

TRAVIS J. ILES
SECURITIES COMMISSIONER



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Texas State Securities Board

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MEMBER

IN THE MATTER OF §
TRAVCO OIL AND GAS, LLC; TRAVIS JORDAN; TOM §
DARCY; TIMELESS PROTECT, LLC; DUANE LEE; §
SUNIL JOSEPH AKA JOSEPH SUNIL AND PAUL JAMES §

Order No. ENF-CDO-20-1795

Travco Oil and Gas, LLC, is being served by certified mail, return receipt requested, to 2304 Elm Valley Drive, Little Elm, Texas 75068, and 4645 Wyndham Lane, Suite 260 B, Frisco, Texas 75033, by certified mail, return receipt requested, to Travis Jordan, its Manager, at 4301 Rancho Del Norte Trail, McKinney, Texas 75070, and by certified mail, return receipt requested, to Travis Jordan, its Registered Agent for Service of Process, at 14842 Alstone Drive, Frisco, Texas 75035.

Travis Jordan is being served by certified mail, return receipt requested, to his attention at the addresses for Travco Oil and Gas, LLC, and the registered agent for Travco Oil and Gas, LLC.

Tom Darcy is being served by certified mail, return receipt requested, to his attention at the addresses for Travco Oil and Gas, LLC, and the registered agent for Travco Oil and Gas, LLC.

Timeless Protect, LLC, is being served by certified mail, return receipt requested, to 519 Cooper Industrial Parkway, Apopka, Florida 32703; 2000 Argentinia Road Plaza One, Suite 301, Mississauga, Ontario, Canada L5N 1P7 and 618 East South Street, Suite 500, Orlando, Florida 32801, and by certified mail, return receipt requested, to Duane Lee, its registered agent in Florida, at 6965 Piazza Grande Avenue, Suite 407, Orlando, Florida 32835.

Duane Lee is being served by certified mail, return receipt requested, to his attention at the addresses for Timeless Protect, LLC, and by certified mail, return receipt requested, addressed the registered agent for Timeless Protect, LLC.

Sunil Joseph aka Joseph Sunil is being served by certified mail, return receipt requested, to his attention at the addresses for Timeless Protect, LLC, and by certified mail, return receipt requested, addressed the registered agent for Timeless Protect, LLC.

Paul James is being served by certified mail, return receipt requested, to his attention at the addresses for Timeless Protect, LLC, and by certified mail, return receipt requested, addressed the registered agent for Timeless Protect, LLC.

EMERGENCY CEASE AND DESIST ORDER

This is your OFFICIAL NOTICE of the issuance by the Securities Commissioner of the State of Texas (the "**Securities Commissioner**") of an EMERGENCY CEASE AND DESIST ORDER pursuant to Section 23-2 of The Securities Act, TEX. REV. CIV. STAT. ANN. arts. 581-1 to 581-45 (West, Westlaw through 2019 R. Sess.) (the "**Securities Act**").

The Enforcement Division of the Texas State Securities Board (the "**Enforcement Division**") has presented evidence sufficient for the Securities Commissioner to find:

FINDINGS OF FACT

1. Travco Oil and Gas, LLC ("**Respondent Travco**") is a Texas Limited Liability Company that can be served with process at its offices at 2304 Elm Valley Drive, Little Elm, Texas 75068, and 4645 Wyndham Lane, Suite 260 B, Frisco, Texas 75033. Respondent Travco can also be served through Travis Jordan in his capacity as its Manager at 4301 Rancho Del Norte Trail, McKinney, Texas 75070, and through Travis Jordan in his capacity as its Registered Agent for Service of Process at 14842 Alstone Drive, Frisco, Texas 75035.
2. Travis Jordan ("**Respondent Jordan**") is the Manager and President of Respondent Travco. He can be served with process at the office for Respondent Travco or through the Registered Agent for Service of Process for Respondent Travco.
3. Tom Darcy ("**Respondent Darcy**") is an agent of Respondent Travco. He can be served with process at the office for Respondent Travco or through the Registered Agent for Service of Process for Respondent Travco.
4. Timeless Protect, LLC ("**Respondent Timeless Protect**") is a Florida Limited Liability Company that can be served with process at 519 Cooper Industrial Parkway, Apopka, Florida 32703; 2000 Argentia Road Plaza One, Suite 301, Mississauga, Ontario, Canada L5N 1P7 and 618 East South Street, Suite 500, Orlando, Florida 32801. It can also be served with process through Duane Lee, its Registered Agent for Service of Process in Florida, at 6965 Piazza Grande Avenue, Suite 407, Orlando, Florida 32835.
5. Duane Lee ("**Respondent Lee**") is the Chief Executive Officer of Respondent Timeless Protect and is the Florida Registered Agent for Service of Process for Respondent Timeless Protect. He can be served with process at the addresses for Respondent Timeless Protect and in his capacity as the Registered Agent for Service of Process for Respondent Timeless Protect.
6. Sunil Joseph aka Joseph Sunil ("**Respondent Joseph**") is a Manager of Respondent Timeless Protect. He can be served with process at the addresses

for Respondent Timeless Protect and through the Registered Agent for Service of Process for Respondent Timeless Protect.

7. Paul James (“**Respondent James**”) is a Manager of Respondent Timeless Protect. He can be served with process at the addresses for Respondent Timeless Protect and through the Registered Agent for Service of Process for Respondent Timeless Protect.

THE BUSINESS OF RESPONDENT TRAVCO

8. On or about March 4, 2013, Respondent Jordan organized Respondent Travco with the Texas Secretary of State. Respondent Jordan has been and is serving as its Managing Member and President.
9. Respondent Travco is an independent oil and gas company that focuses on conventional drilling in central Oklahoma.
10. Respondent Travco also deals in investments in oil and gas programs with investors throughout the United States and China.
11. Respondents Travco and Jordan are describing Respondent Travco and its dealing in investments in oil and gas programs as follows:
 - A. Respondents Travco and Jordan are representing that their philosophy involves selling low-cost, high-quality products directly to investors.
 - B. Respondents Travco and Jordan are representing their goal is to offer the highest quality developments that reduce risk and increase returns.
 - C. Respondents Travco and Jordan are representing that Respondent Travco offers programs at a fraction of the cost of its competitors, and these programs ensure investors are able to secure solid positions in more wells and diversify their portfolios.

RESPONDENTS TRAVCO, JORDAN AND DARCY ARE NOW OFFERING UNITS IN THE MOODY 3 WELL DEVELOPMENT

12. The Moody 3 Well Development, also referred to as the Moody Prospect, consists of three wells in Arkoma Basin in Wagoner County, Oklahoma. The Moody 3 Well Development actually involves four wells, including two wells that have already been drilled and completed and two new wells.
13. Respondents Travco, Jordan and Darcy are now offering the units in the Moody 3 Well Development (the “**unprotected units**”).

14. Respondents Travco, Jordan and Darcy are also offering the units in the Moody 3 Well Development that are purportedly protected by Respondent Timeless Protect (the “**protected units**”).

THE UNPROTECTED UNITS
IN THE MOODY 3 WELL DEVELOPMENT

15. Respondents Travco and Darcy are contacting potential investors through unsolicited telephone calls in a practice commonly referred to as “cold-calling.”
16. Respondents Travco, Jordan and Darcy are offering potential investors the opportunity to purchase unprotected units for \$74,036.00 per unprotected unit payable to Respondent Travco.
17. Respondents Travco, Jordan and Darcy are representing that each unit represents eight percent of the working interest and six and a half percent net revenue interest in the project.
18. Respondents Travco, Jordan and Darcy are telling prospective purchasers of unprotected units that the unprotected units are “direct working interests” and not investments in joint ventures or partnerships.
19. Respondents Travco, Jordan and Darcy are representing that purchasers of unprotected units may profit from the extraction of oil as follows:
 - A. Assuming the price of oil is \$60.00 per barrel and accounting for \$2,000.00 in lease operating expenses, purchasers of one unprotected unit should receive an annual return of \$86,400.00 or 117 percent of their principal investment if operations produce 50 barrels of oil per day.
 - B. Assuming same price of oil and cost for lease expenses, purchasers of one unprotected unit should still receive an annual return of \$51,840.00 or 70 percent of their principal investment if operations produce only 30 barrels of oil.
20. Respondents Travco, Jordan and Darcy are representing that purchasers of unprotected units may profit from the extraction of gas as follows:
 - A. Assuming the price of gas is \$4.00 per MCFG of gas and accounting for \$2,000.00 in lease operating expenses, purchaser of one unprotected unit should receive an annual return of \$34,560.00 or 47 percent of their principal investment if operations extract 300 MCFG of gas per day.
 - B. Assuming the same price of gas and cost for lease expenses, purchasers of one unprotected unit should still receive an annual return of \$23,040.00 or 31 percent of their principal investment if operations extract only 200 MCFG of gas per day.

21. Respondent Travco, and not a separate company, serves as the operator for the Moody 3 Well Development.

THE PROTECTED UNITS
IN THE MOODY 3 WELL DEVELOPMENT

22. Respondents are offering protected units for \$74,036.00 per protected unit payable to Respondent Travco and an additional \$22,210.80 per protected unit that Respondent Travco will transfer to Respondent Timeless Protect.
23. The protected units are the same as the unprotected units except that purchasers of protected units are being enrolled in a Cash Back Program managed by Respondents Timeless Protect, Lee, Joseph and James.

THE CASH BACK PROGRAM
AND GUARANTEED PAYMENTS TO PURCHASERS OF PROTECTED UNITS

24. Respondents Timeless Protect and Lee are describing Respondent Timeless Protect and its Cash Back Program as follows:
 - A. Respondent Timeless Protect's directors and founders have more than 50 years of experience in the investment, property development, sales, marketing, and structured finance industry.
 - B. Respondent Timeless Protect has operated for around three years, is involved in 25 to 30 different industries and is active in 30 countries, and its business continues to grow because of its "bulletproof" structure.
 - C. Respondent Timeless Protect now deals with 13 companies involved in oil and gas drilling and exploration.
 - D. Respondent Timeless Protect recognizes that oil and gas drilling and exploration involves an element of risk and the Cash Back Program eliminates the risk.
25. Respondent Timeless Protect, as managed by Respondents Lee, Joseph and James, is the administrator of the Cash Back Program.
26. Principal sent to Respondent Timeless Protect for the Cash Back Program, less an eight percent fee, is purportedly held in a trust account.
27. The trust account is purportedly fully insured by a corporate insurance policy issued by Aspen Re, a syndicate of Lloyds of London, and a financial guarantee policy that lists clients as beneficiaries. The corporate insurance policy is described in greater detail as follows:

- A. The corporate insurance policy for the trust account expires on June 25, 2020.
 - B. The corporate insurance policy for the trust account only covers instances of breach of duty, fraud and other misconduct of Clariant Capital Corporation as the manager of the trust, and only up to \$3 million.
28. Assuming purchasers of protected units elect to participate in the Cash Back Program with a 15 year term, the Cash Back Program entitles them to the following payments regardless of the success or profitability of the Moody 3 Well Development:
- A. After a four-year term, purchasers of protected units may elect an early withdrawal from the Cash Back Program that pays an amount equal to 25 percent of principal invested with Respondents Travco and Timeless Protect.
 - B. After an eight-year term, purchasers of protected units may elect an early withdrawal from the Cash Back Program that pays an amount equal to 50 percent of principal invested with Respondents Travco and Timeless Protect.
 - C. After a fifteen-year term, purchasers of protected units may elect to receive a full return of principal invested with Respondents Travco and Timeless Protect.
29. Respondents Timeless Protect, Travco, Lee, Jordan and Darcy are representing that purchasers of protected units will benefit from the Cash Back Program regardless of the solvency or continued existence of Respondent Timeless Protect. Respondents Timeless Protect, Lee, Travco and Darcy are specifically representing as follows:
- A. Respondents Timeless Protect and Lee are representing the Cash Back Program is an “absolute guarantee” that money will be paid to the investor at the end of the term, even if Respondent Timeless Protect and affiliated oil companies go out of business and the associated oil wells cease to exist.
 - B. Respondents Travco and Darcy are representing the Cash Back Program is secured by an insurance policy from Lloyds of London, and if Respondent Timeless Protect “magically disappears,” the “Lloyds of London Policy would then take effect, guaranteeing you your capital back.

UNDISCLOSED INFORMATION RELATING
TO RESPONDENT TRAVCO AND ITS STATUS AS AN OPERATOR IN OKLAHOMA

30. As described herein, Respondent Travco, and not a separate company, serves as the operator for the Moody 3 Well Development.

31. Although Respondent Travco, and not a separate company, serves as the operator, according to a Form 1006B Report from the Oklahoma Corporation Commission dated November 15, 2019, Respondent Travco is not an operator in Oklahoma.

UNDISCLOSED INFORMATION RELATING TO THE TERMS OF THE CASH BACK PROGRAM AND THE RISKS ASSOCIATED WITH THE PROTECTED UNITS

32. As described herein, Respondents are claiming purchasers of protected units are being enrolled in a Cash Back Program administered by Respondent Timeless Protect.
33. As also described herein, principal from purchasers of protected units is purportedly deposited in a trust account and the trust account is fully insured by a corporate insurance policy issued by Aspen Re, a syndicate of Lloyds of London, and includes a financial guarantee policy that lists clients as beneficiaries. As also described herein, the corporate insurance policy for the trust account expires on June 25, 2020, and it only covers instances of breach of duty, fraud and other misconduct of Clariant Capital Corporation as the manager of the trust account up to \$3 million.
34. Investors are not being provided with the following information about the Cash Back Program and its trust account:
 - A. Investors are not being provided any material information relevant to Clariant Capital Corporation, including the identity of all its principals, its principal place of business, its qualifications to manage the trust or its authority to manage funds maintained in the trust.
 - B. Investors are not being provided any material information relevant to Respondent Suni, the Chairman of Clariant Capital Corporation, including his qualifications to manage the trust or its authority to manage funds maintained in the trust
 - C. Investors are not being provided information about other sources of funds commingled with their funds or the amount of funds from other sources commingled with their funds.
 - D. Investor are not being told the strategy for managing funds maintained in the trust account.
35. Although Respondents are describing the Cash Back Program and its trust account and promising that purchasers of protected units may elect to receive payments from Respondent Timeless Protect as described herein, Respondent Timeless Protect actually retains the contractual right to unilaterally amend,

modify, append and/or change the terms of the Cash Back Program and the benefits for purchasers of protected units.

THE UNDISCLOSED UNDERTAKING FILED BY RESPONDENT JAMES

36. The Ontario Securities Commission investigated Respondent James and others suspected of violating securities laws.
37. Respondent James filed an undertaking relating to his dealings in securities with the Ontario Securities Commission.
38. Respondents Timeless Protect and James are not disclosing the undertaking to potential purchasers of protected units.

REGISTRATION VIOLATIONS

39. Respondents have not been registered as dealers or agents at any time material hereto.
40. The unprotected units have not been registered by notification, coordination or qualification and no permit has been issued for their sale in Texas.
41. The protected units have not been registered by notification, coordination or qualification and no permit has been issued for their sale in Texas.
42. Respondents Travco, Jordan and Darcy appear to be relying on Regulation D, Rule 506. This federal regulation serves as a basis for preempting the Texas State Securities Board from administering a state law that protects investors by requiring the registration of securities.
43. Although Respondents Travco, Jordan and Darcy appear to be relying on Regulation D, Rule 506, the unprotected and protected units do not qualify for safe harbor pursuant to Regulation D, Rule 506, because:
 - A. The unprotected and protected units do not qualify for Regulation D, Rule 506(b), at least in part, because Respondents Travco and Darcy are using "cold calling" to publicly solicit investors.
 - B. The unprotected and protected do not qualify for Regulation D, Rule 506(c), at least in part, because Respondent Travco is not limiting sales to accredited investors.

DECEIT AND OPERATOR OF THE MOODY 3 WELL DEVELOPMENT

44. As described herein, Respondent Travco, and not a separate company, serves as the operator for the Moody 3 Well Development.

45. As also described herein, according to a Form 1006B Report from the Oklahoma Corporation Commission dated November 15, 2019, Respondent Travco is not an operator in Oklahoma.
46. The statements of Respondents Travco, Jordan and Darcy relating to the operator are materially misleading or otherwise likely to deceive the public because, according to a Form 1006B Report from the Oklahoma Corporation Commission dated November 15, 2019, Respondent Travco is not an operator in Oklahoma.

FRAUD AND DECEIT AND CONCEALMENT OF THE
IDENTITY OF THE PRINCIPALS OF RESPONDENT TIMELESS PROTECT

47. Respondent Timeless Protect, Joseph, Lee and James are intentionally failing to disclose the following information about their identity and management of Respondent Timeless Protect:
 - A. They are intentionally failing to disclose the identity of the officers and managers of Respondent Timeless Protect, and this information constitutes material facts.
 - B. They are intentionally failing to disclose the business repute and qualifications of the officers and managers of Respondent Timeless Protect, as well as any other managerial officers of Respondent Timeless Protect, and this information constitutes material facts.
 - C. They are intentionally failing to disclose the experience of the managers and officers of Respondent Timeless Protect in managing funds that generate returns for investors, and this information constitutes material facts
48. Respondents Travco, Jordan and Darcy are offering protected units coupled with the Cash Back Program managed by Respondent Timeless Protect, and their statements are materially misleading or otherwise likely to deceive the public because they are not disclosing the following information about the identity and management of Respondent Timeless Protect:
 - A. They are failing to disclose the identity the officers and managers of Respondent Timeless Protect.
 - B. They are failing to disclose the business repute and qualifications of the officers and managers of Respondent Timeless Protect, as well as any other managerial officers of Respondent Timeless Protect.
 - C. They are failing to disclose the experience of the managers and officers of Respondent Timeless Protect in managing funds that generate returns for investors.

FRAUD AND DECEIT AND CONCEALMENT OF THE STRATEGY FOR GENERATING PAYMENTS FOR PURCHASERS OF PROTECTED UNITS

49. As described herein, purchasers of protected units are being enrolled in the Cash Back Program and the Cash Back Program entitles them to the following payments regardless of the success or profitability of the Moody 3 Well Development:
 - A. After a four year term, purchasers of protected units may elect an early withdrawal from the Cash Back Program that pays an amount equal to 25 percent of principal invested with Respondents Travco and Timeless Protect.
 - B. After an eight year term, purchasers of protected units may elect an early withdrawal from the Cash Back Program that pays an amount equal to 50 percent of principal invested with Respondents Travco and Timeless Protect.
 - C. After a fifteen year term, purchasers of protected units may elect to receive a full return of principal invested with Respondents Travco and Timeless Protect.
50. In connection with the offer of the protected units, Respondents Timeless Protect, Lee, Joseph and James are intentionally failing to disclose the strategy for managing and using funds maintained in trust, including the strategy for ensuring Respondent Timeless Protect has access to sufficient funds for satisfying its obligations to pay purchasers of protected units, and this information constitutes material facts.
51. Respondents Travco, Jordan and Darcy are offering protected units, and their statements are materially misleading or otherwise likely to deceive the public because they are not providing purchasers of protected units with material information relating to the strategy for managing and using funds maintained in trust, including the strategy for ensuring Respondent Timeless Protect has access to sufficient funds for satisfying its obligations to pay purchasers of protected units.

DECEIT AND THE PROMISE OF PAYMENTS

52. As described herein, Respondents are promising purchasers of protected units they may elect to receive payments from Respondent Timeless Protect after four, eight and fifteen years.
53. These statements are materially misleading or otherwise likely to deceive the public because Respondent Timeless Protect actually retains the contractual right to unilaterally amend, modify, append, and/or change the terms of the Cash Back Program and the benefits for purchasers of protected units.

**FRAUD AND DECEPTIVE PRACTICES IN CONNECTION
WITH THE MANAGEMENT OF INVESTOR FUNDS IN A TRUST ACCOUNT**

54. In connection with the offer of protect units, Respondents Timeless Protect, Lee, Joseph and James are intentionally failing to disclose the following information:
- A. They are intentionally failing to disclose material information relevant to Clariant Capital Corporation, including the identity of all its principals, its principal place of business, its qualifications to manage the trust or its authority to manage funds maintained in the trust, and this information constitutes material facts.
 - B. They are intentionally failing to disclose material information relevant to Respondent Joseph, the Chairman of Clariant Capital Corporation, including his qualifications to manage the trust or its authority to manage funds maintained in the trust, and this information constitutes material facts.
 - C. They are intentionally failing to disclose material information about other sources of funds commingled with their funds or the amount of funds from other sources commingled with their funds, and this information constitutes material facts.
 - D. They are intentionally failing to disclose the strategy for managing funds maintained in the trust account, and this information constitutes material facts.
55. Respondents Travco and Jordan are offering protected units, and their statements are materially misleading or otherwise likely to deceive the public because they are not disclosing the following information:
- A. They are intentionally failing to disclose material information relevant to Clariant Capital Corporation, including the identity of all its principals, its principal place of business, its qualifications to manage the trust or its authority to manage funds maintained in the trust, and this information constitutes material facts.
 - B. They are intentionally failing to disclose material information relevant to Respondent Joseph, the Chairman of Clariant Capital Corporation, including his qualifications to manage the trust or its authority to manage funds maintained in the trust, and this information constitutes material facts.
 - C. They are intentionally failing to disclose information about other sources of funds commingled with their funds or the amount of funds from other sources commingled with their funds, and this information constitutes material facts.

- D. They are intentionally failing to disclose the strategy for managing funds maintained in the trust account, and this information constitutes material facts.

FRAUD AND DECEIT AND CONCEALMENT OF THE UNDERTAKING BY THE ONTARIO SECURITIES COMMISSION

56. As described herein, the Ontario Securities Commission investigated Respondent James and others suspected of violating securities laws. Respondent James filed an undertaking relating to his dealings in securities with the Ontario Securities Commission.
57. In connection with the offer of protected and unprotected units, Respondents Timeless Protect and James are intentionally failing to disclose the information set forth herein relating to the Ontario Securities Commission undertaking naming Respondent James.
58. As described herein, Respondents Travco, Jordan and Darcy are offering protected units, and their statements are materially misleading or otherwise likely to deceive the public because they are not disclosing the information set forth herein relating to the undertaking issued by the Ontario Securities Commission.

FRAUD AND CONCEALMENT OF THE RISKS OF LIABILITY

59. As described herein, Respondents Travco, Jordan and Darcy are telling prospective purchasers of unprotected units and protected units that the unprotected units and protected units are “direct working interests” and not investments in joint ventures or partnerships.
60. As also described herein, Respondents Travco, Jordan and Darcy intentionally failing to disclose information relating to the risks associated with the purchase of direct working interests, including information about the potential liabilities associated with purchasing direct working interests, and this information constitutes material facts.

CONCLUSIONS OF LAW

1. The protected units and unprotected units are securities as the term is defined by Section 4.A of the Texas Securities Act.
2. Respondents are violating Section 7 of the Securities Act by offering securities for sale in Texas at a time when the securities are not registered with the Securities Commissioner.
3. Respondents are violating Section 12 of the Securities Act by offering securities for sale in Texas without being registered pursuant to the provisions of Section 12 of the Securities Act.

4. Respondents are engaging in fraud in connection with the offer for sale of securities.
5. Respondents have made an offer containing a statement that is materially misleading or otherwise likely to deceive the public.
6. Respondents' conduct, acts, and practices threaten immediate and irreparable public harm.
7. The foregoing violations constitute bases for the issuance of an Emergency Cease and Desist Order pursuant to Section 23-2 of the Texas Securities Act.

ORDER

1. It is therefore ORDERED Respondents immediately CEASE AND DESIST from offering for sale any security in Texas until the security is registered with the Securities Commissioner or is offered for sale pursuant to an exemption from registration under the Securities Act.
2. It is further ORDERED Respondents immediately CEASE AND DESIST from acting as securities dealers or agents in Texas until Respondents are registered with the Securities Commissioner or are acting pursuant to an exemption from registration under the Securities Act.
3. It is further ORDERED Respondents immediately CEASE AND DESIST from engaging in any fraud in connection with the offer for sale of any security in Texas.
4. It is further ORDERED Respondents immediately CEASE AND DESIST from offering securities in Texas through an offer containing a statement that is materially misleading or otherwise likely to deceive the public.

NOTICE

Pursuant to Section 23-2 of the Texas Securities Act, you may request a hearing before the 31st day after the date you were served with this Order. The request for a hearing must be in writing, directed to the Securities Commissioner, and state the grounds for the request to set aside or modify the Order. Failure to request a hearing will result in the Order becoming final and non-appealable.

You are advised under Section 29.D of the Texas Securities Act that any knowing violation of an order issued by the Securities Commissioner under the authority of Section 23-2 of the Texas Securities Act is a criminal offense punishable by a fine of not more than \$10,000, or imprisonment in the penitentiary for two to ten years, or by both such fine and imprisonment.

SIGNED AND ENTERED by the Securities Commissioner this 22nd day of November, 2019.



TRAVIS J. ILES
Securities Commissioner