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## Texas State Securities Board

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IN THE MATTER OF  
ADVANCED WELLNESS SERVICES, LLC  
DBA WELLNESSTECH HEALTH™, RECOVERY  
MANAGEMENT INTERNATIONAL, AND  
RANDALL "RANDY" JOHNSON

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**ORDER NO. ENF-20-CDO-1815**  
SOAH Docket 312-19-3969

TO: ADVANCED WELLNESS SERVICES, LLC, DBA WELLNESSTECH HEALTH™  
31008 Clearwater Court, Georgetown, Texas 78628

RECOVERY MANAGEMENT INTERNATIONAL  
31008 Clearwater Court, Georgetown, Texas 78628

RANDALL "RANDY" JOHNSON  
31008 Clearwater Court, Georgetown, Texas 78628

### ORDER MODIFYING EMERGENCY CEASE AND DESIST ORDER

#### I. STATEMENT OF THE CASE

On March 7, 2019, the Securities Commissioner (**Commissioner**) entered an Emergency Cease and Desist Order, Order No. ENF-19-CDO-1775, (**Emergency Order**) against Advanced Wellness Services, LLC d/b/a WellnessTech Health™, Recovery Management International, and Randall "Randy" Johnson (collectively, **Respondents**). In the Emergency Order, the Commissioner ordered the Respondents to cease and desist from:

1. Offering for sale any security in Texas until the security is registered with the Commissioner or is offered for sale pursuant to an exemption from registration under the Texas Securities Act (**TSA**);
2. Acting as securities dealers or agents in Texas until they are registered with the Commissioner or are acting pursuant to an exemption from registration under the TSA;
3. Engaging in any fraud in connection with the offer for sale of any security in Texas; and
4. Offering securities in Texas through an offer containing a statement that is materially misleading or otherwise likely to deceive the public.

Respondents requested a hearing regarding the Emergency Order and on November 21, 2019, a hearing on the merits was held before an Administrative Law Judge (**ALJ**) at the State Office of Administrative Hearings (**SOAH**).

## II. PROPOSAL FOR DECISION

The ALJ issued a Proposal for Decision (**PFD**) on March 13, 2020. The parties filed exceptions to the PFD and the ALJ ruled on the exceptions by letter dated April 28, 2020. The Finding of Fact and Conclusions of Law from the PFD, as modified by the letter ruling on the exceptions, are as follows:<sup>1</sup>

### FINDINGS OF FACT

1. The Commissioner of the Texas State Securities Board (**SSB**) entered an Emergency Cease and Desist Order (**Emergency Order**) against Advanced Wellness Services, LLC d/b/a WellnessTech Health™ (**Respondent Advanced Wellness**<sup>2</sup>), Recovery Management International (**Respondent Recovery Management**), and Randall "Randy" Johnson (**Respondent Johnson**).
2. The Emergency Order advised Respondents of their right to a hearing.
3. Respondents<sup>3</sup> timely filed a request for hearing.
4. Respondents and the SSB Enforcement Division (**Enforcement Division**) waived the requirement that the hearing be held within 10 days of the receipt of the request for hearing.
5. On April 12, 2019, the Enforcement Division sent Respondents a notice of hearing that contained a statement of the time, place, and nature of the hearing; a statement of the legal authority and jurisdiction under which the hearing was to be held; a reference to the particular sections of the statutes and rules involved; and a short, plain statement of the factual matters asserted.
6. On November 21, 2019, Administrative Law Judge (**ALJ**) Linda H. Brite convened the hearing on the merits. Respondents appeared and were represented by Randall "Randy" Johnson. The Enforcement Division appeared through its attorney, Jeremy Heintz. The record closed on January 23, 2019, after the parties submitted their closing arguments and responses.

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<sup>1</sup> Minor corrections for spelling, grammar, and typographical errors have been made to improve readability. These changes have been noted and are explained in footnotes.

<sup>2</sup> A spelling correction has been made to this word. It appears as "Welness" in the PFD.

<sup>3</sup> A spelling correction has been made to this word. It appears as "Respondent" (singular) in the PFD.

7. Respondents placed advertisements related to medical equipment in the Austin, Dallas, and Houston Financial Services sections of the Craigslist website.
8. Respondents published advertisements on Craigslist to Texas residents offering the opportunity to invest \$50,000 to purchase an investment tied to medical equipment. The advertisements claimed the investment would yield a return of 20% per year over a term of two years, paid on a monthly basis.
9. Respondents referred to the medical equipment by various names, such as the PS-8X, the WellnessTech System, and the WellnessTech™ Screening System (collectively hereinafter referred to as the WellnessTech System).
10. Potential investors must pay \$50,000 to Respondent Advanced Wellness to purchase an investment tied to a WellnessTech System.
11. Respondents explained that the WellnessTech System was “the most advanced early screening system for use by primary care physicians” and that it “allows the physician to test their patients for 8 critical risk factors with a 10-minute, non-invasive test that is part of the patient’s annual check-up.”
12. Respondents claimed that Respondent Advanced Wellness was the “exclusive distributor” of the WellnessTech System.
13. Respondents were representing that Respondent Advanced Wellness or Personalized Healthcare would place a WellnessTech System with a medical facility and execute<sup>4</sup> a service agreement with the medical facility.
14. Respondents represented:
  - the service agreement provided that either Respondent Advanced Wellness or Personalized Healthcare would manage the WellnessTech System;
  - the service agreement also provided the medical facility would pay a fee ranging from \$200 to \$250 to either Respondent Advanced Wellness or Personalized Healthcare whenever the medical facility used the WellnessTech System to test a patient; and
  - Respondent Advanced Wellness or Personalized Healthcare were responsible for managing and servicing each WellnessTech System.
15. Investors of the WellnessTech Systems are passive. They are not responsible for managing or servicing the WellnessTech Systems.

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<sup>4</sup> A typographical error has been corrected. It appears as “executive” in the PFD.

16. Respondent Advanced Wellness or Personalized Healthcare oversaw facilitating the maintenance, service, and software updates for the WellnessTech System.
17. Respondent Advanced Wellness or Personalized Healthcare oversaw facilitating the training of medical staff to use the Wellness Tech System to test patients and interpret the results of the test.
18. Respondent Advanced Wellness or Personalized Healthcare oversaw the billing and support for all tests conducted by the WellnessTech System.
19. On February 19, 2019, the Enforcement Division contacted Respondent Johnson. It told Respondent Johnson that the investments tied to the WellnessTech System were regulated as securities.
20. At approximately 12:00 p.m. on February 28, 2019, the Enforcement Division met with Respondent Johnson and provided him a cease and desist letter. The letter again explained that the investments tied to the WellnessTech System constituted securities and afforded Respondents the opportunity to comply with the law.
21. At approximately 1:50 p.m. on February 28, 2019, Respondent Johnson solicited a potential investor to sign the investment agreement and transfer funds.
22. At approximately 2:00 p.m. on February 28, 2019, Respondent Johnson sent a written communication to the Enforcement Division representing that Respondents agreed "to cease and desist offering investments tied to medical devices, such as [the] WellnessTech System..."
23. On March 3, 2019, Respondent Johnson again solicited the potential investor to sign the investment agreement and transfer funds.
24. On March 7, 2019, Respondent Johnson solicited the potential investor, offering more lucrative returns.
25. Even after agreeing to cease and desist offering the investments, Respondents continued to offer them.
26. The investments tied to the WellnessTech System have not been registered with the Securities Commissioner.
27. Respondent Advanced Wellness has not been registered as a dealer at any time material hereto.
28. Respondents Recovery Management and Johnson have acted as agents of Respondent Advanced Wellness, an unregistered dealer.

29. Respondents intentionally failed to disclose material facts by failing to disclose information about Respondents' operations, risks associated with the investments, or other investment offerings.
30. Respondents intentionally failed to disclose the following material facts:
  - the Enforcement Division determined the investments tied to WellnessTech System are securities regulated by the Securities Act;
  - the Enforcement Division determined Respondents were violating statutory registration and disclosure requirements through their offer of investments tied to the WellnessTech System; and
  - Respondent Johnson submitted false information to the Director of the Enforcement Division and misrepresented that Respondent Advanced Wellness and Respondent Johnson would comply with the Securities Act by ceasing offers of the investments tied to the WellnessTech System.
31. No evidence was presented that Respondent made a statement in an offer that was misleading or otherwise deceptive.

#### CONCLUSIONS OF LAW<sup>5</sup>

1. SSB has jurisdiction over Respondents and the subject matter of this disciplinary action pursuant to the provisions of the Securities Act. Tex. Rev. Civ. Stat. art. 581-1 *et seq.*
2. The State Office of Administrative Hearings has jurisdiction over matters related to the hearing in this proceeding, including the authority to issue a proposal for decision with findings of fact and conclusions of law. Tex. Gov't Code ch. 2003.
3. On receiving a request for a hearing from a person who is the subject of an Emergency Cease and Desist Order, the Commissioner of the SSB must serve notice of the time and place of the hearing. The hearing must be held not later than the 10th day after the date the Commissioner receives the request for a hearing unless the parties agree to a later hearing date. Tex. Rev. Civ. Stat. art. 581-23-2(D).<sup>6</sup>
4. Respondents were given adequate notice of the hearing. Tex. Gov't Code §§2001.051-.052.

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<sup>5</sup> Footnotes have been added to standardize the legal references to the TSA to other orders of the Commissioner to facilitate conformity and enhance searching when researching Board orders. These footnotes are for informational purposes only and are not modifications to the Conclusions of Law.

<sup>6</sup> Section 23-2.D of the TSA.

5. At the hearing, the Commissioner has the burden of proof and must present evidence in support of the order. Tex. Rev. Civ. Stat. art. 581-23-2(D).<sup>7</sup>
6. After the hearing, the Commissioner must affirm, modify, or set aside in whole or part the emergency order. Tex. Rev. Civ. Stat. art. 581-23-2(E).<sup>8</sup>
7. Respondents engaged in fraud in connection with the offer for sale of a security. Tex. Rev. Civ. Stat. art. 581-23-2(A)(I)(A).<sup>9</sup>
8. Insufficient evidence was presented to establish that Respondents made an offer that contained a statement that was materially misleading or otherwise likely to deceive. Tex. Rev. Civ. Stat. art. 581-23-2(A)(2).<sup>1011</sup>
9. Respondents' conduct violated sections 7 and 12 of the Securities Act. Tex. Rev. Civ. Stat. art. 581-7, 581-12.<sup>12</sup>
10. Respondents' conduct, acts, and practices threatened immediate and irreparable public harm. Tex. Rev. Civ. Stat. art. 581-23-2(A).<sup>13</sup>
11. The fraud in connection with offering securities for sale and violations of section 7 and 12 of the Securities Act constituted a sufficient basis for issuing the Emergency Order. Tex. Rev. Civ. Stat. art. 581-23-2(A)(2).<sup>14</sup>
12. The findings of fact, conclusions of law, and ordering paragraphs of the Emergency Order should be upheld, as modified.

### III. MODIFICATIONS TO ORDER NO. ENF-19-CDO-1775

The Findings of Fact and Conclusions of Law contained in the Emergency Cease and Desist Order, Order No. ENF-19-CDO-1775, issued against Respondents on March 19, 2019, were modified by the ALJ as follows:

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<sup>7</sup> Section 23-2.D of the TSA.

<sup>8</sup> Section 23-2.E of the TSA.

<sup>9</sup> Section 23-2.A(1)(A) of the TSA.

<sup>10</sup> A typographical error has been corrected. It appears as "582-23-2(A)(2)" in the PFD.

<sup>11</sup> Section 23-2.A(2) of the TSA.

<sup>12</sup> Sections 7 and 12 of the TSA.

<sup>13</sup> Section 23-2.A of the TSA.

<sup>14</sup> Section 23-2.A(2) of the TSA.

## FINDINGS OF FACT

1. This Emergency Cease and Desist Order is brought to stop the respondents from immediately and irreparably harming Texas residents through the illegal and fraudulent sale of securities tied to the financing, placement, management and servicing of medical equipment.

## SUMMARY OF THE ACTION

2. The Enforcement Division of the State Securities Board (hereinafter referred to as the "Enforcement Division") investigated the respondents and determined they were violating the registration and disclosure requirements set forth in the Securities Act.
3. The Enforcement Division corresponded with the respondents and subsequently met with the respondents. The Enforcement Division afforded the respondents the opportunity to voluntarily stop violating the Securities Act and become compliant with the law.
4. The respondents agreed to comply with the law and promised they would cease and desist violating the Securities Act.
5. The communications were a sham. The respondents are continuing to illegally and fraudulently offer securities, and they are threatening immediate and irreparable harm to Texas residents.

## THE RESPONDENTS

6. Advanced Wellness Services, LLC, doing business as WellnessTech Health(tm) (hereinafter referred to as "Respondent Advanced Wellness"), can be served with process at 31008 Clearwater Court, Georgetown, Texas 78628.
7. Recovery Management International (hereinafter referred to as "Respondent Recovery Management") can be served with process at 31008 Clearwater Court, Georgetown, Texas 78628.
8. Randall "Randy" Johnson (hereinafter referred to as "Respondent Johnson") can be served with process at 31008 Clearwater Court, Georgetown, Texas 78628. Respondent Johnson is the President of Respondent Advanced Wellness and Respondent Recovery Management.

## OTHER PARTIES

9. Personalized Healthcare Solutions, LLC (hereinafter referred to as "Personalized Healthcare") operates from its place of business at 116 Wilson Pike Circle #240, Brentwood, Tennessee 37027. It manages and services the medical equipment described herein.

10. Respondent Johnson is the Vice-President of Marketing of Personalized Healthcare.

#### THE PUBLIC SOLICITATIONS

11. Respondents have been publishing advertisements that specifically target Texas residents.
12. The advertisements offer Texas residents the opportunity to invest \$50,000.00 to purchase an investment tied to medical equipment.
13. The advertisements claim the investment will yield a return of 20 percent per year over a term of two years, paid on a monthly basis.

#### THE WELLNESSTECH SYSTEM

14. Respondents are referring to the medical equipment by various names, such as the PS-8X, the WellnessTech System and the WellnessTech(tm) Screening System (collectively hereinafter referred to as the "WellnessTech System").
15. Respondents are explaining that the WellnessTech System is "the most advanced early screening system for use by Primary Care physicians" and that it "allows the physician to test their patients for 8 critical risk factors with a 10-minute, non-invasive test that is part of the patient's annual checkup."
16. Respondents are claiming that Respondent Advanced Wellness is the "exclusive distributor" of the WellnessTech System.

#### THE INVESTMENTS TIED TO THE WELLNESSTECH SYSTEMS

17. Respondents are offering potential investors the opportunity to purchase an investment tied to a WellnessTech System.
18. Potential investors must pay \$50,000.00 to Respondent Advanced Wellness to purchase an investment tied to a WellnessTech System.
19. Respondent Advanced Wellness purports to use the principal to finance the purchase of a WellnessTech System.
20. Respondent Advanced Wellness or Personalized Healthcare place a WellnessTech System with a medical facility and execute a service agreement with the medical facility.
21. The service agreement provides that either Respondent Advanced Wellness or Personalized Healthcare will manage the WellnessTech System.



22. The service agreement also provides the medical facility will pay a fee ranging from \$200.00 to \$250.00 to either Respondent Advanced Wellness or Personalized Healthcare whenever the medical facility uses the WellnessTech System to test a patient.
23. Respondent Advanced Wellness is promising to pay investors a return of 20 percent per year on a monthly basis over a term of two years, regardless of the number of tests administered by the WellnessTech System.
24. Respondent Advanced Wellness is also promising to pay \$5.00 to investors whenever the medical facility uses the WellnessTech System to test a patient. The return is purportedly paid on a monthly basis over the term of the service agreement with the medical facility, and Respondents claim the aggregate payment of these returns may yield an additional profit of \$15,000.00 to \$18,000.00 per year over a term of five years.

#### THE MANAGEMENT OF THE WELLNESSTECH SYSTEMS

25. Investors are passive. They are not responsible for managing or servicing the WellnessTech System.
26. Instead, Respondent Advanced Wellness or Personalized Healthcare are responsible for managing and servicing each WellnessTech System.
27. Respondent Advanced Wellness or Personalized Healthcare must maintain the WellnessTech System, service the WellnessTech system and update software used by the WellnessTech System.
28. Respondent Advanced Wellness or Personalized Healthcare must also train medical staff to use the WellnessTech System to test patients and interpret the results of tests.
29. Respondent Advanced Wellness or Personalized Healthcare must also handle billing and support for all tests conducted by the WellnessTech System.

#### THE SCHEME TO OBSTRUCT THE INVESTIGATION

30. The Enforcement Division of the State Securities Board (hereinafter referred to as the "Enforcement Division") has been investigating Respondents Advanced Wellness, Recovery Management and Johnson, as well as Personalized Healthcare.
31. The Enforcement Division determined Respondents were offering investments tied to the WellnessTech System in Texas and that these investments constituted securities regulated by the Securities Act.

32. The Enforcement Division also determined that Respondents were violating the registration and disclosure requirements set forth in the Securities Act.
33. On February 19, 2019, the Enforcement Division contacted Respondent Johnson. It told Respondent Johnson that the investments tied to the WellnessTech System were regulated as securities.
34. Although the Enforcement Division told Respondent Johnson that the investments tied to the WellnessTech System were regulated as securities, Respondents continued to offer investments tied to the WellnessTech System in violation of the registration and disclosure requirements of the Securities Act.
35. On February 28, 2019, the Enforcement Division met with Respondent Johnson. It again explained that the investments tied to the WellnessTech System constituted securities and afforded Respondents the opportunity to become compliant with the law.
36. Shortly after the meeting, Respondent Johnson sent a written communication to the Enforcement Division representing that Respondents agreed "to cease and desist offering investments tied to medical devices, such as [the] WellnessTech System..."
37. The communications were a sham. On the same day Respondent Johnson met with the Enforcement Division, Respondents again illegally offered investments tied to the WellnessTech System. Moreover, Respondents are continuing to illegally and fraudulently offer securities in Texas.

#### REGISTRATION VIOLATIONS

38. The investments tied to the WellnessTech System have not been registered by qualification, notification or coordination, and no permit has been granted for their sale in Texas.
39. Respondent Advanced Wellness has not been registered as a dealer at any time material hereto and Respondents Recovery Management and Johnson have acted as agents of Respondent Advanced Wellness, an unregistered dealer.

#### FRAUD IN CONNECTION WITH THE OFFER OF INVESTMENTS TIED TO THE WELLNESSTECH SYSTEMS

40. In connection with the offer of investments tied to the WellnessTech System, Respondents are intentionally failing to disclose the following material facts relating to the operations of Respondent Advanced Wellness:
  - A. The business repute, qualifications and experience of Respondent Advanced Wellness, including its experience in successfully evaluating, managing and servicing medical equipment, and

B. The assets, liabilities and capitalization of Respondent Advanced Wellness, or any financial information relating to its ability to satisfy its promise to pay a fixed annual return of 20 percent over a two-year term.

41. ABANDONED.

42. ABANDONED.

43. In connection with the offer of investments tied to the WellnessTech System, Respondents are intentionally failing to disclose the following material facts relating to the risks associated with the investments tied to the WellnessTech System:

A. The WellnessTech System may be subject to technical glitches, malfunctions, defects or other technical impediments, and these technical impediments may negatively impact its ability to test patients,

B. The WellnessTech System may suffer physical or elemental damage, such as cracks, abrasions or contamination from water, that may negatively impact its ability to test patients,

C. Respondent Advanced Wellness competes with other entities for market share, and promoters of other products may secure contracts with medical facilities that require the medical facilities to use products other than the WellnessTech System,

D. ABANDONED.

E. Turnover of staff at medical facilities may require Advanced Wellness or another party to regularly train new practitioners before the practitioners can use the WellnessTech System to test patients,

F. Medical facilities using the WellnessTech System compete with other medical facilities for market share, and this competition may result in fewer patients frequenting a medical facility using the WellnessTech System,

G. A medical facility using the WellnessTech System may close, file for bankruptcy or otherwise cease doing business, and

H. Changes in regulation by the government or coverage by insurance carriers may negatively impact the use, costs or profitability of the WellnessTech System.

44. In connection with the offer of investments tied to the WellnessTech System, Respondents are intentionally failing to disclose Respondent Recovery Management's role in offering, servicing or managing the WellnessTech System or investments tied to the WellnessTech System, and this information constitutes a material fact.

45. In connection with the offer of investments tied to the WellnessTech System, Respondents are intentionally failing to disclose the following material facts relating to other investment offerings:
  - A. Respondent Recovery Management has been advertising "Secured Partnership Investments" tied to secured mortgages and other types of receivables that purportedly generate returns of more than 20 percent on an annual basis, and
  - B. Any information that reflects the success of the Secured Partnership Investments, as well as any outstanding obligations to investors promised a return of more than 20 percent on an annual basis.
46. In connection with the offer of investments tied to the WellnessTech System, Respondents are intentionally failing to disclose the following material facts relating to the Enforcement Division:
  - A. Respondents are intentionally failing to disclose that the Enforcement Division determined the investments tied to the WellnessTech System are securities regulated by the Securities Act,
  - B. Respondents are intentionally failing to disclose that the Enforcement Division determined that Respondents were violating statutory registration and disclosure requirements through their offer of investments tied to the WellnessTech System, and
  - C. Respondents are intentionally failing to disclose that Respondent Johnson submitted false information to the Director of the Enforcement Division and misrepresented that Respondent Advanced Wellness and Respondent Johnson would comply with the Securities Act by ceasing offers of the investments tied to the WellnessTech System.

MISLEADING AND DECEPTIVE STATEMENTS IN CONNECTION WITH  
THE OFFER OF INVESTMENTS TIED TO THE WELLNESSTECH SYSTEMS

47. REMOVED.
48. ABANDONED.

CONCLUSIONS OF LAW

1. The investments tied to the WellnessTech System are "securities" as that term is defined in Section 4.A of the 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. REMOVED.
6. Respondents' conduct, acts and practices threaten immediate and irreparable harm.
7. The foregoing violations constitute bases for the issuance of an Emergency Cease and Desist Order pursuant to Section 23-2 of the Securities Act.

### ORDER

IT IS THEREFORE ORDERED that the Emergency Cease and Desist Order, Order No. ENF-19-CDO-1775, issued against Respondents on March 19, 2019, shall be affirmed with the modifications detailed above.

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 they 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.

SIGNED AND ENTERED by the Securities Commissioner on July 23, 2020.



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TRAVIS J. ILES  
Securities Commissioner

## CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been sent to the Respondents by certified mail, return receipt requested, to their last known addresses on Page 1 of this Order; to the Respondents' representative of record named below via electronic mail and certified mail, return receipt requested; to the Staff via electronic mail and hand-delivery; and by regular mail to the State Office of Administrative Hearings, on July 23, 2020.

Randall Johnson  
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Georgetown, Texas 78628  
[rmiusa@verizon.net](mailto:rmiusa@verizon.net)  
*Representative for Respondents*

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*Representative for Staff*

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Administrative Law Judge  
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Marlene K. Sparkman  
General Counsel  
State Securities Board