UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549

ADMINISTRATIVE PROCEEDINGS RULINGS
Release No. 2244/January 22, 2015

ADMINISTRATIVE PROCEEDING
File No. 3-16104

In the Matter of	:	
	:	
MICHAEL LEE MENDENHALL	:	ORDER

      This Order addresses Respondent Michael Lee Mendenhall's (Mendenhall) motion, filed January 21, 2015, for a 120 day extension of time to respondent to the Division of Enforcement's (Division) motion for summary disposition. Mendenhall requests the extension in order to obtain legal representation. The Division responded on January 21, 2015.

      This proceeding was instituted on September 12, 2014, pursuant to Sections 15(b) of the Securities Exchange Act of 1934 and 203(f) of the Investment Advisers Act of 1940. The proceeding is a follow-on proceeding based on *People v. Mendenhall*, No. 2011CR10094 (Colo. Dist. Ct. Apr. 20, 2012), in which Mendenhall was convicted of securities fraud and theft under Colorado state law.

      A prehearing conference, at which Mendenhall and the Division appeared, was held on October 28, 2014. The Division was granted leave to file a motion for summary disposition pursuant to 17 C.F.R. § 201.250(a). *Michael Lee Mendenhall*, Admin. Proc. Rulings Release No. 1952, 2014 SEC LEXIS 4054 (A.L.J. Oct. 28, 2014). The date set for the Division's motion for summary disposition was December 12, 2014, and for Mendenhall's opposition, January 16, 2015. *Id*. Thus, Mendenhall has been aware of the due date for his opposition for three months but did not file his request for an extension until after that due date. Further, a four-month extension would adversely impact the timely completion of this proceeding and be an inefficient use of administrative resources. *See* 17 C.F.R. §§ 201.161(b), .360. However, a four-week extension will be granted. Mendenhall may file an opposition by February 13, 2015, and, if he does so, the Division may file a reply by February 20, 2015.

      IT IS SO ORDERED.

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/S/ Carol Fox Foelak
Carol Fox Foelak
Administrative Law Judge

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