Division of Securities
Utah Department of Commerce
160 East 300 South
Box 146760
Salt Lake City, UT 84114-6760
Telephone: (801) 530-6600
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BEFORE THE DIVISION OF SECURITIES

OF THE DEPARTMENT OF COMMERCE OF THE STATE OF UTAH

IN THE MATTER OF:	MOTION FOR ENTRY OF DEFAULT JUDGMENT
JEFFREY LANE MOWEN; ELIZABETH WARD (aka MOWEN); Respondents.	**Docket No. SD-06-0037** Docket No. SD-06-0038

The Utah Division of Securities (Division) hereby moves for a default judgment against Jeffrey Lane Mowen, based on the following:

1. On June 29, 2006, the Division commenced a formal adjudicative proceeding by issuing an Order to Show Cause (OSC) and Notice of Agency Action (Notice) to Jeffrey Lane Mowen (Mowen).

2. On July 7, 2006, the Division received notice from the United States Postal Service that the OSC and Notice were successfully delivered to Mowen at the Utah County Jail, where he was held temporarily as an inmate.

3. At a hearing held on Friday, August 4, 2006, the presiding officer, Wayne Klein, extended Mowen's deadline to respond to the OSC to August 18th, 2006.

4. Mowen attended the August 4th hearing, along with attorney Michael Holje, of Brown Bradshaw and Moffat, and said he planned to retain Mr. Holje in the following weeks and file an answer to the OSC by the given deadline.

5. As of the date of this motion Mowen has not filed a response to the OSC.

WHEREFORE, the Division requests that the Court find Jeffrey Lane Mowen in default pursuant to Utah Code Ann. § 63-46b-11(1)© and requests that the Court enter a default judgment for the Division as follows:

1. That Jeffrey Lane Mowen be adjudged and decreed to have willfully engaged in the acts alleged in the June 29, 2006, OSC, in violation of the Utah Uniform Securities Act;

2. That Jeffrey Lane Mowen be ordered to permanently cease and desist from any violations of the Act; and

3. That Jeffrey Lane Mowen be ordered to pay a fine of two hundred fifty thousand dollars ($250,000) to the Division, by Thursday, November 30, 2006.

DATED this 1 day of September, 2006.

MARK L. SHURTLEFF
UTAH ATTORNEY GENERAL

JEFF BUCKNER
Assistant Attorney General

Division of Securities
Utah Department of Commerce
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BEFORE THE DIVISION OF SECURITIES

OF THE DEPARTMENT OF COMMERCE OF THE STATE OF UTAH

IN THE MATTER OF:	AFFIDAVIT OF SERVICE AND NON-RESPONSE
JEFFREY LANE MOWEN; ELIZABETH WARD (aka MOWEN); Respondents.	**Docket No. SD-06-0037** Docket No. SD-06-0038

I, Pam Radzinski, first being duly sworn, depose and state as follows:

1. I am the Executive Secretary for the Department of Commerce Division of Securities (the Division).

2. As executive secretary for the Division, I am responsible for supervising the mailing of the Division's Orders to Show Cause and for receiving any responses filed by respondents.

3. On June 29, 2006, the Division mailed, by certified mail, an Order to Show Cause (OSC) to Jeffrey Lane Mowen, along with a Notice of Agency Action (Notice), advising that a

default order would be entered if he failed to file a written response to the OSC within thirty (30) days of the mailing date of the Notice.

4. On July 7, 2006, the Division received notice from the United States Postal Service that the OSC and Notice were successfully delivered to Mowen at the Utah County Jail, where he was held temporarily as an inmate.

5. At a hearing held on Friday, August 4, 2006, the presiding officer, Wayne Klein, extended Mowen's deadline to respond to the OSC to August 18th, 2006.

6. As of the date of this Affidavit, the Division has not received a response from Jeffrey Lane Mowen.

DATED this 5TH day of September, 2006.

PAM RADZINSKI
Executive Secretary

SALT LAKE COUNTY)
) ss
STATE OF UTAH)

Signed and subscribed to before me this 5 day of September, 2006

NOTARY PUBLIC
KAREN S. MEDLEY
160 East 300 South 2nd Fl
Salt Lake City, UT 84114
COMMISSION EXPIRES
April 8, 2007
STATE OF UTAH

Notary Public