

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
204 NORTH ROBINSON AVE, SUITE 400
OKLAHOMA CITY, OK 73102



In the Matter of:

Eufaula Hills Holdings, Inc.,

Respondent.

ODS File No. 22-098

ORDER TO FILE STATEMENT

The Administrator of the Oklahoma Department of Securities ("**Department**") issues this Order pursuant to Section 1-602 of the Oklahoma Uniform Securities Act of 2004 ("**Act**"), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (2024), requiring the filing of a sworn statement with supporting documents by Eufaula Hills Holdings, Inc. ("**Respondent**").

In June 2021, you filed a United States Securities and Exchange Commission ("**SEC**") Form D with the SEC (the "**Form D**"). The date of your first sale disclosed in the Form D was 4/22/2021. Also disclosed in the Form D is your principal place of business – McAlester, Oklahoma – along with Oklahoma as your jurisdiction of organization.

Rule 660:11-11-61 of the *Rules of the Oklahoma Securities Commission and the Administrator of the Department of Securities* ("**Rules**"), Okla. Admin. Code, §§ 660:1-1-1 through 660:25-7-1, states, in part:

- (a) Notice requirement. Issuers offering a security in this state in reliance upon Section 1-301.1 of the [Act] by reason of compliance with Regulation D, Rule 506, . . . shall be required to file a notice with the Administrator. Such notice shall be *filed no later than fifteen (15) days* after the first sale of a security subject to the Securities Act for which a notice is required. (Emphasis added.)

IT IS HEREBY ORDERED that Respondent file with the Department, no later than August 21, 2024, a sworn statement, with any and all supporting documentation, describing in detail the following:

1. Your business activities in the state of Oklahoma in connection with the offering related to the Form D (the "**Offering**").
2. Identify any and all persons to whom you have offered and sold securities as part of the Offering, in or from Oklahoma.
3. Detail the reason(s) for your failure to comply with Rule 660:11-11-61.

4. Provide any and all subscription agreements, private placement memoranda and any other offering documents used by you in connection with the Offering.
5. Detail whether a diligent search has been made by you, or your representatives, for the information required by Item Nos. 1 through 4 above, whether you have provided all the information required, and if not, the reason(s) you have not.

Witness my Hand and the Official Seal of the Oklahoma Department of Securities this 18th day of August, 2024.

(SEAL)



KENNETH MAILLARD, DEPUTY ADMINISTRATOR
OF THE OKLAHOMA DEPARTMENT OF
SECURITIES



Appendix "A"

Instructions

1. Documents filed with the Department in response to the *Order to File Statement* ("Order") shall be accompanied by a list briefly identifying each document or other material, its custodian, and the item or items of the Order to which it relates.
2. Documents required by the Order must be produced in an electronic format. The documents shall be in their native format with all associated metadata.¹
3. Files shall be given a meaningful name in relation to their content (e.g. Smith_ChkBnk_Stmnt_1-1-12.xlsx, SmithContract_1-1-12.tiff) and NOT a generic file name (e.g. Bnk_0001.xlsx).
4. File names shall be unique and non-duplicative.
5. Electronic mail messages shall be filed with the Department in their native format (e.g. as a .pst, .msg, etc. file).
6. Imaged productions in the TIFF format will be accepted, when the documents filed with the Department are ordinarily used and maintained as such, if:
 - a. Images are at least 300 Dots Per Inch in resolution; and
 - b. The file type lends itself to imaging. If it does not, the production must include copies of the original file in its native format (for example, spreadsheets shall be produced as .xls or .xlsx files).
7. Adobe PDF files are acceptable as native file productions *only* when they have been used and maintained as PDF files in the normal course of business.
8. Files shall NOT be individually password protected. Password protection shall be applied only to the media the file(s) is stored upon when filed with the Department. Provide passwords to the Department via a separate, mailed or hand-delivered response.
9. Should any document(s), required to be filed by the Order, be withheld pursuant to a claim of privilege or for any other reason, submit a list stating: (a) the nature of the documents, communications, or information not being produced; (b) the creator(s) and date(s) of creation of the documents, communications, or information; (c) their present, or last known custodian; and (d) the reason(s) the documents are not produced.
10. Should any document(s) required to be filed by the Order have been destroyed for any reason, provide a detailed statement describing such document(s) and setting forth

¹ Assistance complying any technical requirements may be attained by calling the Department's IT office at (405) 280-7710. Respondents shall, at all times, retain the legal obligation and responsibility of complying with the Order.

when, how, and why the document(s) were destroyed. If the destruction occurred as a result of a document retention policy, provide a copy of that document retention policy with the detailed explanation.

11. Place a mark on all media, including, but not limited, to optical disks, flash drives and/or hard drives, containing files submitted by you identifying the media/files as having been provided by you.


12. Place a mark on all hardcopy documents submitted by you identifying them as having been provided by you.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 1st day of August, 2024, a true and correct copy of the above and foregoing *Order to File Statement* was emailed and mailed, by certified mail, return receipt requested, delivery restricted, with postage prepaid thereon, addressed to:

Eufaula Hills Holdings, Inc.
c/o Chong Yang
540 Thomas Rd.
McAlester, OK 74501

Eufaula Hills Holdings, Inc.
c/o Chong Yang
1406 E. South Ave.
McAlester, OK 74501



Michelle Statham
Paralegal

