

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

Oklahoma Department of Securities)
ex rel. Melanie Hall,)
Administrator,)
Plaintiff,)
v.)
North Texas Energy, Inc.,)
Defendant.)

OCT 10 2024

RICK WARREN
COURT CLERK

Case No. 111 _____

CV - 2024 - 2872

PLAINTIFF'S APPLICATION TO ENFORCE COMPLIANCE WITH AN ORDER TO
FILE STATEMENT AND PRODUCE DOCUMENTS
AND
AUTHORITY IN SUPPORT

Plaintiff, Oklahoma Department of Securities ("Department") ex rel. Melanie Hall, Administrator, moves this Court for an order enforcing compliance with an *Order to File Statement and Produce Documents* issued pursuant to Section 1-602(B) of the Oklahoma Uniform Securities Act of 2004 ("Act"), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (2024), to North Texas Energy, Inc. (the "OFS"). The OFS was issued for the purpose of obtaining a sworn statement with supporting documents necessary to the Department's investigation of possible violations of the Act.

BACKGROUND

1. North Texas Energy, Inc. ("NTE"), is a Nevada corporation. NTE's principal place of business is in Dallas, Texas. NTE purportedly participates in the oil and gas industry.

2. Based on information received by the Department, NTE may have violated, may be continuing to violate, and/or may have aided, or are materially aiding, violations of the Act by, at the least, the offer and sale of unregistered securities.

3. The Department has initiated an investigation into NTE's transactions. Section 1-602 of the Act sets out the authority of the Administrator of the Department ("Administrator") to investigate as follows:

(A) The Administrator may:

(1) Conduct public or private investigations within or outside of this state which the Administrator considers necessary or appropriate to determine whether a person has violated, is violating, or is about to violate this act or a rule adopted or order issued under this act, or to aid in the enforcement of this act or in the adoption of rules and forms under this act[.]

4. Subsection (B) of Section 1-602 of the Act authorizes the Administrator to require the filing of statements and production of documents as follows:

For the purpose of an investigation or proceeding under this act, the Administrator or its designated officer may administer oaths and affirmations, subpoena witnesses, seek compulsion of attendance, take evidence, require the filing of statements, and require the production of any records that the Administrator considers relevant or material to the investigation or proceeding.

5. On September 5, 2024, the Department issued the OFS with production due dates of September 16th and 23rd, 2024. *Exhibit A*. Service of the OFS on NTE was completed via certified mail, return receipt requested, with postage prepaid to NTE's listed registered agent's address in Nevada and was signed for on September 12, 2024. *Id.* at pg. 10.

6. To date, the Department has not received a response to the OFS. *Exhibit B*.

AUTHORITY

Pursuant to Section 1-602 of the Act, the Administrator has the authority to apply to this Court to enforce compliance with the OFS. Subsection (C) of Section 1-602 of the Act provides as follows:

If a person does not . . . file a statement [or] produce records...the Administrator may apply to the district court of Oklahoma County . . . to enforce compliance. The court may:

1. Hold the person in contempt;

* * *

3. Order the person to testify about the matter under investigation or in question;

4. Order the production of records;

5. Grant injunctive relief, *including* restricting or prohibiting the offer or sale of securities or the providing of investment advice (emphasis added);

6. Impose a civil penalty up to a maximum of Five Thousand Dollars (\$5,000.00) for a single violation or Two Hundred Fifty Thousand Dollars (\$250,000.00) for multiple violations in a single proceeding or a series of related proceedings; and

7. Grant any other necessary or appropriate relief.

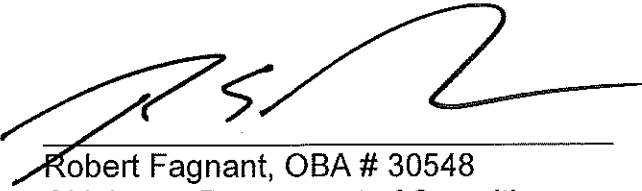
Enforcement of the OFS under Section 1-602 is necessary for the effective enforcement of the Act by the Administrator.

WHEREFORE, the Department requests this Court order NTE to file with the Department a sworn statement with supporting documents, as requested in the OFS, and grant such other relief as this Court deems appropriate.

Respectfully submitted,

OKLAHOMA DEPARTMENT OF SECURITIES
MELANIE HALL, ADMINISTRATOR

By:

A handwritten signature in black ink, appearing to read 'RF', is written over a horizontal line. The signature is stylized and cursive.

Robert Fagnant, OBA # 30548
Oklahoma Department of Securities
204 North Robinson Ave, Suite 400
Oklahoma City, Oklahoma 73102
Telephone: (405) 280-7700
Fax: (405) 280-7742
Email: rfagnant@securities.ok.gov

AFFIDAVIT OF BRENDA LONDON

STATE OF OKLAHOMA)
)
COUNTY OF OKLAHOMA) ss:

Brenda London, of lawful age, being first duly sworn, upon oath states as follows:

1. I am a Paralegal for the Oklahoma Department of Securities ("Department") and the custodian of records for the Enforcement Division of the Department.
2. In the course of its regularly conducted business activity, it is the practice of the Enforcement Division to make a record of the receipt of all incoming mail and hand-delivered items relating to an investigation or proceeding. These records are made at or near the time the Department receives the mail or hand-delivered items. The Enforcement Division preserves these records as required by law.
3. The Enforcement Division also preserves, in an electronic file, all documents, relating to an investigation or proceeding, submitted by electronic upload through the Department's website or via email.
4. After a diligent search of the Enforcement Division's records relating to North Texas Energy, Inc. ("NTE"), I have determined: the Department has not received any sworn statement or supporting documents as required in the *Order to File Statement and Produce Documents* issued by the Administrator of the Department to NTE on September 5, 2024 (the "OFS"), and the Department has not received any correspondence from NTE regarding the OFS.

FURTHER AFFIANT SAITH NOT.

Brenda London
Brenda London

Subscribed and sworn to before me this 17th day of October, 2024, by Brenda London.

[Signature]
Notary Public

(SEAL)



EXHIBIT B

OKLAHOMA DEPARTMENT OF SECURITIES
204 North Robinson, Suite 400
Oklahoma City, Oklahoma 73102

25-032

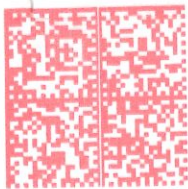
OKLAHOMA DEPARTMENT OF SECURITIES
204 North Robinson, Suite 400
Oklahoma City, Oklahoma 73102

25-032

CERTIFIED MAIL



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FIRST-CLASS MAIL
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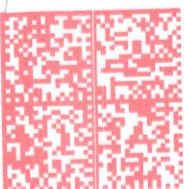
US POSTAGE

North Texas Energy, Inc.
17304 Preston Rd., Suite 800
Dallas, TX 75252

CERTIFIED MAIL



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US POSTAGE

North Texas Energy, Inc.
c/o United Registered Agents, Inc.
701 S. Carson St., Suite 200
Carson City, NV 89701