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BEFORE THE DIVISION OF SECURITIES

OF THE DEPARTMENT OF COMMERCE

OF THE STATE OF UTAH

IN THE MATTER OF, RED DESERT DEVELOPMENT CORP.; RED DESERT UNDERGROUND, LLC; RONALD H. BAIRD RESPONDENTS.	PETITIONER'S INITIAL DISCLOSURES CASE NO. SD- 13-0018 CASE NO. SD- 13-0019 CASE NO. SD- 13-0020

The undersigned Assistant Attorney General, Paul G. Amann, on behalf of the State of Utah, Department of Commerce, Securities Division (Division), hereby submits the following initial disclosures as required by Utah Administrative Code R151-4-503, and the scheduling order issued in this case.

WITNESSES (with discoverable information):

1. Respondent, Ronald H. Baird
2. Erin J. Chambers

   5277 Winchester Lane

   Ogden, Utah 84403

   Cell: (801)791-7517
3. Detective Rick Childress

Ogden City Police Department

629-8348

4. Matt Edwards

Utah Division of Securities Investigator

801.530.6612

5. Adam Sweet

Utah Division of Securities Investigator

801.530-6415

The Division reserves the right to amend its disclosures with the names of other witnesses as may become known through its investigation, discovery or other avenues.

EVIDENCE: With the exclusion of non-discoverable material (*e.g.*, material that is attorney work-product, attorney-client privileged, confidential) the Division hereby gives notice that it will provide reasonable access to its files as mandated by Rule 151-4-503(1)(b)(ii)(B) of the Utah Rules of Administrative Procedure.

Pursuant to Rule 151-4-503(1)(b)(ii)(A), the Division hereby describes the documents which are in the Division's possession:

1. Mountain America Credit Union (MACU) Signature Cards dated 9.16.11, 10.31.11, 12.27.11
2. Ronald Baird's MACU Statements dated 1.1.07 through 6.30.12
3. Red Desert Underground's MACU Statements dated 2.14.07 through 9.30.11
4. Ronald Baird's MACU Statements dated 3.21.07 through 9.30.10
5. Pressure Smoke USA, LLC's MACU Statements dated 5.4.10 through 6.30.12
6. Western AG Pro, LLC's MACU Statements dated 8.1.11 through 6.30.12
7. Ronni and Ronald Baird's MACU Statements dated 8.16.11 through 6.30.12
8. Western AG Pro, LLC's Statements dated 9.16.11 through 2.29.12
9. Division's Subpoena Duces Tecum to MACU dated 7.5.12
10. Wire transfer to MACU dated 12.16.11
11. Wire transfers to MACU dated 12.6.10, 8.1.11, 2.17.12
12. Wire transfers to MACU dated 11.5.07, 11.30.07, 12.28.07, 12.31.07
13. Wire transfers to MAC dated 2.14.11, 2.22.11, 3.1.11, 5.2.11

14. Red Desert Development canceled checks dated 3.27.07 through 2.8.08
15. MACU loan documents in Ronald Baird's name dated 12.1.06
16. MACU loan documents in Western AG Pro, LLC's name dated 12.16.11
17. MACU refusal to grant loan to Ronald Baird documents
18. Ronald Baird MACU signature card dated 12.1.06
19. Red Desert Underground signature card dated 2.14.07
20. Red Desert Development Corp. application and signature card dated 3.21.07
21. Red Desert Underground canceled checks dated 2.22.07 through 6.10.09
22. MACU cashier's checks 4.26.07 through 2.8.08
23. All Red Desert Dev. Corp. check deposits and teller work from March, 2007 through March, 2008
24. All Ron Baird check deposits and teller work from January, 2007 through December, 2008
25. All Red Desert Underground check deposits and teller work from February, 2007 through November, 2011
26. Red Desert Underground Articles of Organization
27. MACU Business Account Transfer Agreement
28. MACU one canceled cashier's check to Baird dated 5.2.11
29. Six canceled MACU cashier's checks dated 11.05.07 through 10.14.08
30. Thirty canceled MACU cashier's checks dated 3.5.07 through 11.24.08
31. Sixty-eight canceled MACU cashier's checks dated 3.23.07 through 12.29.08
32. Nine canceled MACU cashier's checks dated 8.18.11 through 6.1.12
33. Copies of checks deposited to Western AG Pro, LLC 8.16.11 through 7.11.12
34. Credit report for Ronald Baird dated 6.22.12
35. Credit report for Ronald Baird dated 12.9.11
36. Credit report for Ronald Baird dated 2.29.12
37. MACU deposits for Pressure Smoke Utah May, 2010 through 3.1.11
38. MACU deposits for Ronald Baird October, 2009 through 2.16.12
39. MACU deposits for Ronni Baird August, 2011 through 7.20.12

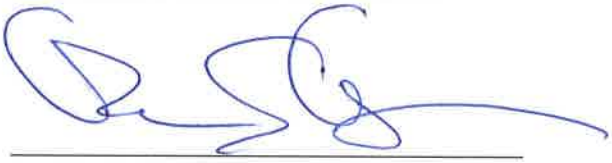
40. MACU canceled checks from Ronald Baird dated 1.19.07 through 12.1.10

41. Victim's original complaint including documentation of investigation by Ogden Police Department.

The Division reserves the right to amend its disclosures with other evidence as may become known through its investigation, discovery or other avenues.

DATED this 15th day of May, 2013.

JOHN E. SWALLOW
UTAH ATTORNEY GENERAL



PAUL G. AMANN
Assistant Attorney General

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th day of May, 2013, I sent via email a true and correct copy of the foregoing to the following:

Jared B. Pearson, Esq.
Counsel for Respondents
Email: jared@evelandlawfirm.com

Maria Skedros