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SEP 04 2012

Wallace T. Boyack (# 404)  
BOYACK ASHTON LC  
2290 East 4500 South, Suite 130  
Salt Lake City, UT 84117  
Telephone (801) 278-9925  
Attorney for Manly E. Logan

Utah Department of Commerce  
Division of Securities

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

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IN THE MATTER OF:

MAVERICK MINING COMPANY, INC.  
MARK K. BOWMAN  
MANLEY E. LOGAN

LOGAN'S RESPONSE TO ORDER TO  
SHOW CAUSE

Docket No. SD-12-0046  
Docket No. SD-12-0047  
Docket No. SD-12-0048

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Manley E. Logan responds to the Division's Order to Show Cause as follows:

**FIRST DEFENSE**

To the extent a response is required to the introductory paragraph of the pleading, deny.

Response to numbered paragraphs of Order to Show Cause:

1. As to Respondent Logan, deny.
2. This Respondent is without sufficient information to admit or deny the allegations of this paragraph and therefore, deny.
3. This Respondent is without sufficient information to admit or deny the allegations of this paragraph and therefore, deny.
4. Admit.
5. Deny as to Respondent Logan. As to the other Respondent, this Respondent is without sufficient information to admit or deny the remaining allegations of this paragraph and therefore, deny.
6. As to this Respondent, deny. As to the other Respondent this Respondent is without sufficient

information to admit or deny the allegations of this paragraph and therefore, deny.

7. Admit.

8. Deny.

9. Deny.

10. Deny.

11. This Respondent is without sufficient information to admit or deny the allegations of this paragraph and therefore, deny.

12. This Respondent is without sufficient information to admit or deny the allegations of this paragraph and therefore, deny.

13. This Respondent is without sufficient information to admit or deny the allegations of this paragraph and therefore, deny.

14. This Respondent is without sufficient information to admit or deny the allegations of this paragraph and therefore, deny.

15. This Respondent is without sufficient information to admit or deny the allegations of this paragraph and therefore, deny.

16. This Respondent is without sufficient information to admit or deny the allegations of this paragraph and therefore, deny.

17. This Respondent is without sufficient information to admit or deny the allegations of this paragraph and therefore, deny.

18. Admit.

19. Admit.

20. Deny.

21. Deny and assert that Respondent Logan may have expressed his opinions or received information from Respondent Bowman which he relayed to J.M.

22. Respondent denies that he set up the call and as to the other allegations this Respondent is without sufficient information to admit or deny the allegations of this paragraph and therefore, deny.

23. This Respondent is without sufficient information to admit or deny the allegations of this paragraph and therefore, deny.

24. This Respondent is without sufficient information to admit or deny the allegations of this paragraph and therefore, deny.

25. Deny.

26. This Respondent is without sufficient information to admit or deny the allegations of this paragraph and therefore, deny.

27. This Respondent is without sufficient information to admit or deny the allegations of this paragraph and therefore, deny.

28. This Respondent is without sufficient information to admit or deny the allegations of this paragraph and therefore, deny.

29. This Respondent is without sufficient information to admit or deny the allegations of this paragraph and therefore, deny.

30. This Respondent is without sufficient information to admit or deny the allegations of this paragraph and therefore, deny.

31. This Respondent is without sufficient information to admit or deny the allegations of this paragraph and therefore, deny.

32. This Respondent is without sufficient information to admit or deny the allegations of this

paragraph and therefore, deny.

33. This Respondent is without sufficient information to admit or deny the allegations of this paragraph and therefore, deny.

34. This Respondent incorporates by reference his responses to paragraphs 1 through 33.

35. Deny.

36. Deny.

37. Deny.

38. This Respondent incorporates by reference his responses to paragraphs 1 through 33.

39. Deny.

40. Deny.

41. Deny.

This Respondent asserts the following defenses.

#### SECOND DEFENSE

The statements in the order to show cause are based in part on fraud. Fraud should be plead with particularity. The allegations and statements are not made with particularity.

#### THIRD DEFENSE

This Respondent did not offer, sell, or solicit individuals referenced in the Order to Show Cause to purchase securities

#### FOURTH DEFENSE

Some of the allegations about fraudulent misstatements reference matters that are not material, lack relevance, and are stale and dated.

#### FIFTH DEFENSE

The allegations frequently referred to “Respondents” without identify which Respondent committed the violation or made the statement or engaged in the conduct. This is patently unfair and prejudicial to this Respondent.

#### SIXTH DEFENSE

J. M. became a principal of Maverick and had superior access to information and the facts than Respondent Logan.

#### SEVENTH DEFENSE

Respondent Logan had no duty to disclose.

#### EIGHTH DEFENSE

Respondent Logan was not an officer or a director of Maverick, was not a salesman of the securities, and had no authorization or authority to be a salesman of any securities. He received no compensation relating to the sale of securities.

#### NINTH DEFENSE

Respondent Logan’s declarations were opinions, were made in casual conversation, and should be considered puffing.

#### TENTH DEFENSE

The allegations clearly state that Respondent Logan was not involved in the offer or sale of any securities.

#### ELEVENTH DEFENSE

Respondent Logan relayed information others told him.  
Any allegation no specifically admitted is denied.

#### CONCLUSION

Based on the foregoing the Order to Show Cause should be denied.

Dated this 4 day of September 2012.

  
Wallace T. Boyack  
Attorney for Manley E. Logan

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 4 day of September 2012 an original or copy of the foregoing Response to the Order to Show Cause was served on the following by U.S. Mail or personal service:

Administrative Court Clerk  
c/o Julie Price  
Utah Division of Securities  
160 East 300 South, 2<sup>nd</sup> Floor  
Box 146760  
Salt Lake City, Utah 84114-6760

D. Scott Davis  
Assistant Attorney General  
Utah Division of Securities  
160 East 300 South, 5<sup>th</sup> Floor  
Salt Lake City, Utah 84114-0872

