

UNITED STATES OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION

In the Matter of

NATURAL BLUE  
RESOURCES, INC., JAMES  
E. COHEN, AND JOSEPH  
A. CORAZZI,

Respondents.

Administrative Proceeding  
File No. 3-15974

**RESPONDENT CORAZZI'S MOTION FOR MORE DEFINITE STATEMENT  
AND/OR MOTION FOR SUMMARY DISMISSAL OF CHARGES  
AGAINST RESPONDENT CORAZZI**

COMES NOW, Respondent, Joseph A. Corazzi, by and through his undersigned counsel, The Waggoner Legal Group, Robert M. Strumor and William J. Waggoner, pursuant to the Securities Exchange Commission Rules of Practice ("Rule 201.154"), for Respondent Corrazi's Motion for a More Definite Statement and/or Motion for Summary Dismissal of Charges Against Respondent Corrazi (the "Corrazi Motion"), submits the following:

**I.**

**BACKGROUND**

On July 16, 2014, the Securities and Exchange Commission (the "Commission"), filed its Order Instituting Cease-And-Desist Proceedings pursuant to Section 8A of the Securities Act of 1933, and Sections 15(b) and 21C of the Securities Exchange Act of 1934 and Notice of Hearing (the "Order"), which commenced this proceeding against Natural Blue Resources, Inc. ("Natural Blue"), James E. Cohen ("Cohen") and Joseph A. Corrazi ("Corrazi").

This Corrazi Motion is intended to relate only to the charges against Corrazzi. The Commission has filed the Division of Enforcement's Motion for Entry of Default and Imposition of Sanctions Against Respondent Natural Blue Resources, Inc. The Commission entered its Order to Show Cause on November 5, 2014, requiring Natural Blue to respond by November 14, 2014 or face sanctions and civil penalties. Therefore, Natural Blue may no longer a party to this action.

The charges against Corrazi are that he willfully violated Section 17(a)(1) and 17(2) of the Securities Act, and Section 10(b) of the Exchange Act, and Rules 10b-5(a) and 10b-5(c) thereunder, which prohibit fraudulent conduct in connection with the purchase and sale of securities by engaging in a device, scheme and/or artifice to defraud and/or engaging in a transaction, practice and/or course of business which operated, or would have operated, as a fraud or deceit upon the purchaser.

The Commission has alleged that Natural Blue, Cohen and Corazzi violated these laws and regulations by creating and operating Natural Blue as a vehicle for Cohen and Corazzi to control and profit from the company, while failing to disclose their roles as *de facto* officers or their past criminal and regulatory violations to potential investors. The charge also claims that both Cohen and Corazzi knew or were reckless in not knowing that they committed deceptive acts in furtherance of this fraudulent scheme. See Section L. Violations, of the Order.

Respondent Corazzi timely filed his Answer of Respondent Joseph Corazzi (the "Answer") on August 18, 2014.

## II.

### THE MOTION

In his Answer, Respondent Corazzi denied all of the Commission's charges and more specifically denied that he was ever an officer, director, control person or affiliate of Natural Blue but rather that he performed consulting service for Natural Blue pursuant to the Consulting Agreement between JEC, Corporation and Natural Blue. See Corazzi Answer, Par. 8, 26 and 30.

Respondent Corazzi also specifically denies that he was a "person participating in the offering of penny stock". See Answer of Respondent Corazzi, Par. 58. Respondent Corazzi admits that he owned shares of Natural Blue but denies that he was a control person or that he controlled any of the shares that were issued in the name of third parties or entities. See Corazzi Answer, Pr. 30-33.

Notwithstanding the Commissions allegations that Respondent Corazzi was a *de facto* officer or director, the charges are insufficient to support those allegations. For example, Respondent Corazzi specifically denies that he was ever an officer, director or employee of Natural Blue and never had any decision making authority over Natural Blue or its finances. See Corazzi Answer, Par. 8-11.

There is not one supportable statement in the Commission's charges against Respondent Corazzi that would place Respondent Corazzi on notice of the factual basis for the Commissions charges. See the Commission's Order, SEC, Para. 15-21. For example, did Respondent Corazzi sign any of Natural Blue's Exchange Act filings? The answer is no. There were actual officers of Natural Blue like Toney Anaya and Erik Perry who did sign Natural Blue's periodic Exchange Act filings. See the Order, Section F. Par. 27 and 28.

The answer is also negative with regard to Respondent Corazzi's involvement in the official actions of the Natural Blue Board of Directors. Respondent Corazzi was never a member of the Natural Blue Board of Directors. Nor did Respondent Corazzi ever serve as a temporary or permanent employee or officer of Natural Blue. Respondent Corazzi was never more than a consultant to Natural Blue notwithstanding the Commission's repeated naked assertions that Respondent Corazzi was a *de facto* officer of Natural Blue. See Corazzi Answer, Par. 1-12.

Although we are before an administrative tribunal, Rule 8(a)(2) of the Federal Rules of Civil Procedure is instructive. The Rule requires that a civil complaint contain a short plain statement of the claim showing that the pleader is entitled to relief. See Rule 8(a)(2), FRCP. In this case, Respondent Corazzi is unable to defend the charges that are premised on the unsupported assertion that, at all times material thereto, was a *de facto* officer or director of Natural Blue.

### **III.**

#### **REQUEST FOR RELIEF**

Based upon the foregoing, Respondent Joseph A. Corazzi respectfully requests that the Commission be ordered to amend its Order to make a more definite statement and therein to state with particularity each instance in which it alleges that Respondent acted as a *de facto* officer or director of Natural Blue or in the alternative, if unable to do so, the charges against Respondent Corazzi as presented in the Order respectfully should be dismissed.

Respectfully submitted,

THE WAGGONER LEGAL GROUP

By 

Robert M. Strumor/William J. Waggoner  
*Attorneys for Respondent Corazzi*  
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Santa Fe, NM 87501  
(505) 983-3272 / FAX: (505) 820-9228

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served on the following on this 6<sup>th</sup> day of November, 2014, in the manner indicated below:

Federal Express

Jill M. Peterson  
Assistant Secretary  
United States Securities and Exchange Commission  
Office of the Secretary  
100 F. Street, N.E.  
Washington, DC 20549-2557

Electronic Delivery

The Honorable Carol Fox Foelak  
Administrative Law Judge  
Securities and Exchange Commission  
100 F. Street, N.E.  
Washington, DC 20549

Electronic Delivery

Rua M. Kelly, Esq.  
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Securities and Exchange Commission  
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Natural Blue Resources, Inc.  
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Woburn, MA 01801 16  
[joe@superior-fuel.com](mailto:joe@superior-fuel.com)



## Shipment Receipt

### Address Information

Ship to:  
Jill M. Peterson  
United States SEC  
100 F. Street NE

WASHINGTON, DC  
20549  
US  
617-573-8941

Ship from:  
Robert M. Strumor  
The Waggoner Legal Group  
529 W. San Francisco

Santa Fe, NM  
87501  
US  
5059833272

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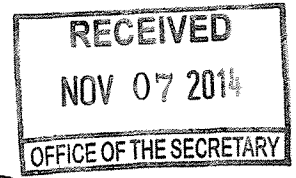
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ROBERT M. STRUMOR

*OF COUNSEL*  
THE HONORABLE DANIEL A. SANCHEZ (*Ret.*)

November 6, 2014

**HAND DELIVERED**

The Honorable Carol Fox Foelak  
Administrative Law Judge  
Securities and Exchange Commission  
100 F. Street, N.E.  
Washington, DC 20549

*Re: In the Matter of Natural Blue Resources, et. al.,  
Administrative Proceedings File No. 3-15974*

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Dear Honorable Carol Fox Foelak:

Enclosed is the following:

- Copy - November 5, 2014 The Waggoner Legal Group Cover Letter to Jill M. Peterson, Assistant Secretary, Securities and Exchange Commission - along with Respondent Corazzi's Motion for a More Definite Statement and/or Motion for Summary Dismissal of Charges Against Respondent Corazzi (**previously submitted via Federal Express, package no. 771755085923**);
- Copy of November 5, 2014 Federal Express receipt confirmation; and
- Respondent Corazzi's Memorandum Respondent Corazzi's Memorandum of Points and Authorities in Support of Respondent Corazzi's Motion for a More Definite Statement and/or Motion for Summary Dismissal of Charges Against Respondent Corazzi.

Thank you.

Very truly yours,

  
THE WAGGONER LEGAL GROUP

Robert M. Strumor, Esq.

# THE WAGGONER LEGAL GROUP

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*OF COUNSEL*  
THE HONORABLE DANIELA A. SANCHEZ (*Ret.*)

November 5, 2014

Jill M. Peterson  
Assistant Secretary  
United States Securities and Exchange Commission  
Office of the Secretary  
100 F. Street, N.E.  
Washington, DC 20549-2557

**RE:** *In the Matter of Natural Blue Resources, et al.,  
Administrative Proceeding File No. 3-15974*

Dear Ms. Peterson:

Enclosed Please find the original and three copies of the following document for filing:

*Defendant Corrazi's Motion for More Definite Statement and/or Motion for Summary  
Dismissal of Charges Against Respondent Corrazi.*

Thank you.

Sincerely,

THE WAGGONER LEGAL GROUP

By: 

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