

Division of Securities
Utah Department of Commerce
160 East 300 South, 2nd Floor
Box 146760
Salt Lake City, UT 84114-6760
Telephone: (801) 530-6600
FAX: (801)530-6980

**BEFORE THE DIVISION OF SECURITIES
OF THE DEPARTMENT OF COMMERCE
OF THE STATE OF UTAH**

IN THE MATTER OF:

**PARAGON INVESTMENTS, INC.,
STEVEN E. ELMONT, and
MARK A. MEILING,**

Respondents.

ORDER TO SHOW CAUSE

Docket No. SD-10-0001

Docket No. SD-10-0002

Docket No. SD-10-0003

It appears to the Director of the Utah Division of Securities (Director) that Paragon Investments, Inc., Steven E. Elmont, and Mark A. Meiling have engaged in acts and practices that violate the Utah Uniform Securities Act, Utah Code Ann. § 61-1-1, et seq. (the Act). Those acts are more fully described herein. Based upon information discovered in the course of the Utah Division of Securities' (Division) investigation of this matter, the Director issues this Order to Show Cause in accordance with the provisions of § 61-1-20(1) of the Act.

STATEMENT OF JURISDICTION

1. Jurisdiction over Respondents and the subject matter is appropriate because the Division

alleges that they violated § 61-1-1 (securities fraud) of the Act while engaged in the offer and sale of securities in or from Utah.

STATEMENT OF FACTS

THE RESPONDENTS

2. Paragon Investments, Inc. (Paragon) was, at all times relevant, a Utah corporation. Paragon incorporated in Utah on April 26, 2000. It was voluntarily dissolved as of April 28, 2009.
3. Steven E. Elmont (Elmont) was, at all relevant times, a resident of Utah County, Utah. Elmont is not licensed as a broker-dealer, agent, investment advisor, or investment advisor representative in Utah.
4. Mark A. Meiling (Meiling) was, at all relevant times, a resident of Salt Lake County, Utah. Meiling is not and has never been licensed as a broker-dealer, agent, investment advisor, or investment advisor representative in Utah.

GENERAL ALLEGATIONS

5. From approximately December 2005 to August 2007, Respondents offered and sold securities to four groups of investors, in or from Utah, and collected a total of at least \$6,010,000.
6. Elmont and Meiling made material misrepresentations and omissions regarding the \$6,010,000 invested by the investors at issue.
7. The investors lost \$4,002,000 in principal alone.

INVESTOR HH

8. In December 2005, Meiling met with HH in Salt Lake County, Utah to discuss an investment opportunity in Paragon.
9. During the meeting, Meiling made the following representations:
 - a. Paragon collected funds to invest with Thomas Bannon¹ (Bannon,) a trusted investment banker in New York, who would invest the funds worldwide into “micro international investments;”
 - b. The investments involved certain transactions where each transaction earned small amounts of money;
 - c. Advancement in computer technology made it possible to earn money based on the number of transactions;
 - d. Bannon would keep a certain percentage of the interest earned, then Paragon and Meiling would each earn 0.5% per month on HH’s funds, leaving a 4% per month return for HH on a one-year term;
 - e. HH’s returns would be paid in a lump sum payment at the end of the year;
 - f. A minimum of \$100,000 was needed to invest, and additional funds could be added in \$100,000 increments;
 - g. Meiling invested in Paragon and was making money;

¹Thomas Bannon is listed as the Manager/Member and registered agent of Overseas Investors LLC (Overseas.) Overseas incorporated in Florida on September 17, 1998. Overseas is not registered with the Utah Division of Securities.

- h. There was some risk involved with the investment; and
 - i. HH would be able to get his investment funds back within fifteen days of giving Paragon notice.
- 10. On or about January 10, 2006, HH spoke to Elmont by telephone while HH was in Salt Lake County, Utah.
- 11. During the telephone conversation with HH, Elmont made the following representations:
 - a. Paragon was collecting funds to invest with Bannon;
 - b. Paragon offered a 4% per month return on investment funds;
 - c. To participate, HH needed a minimum investment of \$100,000; and
 - d. HH could get his funds back within 15 days notice.
- 12. Following the telephone conversation with HH, Elmont sent HH an e-mail with a document attached entitled *Financial Joint Venture Agreement (Agreement.)*
- 13. According to the Agreement, HH agreed to wire \$100,000 to Paragon's Washington Mutual Bank account in Utah County, Utah, on January 11, 2006.
- 14. The Agreement states the following:
 - a. Paragon "guaranties (*sic*) to HH the payment of a monthly four percent (4%) return on investment;"
 - b. HH could add to his investment in increments of "no less than \$100,000;" and
 - c. Funds could be liquidated after giving Paragon fifteen days written notice.
- 15. At no time did Meiling or Elmont provide HH with disclosure documents.

16. Based on Meiling and Elmont's representations, HH wired \$100,000 to Paragon's Washington Mutual bank account on or about January 11, 2006. HH only authorized Paragon to invest the funds with Bannon.
17. Bank records reveal that HH's initial \$100,000 investment was deposited into Paragon's Washington Mutual Bank account on or about January 11, 2006, bringing the account balance to \$100,000.21. On January 12, 2006, \$100,000 was wired from Paragon's account to Bannon and Overseas.
18. After HH made the initial investment, Elmont sent HH e-mails, stating HH's interest was "parked" in an account until the lump sum payment was made to HH.
19. On or about August 11, 2006, HH invested an additional \$100,000.
20. Bank records reveal that HH's second \$100,000 investment was deposited into Paragon's Washington Mutual Bank account on or about August 11, 2006, and brought the account balance to \$101,120.55.
21. Elmont also transferred \$100,000 from Paragon's account that same day to another account held by Paragon at Washington Mutual, bringing that second account balance to \$133,193.88. A first in first out analysis of the funds shows the \$100,000 was part of a \$400,000 transfer to S3 Consulting, Inc.²
22. On or about December 12, 2006, HH invested another \$100,000 for a third time.

²S3 Consulting, Inc. (S3) incorporated in Utah on April 13, 2005. Joseph R. Jackson (Jackson) is listed as Director and President. S3's status is active as of September 2, 2009. S3 is not registered with the Utah Division of Securities.

23. Bank records reveal that HH's third \$100,000 investment was deposited into Paragon's Washington Mutual Bank account on or about December 12, 2006, bringing the account balance to \$214,230.75. HH's funds were used in the following manner:
 - a. \$2,235.65 to pay Select Health pace; and
 - b. \$97,764.35 to pay ADP Financial Services (ADP.)³
24. To date, HH has received about \$144,000 in interest payments from Paragon and Elmont.

CAPITAL VENTURES' INVESTMENTS (TW AND VW)

25. In or about February 2006, TW and VW met Meiling at an insurance seminar in Boise, Idaho.⁴
26. Meiling told TW and VW about an investment opportunity with Elmont and Paragon. Meiling said that the investment involved overnight banking and that Paragon offered a 4% per month return on investment funds.
27. Days following the seminar, TW and VW contacted Elmont by telephone while in Boise, Idaho. Elmont said he was at his office in Draper, Utah. Subsequently, TW and VW had numerous discussions with Elmont via telephone and in person while in Nampa, Idaho.
28. During these conversations, Elmont made the following representations:
 - a. He owned and operated Paragon;

³Paragon used ADP to pay Elmont, Jackson, Meiling, and the monthly interest payments of investors.

⁴Meiling presented at seminars discussing how to use home equity to invest in safer investments, such as insurance products. TW and VW worked in the mortgage industry.

- b. Funds placed with Paragon would be invested with a retired banker in New York (Bannon);⁵
- c. Bannon used investment funds for overnight banking, including the buying and selling of financial instruments;
- d. Bannon made a profit by engaging in arbitrage;
- e. Arbitrage minimized or eliminated risk, because Bannon would not have to hold on to an instrument for any length of time;
- f. Even though the risk involved with the investment was low, the investment was not for everybody;
- g. Investors had to have funds available to invest;
- h. Bannon leveraged investment funds by using a line of credit equal to ten times the amount of capital placed with Bannon;
- i. Bannon did not need to make much of a profit when selling the instruments to make money;
- j. If Bannon made 0.1% on a transaction, it was as if Bannon actually made 1% on the transaction because of the leveraging;
- k. He had known Bannon for about six years, but had invested with Bannon for about one year;

⁵TW and VW did not learn that the retired banker was Bannon until months after the investment.

- l. Bannon never missed a payment during the year Elmont and Paragon had been investing;
 - m. He would be able to pay Paragon's investors as long as Bannon continued to pay Paragon;
 - n. Paragon always had less than ten investors, but Elmont did not disclose the exact number;
 - o. A minimum investment of \$100,000 was needed to participate;
 - p. TW and VW could get their funds back by giving Elmont thirty days notice, but the maximum they were allowed back per month was \$250,000;
 - q. Paragon would receive a 5% per month return from Bannon on investment funds;
 - r. 4% per month would be paid to TW and VW; and
 - s. Both Paragon and Meiling would earn 0.5% per month each.
29. TW and VW wanted to raise investment funds for Paragon through a company called Capital Ventures, LLC (CVL.) Elmont supported the idea.
30. On or about April 13, 2006, Elmont emailed TW and VW a document entitled *Financial Joint Venture Agreement* (Agreement.) The agreement states CVL agrees "to make available to Paragon" \$150,000.
31. The agreement makes the following statements:
- a. "Paragon guaranties (*sic*) the payment of a monthly 4% return on investment;"
 - b. CVL "may increase the amount of Funds (*sic*) in increments of no less than

\$100,000;”

- c. CVL may “withdraw all or part of its total Funds (*sic*), together with any accrued profits, upon giving Paragon thirty days notice;” and
 - d. “[E]ach withdrawal shall be limited to a maximum of \$250,000.”
- 32. Elmont failed to provide TW and VW with any disclosure documents.
 - 33. Based on Elmont’s representations, TW and VW wired \$50,000 from CVL’s bank account to Paragon’s Washington Mutual Bank account on or about April 14, 2006. TW and VW authorized Elmont and Paragon to invest the funds solely with Bannon.
 - 34. Bank records reveal TW’s and VW’s \$50,000 into Paragon’s Washington Mutual Bank account on or about April 14, 2006, bringing the account balance to \$51,023.80. Later that day, Paragon withdrew \$50,000 in order to purchase a \$50,000 official check made payable to S3.
 - 35. Between April 2006 and May 2007, CVL invested approximately \$5.65 million in Paragon. Several of CVL’s clients wired money directly to Paragon and had contact with Elmont prior to investing.
 - 36. Bank records reveal that Elmont used funds provided by TW and VW, CVL, and CVL’s investors in the following manner:
 - a. \$980,000 to Bannon;
 - b. Approximately \$3 million to S3;
 - c. \$1 million to Rochester Foundation, Inc.;

- d. Approximately \$450,000 to ADP payroll services;
 - e. Approximately \$200,000 to Joseph Jackson; and
 - f. Approximately \$125,000 to unknown sources.
37. On or about July 14, 2007, Elmont sent TW and VW a \$250,000 check as part of their request for principal to be returned.
38. Elmont and Paragon have paid CVL about \$1.85 million in interest and principal to date.

RB AND KB, HUSBAND AND WIFE

39. In or about January or February 2006, Meiling told RB and KB about an investment opportunity with Paragon in Sandy, Utah.
40. During the initial discussion, Meiling told RB that Paragon offered a 4% monthly return for funds and home equity funds could be used to invest.
41. On or about February 2, 2006, Meiling sent RB an e-mail with two attachments: an article explaining how to use home equity to accumulate wealth and a document entitled *Summary of Terms of Investment Agreement* (Summary.) The Summary states the following about the Paragon offering:
- a. Clients needed to invest at least \$100,000;
 - b. Clients could get funds back within fifteen days of providing Paragon with written notice;
 - c. Clients could earn 4% per month on investment funds;
 - d. Investment funds would “never be commingled with funds used to pay Paragon’s

day-to-day expenses;”

- e. Funds “may be commingled with other funds from Paragon and/or its clients that are being used for the same purpose;”
 - f. “[T]he methods used to generate the returns are proprietary and confidential;” and
 - g. The investment was “not an offering of securities of any kind.”
42. In or about Summer 2006, Meiling met with RB and KB in Sandy, Utah, to make a presentation about Paragon.
43. During the presentation, Meiling made the following representations:
- a. Paragon collected funds to invest with Bannon, who invested funds in Overseas Investors, LLC;
 - b. A minimum investment of \$100,000 was needed to participate and home equity could be used to invest;
 - c. The investment offered a 3.5% per month return;
 - d. Meiling would receive 0.5% per month for referring RB and KB to Paragon;
 - e. The investment was 100% safe, and there was no risk involved with the investment; and
 - f. RB could “retire the ward”⁶ with the investment.
44. In or about November 2006, Meiling met with RB and KB in Sandy, Utah.
45. During this meeting, Meiling made the following representations:

⁶Congregation for members of The Church of Jesus Christ of Latter-day Saints.

- a. Paragon had nine investors and was not accepting any funds from new investors;
 - b. He would sneak RB and KB into the investment because they were friends;
 - c. He would sneak RB and KB into the investment by having RB and KB send funds to another Paragon investor who had agreed to forward the funds to Paragon through Elite Ventures, LLC (Elite);⁷
 - d. He would give RB and KB a signed contract in return for an investment;⁸
 - e. RB's and KB's funds would be pooled with other investors' funds to make the \$100,000 investment minimum;⁹
 - f. The investment had no risk;
 - g. The investment was guaranteed 100%; and
 - h. RB and KB could get their funds back within fifteen days of making a request.
46. Meiling failed to provide RB and KB with any disclosure documents.
47. RB and KB only authorized their investment funds to be invested with Paragon and Bannon.
48. Based on Meiling's representations, RB and KB invested in Paragon by transferring

⁷Jason Lee, a brother-in-law to TW and VW, started his own business, Elite Ventures, LLC, to raise funds to invest with Paragon and Elmont.

⁸Following this statement, Meiling showed RB and KB a one page contract to be provided, which was similar to the Summary. However, RB and KB never received any such contract.

⁹This statement was made in response to RB's claim that he had access to \$120,000, but was only willing to invest \$50,000.

- \$50,000 to Elite's Washington Mutual Bank account on or about November 14, 2006.
49. Bank records reveal that RB's and KB's \$50,000 brought Elite's Washington Mutual Bank account balance to \$109,245.03.
 50. RB's and KB's funds were part of an \$89,000 transfer from Elite's account to Paragon's Washington Mutual Bank account on November 15, 2006, bringing the account balance to \$429,000.
 51. A first in first out analysis of the account shows the \$89,000 transfer was part of a \$695,000 transfer to S3.
 52. In or about July or August 2007, Meiling met with RB and KB regarding a new investment opportunity while in Sandy, Utah. During the discussion Meiling made the following representations:
 - a. RB and KB could invest a small amount of money and would make about ten times their investment within three months;
 - b. RB's and KB's funds would be held in a trust account and would be safe;
 - c. The Prime Minister of Canada was investing in the opportunity as well;
 - d. RB and KB could use home equity funds to invest; and
 - e. RB and KB would be able to get their funds aback at any time.
 53. Meiling never discussed how the investment made a profit, where the money was going, or how the funds would be used.
 54. Based on Meiling's representations, RB and KB transferred \$10,000 from a home equity

line of credit to Meiling's bank account on or about August 2, 2007.

55. Bank records reveal that \$10,000 was deposited in Meiling's Washington Mutual bank account on or about August 2, 2007, bringing the account balance to \$10,011.15.¹⁰
56. On or about August 3, 2007, \$10,000 was transferred from Meiling's account to an account held by Elite at Washington Mutual Bank, bringing the account balance to \$10,000.01. Records show RB's and KB's \$10,000 was part of a \$40,000 wire to an individual in Pennsylvania.
57. To date, RB and KB have received about \$14,000 on the Paragon investment from Elite, but have been unable to recover any funds on the \$10,000 investment.

CAUSES OF ACTION

COUNT I

Securities Fraud under § 61-1-1 of the Act

58. The Division incorporates and re-alleges paragraphs 1 through 57.
59. The investment opportunities offered and sold by Respondents are securities under § 61-1-13 of the Act.
60. In connection with the offer and sale of securities to investors, Respondents, directly or indirectly, made false statements, including, but not limited to, the following:
 - a. To RB and KB:
 - i. The offering was not a security of any kind, when in fact, the transaction

¹⁰According to Washington Mutual Bank the \$10,000 deposited in Meiling's account was a cash advance from RB's and KB's line of credit.

was a security;

- ii. The investment was 100% safe and involved no risk, when in fact, Meiling had no reasonable basis on which to make the statement;
- iii. The \$10,000 investment would be safe because it was held in a trust account, when in fact, Meiling had no reasonable basis on which to make this statement.

61. In connection with the offer and sale of securities to investors, Respondents, directly or indirectly, failed to disclose material information, including, but not limited to, the following, which was necessary in order to make representations made not misleading:

- a. That Meiling's claim that Bannon was a trusted investment banker was based on information passed to him from Elmont;
- b. That Meiling had not completed his own due diligence;
- c. That Elmont filed for Chapter 7 bankruptcy in 2003.¹¹
- d. To whom RB's and KB's funds would be given;
- e. How RB's and KB's investment would earn a profit;
- f. Some or all of the information typically provided in an offering circular or prospectus regarding Paragon, such as:
 - i. The identity of Paragon's principals;
 - ii. Paragon's financial statements;

¹¹Case number 03-32697 filed July 23, 2003 and terminated October 28, 2003.

- iii. The business and operating history of Paragon, Elite, and Bannon;
- iv. The track record of Paragon and Bannon to other investors;
- v. The number of other investors;
- vi. The risk factors for Paragon investors;
- vii. Discussion of pertinent suitability factors for the investment;
- viii. Any conflicts of interest the issuer, the principals, or the agents may have with regard to the investment;
- ix. Any involvement of Paragon or its principals in certain legal proceedings, including bankruptcy or prior violations of state or federal securities laws;
- x. Whether the investment is a registered security or exempt from registration; and
- xi. Whether the person selling the investment is licensed.

62. Based upon the foregoing, Paragon Investments, Steven E. Elmont and Mark A. Meiling violated § 61-1-1 of the Act.

COUNT II
Sale of an Unregistered Security under § 61-1-7 of the Act
(The Respondents)

- 63. The Division incorporates and re-alleges paragraphs 1 through 57.
- 64. The investment opportunities offered and sold by Respondents are securities under § 61-1-13 of the Act.
- 65. The securities were offered and sold in this state.

66. The securities were not registered under the Act, and Respondents did not file any claim of exemption relating to the securities.
67. Based on the above information, Paragon Investments, Inc., Steven E. Elmont, and Mark A. Meiling violated § 61-1-7 of the Act.

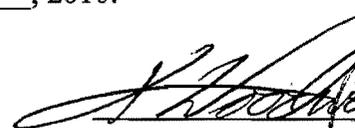
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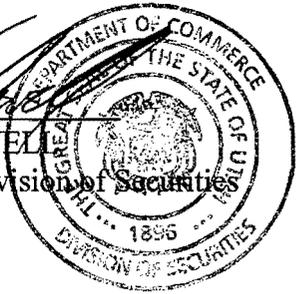
The Director, pursuant to § 61-1-20 of the Act, hereby orders Respondents to appear at a formal hearing to be conducted in accordance with Utah Code Ann. §§ 63-46b-4 and 63-46b-6 through -10, and held before the Utah Division of Securities. The hearing will occur on Tuesday, March 2, 2010, at 9:00 a.m., at the office of the Utah Division of Securities, located in the Heber Wells Building, 160 East 300 South, 2nd Floor, Salt Lake City, Utah. The purpose of the hearing is to establish a scheduling order and address any preliminary matters. If Respondents fail to file an answer and appear at the hearing, the Division of Securities may hold Respondents in default, and a fine may be imposed in accordance with Utah Code Ann. § 63-46b-11. In lieu of default, the Division may decide to proceed with the hearing under § 63-46b-10. At the hearing, Respondents may show cause, if any they have:

- a. Why Respondents should not be found to have engaged in the violations alleged by the Division in this Order to Show Cause;
- b. Why Respondents should not be ordered to cease and desist from engaging in any further conduct in violation of Utah Code Ann. § 61-1-1, or any other section of the Act;

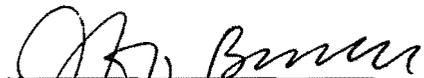
- c. Why Paragon Investments should not be ordered to pay a fine of \$5,000,000 to the Division of Securities, which may be reduced by restitution paid to the investors;
- d. Why Steven E. Elmont should not be ordered to pay a fine of \$2,500,000 to the Division of Securities, which may be reduced by restitution paid to the investors;
- e. Why Mark A. Meiling should not be ordered to pay a fine of \$225,000 to the Division of Securities, which may be reduced by restitution paid to the investors.

DATED this 13th day of January, 2010.


KEITH WOODWELL
Director, Utah Division of Securities



Approved:


JEFF BUCKNER
Assistant Attorney General

J. N.

Division of Securities
Utah Department of Commerce
160 East 300 South, 2nd Floor
Box 146760
Salt Lake City, UT 84114-6760
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FAX: (801)530-6980

**BEFORE THE DIVISION OF SECURITIES
OF THE DEPARTMENT OF COMMERCE
OF THE STATE OF UTAH**

IN THE MATTER OF:

**PARAGON INVESTMENTS, INC.,
STEVEN E. ELMONT, and
MARK A. MEILING,**

Respondents.

NOTICE OF AGENCY ACTION

Docket No. SD-10-0001

Docket No. SD-10-0002

Docket No. SD-10-0003

THE DIVISION OF SECURITIES TO THE ABOVE-NAMED RESPONDENT:

You are hereby notified that agency action in the form of an adjudicative proceeding has been commenced against you by the Utah Division of Securities (Division). The adjudicative proceeding is to be formal and will be conducted according to statute and rule. See Utah Code Ann. §§ 63G-4-201 and 63G-4-204 through 209; see also Utah Admin. Code R151-46b-1, *et seq.* The legal authority under which this formal adjudicative proceeding is to be maintained is Utah Code Ann. § 61-1-20. You may be represented by counsel or you may represent yourself in this proceeding. Utah Admin. Code R151-46b-6.

You must file a written response with the Division within thirty (30) days of the mailing date of this Notice. Your response must be in writing and signed by you or your representative. Your

response must include the file number and name of the adjudicative proceeding, your version of the facts, a statement of what relief you seek, and a statement summarizing why the relief you seek should be granted. Utah Code Ann. § 63G-4-204(1). In addition, pursuant to Utah Code Ann. § 63G-4-204(3), the presiding officer requires that your response:

- (a) admit or deny the allegations in each numbered paragraph of the Order to Show Cause, including a detailed explanation for any response other than an unqualified admission. Allegations in the Order to Show Cause not specifically denied are deemed admitted;
- (b) identify any additional facts or documents which you assert are relevant in light of the allegations made; and
- (c) state in short and plain terms your defenses to each allegation in the Order to Show Cause, including affirmative defenses, that were applicable at the time of the conduct (including exemptions or exceptions contained within the Utah Uniform Securities Act).

Your response, and any future pleadings or filings that should be part of the official files in this matter, should be sent to the following:

Signed originals to:

Administrative Court Clerk
c/o Pam Radzinski
Utah Division of Securities
160 E. 300 South, 2nd Floor
Box 146760
Salt Lake City, UT 84114-6760
(801) 530-6600

A copy to:

Jeff Buckner
Assistant Attorney General
160 East 300 South, 5th Floor
Salt Lake City, UT 84114-0872
(801) 366-0310

An initial hearing in this matter has been set for March 2, 2010 at the Division of Securities,

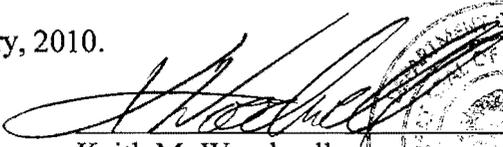
2nd Floor, 160 East 300 South, Salt Lake City, Utah, at 9:00 A.M.

If you fail to file a response, as described above, or fail to appear at any hearing that is set, the presiding officer may enter a default order against you without any further notice. Utah Code Ann. § 63G-4-209; Utah Admin. Code R151-46b-10(11). After issuing the default order, the presiding officer may grant the relief sought against you in the Order to Show Cause, and will conduct any further proceedings necessary to complete the adjudicative proceeding without your participation and will determine all issues in the proceeding. Utah Code Ann. § 63G-4-209(4); Utah Admin. Code R151-46b-10(11)(b). In the alternative, the Division may proceed with a hearing under § 63G-4-208.

The Administrative Law Judge will be J. Steven Eklund, Utah Department of Commerce, 160 East 300 South, P.O. Box 146701, Salt Lake City, UT 84114-6701, telephone (801) 530-6648. This adjudicative proceeding will be heard by Mr. Eklund and the Utah Securities Commission. You may appear and be heard and present evidence on your behalf at any such hearings.

You may attempt to negotiate a settlement of the matter without filing a response or proceeding to hearing. To do so, please contact the Utah Securities Division. Questions regarding the Order to Show Cause should be directed to the Division's attorney, Jeff Buckner, at (801) 366-0310.

Dated this 13th day of January, 2010.


Keith M. Woodwell
Director, Division of Securities



CERTIFICATE OF MAILING

I hereby certify that on the 14 day of January 2010, I mailed, by certified mail, a true and correct copy of the forgoing **Order to Show Cause and Notice of Agency Action** to:

Paragon Investments. Inc.
c/o Steven Earl Elmont
281 River Way
Lehi, UT 84043

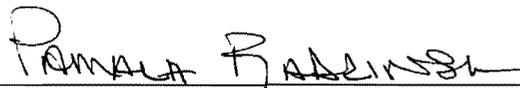
Certified Mail: 7009 2820 0001 2594 5576

Steven Earl Elmont
281 River Way
Lehi, UT 84043

Certified Mail: 7009 2820 0001 2594 5583

Mark Alan Meiling
1454 Silvercrest Drive
Sandy, UT 84093

Certified Mail: 7009 2820 0001 2594 5569



Pamala Radzinski
Executive Secretary