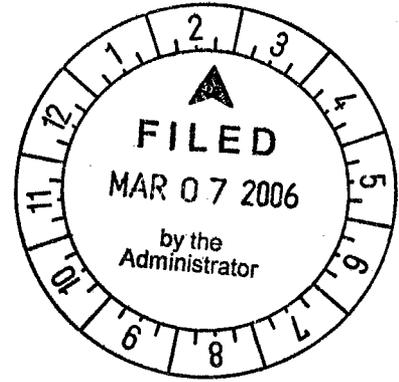


STATE OF OKLAHOMA  
DEPARTMENT OF SECURITIES  
FIRST NATIONAL CENTER  
120 N. ROBINSON, SUITE 860  
OKLAHOMA CITY, OKLAHOMA 73102



In the Matter of:

Shelter Petroleum, Inc.  
and Phillip Don Robinson, Sr.,

Respondents.

ODS File No. 05-107

**ORDER TO CEASE AND DESIST**

On February 1, 2006, an Enforcement Division Recommendation (Recommendation) naming Shelter Petroleum, Inc. (Shelter) and Phillip Don Robinson, Sr. (Robinson) (collectively, the "Respondents") was filed with the Administrator of the Oklahoma Department of Securities (Department). The issuance of a cease and desist order is authorized by Section 406 of the Oklahoma Securities Act (Predecessor Act), Okla. Stat. tit. 71, §§ 1-413, 501, 701-703 (2001 & Supp. 2003), and Section 1-604 of the Oklahoma Uniform Securities Act of 2004 (Act), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (Supp. 2003).

On February 3, 2006, the Administrator of the Department issued a Notice of Opportunity for Hearing with the Recommendation attached (Notice of Hearing). The Administrator also issued a Notice of Service on the Administrator and Affidavit of Compliance (Notice of Service) on February 3, 2006. The Notice of Hearing and the Notice of Service were mailed February 3, 2006, to the last known address of Respondents, by certified mail, return receipt requested, and delivery restricted. On February 8, 2006, the Notice of Hearing and the Notice of Service sent to Respondents at 1616 SW 80th Street, Oklahoma City, Oklahoma, were returned marked "Returned To Sender, Forwarding Order Expired."

The Notice of Hearing specified that failure to request a hearing would result in the issuance of an order to cease and desist against Respondents. No request for hearing or any other response has been received by the Administrator.

The Administrator of the Department, being fully advised in this matter, does hereby adopt the Findings of Fact and Conclusions of Law set forth below.

### Findings of Fact

1. Shelter was incorporated under the laws of the state of Oklahoma in November 1986. Shelter's status as an Oklahoma corporation was suspended on June 17, 2005.

2. At all times material hereto, Shelter operated under the dominion and control of Robinson.

3. Beginning in November 2003, Respondents offered and sold fractional undivided working interests in oil and gas leases (Working Interests) in and/or from Oklahoma.

4. The Working Interests were offered and sold by Respondents to persons with whom they had no previous substantive business relationship.

5. The Working Interests were not registered pursuant to Section 301 of the Predecessor Act.

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. Effective service of process was made on Respondents pursuant to Section 1-611 of the Act.

2. The Working Interests are securities as defined by subsection (v) of Section 2 of the Predecessor Act.

3. Respondents offered and sold unregistered securities in and/or from the state of Oklahoma, in violation of Section 301 of the Predecessor Act.

4. The Administrator has the authority to order Respondents to cease and desist from engaging in an act, practice, or course of business constituting a violation of the Predecessor Act and/or the Act.

5. It is in the public interest to order Respondents to cease and desist from engaging in an act, practice, or course of business constituting a violation of the Act.

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

**IT IS HEREBY ORDERED**, that Shelter and Robinson cease and desist from engaging in any act, practice, or course of business constituting a violation of the Act and from doing any act in furtherance thereof in any capacity.

Witness my Hand and the Official Seal of the Oklahoma Department of Securities  
this 7th day of ~~February~~<sup>March</sup>, 2006.

(SEAL)

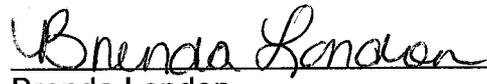
  
\_\_\_\_\_  
IRVING L. FAUGHT, ADMINISTRATOR OF THE  
OKLAHOMA DEPARTMENT OF SECURITIES

CERTIFICATE OF MAILING

The undersigned hereby certifies that on the 7th day of ~~February~~<sup>March</sup>, 2006, a true and correct copy of the above and foregoing Order to Cease and Desist was mailed by certified mail, return receipt requested, delivery restricted, with postage prepaid thereon, addressed to:

Shelter Petroleum, Inc.  
1616 SW 80th Street  
Oklahoma City, OK 73189

Phillip Don Robinson, Sr.  
1616 SW 80th Street  
Oklahoma City, OK 73189

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