, Defendants, directly and indirectly, prepared, disseminated, used, issued and made oral presentations, false and misleading account statements, written offering documents, promotional materials, investor and other correspondence, which contained untrue statements of material facts and misrepresentations of material facts and which omitted to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading, including, but not limited to, those set forth above.

61. Defendants made these misrepresentations and omissions knowingly or with severe recklessness.

62. By reason of the foregoing, Defendants have violated and, unless enjoined, will continue to violate, Section 10(b) of the Exchange Act [15 U.S.C. §78j(b)] and Rule 10b-5 [17 C.F.R. §240.10b-5] thereunder.

SECOND CLAIM

Violations of Section 17(a) of the Securities Act

63. Plaintiff Commission repeats and incorporates paragraphs 1 through 68 of this *Complaint* by reference as if set forth *verbatim*.

64. Defendants, directly or indirectly, singly or in concert with others, in the offer and sale of securities, by use of the means and instruments of transportation and communication in interstate commerce and by use of the mails, has (a) employed devices, schemes or artifices to defraud; (b) obtained money or property by means of untrue statements of material fact or omissions to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading; and (c) engaged in transactions, practices or courses of business which operate or would operate as a fraud or deceit.

65. As part of and in furtherance of this scheme, Defendants, directly and indirectly, prepared, disseminated, used, issued and made oral presentations, false and misleading account statements, written offering documents, promotional materials, investor and other correspondence, which contained untrue statements of material fact and which omitted to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading, including, but not limited to, those statements and omissions set forth above.

66. Defendants made the above-referenced misrepresentations and omissions knowingly or with severe recklessness. Defendants, in addition, were negligent in connection with their offer and sale of the securities alleged in this *Complaint*.

67. By reason of the foregoing, the Defendants have violated, and unless enjoined, will continue to violate Section 17(a) of the Securities Act [15 U.S.C. §77q(a)].

THIRD CLAIM

Violations of Sections 5(a) And 5(c) of the Securities Act

68. Plaintiff Commission repeats and incorporates paragraphs 1 through 68 of this *Complaint* by reference as if set forth *verbatim*.

69. Defendants, directly or indirectly, singly or in concert with others, have been offering to sell, selling and delivering after sale, certain securities and have been, directly and indirectly, (a) making use of the means and instruments of transportation and communication in interstate commerce and of the mails to sell securities, through the use of written contracts, offering documents and otherwise, (b) carrying and causing to be carried through the mails and in interstate commerce by the means and instruments of transportation such securities for the purpose of sale and for delivery after sale, and (c) making use of the means or instruments of transportation and communication in interstate commerce and of the mails to offer to sell such securities.

70. No registration statement has been filed with the Commission or is otherwise in effect with respect to the offer and sale of any securities described herein.

71. By reason of the foregoing, Defendants have violated and, unless enjoined, will continue to violate Sections 5(a) and 5(c) of the Securities Act [15 U.S.C. §§ 77e(a) and 77e (c)].

FOURTH CLAIM

Claims against the Relief Defendants as Custodians of Investor Funds

72. Plaintiff Commission repeats and incorporates paragraphs 1 through 68 of this *Complaint* by reference as if set forth *verbatim*.

73. Relief Defendants received, directly or indirectly, funds and/or other benefits from Defendants, which either are the proceeds of, or are traceable to the proceeds of, the unlawful activities alleged herein and to which they have no legitimate claim to these funds and property.

74. Relief Defendants obtained the funds and property as part of and in furtherance of the securities violations alleged and under circumstances in which it is not just, equitable or conscionable for them to retain the funds and property, and accordingly, they have been unjustly enriched.

75. The Commission is entitled to an order requiring that Relief Defendants disgorge these funds and property plus prejudgment interest thereon.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court:

I.

Enter a temporary restraining order restraining Defendants Travis E. Correll, individually and d/b/a Horizon Establishment, Gregory W. Thompson, Harry Robinson "Robbie" Gowdey, individually and d/b/a Atlas and Jericho Productions, Dwight J. Johnson, Neulan D. Midkiff, Travis Correll & Co., Inc., The Net Worth Group, Inc., TNT Office Supply, Inc., Joshua Tree

Group LLC from continuing violations of Sections 5(a), 5(c) and 17(a) of the Securities Act [15 U.S.C. §§ 77e(a), 77e (c) and 77q(a)] and Section 10(b) of the Exchange Act [15 U.S.C. §78j(b)] and Rule 10b-5 thereunder [17 C.F.R. §240.10b-5].

II.

Enter a preliminary injunction enjoining Defendants Travis E. Correll, individually and d/b/a Horizon Establishment, Gregory W. Thompson, Harry Robinson “Robbie” Gowdey, individually and d/b/a Atlas and Jericho Productions, Dwight J. Johnson, Neulan D. Midkiff, Travis Correll & Co., Inc., The Net Worth Group, Inc., TNT Office Supply, Inc., Joshua Tree Group LLC from further violations of Sections 5(a), 5(c) and 17(a) of the Securities Act [15 U.S.C. §§ 77e(a), 77e (c) and 77q(a)] and Section 10(b) of the Exchange Act [15 U.S.C. §78j(b)] and Rule 10b-5 thereunder [17 C.F.R. §240.10b-5].

III.

Permanently enjoin each Defendant and their agents, servants, employees, attorneys and all persons in active concert or participation with him who receive actual notice of the injunction by personal service or otherwise, and each of them, from future violations of Sections 5(a), 5(c) and 17(a) of the Securities Act [15 U.S.C. §§ 77e(a), 77e (c) and 77q(a)] and Section 10(b) of the Exchange Act [15 U.S.C. §78j(b)] and Rule 10b-5 thereunder [17 C.F.R. §240.10b-5].

IV.

Require a full and accurate accounting and an interim asset freeze of all assets of Defendants Travis E. Correll, individually and d/b/a Horizon Establishment, Gregory W. Thompson, Harry Robinson “Robbie” Gowdey, individually and d/b/a Atlas and Jericho

Productions, Dwight J. Johnson, Neulan D. Midkiff, Travis Correll & Co., Inc., The Net Worth Group, Inc., TNT Office Supply, Inc., Joshua Tree Group LLC and each Relief Defendant until a full and accurate accounting can be made of all investor monies raised in this scheme and a determination made as to the disposition of those assets.

V.

Enter and order *instanter* that Defendants Travis E. Correll, individually and d/b/a Horizon Establishment, Gregory W. Thompson, Harry Robinson "Robbie" Gowdey, individually and d/b/a Atlas and Jericho Productions, Dwight J. Johnson, Neulan D. Midkiff, Travis Correll & Co., Inc., The Net Worth Group, Inc., TNT Office Supply, Inc., Joshua Tree Group LLC and each Relief Defendant be restrained and enjoined from destroying, removing, mutilating, altering, concealing or disposing of, in any manner, any of their books and records or documents relating to the matters set forth in the *Complaint*, or the books and records and such documents of any entities under their control, until further order of the Court;

VI.

Enter an order that the parties may commence discovery immediately, and that notice periods be shortened to permit the parties to require production of documents or to take oral depositions on seventy-two (72) hours notice by facsimile or personal service;

VII.

Order each Defendant to disgorge an amount equal to the funds and benefits obtained as a result of the violations alleged, plus prejudgment interest on that amount, and each Relief Defendant to disgorge an amount equal to the funds and benefits obtained directly or indirectly,

from the Defendants, which either are the proceeds of, or are traceable to the proceeds of, the unlawful activities alleged herein, plus prejudgment interest on that amount.

VIII.

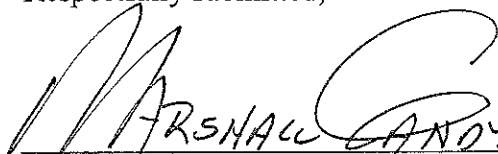
Order civil penalties against each Defendant pursuant to Section 20(d) of the Securities Act, Section 21(d)(3) of the Exchange Act for violations of the federal securities laws as alleged herein; and

IX.

Such other and further relief as the Commission may show itself entitled.

Dated: December 7, 2005.

Respectfully submitted,

A handwritten signature in black ink that reads "MARSHALL GANDY". The signature is stylized with large, sweeping loops.

MARSHALL GANDY
Lead Attorney
Texas Bar No. 07616500
SECURITIES AND EXCHANGE COMMISSION
Burnett Plaza, Suite 1900
801 Cherry Street, Unit #18
Fort Worth, TX 76102-6882
(817) 978-6464
(817) 978-4927 (fax)
gandym@sec.gov

Of Counsel:

KATHERINE S. ADDLEMAN

JEFFREY A. COHEN

DOUGLAS A. GORDIMER

RONDA J. BLAIR

SECURITIES AND EXCHANGE COMMISSION

Fort Worth District Office

Burnett Plaza, Suite 1900

801 Cherry Street, Unit #18

Fort Worth, TX 76102-6882