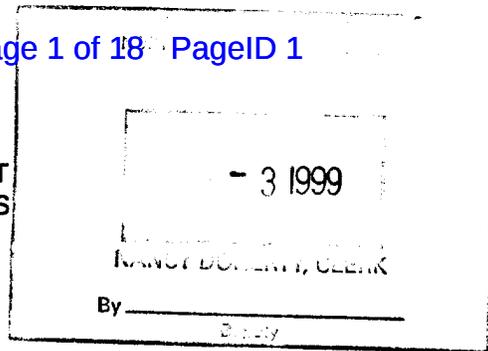


ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

vs.

REDBANK PETROLEUM, INC.,
AMERITECH PETROLEUM, INC.,
LYRIC INTERNATIONAL, INC.,
BRENT A. WAGMAN,
MARGARET F. SWINNEY,

Defendants,

and

MARY B. WAGMAN, WARREN DONOHUE, MICHAEL
G. MAGUIRE, NATURAL GAS TECHNOLOGIES,
INC., WOODMAN ENTERPRISES, INC.,
WAGMAN PETROLEUM, INC., SEISMIC
INTERNATIONAL, INC., and COOKE
ENTERPRISES, INC.,

Defendants Solely for Purposes
of Equitable Relief.

CIVIL ACTION NO.

3 - 99 CV 1267 - T

COMPLAINT

Plaintiff Securities And Exchange Commission, for its Complaint against Defendants Redbank Petroleum, Inc., AmeriTech Petroleum, Inc., Lyric International, Inc., Brent A. Wagman and Margaret F. Swinney (collectively "Defendants"), and Relief Defendants Mary B. Wagman, Warren Donohue, Michael G. Maguire, Natural Gas Technologies, Inc., Woodman Enterprises, Inc., Wagman Petroleum, Inc., Seismic Petroleum, Inc., and Cooke Enterprises, Inc. (collectively "Relief Defendants"), alleges the following:

SUMMARY

1. This matter involves a \$15 million unregistered note offering scheme and a related stock fraud that was devised and executed by Defendant Brent A. Wagman ("Wagman"), a recidivist securities law violator. Wagman was assisted in the scheme by his executive assistant, Defendant Margaret F. Swinney ("Swinney").

2. From approximately 1996 to the present, two privately held corporations under Wagman's control, Defendants AmeriTech Petroleum, Inc. ("AmeriTech") and Redbank Petroleum, Inc. ("Redbank"), sold at least \$15 million in "high interest corporate notes." Wagman initially offered and sold AmeriTech notes to investors beginning in around 1996; however, he began selling Redbank notes in 1998 after agreeing with the State of Maryland to refund approximately \$2 million to certain Maryland investors who had purchased AmeriTech notes. Proceeds from the sales of the Redbank notes were used, at least in part, in Ponzi fashion to recompense the Maryland investors. Neither Wagman nor Redbank disclosed to Redbank investors, or to AmeriTech investors who subsequently reinvested funds with the company, the existence of the Maryland action, or the intention to use the proceeds of the sales of Redbank notes in this manner.

3. The purported purpose of the sales of the AmeriTech/Redbank notes was to acquire existing oil and gas properties and leases and to fund the operations of AmeriTech and Redbank. Wagman and Swinney, through AmeriTech and Redbank, marketed the notes nationwide through a network of brokers and financial advisers. In turn, the brokers and financial advisers offered the notes to retirees and others as risk-free investments which were backed by an "unconditional guarantee" and which promised above market rates of return. Rather than using the proceeds of notes for the stated purposes, Wagman and Swinney diverted most of the proceeds from the note sales to fund the operations of several other entities under Wagman's control, to provide monies to Wagman and Swinney personally, and to make Ponzi payments to lull investors and lure new investors.

4. One of the Wagman-controlled companies that received proceeds from the AmeriTech and Redbank note offerings was Defendant Lyric International, Inc. ("Lyric"), a public company whose common stock is quoted in the over-the-counter market on the NASD Bulletin Board. During the past year, Lyric filed public reports with the Commission, issued press releases, made Internet postings and used other promotional documents, which among other things, promoted its acquisition of assets from Redbank and AmeriTech. These promotions were false and misleading because they failed to disclose Wagman's controlling relationship with Lyric, and that the assets had been acquired from related parties that had been sanctioned for securities violations.

5. Contemporaneously with the false and misleading promotions, Wagman sold at least \$389,637 of Lyric shares into the public market. Wagman controls more than three million additional shares of Lyric stock, which he is presently promising to sell to raise funds to reimburse complaining Redbank and AmeriTech investors.

6. The Relief Defendants, including Mary B. Wagman ("Mary Wagman"), Warren Donohue ("Donohue"), Michael G. Maguire ("Maguire"), Natural Gas Technologies, Inc. ("NGT"), Woodman Enterprises, Inc. ("Woodman"), Wagman Petroleum, Inc. ("Wagman Petroleum"), Seismic International, Inc. ("Seismic") and Cooke Enterprises, Inc. ("Cooke"), each obtained a portion of the funds that Defendants obtained from AmeriTech and Redbank investors or obtained Lyric stock for no apparent consideration.

7. By engaging in the conduct as described in this Complaint, the Defendants, directly or indirectly, have engaged, and unless enjoined and restrained, will again engage in transactions, acts, practices and courses of business that constitute violations of Section 17(a) of the Securities Act, 15 U.S.C. §77q(a), of Section 10(b) of the Securities Exchange Act of 1934 ("Exchange Act"), 15 U.S.C. §78j(b), and Rule 10b-5, 17 C.F.R. §240.10b-5, promulgated under Section 10(b) of the Exchange Act. In addition, by engaging in the conduct described in

this Complaint, Defendants Wagman, Swinney, AmeriTech and Redbank, directly or indirectly, have engaged, and unless enjoined and restrained, will again engage in transactions, acts, practices and courses of business that constitute violations of Sections 5(a) and 5(c) of the Securities Act of 1933 ("Securities Act"), 15 U.S.C. §§77e(a) & e(c).

JURISDICTION AND VENUE

8. Plaintiff Securities and Exchange Commission ("Commission") is an agency of the United States of America established by Section 4(a) of the Exchange Act, 15 U.S.C. §77d(a).

9. The Commission brings this action pursuant to the authority conferred upon the Commission by Section 20(b) of the Securities Act, 15 U.S.C. §77t(b), and by Section 21(d) of the Exchange Act, 15 U.S.C. §78u(d), to enjoin Redbank, AmeriTech, Lyric, Wagman and Swinney from future violations of the federal securities laws. The Commission also seeks disgorgement of ill-gotten gains from the Defendants plus prejudgment interest, an asset freeze, the appointment of a temporary receiver, an accounting and such other equitable relief that may be deemed appropriate. In addition, the Commission seeks civil penalties pursuant to Section 20(d) of the Securities Act, 15 U.S.C. §77t(d) and to Section 21(d) of the Exchange Act, 15 U.S.C. §78u(d).

10. The Commission is also seeking an order requiring the Relief Defendants to disgorge money and stock derived, directly or indirectly, from the Defendants' fraudulent conduct, and to pay prejudgment interest thereon, and for other appropriate relief.

11. This Court has jurisdiction over this action, and venue is proper, pursuant to Sections 20(d) and 22(a) of the Securities Act, 15 U.S.C. §§77t(d) and 77v(a), and Sections 21(d) and (e) and 27 of the Exchange Act, 15 U.S.C. §§77u(d) and (e) and 78aa.

12. The Defendants, directly or indirectly, made use of the means or instruments of transportation and communication, and the means or instrumentalities of interstate commerce

or of the mails, in connection with the transactions, acts, practices and courses of business alleged in this Complaint. Certain of the transactions, acts, practices and courses of business alleged herein took place in the Northern District of Texas and elsewhere.

DEFENDANTS

13. Redbank Petroleum, Inc. is a Texas corporation located in Addison, Texas, which purportedly is engaged in the business of oil and gas exploration.

14. AmeriTech Petroleum, Inc. is a Texas corporation located in Addison, Texas, which purportedly is engaged in the business of oil and gas exploration. AmeriTech has been named in actions for securities violations by two state regulatory authorities in connection with the offer and sale of securities described herein.

15. Lyric International, Inc. is a Colorado corporation with offices in Addison, Texas. Lyric's common stock is quoted on the NASD Bulletin Board. Lyric holds itself out as "a diverse, emerging service company" targeting the areas of natural resources, new technology and oil well services. Lyric operates from offices located next door to Redbank and AmeriTech in Addison, Texas in Addison, Texas.

16. Brent A. Wagman is a 41-year-old Celina, Texas resident. Wagman is the president and/or control person of Redbank, AmeriTech and Lyric. Wagman is also, or has been, an officer or control person of Relief Defendants NGT, Woodman, Wagman Petroleum, Inc. and Seismic International, Inc. Wagman has a history of securities law violations.

17. Margaret F. Swinney, a Dallas-area resident, is Wagman's executive assistant. Along with Wagman, Swinney controls the books and records and directs the disbursement of funds on behalf of Redbank, AmeriTech and Lyric.

RELIEF DEFENDANTS

18. Mary B. Wagman, a resident of Celina, Texas, is Defendant Wagman's spouse. Mary Wagman received cash and other gifts derived from AmeriTech and Redbank investor

funds. She is currently paid a salary of \$84,000 per year from Lyric for performing nominal or no work.

19. Warren Donohue, a resident of Alpine, New Jersey, is an officer of several Wagman controlled entities, including Lyric, and a long-time friend of Wagman. Donohue has received cash payments from AmeriTech of more than \$500,000 for no apparent consideration.

20. Michael G. Maguire, a resident of Snyder, Texas, is Lyric's president. Since December 1998, Maguire has received more than 100,000 shares of Lyric stock for no apparent consideration.

21. Natural Gas Technologies, Inc. is a Texas corporation. NGT is an oil and gas company that is controlled by Wagman. NGT maintains an office with Lyric, which is located next door to Redbank and AmeriTech in Addison, Texas. NGT has received substantial cash payments from Redbank and AmeriTech investor funds for no apparent consideration.

22. Woodman Enterprises, Inc. is a Texas corporation. Woodman is an oil and gas service company that is controlled by Wagman. In September 1998, Lyric acquired Woodman from Redbank. Woodman shares office space with Lyric in Addison, Texas, and has been subsidized by Redbank and AmeriTech investor funds for no apparent consideration.

23. Wagman Petroleum, Inc. is a Florida corporation. Wagman is a director and president of Wagman Petroleum. Wagman Petroleum also shares office space with Lyric in Addison, Texas, and has recently received substantial cash payments from Redbank and AmeriTech investor funds for no apparent consideration.

24. Seismic International, Inc. is a Wagman-controlled Delaware corporation. Seismic purportedly is involved in subsurface mapping of geological formations. In November 1998 and March 1999, Lyric acquired Seismic from AmeriTech and Redbank. Seismic shares

office space with Lyric in Addison, Texas, and has been subsidized by Redbank and AmeriTech investor funds for no apparent consideration.

25. Cooke Enterprises, Inc. is believed to be an entity controlled by Wagman. Cooke has recently received Lyric stock valued at over \$1.5 million.

STATEMENT OF FACTS

A. The AmeriTech and Redbank Fraudulent Note Offerings

26. In or around 1996 and 1998, respectively, Wagman formed AmeriTech and Redbank for the purpose of offering and selling corporate promissory notes to the general public. Thereafter, Wagman enlisted Swinney and others, including sales agents, to offer and sell AmeriTech and Redbank notes. On behalf of AmeriTech and Redbank, Wagman and Swinney have raised at least \$15 million, the majority of which has been used to make Ponzi payments and for the personal benefit of Wagman and Swinney.

27. At the direction of Wagman, AmeriTech and Redbank prepared glossy brochures to provide information about the companies and to offer for sale certain corporate promissory notes (the "Offering Documents"). The Offering Documents, which were nearly identical, stated: that AmeriTech and Redbank were in the oil and gas business and that they were seeking investor funds to acquire petroleum producing properties; that the notes were "high interest corporate notes" and were unconditionally guaranteed; that the notes were to be for a nine month duration with a rate of return of 10% to 12%; that the notes were backed by the physical assets of AmeriTech and Redbank, and were bonded by an insurance agreement; and that the investment included no loan charges, loads or any other associated fees.

28. The AmeriTech/Redbank Offering Documents were distributed to the public by Wagman and Swinney through a network of sales agents. The sales agents received undisclosed commissions of 9.5%, and additional undisclosed commissions were paid to others who had

recruited the sales agents. Swinney was also compensated for her efforts in convincing investors to rollover their notes and reinvest funds for an additional nine month period after the expiration of the initial note term.

29. The Offering Documents contained a number of materially false and misleading statements. First, investor funds were not used to acquire other petroleum producing properties, but rather were used to pay off other investors who had purchased notes, to subsidize other companies controlled by Wagman, and for the personal use and benefit of Wagman and Swinney. Second, the investments were not backed by physical assets because neither AmeriTech nor Redbank has any physical assets. Third, the investments were not unconditionally guaranteed, and while AmeriTech and Redbank are in default on many notes, neither AmeriTech or Redbank has the ability to make principal or interest payments under the notes. Fourth, the offering documents falsely represented that no charges, loads or fees were associated with the investments when, in fact, sales commissions were paid with investor funds.

30. AmeriTech and Redbank also failed to disclose several material facts in connection with the offer and sale of the notes. First, as the AmeriTech notes matured and its investors were encouraged to reinvest their principal investment, AmeriTech failed to disclose that the company and Wagman had entered into a Consent Order with the State of Maryland, and that Maryland had determined that AmeriTech had unlawfully offered unregistered securities to investors within the state. Second, Redbank failed to disclose to its investors that some of its funds would be used to pay off the AmeriTech investors in Maryland and to pay legal bills incurred by Wagman resulting from the Maryland action. Third, AmeriTech and Redbank did not disclose to their investors that funds would be used as Ponzi payments for other investors.

31. At Wagman and Swinney's direction, AmeriTech and Redbank investor funds were used for purposes other than those stated in the Offering Documents. Wagman and Swinney used investor funds to subsidize the operations of other companies controlled by Wagman, including

Wagman Petroleum, Woodman, Seismic, NGT and Lyric. Wagman and Swinney also used investor funds for their personal benefit, such as to pay personal expenses and as commissions for Swinney for persuading investors to reinvest in AmeriTech and Redbank notes. Wagman and Swinney also used investor funds to pay a salary to Mary Wagman for performing nominal or no work.

32. The AmeriTech and Redbank notes offered and sold by AmeriTech and Redbank, through Wagman, Swinney and others, are "securities" as that term is defined in Section 2(1) of the Securities Act, 15 U.S.C. §77b, and in Section 3(a)(10) of the Exchange Act, 15 U.S.C. §78c.

33. The AmeriTech and Redbank notes were offered and sold to the public through a general solicitation of investors. No registration statements have been filed with the Commission or are otherwise in effect with respect to these securities.

34. Defendants Wagman, Swinney, AmeriTech and Redbank knew, or were severely reckless in not knowing, that the information they supplied, and omitted to supply, to investors and others in the course of their activities was materially false and misleading.

B. The Related Lyric Fraud Scheme

35. During the past year, Lyric, at Wagman's direction, has filed a number of periodic public reports with the Commission, issued press releases, prepared a company information brochure, and created a web site (www.lyric-international.com), all of which promote the company and its prospects. Lyric's periodic reports and other promotional materials are materially false and misleading because they fail to disclose Wagman's control relationship with the company or that he dominates Lyric's operations, and because they promote Lyric's acquisition of assets from Redbank and AmeriTech without disclosing that the assets had been acquired from related parties that had been sanctioned for securities violations.

36. In Lyric's information brochure, currently used in an ongoing stock offering, Lyric touts the experience of its management. However, the information brochure fails to disclose that Wagman controls the daily operations of the company and is operating fraudulent oil and gas companies, namely AmeriTech and Redbank.

37. Lyric's information brochure also states that it acquired 56 oil and gas wells in Mitchell County, Texas. Further, the information brochure states that, during one month in 1998, the wells produced "160 barrels of oil per day," or 4,800 barrels per month. In fact, Lyric's properties located in Mitchell County, during its most productive month in 1998, produced 1400 barrels of oil, less than 30% of what is represented in the information brochure.

38. Lyric has also represented that it obtained a new mapping technology through its acquisition of Seismic stock from AmeriTech and Cooke. Lyric, however, failed to disclose Wagman's control of AmeriTech and Cooke, and accordingly, failed to disclose that the purchase was a material related-party transaction. In addition, Lyric failed to disclose that AmeriTech was funded by a fraudulent note offering and that investors have outstanding claims against the assets of AmeriTech.

39. Lyric also failed to disclose that Wagman and Swinney have diverted Lyric funds for improper purposes, such as making cash payments to Wagman's wife and paying expenses for Wagman's other companies. Conversely, when Lyric lacked money to pay corporate expenses, Wagman and other companies under his control paid Lyric's expenses.

40. Between March 15 and March 31, 1999, while Lyric was disseminating materially false and misleading information about the company, Wagman sold at least 34,657 shares of Lyric stock for proceeds of \$389,637.

41. Defendants Wagman, AmeriTech and Redbank knew or were severely reckless in not knowing that the information they supplied, and omitted to supply, to others in the course of their activities was materially false and misleading.

C. Recent Events and Activities

42. Defendants AmeriTech, Redbank, Wagman and Swinney have recently made lulling statements to investors who are demanding reimbursement of investor funds. Defendants AmeriTech, Redbank, Wagman and Swinney are deceptively assuring investors that they will be reimbursed.

ROLE OF RELIEF DEFENDANTS

43. Each of the Relief Defendants has received investor funds and/or Lyric stock which the Commission is informed and believes were received for no or inadequate consideration.

CAUSES OF ACTION

COUNT ONE

Violations Of Section 10(b) Of The Exchange Act And Rule 10b-5

44. The Commission restates and incorporates by reference herein the allegations set forth in Paragraphs 1 -43 of the Complaint.

45. Redbank, AmeriTech, Lyric, Wagman and Swinney, directly or indirectly, singly or in concert with others, in connection with the purchase and sale of securities, by use of the means and instrumentalities of interstate commerce and by use of the mails (a) have employed devices, schemes and artifices to defraud, (b) have made untrue statements of material facts and have omitted to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading and (c) have engaged in acts, practices and courses of business which operate as a fraud and deceit upon purchasers, prospective purchasers and other persons.

46. As a part of and in furtherance of their scheme to defraud, Redbank, AmeriTech, Lyric, Wagman and Swinney, directly and indirectly, prepared, disseminated or used contracts, written offering documents, promotional materials, investor and other correspondence and oral

presentations which contained untrue statements of material facts and misrepresentations of material facts and which omitted to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading, including, but not limited to, those set forth above.

47. Redbank, AmeriTech, Lyric, Wagman and Swinney made those misrepresentations and omissions knowingly or with reckless disregard for the truth.

48. By reason of the foregoing, Redbank, AmeriTech, Lyric, Wagman and Swinney have violated and, unless enjoined, will continue to violate the provisions of Section 10(b) of the Exchange Act, 15 U.S.C. §78j(b), and Rule 10b-5, 17 C.F.R. §240.10b-5].

COUNT TWO
Violations Of Section 17(a) Of The Securities Act

49. The Commission restates and incorporates by reference herein the allegations set forth in Paragraphs 1 -48 of the Complaint.

50. Redbank, AmeriTech, Lyric, Wagman and Swinney, directly or indirectly, singly or in concert with others, in the offer and sale of securities, by use of the means and instruments of transportation and communication in interstate commerce and by use of the mails, have (a) employed devices, schemes or artifices to defraud; (b) obtained money or property by means of untrue statements of material fact or omissions to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading; and (c) engaged in transactions, practices or courses of business which operate or would operate as a fraud or deceit.

51. As part of and in furtherance of this scheme, Redbank, AmeriTech, Lyric, Wagman and Swinney, directly and indirectly, prepared, disseminated or used contracts, written offering documents, promotional materials, investor and other correspondence and oral presentations which contained untrue statements of material fact and which omitted to state material facts necessary in

order to make the statements made, in light of the circumstances under which they were made, not misleading, including, but not limited to, those statements and omissions set forth above.

52. Redbank, AmeriTech, Lyric, Wagman and Swinney made the above-referenced misrepresentations and omissions knowingly or with reckless disregard for the truth.

53. By reason of the foregoing, Redbank, AmeriTech, Lyric, Wagman and Swinney have violated, and unless enjoined, will continue to violate Section 17(a) of the Securities Act, 15 U.S.C. §77q(a)(1).

COUNT THREE
Violations Of Sections 5(a) And 5(c) Of The Securities Act

54. The Commission restates and incorporates by reference herein the allegations set forth in Paragraphs 1 - 53 of the Complaint.

55. Redbank, AmeriTech, Wagman and Swinney, directly or indirectly, singly or in concert with others, have been offering to sell, selling and delivering after sale, certain securities and have been, directly and indirectly, (a) making use of the means and instruments of transportation and communication in interstate commerce and of the mails to sell securities, through the use of written contracts, offering documents and otherwise, (b) carrying and causing to be carried through the mails and in interstate commerce by the means and instruments of transportation such securities for the purpose of sale and for delivery after sale, and (c) making use of the means or instruments of transportation and communication in interstate commerce and of the mails to offer to sell such securities.

56. The "high interest corporate notes" were offered and sold to the public through a general solicitation of investors.

57. No registration statement has been filed with the Commission or are otherwise in effect with respect to these securities.

58. By reason of the foregoing, Redbank, AmeriTech, Wagman and Swinney have violated and, unless enjoined, will continue to violate Section 5(a) and (c) of the Securities Act, 15 U.S.C. §77e(a) and (c).

COUNT FOUR
Claim Against Relief Defendants As Custodians Of Investor Funds

59. The Commission restates and incorporates by reference herein the allegations set forth in Paragraphs 1 - 58 of the Complaint.

60. Relief Defendants Mary Wagman, Donohue, Maguire, NGT, Woodman, Wagman, Seismic, and Cooke received, directly or indirectly from Redbank, AmeriTech, Lyric, Wagman and Swinney funds and property which either are the proceeds or are traceable to the proceeds of the unlawful activities of Redbank, AmeriTech, Lyric, Wagman and Swinney and have no legitimate claim to those funds and property.

61. Relief Defendants Mary Wagman, Donohue, Maguire, NGT, Woodman, Wagman Petroleum, Seismic, and Cooke obtained the funds and property as part of and in furtherance of the securities violations alleged and under circumstances in which it is not just, equitable or conscionable for them to retain the funds and property.

62. As a consequence, Relief Defendants Mary Wagman, Donohue, Maguire, NGT, Woodman, Wagman Petroleum, Seismic, and Cooke have been unjustly enriched.

63. The Commission is entitled to an order requiring that Mary Wagman, Donohue, Maguire, NGT, Woodman, Wagman, Seismic, and Cooke disgorge those funds and that property.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court:

I.

Temporarily restrain and preliminarily and permanently enjoin Defendants Redbank, AmeriTech, Lyric, Wagman and Swinney, their agents, servants, employees, attorneys and all

persons in active concert or participation with them who receive actual notice of the injunction by personal service or otherwise, and each of them, from future violations of Section 17(a) of the Securities Act, 15 U.S.C. §77q(a), of Section 10(b) of the Exchange Act, 15 U.S.C. §78j(b), and of Rule 10b-5, 17 C.F.R. §240.10b-5;

II.

Temporarily restrain and preliminarily and permanently enjoin Defendants Redbank, AmeriTech, Wagman and Swinney, their agents, servants, employees, attorneys and all persons in active concert or participation with them who receive actual notice of the injunction by personal service or otherwise, and each of them, from future violations of Sections 5(a) and 5(c) of the Securities Act, 15 U.S.C. §§77e(a) and e(c);

III.

Order Defendants to disgorge an amount equal to the funds and benefits they obtained illegally as a result of the violations alleged, plus prejudgment interest on that amount, and Relief Defendants to disgorge an amount equal to the illegally obtained investors funds plus prejudgment interest on that amount, and/or stock they received from;

IV.

Order civil penalties against Defendants pursuant to Section 20(d) of the Securities Act, 15 U.S.C. §77t(d), and pursuant to Section 21(d) of the Exchange Act, 15 U.S.C. §78u(d), for the violations alleged herein; and

V.

Order instanter a freeze of assets of Defendants and Relief Defendants, and directing that all financial or depository institutions comply with the Court's Order. Furthermore, Order instanter that the Defendants and Relief Defendants repatriate any funds which they received, directly or indirectly, from the activities described in the Complaint held at any bank or other financial

institution not subject to the jurisdiction of the Court, and that they direct the deposit of such funds in identified accounts in the United States, pending conclusion of this matter.

VI.

Order instanter that Defendants and Relief Defendants file with the Court and serve upon Plaintiff, no later than ten (10) calendar days after entry of the freeze order, an accounting, under oath, detailing all of their assets and all funds or other assets received from investors and from one another, and the disposition of those funds and assets.

VII.

Order instanter that Defendants and Relief Defendants be restrained and enjoined from destroying, removing, mutilating, altering, concealing or disposing of, in any manner, any of their books and records or documents relating to the matters set forth in the Complaint, or the books and records and such documents of any entities under their control, until further order of the Court;

VIII.

Order instanter the appointment of a receiver pendente lite for Defendants and Relief Defendants, for the benefit of investors, to marshal, conserve, protect and hold funds and assets obtained by them and their agents, co-conspirators and others involved in this scheme to defraud, wherever such assets may be found, or, with the approval of the Court, dispose of any wasting asset in accordance with the application and proposed order provided herewith;

IX.

Order instanter that Defendant Wagman surrender his passport to the Clerk of this Court, to hold until further order of this Court.

X.

Order that the parties may commence discovery immediately, and that notice periods be shortened to permit the parties to require production of documents, answers to interrogatories and the deposition of any party or party-representative, on seventy-two (72) hours notice by facsimile or personal service;

XI.

Order such other and further relief as the Court may deem just and proper.

Dated this 3 day of June, 1999.



J. KEVIN EDMUNDSON
District of Columbia Bar No. 430746
SPENCER C. BARASCH
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CERTIFICATE OF SERVICE

I hereby certify that on the 3 day of June, 1999, I caused the foregoing instrument(s) to be served by hand delivery on the following individuals and entities:

Redbank Petroleum, Inc.
16775 Addison Road
Addison, Texas 75001

Wagman Petroleum, Inc.
16775 Addison Road
Addison, Texas 75001

Ameritech Petroleum, Inc.
16775 Addison Road
Addison, Texas 75001

Cooke Enterprises, Inc.
16775 Addison Road
Addison, Texas 75001

Lyric International, Inc.
16775 Addison Road
Addison, Texas 75001

Natural Gas Technologies, Inc.
16775 Addison Road
Addison, Texas 75001

Brent A. Wagman
3738 Harvest Glenn
Celina, Texas 75009

Woodman Enterprises, Inc.
16775 Addison Road
Addison, Texas 75001

Margaret F. Swinney
16775 Addison Road
Addison, Texas 75001

Seismic Petroleum, Inc.
16775 Addison Road
Addison, Texas 75001

Mary B. Wagman
3738 Harvest Glenn
Celina, Texas 75009

Warren Donohue
11 Church
Alpine, New Jersey 07620

Michael G. Maguire
2400 32nd Street
Snyder, Texas 79549



J. KEVIN EDMUNDSON