

STATE OF OKLAHOMA  
DEPARTMENT OF SECURITIES  
FIRST NATIONAL CENTER  
120 N. ROBINSON, SUITE 860  
OKLAHOMA CITY, OKLAHOMA 73102



In the Matter of:

Roddy Howald,

Respondent.

ODS File No. 08-016

**ORDER TO CEASE AND DESIST**

Pursuant to Section 1-602 of the Oklahoma Uniform Securities Act of 2004 (Act), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (Supp. 2003), the Enforcement Division of the Oklahoma Department of Securities (Department) conducted an investigation into the activities of Embassy Ventures, Ltd., Embassy Investments and Securities, Inc., Timothy Broadous, Sheri Broadous, Edward Hunt, and Howald, in connection with the offer and/or sale of securities in and/or from the state of Oklahoma. Based thereon, a civil proceeding was filed in the District Court of Oklahoma County, CJ-2008-572, on January 18, 2008.

Without admitting or denying the Findings of Fact and Conclusions of Law set forth in the Petition, Respondent Howald voluntarily executed the *Agreement Relating to Roddy Howald* (Agreement), attached hereto as "Exhibit A" and incorporated herein by reference, and consented to the issuance of this *Order to Cease and Desist* (Order).

This Order is issued pursuant to the Agreement, Section 1-604 of the Act, and 660:2-5-3 of the Rules of the Oklahoma Securities Commission and the Administrator of the Department of Securities (as amended July 1, 2007). For purposes of this Order, the Administrator adopts the Findings of Fact and Conclusions of Law set forth below.

**Findings of Fact**

1. The Administrator has jurisdiction over Respondent Howald and the subject matter of this action.
2. Respondent Howald voluntarily entered into the Agreement and consented to the issuance of this Order.

To the extent any of these Findings of Fact are more properly characterized as Conclusions of Law, they should be so considered.

**Conclusions of Law**

1. The Administrator was authorized to enter into the Agreement and is authorized to issue this Order pursuant to Section 1-604 of the Act and 660:2-5-3 of the Rules.

2. It is in the public interest for the Administrator to issue this Order.

To the extent any of these Conclusions of Law are more properly characterized as Findings of Fact, they should be so considered.

**NOW THEREFORE, IT IS HEREBY ORDERED** that Respondent Howald cease and desist from engaging in act, practice, or course of business constituting a violation of the Act and/or Rules or doing any act in furtherance thereof.

**IT IS FURTHER ORDERED** that Respondent Howald comply with all other provisions of the Agreement.

Witness my Hand and the Official Seal of the Oklahoma Department of Securities this 20th day of October, 2009.

(SEAL)

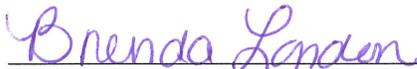
  
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**IRVING L. FAUGHT, ADMINISTRATOR OF THE  
OKLAHOMA DEPARTMENT OF SECURITIES**

CERTIFICATE OF MAILING

The undersigned hereby certifies that on the 20th day of October, 2009, a true and correct copy of the above and foregoing *Order to Cease and Desist* was mailed by first class mail, with postage prepaid thereon, addressed to:

Roddy Howald  
4337 S. Detroit Ave.  
Tulsa, OK 74105

P. David Newsome Jr.  
Cooper Newsome & Woosley PLLP  
401 S. Boston Ave., Ste. 3300  
Tulsa, OK 74103-4070

  
\_\_\_\_\_  
Brenda London, Paralegal

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In the Matter of:

Roddy Howald,

Respondent.

ODS File No. 08-016

**AGREEMENT RELATING TO RODDY HOWALD**

**THIS AGREEMENT** is entered into by and between Roddy Howald (Howald) and the Administrator (Administrator) of the Oklahoma Department of Securities (Department) as of the Effective Date set forth below.

Pursuant to Section 1-602 of the Oklahoma Uniform Securities Act of 2004 (Act), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (Supp. 2003), the Enforcement Division of the Department conducted an investigation into the activities of Embassy Ventures, Ltd. (Embassy Ventures), Embassy Investments and Securities, Inc. (Embassy Investments), Timothy Broadous, Sheri Broadous, Edward Hunt and Howald, in connection with the offer and/or sale of securities in and/or from the state of Oklahoma. Based thereon, a civil proceeding was filed in the District Court of Oklahoma County, CJ-2008-572 (Civil Proceeding), on January 18, 2008. The Department's investigation concluded that Howald offered and sold unregistered securities in violation of Section 1-301 of the Act and that Howald was not registered as an issuer agent to offer and sell securities in Oklahoma in violation of Section 1-402 of the Act.

Respondent Howald desires to expeditiously settle this matter without the adjudication of any issue of law or fact and enters into this Agreement without admitting or denying the Findings of Fact and Conclusions of Law set forth in the Petition. Respondent Howald voluntarily waives his right to a hearing provided by the Act, the Rules of the Oklahoma Securities Commission and the Administrator of the Department of Securities, and the Oklahoma Administrative Procedures Act, and any right to appeal.

The undersigned parties hereto agree as follows:

- 1. Jurisdiction.** The Administrator has jurisdiction over Respondent Howald and the subject matter of this action.
- 2. Order.** The Administrator will issue an order in the form attached hereto as "Attachment A."
- 3. Registration Requirement.** Respondent Howald agrees a) that he not will offer and/or sell securities in and/or from Oklahoma without the securities being registered or exempt from

registration under the Act or any successor act; b) that he will not offer and/or sell securities in and/or from Oklahoma unless he shall first become registered under the Act, subject to the terms of this Agreement; and c) that he will not engage in the business of advising others as to the value of securities or the advisability of investing in, purchasing or selling securities in and/or from Oklahoma unless he shall first become registered as an investment adviser and/or investment adviser representative under the Act, subject to the terms of this Agreement.

Howald may apply for registration under the Act, or any successor act, as an investment adviser, investment adviser representative, broker-dealer, and/or broker-dealer agent. The Department may not deny Howald's application based upon any of the conduct that was alleged in the Petition to have occurred prior to the date of this Agreement.

**4. Restrictions on Registration.** Any future registration of Howald under the Act, or any successor act, shall be subject to the conditions listed below:

- a.) Howald must meet the qualifications required by the Act or any successor act.
- b.) Howald shall not participate in any improper, unethical, and/or illegal conduct in the securities or insurance industry on or after the date of this Agreement.
- c.) For a period of two (2) years following registration as a broker-dealer agent, Howald shall be subject to heightened supervision by the broker-dealer or issuer with which he is affiliated.
- d.) For a period of two (2) years following registration as an investment adviser representative, Howald shall have a specially designated supervisor.
- e.) Howald shall provide the Department with the name of the specially designated supervisor and the individual shall be a broker-dealer agent, investment adviser, or investment adviser representative who is in compliance with federal and state securities laws, rules, and regulations and has no disciplinary history.

**5. Restrictions on Supervisory Capacity.** For a time period of six (6) years from the date of this Agreement, Howald shall be prohibited from being a partner, officer, or director of an investment adviser and/or broker-dealer or having a similar status or performing similar functions, or directly or indirectly, controlling an investment adviser or broker-dealer.

**6. No Coercion.** Respondent Howald enters into this Agreement voluntarily and without any duress, undue influence, or coercion by the Administrator, any employee of the Department, or any member of the Oklahoma Securities Commission.

**7. Consideration.** In consideration for this Agreement, the Administrator will not take further action against Respondent Howald in connection with the offer and/or sale of the securities of Embassy Ventures and Embassy Investments, except as provided below in items 8 and 9, and the Administrator will dismiss Respondent with prejudice as a party in the Civil Proceeding.

**8. Limitation on Agreement.** Nothing in this Agreement shall prohibit the Administrator from furnishing information to any other properly constituted agency or authority. In the event any other agency or authority commences an action in connection with information obtained by

the Administrator against Respondent Howald, the Administrator may assist in such action as authorized by law. It is further understood that the execution of this Agreement does not mean that the Administrator has passed in any way upon the merits of, or recommends or gives approval to, any future securities transactions by Respondent Howald.

**9. Failure to Comply.** If Respondent Howald fails to comply with the terms of this Agreement in any material respect, the Administrator shall proceed against Respondent Howald as authorized by law.

**10. Entire Agreement.** This writing constitutes the entire agreement of the parties with respect to the subject matter hereof and supersedes any and all prior and contemporaneous agreements, representations and understandings of the parties. No supplement, modification or amendment to this Agreement shall be binding unless executed in writing by each of the parties hereto.

**11. Effective Date.** This Agreement shall be effective as of the date on which it is signed by the Administrator as set forth below his signature hereto.

**12. Applicability.** This Agreement applies only to the activities of Respondent Howald, in connection with the offer and/or sale of the securities in Embassy Ventures and Embassy Investments, and to no others.

**IN WITNESS WHEREOF**, the parties have executed this Agreement as of the date and year set forth below their signatures hereto.

**RODDY HOWALD**

  
\_\_\_\_\_

Date: 10/10/09

Address: 4337 S. Detroit Ave -

Tulsa, OK 74105

**IRVING L. FAUGHT, ADMINISTRATOR  
OKLAHOMA DEPARTMENT OF SECURITIES**

  
\_\_\_\_\_

Date: October 20, 2009

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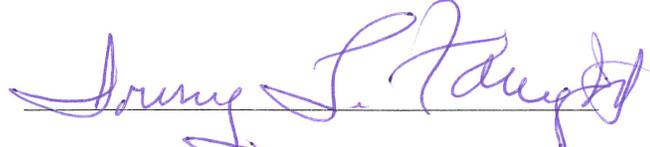
**RODDY HOWALD**

  
\_\_\_\_\_

Date: 10/10/09

Address: 4227 S. Detroit Ave -  
Tulsa, OK 74105

**IRVING L. FAUGHT, ADMINISTRATOR  
OKLAHOMA DEPARTMENT OF SECURITIES**

  
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Date: October 20, 2009

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Witness my Hand and the Official Seal of the Oklahoma Department of Securities this \_\_\_\_\_ day of October, 2009.

(SEAL)

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**IRVING L. FAUGHT, ADMINISTRATOR OF THE  
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4337 S. Detroit Ave.  
Tulsa, OK 74105

P. David Newsome Jr.  
Cooper Newsome & Woosley PLLP  
401 S. Boston Ave., Ste. 3300  
Tulsa, OK 74103-4070

\_\_\_\_\_  
Brenda London, Paralegal