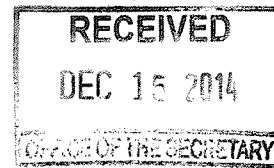


HARD COPY

**UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION**

**ADMINISTRATIVE PROCEEDING
File No. 3-16104**



In the Matter of

MICHAEL LEE MENDENHALL,

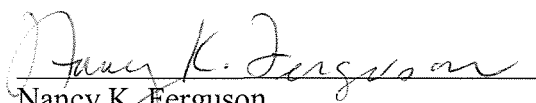
Respondent.

**DIVISION OF ENFORCEMENT'S MOTION FOR SUMMARY DISPOSITION
AGAINST MICHAEL LEE MENDENHALL**

MOTION FOR SUMMARY DISPOSITION

Pursuant to Rule 250(a) of the Rules of Practice, the Division of Enforcement (“Division”) respectfully moves for summary disposition of its allegations in the Order Instituting Proceedings (“OIP”), dated September 12, 2014, against respondent Michael Lee Mendenhall (“Respondent”). The Division relies upon the Memorandum of Law in Support of its Motions for Summary Disposition and the Request for Official Notice in Support of the Motion.

Dated this 12th day of December, 2014.


Nancy K. Ferguson
Securities and Exchange Commission
Byron G. Rogers Federal Building
1961 Stout Street, Suite 1700
Denver, CO 80294-1961
Email: fergusonn@sec.gov
Phone: 303.844.1050

CERTIFICATE OF SERVICE

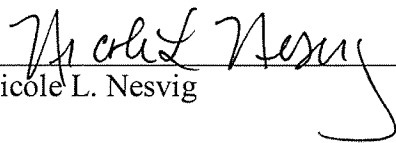
I hereby certify that a true copy of the Division of Enforcement's Motion for Summary Disposition was served on the following on this 12th day of December, 2014, in the manner indicated below:

Securities and Exchange Commission
Brent Fields, Secretary
100 F Street, N.E.
Mail Stop 1090
Washington, D.C. 20549
(By Facsimile and original and three copies by UPS)

Honorable Carol Fox Foelak
100 F Street, N.E.
Mail Stop 2557
Washington, D.C. 20549
(Courtesy copy by Email and UPS)

Mr. Michael Lee Mendenhall

[REDACTED]



Nicole L. Nesvig