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WILLIAM R. SMITH
MEMBER

IN THE MATTER OF
ALWAYS CONSULTING, INC.;
BRUCE GRIFFITH;
DAVID KEVIN LEWIS;
THOMAS A. MARKHAM; AND
CHARLES ROUP

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Order No. ENF-06-CDO-1622

TO: Always Consulting, Inc.
901 Waterfall Way, Suite 302
Richardson, TX 75080

Thomas A. Markham
901 Waterfall Way, Suite 302
Richardson, TX 75080

Bruce Griffith
901 Waterfall Way, Suite 302
Richardson, TX 75080

Charles Roup
901 Waterfall Way, Suite 302
Richardson, TX 75080

David Kevin Lewis
901 Waterfall Way, Suite 302
Richardson, TX 75080

EMERGENCY CEASE AND DESIST ORDER

This is your OFFICIAL NOTICE of the issuance by the Deputy Securities Commissioner of the State of Texas ("Deputy Commissioner") of an EMERGENCY CEASE AND DESIST ORDER pursuant to Section 23-2 of The Securities Act, TEX. REV. CIV. STAT. ANN. art. 581-1 et seq. (Vernon 1964 & Supp. 2006) ("Texas Securities Act").

The Staff of the Enforcement Division of the Texas State Securities Board has presented evidence sufficient for the Deputy Commissioner to find that:

FINDINGS OF FACT

1. Always Consulting, Inc. ("Respondent Always Consulting") maintains a last known address at 901 Waterfall Way, Suite 302, Richardson, TX 75080.

2. Bruce Griffith ("Respondent Griffith") is the purported President and CEO of Respondent Always Consulting and maintains a last known address at 901 Waterfall Way, Suite 302, Richardson, TX 75080.
3. David Kevin Lewis aka David Shane Lewis aka "DW" ("Respondent Lewis") is the purported Director of Field Operations of Respondent Always Consulting and maintains a last known address at 901 Waterfall Way, Suite 302, Richardson, TX 75080.
4. Thomas A. Markham ("Respondent Markham") is the purported Chief Geologist of Respondent Always Consulting and maintains a last known address at 901 Waterfall Way, Suite 302, Richardson, TX 75080. Respondent Markham is also a director of Morgan Creek Energy Corp., a publicly traded company making periodic filings with the U.S. Securities and Exchange Commission pursuant to the Securities Exchange Act of 1934.
5. Charles Roup ("Respondent Roup") is the purported Vice President of Marketing Relations of Respondent Always Consulting and maintains a last known address at 901 Waterfall Way, Suite 302, Richardson, TX 75080.
6. Respondents are offering for sale in Texas "units of participation" in the "Rattlesnake Springs 20 Well Prospect," with each unit representing working interests in 20 new wells to be drilled on a purported oil and gas lease in Osage County, Oklahoma.
7. The "units of participation" have not been registered by qualification, notification or coordination and no permit has been granted for their sale in Texas.
8. Respondents have not been registered with the Securities Commissioner as dealers or agents at any time material hereto.
9. In connection with the offer for sale of the above-described "units of participation", Respondents are intentionally failing to disclose the following material facts:
 - a. On February 14, 1989, Respondent Griffith pleaded guilty to theft of property of the value of \$750 or more but less than \$20,000 in case no. F-8880981-QU in the 291st Judicial District Court of Dallas County, Texas. Respondent Griffith was sentenced to seven years probation;
 - b. On February 14, 1989, Respondent Griffith pleaded guilty to theft of property of the value of \$750 or more but less than \$20,000 in case no. F-8882008-TU in the 291st Judicial District Court of Dallas County, Texas. Respondent Griffith was sentenced to seven years probation;
 - c. On April 4, 1989, the 291st Judicial District Court of Dallas County, Texas revoked Respondent Griffith's probation in case no. F-8880981-QU because he knowingly and intentionally possessed and concealed falsely made, forged, and counterfeited Federal Reserve Notes;

- d. On April 4, 1989, the 291st Judicial District Court of Dallas County, Texas revoked Respondent Griffith's probation in case no. F-8882008-TU because he knowingly and intentionally possessed and concealed falsely made, forged, and counterfeited Federal Reserve Notes;
- e. On February 14, 1994, Respondent Griffith pleaded guilty to two counts of robbery of a financial institution in case no. 3:93-CR-379-H (1), one count of bank robbery in case no. 3:94-CR-025-H (1), and one count of bank robbery in case no. 3:94-CR-038-H (1) in U.S. District Court in the Northern District of Texas. Respondent Griffith was sentenced to 135 months imprisonment to be followed by three years supervised release;
- f. On May 15, 2000, Respondent Lewis pleaded guilty to one count of securities fraud in case no. 3:00-CR-064-M (01) and one count of conspiracy to commit mail fraud in case no. 1:00-CR-016-C (01) in U.S. District Court in the Northern District of Texas. Respondent Lewis was sentenced to 46 months imprisonment to be followed by three years supervised release and was ordered to pay restitution of \$2,228,171.00;
- g. On July 8, 1999, Respondent Markham pleaded guilty to one count of mail fraud in case no. SA-99-CR-86(1)(EP) in U.S. District Court in the Western District of Texas. Respondent Markham was sentenced to 15 months imprisonment to be followed by three years supervised release and was ordered to pay restitution of \$395,786.26; and
- h. On March 2, 2004, Respondent Roup pleaded guilty to assault causing bodily injury in case no. 004-80697-03 in the County Court at Law #4 in Collin County, Texas. Respondent Roup was sentenced to 365 days jail, two years probation, and restitution of \$93,298.76.

CONCLUSIONS OF LAW

1. The above-described "units of participation" are "securities" as that term is defined by Section 4.A of the Texas Securities Act.
2. Respondents are violating Section 7 of the Texas Securities Act by offering securities for sale in Texas at a time when the securities were not registered with the Securities Commissioner.
3. Respondents are violating Section 12 of the Texas Securities Act by offering securities for sale in Texas without being registered pursuant to the provisions of Section 12 of the Texas Securities Act.
4. Respondents are engaging in fraud in connection with the offer for sale of securities.
5. Respondents' conduct, acts, and practices threaten immediate and irreparable public harm.

6. 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 that 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 Texas Securities Act.
2. It is further ORDERED that 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 Texas Securities Act.
3. It is further ORDERED that Respondents immediately CEASE AND DESIST from engaging in any fraud in connection with the offer for sale of any security in Texas.

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 \$5,000, or imprisonment in the penitentiary for not more than two years, or by both such fine and imprisonment.

SIGNED AND ENTERED by the Deputy Securities Commissioner this 25th day of October, 2006.



DON A. RASCHKE
Deputy Securities Commissioner