

To whom it may concern:

On behalf of myself, Jeffrey Steven Hall and J&K Lending, which I was the owner and acting manager of, I am responding to the Order to Show Cause, case number SD-13-0003 and SD-13-0004.

I am not using an attorney or any representative as I don't have the funds to do so. I will to the best of my ability answer all questions honestly. I believe I am following the order that was requested in the Order to Show Cause sent to me. I believe I am supposed to answer each of the allegations on part 11, letter a. through letter h.

- a. CMG partnered with MGM. There is proof everywhere from MGM's website, CMG's website, large magazines and tv show that advertised it, the equipment MGM allowed CMG to use from the actual Star Gate movie, and the contracts between the two companies. It was no secret on either part.
- b. I had 3 other people with me that sat with Gary Whiting, Tim Jensen, and other employees that all said the same thing. They wanted to hit stores by Black Friday after Thanksgiving. They showed us how they were going to advertise in theatres after Halloween. And in many magazines, online video sites, and blogs all were discussing that it was one of the biggest games that was going to hit the market and would try to compete with the 900 lbs gorilla of World of Warcraft. One of the sites was a very popular gaming site called "10 Ton Hammer". I have never played a game in my life, outside of Super Mario Brothers and a few Atari games as a kid, but I just googled it at the time and found thousands of people talking about it and its hopeful release date.
- c. I would call Gary on a regular basis to get updates. I would also talk to audio designers and artist that were working on graphics just to get different opinions. Everything was always congruent and positive.
- d. It was not at risky as other investments. Michelle and I spent hours at her house, restaurants, sporting games, etc and discussed many things. One was my investments and she was always saying she needed someone to help her start investing in more things. I mainly did hard money deals on property. In southern Utah, everyone wanted land and we had lent against it. But land depreciated as you well know and we lost everything. I had also done some trading. When you compare those to a game partnered with MGM, over hundreds of sites and magazines, and had raised some \$40 million dollars, it was not as risky as other stuff she knew I had done. Michelle was starting a new venture that I knew nothing about, but she came to me to help her raise money. It later fizzled to nothing and she charged me \$5,000 for saying I was a part of her idea that cost her \$15,000. I paid her for it and she promised I would receive the study done to use if I wanted, but then denied it to me once CMG went bad. But the point, it was not as risky as many other things I had done based off all those things.
- e. Is very similar to D. Like I said before, we openly talked about over ten of my investments over the years and she was always asking how they were going and the details on them. That's why she sought me out to invest in her company she wanted to start around this exact same time. I gave her every document that CMG had ever given me or anyone else that was invested with them.

UTAH ATTORNEY GENERAL'S OFFICE

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Commercial Enforcement Division

- f. In order to invest, you had to buy a minimum of 50,000 shares. And if you brought in a half a million, they were being sold for \$3.00 for the quantity. I spoke with an SEC attorney named Gary Henry. He told me it was perfectly legal to sell your own shares if they had been owned over a year and the price was fair. (below the market value) So she got them cheaper than anyone else buying at the time, even if they bought 500,000 shares. That's why it was a good deal.
- g. Gary Whiting and Tim Jensen both told me along with those with me that they would go public 60 days after the time the game started selling via internet and stores.
- h. I had 3 others with me at their office when they told me that they had two companies bidding to take CMG public and they thought they could get \$13 a share when it when public.

I had no insider information about anything Gary Whiting was going through legally or what he had gone through. I spoke to so many employees and his partners and even one of his partners that he had for 5 years and everyone said he was on the up and up and was doing a great job with the funding and marketing of CMG and that the company was doing great.

I know that Michelle feels like I lied to her or that I tried to do some type of wrong doing to her. I don't understand why at all. She got every legal document I ever saw or received from CMG. She got her certificates/shares, she had every opportunity I had to look more into the game before and after she invested. I know I said it before, but I was told by an SEC attorney that I could legally sell my own shares. Even since then, I have talked to him 3 times and he says I did nothing wrong at all. I moved to South Carolina to try to start over near my wife's family. We have lived with them that last year and half and I have a job working with middle school kids that have criminal records and we try to integrate them back into regular education classes. I am salaried at \$14,000 a year and I work a second job at the airport loading luggage and make \$9.20 an hour. I'm doing my best right now and I live an honest life and always have. I am sorry for her loss. I lost everything I had in the investment. I lost hundreds of thousands and still have not recovered. I apologize to you as well for wasting government money on such a case. But I feel I didn't do anything wrong at all.

Sincerely,

Jeff Hall

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