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UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934

Release No. 73087./ September 12, 2014

INVESTMENT ADVISERS ACT OF 1940

Release No. 391o7 / September 12, 2014

ADMINISTRATIVE PROCEEDING

File No. 3-16104

**Order Instituting Administrative
Proceedings Pursuant to Sections
15(b) of the Securities Exchange
Act of 1934 and Section 203(f) of
the Investment Advisers Act of
1940, and Notice of Hearing**

Respondent:

Name: MICHAEL L. MENDENHALL

Address: [REDACTED]
[REDACTED]

Michael L. Mendenhall #157626
[REDACTED]
[REDACTED]
[REDACTED]

Phone No.: [REDACTED]
[REDACTED]

RESPONSE TO SUMMARY DISPOSITION

Due to the complexity of the documents received by the respondent from the SEC Denver Regional Office and the nature of the allegations contained there within, respondent will be obtaining legal representation in this matter. Therefore, respondent is respectfully requesting a 120 extension to file an opposition to this matter.

Respectfully submitted,

Wm W. Woodruff

[REDACTED]

[REDACTED]

