

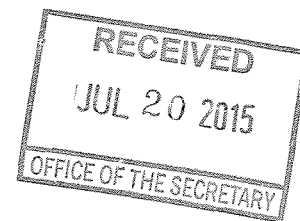
UNITED STATES OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934

Release No. 75383

ADMINISTRATIVE PROCEEDING

File No. 3-16678



In the Matter of

Arrin Corporation,  
Gundaker/Jordan American Holdings  
(a/k/a Jordan American Holdings, Inc.)  
Liberty Petroleum Corporation,  
Mikojo Incorporated,  
Royal Invest International Corp., and  
San Joaquin Bancorp,

Respondents.

RESPONDENT LIBERTY  
PETROLEUM CORPORATION'S  
ANSWER AND MOTION TO  
DISMISS

Respondent Liberty Petroleum Corporation ("LPC") submits this **Answer and Motion to Dismiss** to the "Order Instituting Administrative Proceedings and Notice of Hearing Pursuant to Section 12(j) of the Securities Exchange Act of 1934" ("OIAP"), dated July 8, 2015, pursuant to Rules 154 and 220 of the Commission's Rules of Practice. Ballard Spahr LLP's Notice of Appearance, on behalf of LPC, and pursuant to Rule 102 of the Commission's Rules of Practice, is being submitted with this filing.

LPC is serving the original and three copies to the Commission's Secretary via FedEx and emailing copies to SEC Senior Counsel, David S. Frye (by agreement) and to

the Administrative Law Judge and the Judge's Legal Assistant.

LPC denies the allegations contained in the OIAP. LPC is not delinquent in the filing of any periodic filings or reports or as otherwise alleged in the OIAP. No violation of any SEC Statute, Rule or Regulation has occurred.

**LPC's 1987 Exemption Order**

On August 25, 1987 the Commission issued an Order (Rel. No. 34-24851) granting LPC's request for an exemption from the registration requirement of Section 12(g) and the reporting requirement of Section 15(d) of the Securities Exchange Act of 1934. A copy of Release No. 34-24851 is attached as *Exhibit 1*. On Friday, July 17, 2015, undersigned counsel for LPC spoke with the SEC's Senior Counsel, David S. Frye, informing Mr. Frye of the Exemption Order and communicated the same information to Mr. Frye via email. A copy of LPC's July 17, 2015, email with exhibit to Mr. Frye is attached as *Exhibit 2*. Counsel and Mr. Frye remain in continuing professional and good-faith discussions regarding this matter.

Unless otherwise expressly admitted, the allegations contained in the OIAP against LPC are denied. LPC also moves for an order dismissing the OIAP and matter on the grounds that the OIAP does not state a viable or facial claim against LPC, in light of the 1987 Exemption Order.

LPC respectfully requests that the matter be dismissed and taken off of the hearing calendar currently set for hearing on July 29, 2015. Alternatively, LPC requests that the

hearing be postponed until LPC can be apprised of the Staff's position regarding the 1987 Exemption Order and has a reasonable time to prepare for any necessary hearing.

Respectfully submitted this 20<sup>th</sup> day of July, 2015.

BALLARD SPAHR LLP

*Ethan H. Cohen with express permission*  
Ethan H. Cohen BJ  
999 Peachtree Street, Suite 1000  
Atlanta, Georgia 30309  
Phone: 678.420.9354  
cohene@ballardspahr.com

*Attorneys for Respondent Liberty  
Petroleum Corporation*

# EXHIBIT 1

**SEC Docket (1973-2004), 39 SEC-DOCKET 26-01, In the Matter of Liberty Petroleum Corporation, Securities and Exchange Commission, (Aug. 25, 1987)**

[Click to open document in a browser](#)

In the Matter of LIBERTY PETROLEUM CORPORATION

39 SEC-DOCKET 26

Release No. 34-24851

August 25, 1987

File No. 81-750

*ORDER GRANTING APPLICATION PURSUANT TO SECTION 12(h)*

The Securities and Exchange Commission has issued an order granting the application of Liberty Petroleum Corporation for an exemption from the registration requirement of Section 12(g) and the reporting requirement of Section 15(d) of the Securities Exchange Act of 1934.

# EXHIBIT 2

**From:** "Cohen, Ethan H. (Atlanta)" <[cohene@ballardspahr.com](mailto:cohene@ballardspahr.com)>  
**Date:** July 17, 2015 at 12:49:41 PM EDT  
**To:** "[fryed@sec.gov](mailto:fryed@sec.gov)" <[fryed@sec.gov](mailto:fryed@sec.gov)>  
**Subject:** Liberty Petroleum Corp.; Admin. Proceeding No: 3-16678

Hello, David.

It was good talking with you today.

We represent Liberty Petroleum Corp., in connection with the referenced Administrative Proceeding. Attached is a copy of the SEC News Digest from August 28, 1987, provided by our client and reporting the entry of an order granting Liberty's request for exemptions from the registration and reporting requirements under 12(g) and 15(d). Please see page 2, under "Miscellaneous." Here, you will also find the reference to Release No. 34-24851.

Thank you for looking into this, and I'll look forward to talking again soon.

Respectfully submitted,

Ethan

Ethan H. Cohen  
Ballard Spahr LLP  
678-420-9354

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AUG 21 1987  
U.S. SECURITIES AND  
EXCHANGE COMMISSION

# sec news digest

Issue 87-164

August 28, 1987

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## ADMINISTRATIVE PROCEEDINGS

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### SANCTIONS IMPOSED ON MAX EDWARD ZAVANELLI

The Commission ordered public administrative proceedings under Sections 203(e) and 203(f) of the Investment Advisers Act of 1940 against Max Edward Zavanelli (Zavanelli) and Max Edward Zavanelli d/b/a Zavanelli Portfolio Research, a registered investment adviser. The Order alleges that Zavanelli, from in or about March 1984 and continuing through the present, violated the antifraud provisions of the Advisers Act, by misstating and omitting to state material facts concerning, among other things, his investment performance. As part of his alleged violative conduct, Zavanelli failed to disclose that his average investment "performance" for a seven year period included at least three years during which no actual trading occurred and the purported "results" were from hypothetical portfolios. Zavanelli consented to the Order censuring him, prohibiting him from soliciting or accepting new clients for a period of 180 days and requiring Zavanelli to notify his clients of the Commission's action. In addition, Zavanelli consented to remedial undertakings specified in the Commission's Order. (Rel. IA-1077)

### OFFER OF SETTLEMENT ACCEPTED FROM CITIWIDE SECURITIES CORP. AND HERBERT CANNON

The New York Regional Office announced that, in administrative proceedings ordered pursuant to Sections 15(b) and 19(h) of the Securities Exchange Act of 1934, Citiwide Securities Corp. (Registrant), a registered broker-dealer located in New York, New York, and its president, Herbert Cannon, have submitted Offers of Settlement which the Commission has accepted. Registrant and Cannon, without admitting or denying the allegations, consented to the issuance of an Order Making Findings and Imposing Remedial Sanctions which finds that Registrant wilfully violated, and Cannon wilfully aided and abetted Registrant's violations of, the Net Capital, Recordkeeping, Financial Reporting and Supplemental Reporting provisions of the Exchange Act. The Commission revoked Registrant's registration as a broker or dealer, investment company, investment adviser or municipal securities dealer, with a right to reapply after the greater of five years or the period of any penal sanction that may be imposed in connection with two unrelated criminal convictions. (Rel. 34-24798)

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## INVESTMENT COMPANY ACT RELEASES

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### L&N CMO FUNDING CORPORATION

A notice has been issued giving interested persons until September 18 to request a hearing on an application filed by L&N CMO Funding Corporation for an order pursuant to Section 6(c) exempting Applicant and certain trusts from all provisions of the Act in connection with the issuance and sale of mortgage-backed securities by and equity interests in such trusts. (Rel. IC-15949 - Aug. 25)

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## HOLDING COMPANY ACT RELEASES

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### NORTH CENTRAL MISSOURI ELECTRIC COOPERATIVE, INC. ; HOWARD ELECTRIC COOPERATIVE

Orders have been issued granting, North Central Missouri Electric Cooperative, Inc. and Howard Electric Cooperative, exemptions under Section 3(a)(1) from all of the provisions of the Public Utility Holding Company Act of 1935 except Section 9(a)(2) thereof. (Rel. 35-24445 - Aug. 26; 35-24446 - Aug. 26)



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## SELF-REGULATORY ORGANIZATIONS

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### NOTICE OF PROPOSED RULE CHANGE

The New York Stock Exchange filed a proposed rule change under Rule 19b-4 (SR-NYSE-87-23) that would require member firms to submit to the NYSE, upon its request, customer and proprietary trading data in automated format. Publication of the proposal is expected to be made in the Federal Register during the week of August 24. (Rel. 34-24852)

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## MISCELLANEOUS

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### LIBERTY PETROLEUM CORPORATION

An order has been issued granting the application of Liberty Petroleum Corporation for an exemption from the registration requirement of Section 12(g) and the reporting requirement of Section 15(d) of the Securities Exchange Act of 1934. (Rel. 34-24851)

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## SECURITIES ACT REGISTRATIONS

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The following registration statements have been filed with the SEC under the Securities Act of 1933. The reported information appears as follows: Form, Name, Address and Phone Number (if available) of the issuer of the security; Title and the number and/or face amount of the securities being offered; Name of the managing underwriter or depositor (if applicable); File number and date filed; Assigned Branch; and a designation if the statement is a New Issue.

- S-11 DECADES MONTHLY INCOME & APPRECIATION FUND, 18000 W SARAH LN, L/C BRUCKFIELD LAKES CORPORATE CTR, BROOKFIELD, WI 53005 - 30,000 (\$30,000,000) LIMITED PARTNERSHIP CERTIFICATE. (FILE 33-16399 - AUG. 17) (BR. 5 - NEW ISSUE)
- S-18 LA JCLLA FUNDING INC, 5677 OBERLIN DR STE 200, SAN DIEGO, CA 92121 (619) 455-5993 - 3,000,000 (\$150,000) COMMON STOCK. 3,000,000 (\$750,000) COMMON STOCK. 3,000,000 (\$3,000,000) COMMON STOCK. (FILE 33-16414-LA - AUG. 06) (BR. 11 - NEW ISSUE)
- S-18 REPUBLIC NATIONAL BANCORP INC, 2020 NORTH CENTRAL AVE, PHOENIX, AZ 85004 (602) 258-5555 - 666,667 (\$5,000,002.50) COMMON STOCK. UNDERWRITER: COMMUNITY CAPITAL GROUP. (FILE 33-16415-LA - AUG. 07) (BR. 1 - NEW ISSUE)
- S-18 NORTHERN DANGER CORP, #2 CORPORATE PLZ STE 200, NEWPORT BEACH, CA 92660 (714) 760-1818 - 50,000,000 (\$500,000) COMMON STOCK. 50,250,000 (\$1,005,000) COMMON STOCK. 50,250,000 (\$2,010,000) COMMON STOCK. 63,750,000 (\$3,435,000) COMMON STOCK. 2,500,000 (\$100) WARRANTS, OPTIONS OR RIGHTS. UNDERWRITER: FIRST EAGLE INC. (FILE 33-16417-LA - AUG. 10) (BR. 12 - NEW ISSUE)
- S-18 CANBURY GROUP INC, 18201 VON KARMAN AVE, STE 1020, IRVINE, CA 92715 (714) 553-9301 - 10,000,000 (\$100,000) COMMON STOCK. 40,000,000 WARRANTS, OPTIONS OR RIGHTS. 40,000,000 (\$4,000,000) COMMON STOCK. (FILE 33-16503-LA - AUG. 11) (BR. 12 - NEW ISSUE)
- S-18 ARNEX INVESTMENT GROUP LTD, 156 28 79TH ST, HOWARD BEACH, NY 11414 (718) 845-3103 - 5,000,000 (\$500,000) COMMON STOCK. 5,500,000 (\$1,375,000) COMMON STOCK. 11,000,000 (\$5,250,000) COMMON STOCK. 500,000 (\$50) WARRANTS, OPTIONS OR RIGHTS. 500,000 (\$75,000) COMMON STOCK. UNDERWRITER: INVESTORS CENTER INC. (FILE 33-16513-NY - AUG. 13) (BR. 11 - NEW ISSUE)
- S-18 GREATER MIAMI AUTO AUCTIONS INC, 18200 NW 27TH AVE, MIAMI, FL 33055 (305) 621-5100 - 208,334 (\$1,250,000) COMMON STOCK. 1,041,670 (\$1,822,923) COMMON STOCK. 20,834 WARRANTS, OPTIONS OR RIGHTS. 20,833 (\$149,998) COMMON STOCK. 104,170 (\$182,298) COMMON STOCK. UNDERWRITER: VANERBILT SECURITIES INC. (FILE 33-16525-A - AUG. 14) (BR. 4 - NEW ISSUE)
- S-1 DUKATGOUGH SYSTEMS INC, 275 MADISON AVE, NEW YORK, NY 10016 (212) 983-4774 - 3,000,000 (\$3,000,000) COMMON STOCK. 1,500,000 (\$2,250,000) COMMON STOCK. 300,000 (\$1) WARRANTS, OPTIONS OR RIGHTS. 300,000 (\$360,000) COMMON STOCK. UNDERWRITER: EQUITIES INTERNATIONAL SECURITIES INC. (FILE 33-16527 - AUG. 14) (BR. 10 - NEW ISSUE)

- S-18 PIPE RACK INC, 1407 BROADWAY, NEW YORK, NY 10018 (212) 391-4950 - 1,000,000 (\$250,000) COMMON STOCK. 1,100,000 (\$330,000) COMMON STOCK. 1,100,000 (\$1,100,000) COMMON STOCK. 100,000 (\$100) WARRANTS, OPTIONS OR RIGHTS. 100,000 (\$30,000) COMMON STOCK. UNDERWRITER: MONARCH FUNDING CORP. (FILE 33-16554-NY - AUG. 14) (BR. 2 - NEW ISSUE)
- S-18 CONODCNT CORP, 1625 BROADWAY STE 770, DENVER, CO 80202 (303) 592-5444 - 1,000,000 (\$1,000,000) COMMON STOCK. (FILE 33-16555-D - AUG. 14) (BR. 3 - NEW ISSUE)
- S-8 NYNEX CORP, 335 MADISON AVE, NEW YORK, NY 10017 (212) 370-7400 - 175,000,000 (\$175,000,000) OTHER SECURITIES INCLUDING VOTING TRUST. (FILE 33-16570 - AUG. 21) (BR. 13)
- S-18 EXCHANGE FIRST CO, 63 WALL ST, 27TH FLR, NEW YORK, NY 10005 (212) 797-4970 - 350,000 (\$350,000) COMMON STOCK. 350,000 (\$700,000) COMMON STOCK. (FILE 33-16589-NY - AUG. 17) (BR. 12 - NEW ISSUE)
- S-18 MERLIN BAINES & CO INC /DE/, 187 SOUTHGATE CRESCENT, MASSAPEQUA PARK, NY 11762 (516) 798-6817 - 4,000,000 (\$1,000,000) COMMON STOCK. 8,000,000 (\$4,000,000) COMMON STOCK. UNDERWRITER: SHERMAN FITZPATRICK & CO INC. (FILE 33-16605-NY - AUG. 17) (BR. 11 - NEW ISSUE)
- S-3 WESTINGHOUSE CREDIT CORP, ONE OXFORD CENTRE, 301 GRANT ST, PITTSBURGH, PA 15219 (412) 393-3000 - 1,000,000,000 (\$1,000,000,000) STRAIGHT BONDS. (FILE 33-16613 - AUG. 18) (BR. 12)
- S-1 CATALYST THERMAL ENERGY CORP, 245 PARK AVE, NEW YORK, NY 10167 (212) 949-0040 - 2,760,000 (\$26,220,000) COMMON STOCK. UNDERWRITER: DREXEL BURNHAM LAMBERT INC, HANIFEN IMJHOFF INC, MERRILL LYNCH CAPITAL MARKETS. (FILE 33-16618 - AUG. 19) (BR. 8 - NEW ISSUE)
- S-3 TEXAS EASTERN CORP, 1221 MCKINNEY ST, P O BOX 2521, HOUSTON, TX 77252 (713) 759-3131 - 150,000 (\$6,112,500) COMMON STOCK. (FILE 33-16627 - AUG. 19) (BR. 8)
- S-4 UNITED INSURANCE COMPANY OF AMERICA, ONE E WACKER DR, CHICAGO, IL 60601 (312) 661-4500 - 4,127,679 (\$21,376,000) COMMON STOCK. (FILE 33-16628 - AUG. 19) (BR. 9 - NEW ISSUE)
- S-1 INVITRON CORP /DE/, 4649 LE BOURGET DR, ST LOUIS, MO 63134 (314) 426-5000 - 3,450,000 (\$44,650,000) COMMON STOCK. UNDERWRITER: BROWN ALEX & SONS INC, SHEARSON LEHMAN BROTHERS INC. (FILE 33-16635 - AUG. 19) (BR. 4 - NEW ISSUE)
- S-8 HANDLEMAN CO /MI/, 500 KIRTS BLVD, TROY, MI 48084 (313) 362-4400 - 2,000,000 (\$2,000,000) OTHER SECURITIES INCLUDING VOTING TRUST. (FILE 33-16637 - AUG. 18) (BR. 7)
- S-3 FODTE CONE & BELDING COMMUNICATIONS INC, 101 E ERI ST, CHICAGO, IL 60611 (312) 751-7000 - 110,000 (\$7,383,200) COMMON STOCK. (FILE 33-16639 - AUG. 20) (BR. 5)
- S-3 PITT DES MOINES INC, 3400 GRAND AVE, NEVILLE ISLAND, PA 15225 (412) 331-3000 - 119,949 (\$2,788,814.25) COMMON STOCK. (FILE 33-16647 - AUG. 20) (BR. 10 - NEW ISSUE)
- S-6 BIRMINGHAM STEEL CORP, #1 INDEPENDENCE PLZ STE 710, BIRMINGHAM, AL 35209 (205) 871-9290 - 400,000 (\$8,154,080) COMMON STOCK. (FILE 33-16648 - AUG. 20) (BR. 6)
- S-8 CITYFED FINANCIAL CORP, 293 S COUNTY RD, PALM BEACH, FL 33480 (305) 655-5919 - 925,000 (\$9,018,750) COMMON STOCK. (FILE 33-16649 - AUG. 19) (BR. 1)
- S-8 PARK ELECTROCHEMICAL CORP, 5 DAKOTA DR, LAKE SUCCESS, NY 11042 (516) 354-4100 - 80,000 (\$1,890,000) COMMON STOCK. (FILE 33-16650 - AUG. 20) (BR. 3)
- S-4 CENTURY FINANCIAL CORP /PA/, 171 W ADAMS ST, ROCHESTER, PA 15074 (412) 774-1872 - 1,167,375 (\$14,522,145) COMMON STOCK. (FILE 33-16652 - AUG. 20) (BR. 2 - NEW ISSUE)
- S-1 JET CAPITAL CORP /DE/, 800 THIRD AVE, NEW YORK, NY 10022 (212) 421-1646 - 2,760,000 (\$49,680,000) COMMON STOCK. UNDERWRITER: KIDDER PEABODY & CO INC, SMITH BARNEY HARRIS UPHAM & CO INC. (FILE 33-16654 - AUG. 20) (BR. 3 - NEW ISSUE)
- S-3 MELLON BANK CORP, ONE MELLON BANK CTR, 500 GRANT ST, PITTSBURGH, PA 15258 (412) 787-5534 - 1,000,000 (\$100,000,000) PREFERRED STOCK. (FILE 33-16657 - AUG. 20) (BR. 1)

- S-3 MELLON BANK CORP, ONE MELLON BANK CTR, 500 GRANT ST, PITTSBURGH, PA 15258  
(412) 787-5534 - 200,000,000 (\$200,000,000) CONVERTIBLE DEBENTURES AND NOTES. (FILE  
33-16658 - AUG. 20) (BR. 1)
- S-3 ARX INC, 35 S SERVICE RD, PLAINVIEW, NY 11803 (516) 694-6700 - COMMON STOCK. (FILE  
33-16659 - AUG. 20) (BR. 3)
- S-11 CONFED SAVINGS BANK /MA/, 45 CENTRAL ST, LOWELL, MA 01852 - 100,000,000  
(\$100,000,000) MORTGAGE BONDS. UNDERWRITER: MORGAN STANLEY & CO INC. (FILE 33-16660 -  
AUG. 20) (BR. 11 - NEW ISSUE)

## ACQUISITIONS OF SECURITIES

Companies and individuals must report to the Commission within ten days on Schedule 13D if after the acquisition of equity securities of a public company their beneficial interest therein exceeds five percent. Persons eligible to use the short form (Schedule 13G) may in lieu of filing a Schedule 13D file a Schedule 13G within 45 days after the end of the calendar year in which the person became subject to Section 13(d)(1). Companies and individuals making a tender offer must have on file at the time the tender offer commences a Schedule 14D-1.

Below is a list of recent filings of Schedules 13D and 14D, which includes the following information: Column 1 - the company purchased (top), and the name of the purchaser; Column 2 - the type of security purchased; Column 3 - the type of form filed; Column 4 - the date the transaction occurred; Column 5 - the current number of shares (in 000's) owned (top) and the current percent owned; Column 6 - the CUSIP number (top) and the prior percent owned; and Column 7 - the status of the filing, i.e., new, update or revision.

NAME AND CLASS OF STOCK/OWNER	FORM	EVENT DATE	SHARES (000) OWNED	CUSIP PRIOR%	FILING STATUS
AMERICAN PHYSICIANS SVCS GRO COM SUN EQUITIES ET AL	13D	8/21/87	433 7.4	02888210 6.4	UPDATE
CLARION CAP CORP FIRST CITY DEVEL CORP ET AL	COM 13D	8/5/87	744 72.4	18051810 65.2	UPDATE
HOSPITALITY CAPITAL CORP HEAD DONALD R	COM 13D	7/31/87	311 13.9	44090920 0.0	NEW
INERTIA DYNAMICS CORP RYOBI LIMITED	COM 14D-1	8/26/87	1,732 33.7	45661610 33.7	UPDATE
INSITUFORM OF NORTH AMERICA RINGSWOOD LTD ET AL	CL A 13D	9/17/87	456 7.0	45766410 15.1	UPDATE
INTERSTATE GEN L P INTERSTATE BUSINESS CORP ET AL	UNIT LTD PARTN 13D	8/18/87	7,526 76.0	45088530 77.7	UPDATE
KENNER PARKER TOYS INC NEW WORLD ENTERTAINMENT ET AL	COM 14D-1	8/25/87	907 7.8	48948510 7.8	UPDATE
MANPOWER INC BEAR STEARNS & CO	COM 13D	8/21/87	1,103 6.8	56418210 5.1	UPDATE
MAXUS ENERGY CORP TURNER TOM E ET AL	PFD COMB 34 13D	8/20/87	1,564 36.1	57773020 47.6	UPDATE
NORTH AMERN VENTURES INC NORTH AMERICAN HLDG CORP	COM 13D	8/12/87	1,425 6.0	65720610 9.8	UPDATE
RORER GROUP INC CLORE ALAN E ET AL	COM 13D	8/24/87	3,115 14.3	77675510 14.1	UPDATE
SPERTI DRUG PRODS INC KUBICKI CHARLES J	COM 13D	8/20/87	363 18.5	84837410 50.2	UPDATE
WESTAR CORP CIPAR V MALCOLM	COM 13D	8/5/87	800 5.2	95709710 0.0	NEW

## RECENT 8K FILINGS

Form 8-K is used by companies to file current reports on the following events:

- Item 1. Changes in Control of Registrant.
- Item 2. Acquisition or Disposition of Assets.
- Item 3. Bankruptcy or Receivership.
- Item 4. Changes in Registrant's Certifying Accountant.
- Item 5. Other Materially Important Events.
- Item 6. Resignations of Registrant's Directors.
- Item 7. Financial Statements and Exhibits.

The companies listed below have filed 8-K reports for the date indicated and/or amendments to 8-K reports previously filed, responding to the item(s) of the form specified. Copies of the reports may be purchased from the Commission's Public Reference Room (when ordering, please give the date of the report). An invoice will be included with the requested material when mailed.

NAME OF ISSUER	STATE CODE	8K ITEM NU.							DATE	COMMENT
		1	2	3	4	5	6	7		
AMERICAN BIOMATERIALS CORP	VA			X	X		X		08/07/87	
ANECO REINSURANCE CO LTD							X		08/12/87	
ANOVA VENTURES CORP	DE				X		X		08/19/87	
ATCOR INC	DE	X					X		08/10/87	
B&A RESEARCH & SERVICES INC	CO		X						07/03/87	
BARCLAYS AMERICAN CORP	NC				X		X		08/24/87	
BLCKBUSTER ENTERTAINMENT CORP	DE						X		06/15/87	AMEND
BRISTOL INVESTMENTS INC	CO	X							08/24/87	
CABLE TV FUND IX-C LTD	CO		X						05/15/87	AMEND
CABLE TV FUND VIII-C LTD	CO		X						05/15/87	AMEND
CARRINGTON LABORATORIES INC /TX/	TX	X					X		08/11/87	
CENTURY PROPERTIES FUND XIV	CA		X						07/31/87	AMEND
CERTAINTIED CORP	MD		X				X		08/11/87	
COMARCO INC	CA				X		X		08/05/87	
COMARCO INC	CA				X		X		08/18/87	
COMMODORE ENVIRONMENTAL SERVICES INC /UT	UT								01/08/87	AMEND
COMMODORE ENVIRONMENTAL SERVICES INC /UT	UT								01/09/87	AMEND
COMMODORE ENVIRONMENTAL SERVICES INC /UT	UT								07/29/87	AMEND
CONSOLIDATED CAPITAL INSTITUTIONAL PROPE	CA					X			05/29/87	
CONSOLIDATED CAPITAL INSTITUTIONAL PROPE	CA				X		X		06/30/87	
CONSOLIDATED RESOURCES HEALTH CARE FUND	GA		X				X		10/31/86	
CONSOLIDATED RESOURCES HEALTH CARE FUND	GA		X				X		02/05/87	
CONSOLIDATED RESOURCES HEALTH CARE FUND	GA				X				08/07/87	
CONSOLIDATED STORES CORP /DE/	DE						X X		08/17/87	
CP NATIONAL CORP	CA				X				08/13/87	
DAY INTERNATIONAL CORP	MI	X					X		08/11/87	
DIGITAL METCOM INC	NV				X				08/10/87	
ECOGEN INC	DE				X				08/06/87	
ELECTRONICS MISSILES & COMMUNICATIONS IN	DE				X				08/17/87	
EQUITEX INC	DE		X				X		08/10/87	
F&M BANCORPORATION INC	WI						X		07/16/87	AMEND
FIRST FINANCIAL CORP /WI/	WI				X		X		08/24/87	
FIRST OAK BROOK BANCSHARES INC	DE			X					06/15/87	
GALAXY CARPET MILLS INC					X				06/19/87	
GAY INTERNATIONAL INC	UT						X		02/28/87	
GRANTON TECHNOLOGY LTD	NY				X				08/14/87	
HANNA M A CO/DE	DE	X					X		08/11/87	
HARTFORD FIRE INSURANCE CO	CT				X				08/13/87	
HOLDER INTERNATIONAL INDUSTRIES INC	DE			X			X		08/12/87	
HOME SAVINGS OF AMERICA FA					X		X		08/25/87	
ILLINI COMMUNITY BANCORP INC	IL		X				X		08/07/87	
IHT INC	DE								06/24/87	AMEND
INSITUFORM MID AMERICA INC	DE				X		X		08/12/87	
INSITUFORM OF NORTH AMERICA INC	DE				X		X		08/18/87	
INTERNATIONAL HOLDING CAPITAL CORP	HI				X		X		08/17/87	
ISRAMCO INC	DE				X				07/27/87	
JACOR COMMUNICATIONS INC	OH		X		X		X		08/12/87	
KRUPP INSURED PLUS LTD PARTNERSHIP	MA		X				X		08/11/87	

RECENT 8K FILINGS CONT.

NAME OF ISSUER	STATE CODE	8K ITEM NO.							DATE	COMMENT	
		1	2	3	4	5	6	7			
MAGNETEK INC	DE							X	12/30/86	AMEND	
MARINE CORP /WI/	WI					X			08/21/87		
MATRIX MEDICA INC	CO					X			08/24/87		
MDC MORTGAGE FUNDING TRUST R-6						X	X		07/29/87		
MECCO RESEARCH INC	CA					X	X		08/17/87		
MEDMASTER SYSTEMS INC/DE	DE	NO ITEMS								06/26/87	AMEND
MID AMERICA INDUSTRIES INC	DE					X			08/13/87		
MGBILE AMERICA CORP	FL					X			08/04/87		
MONT BLANC RESOURCES INC	NY	X		X	X	X	X		08/11/87		
NATIONAL HEALTHCARE INC	DE		X					X	03/09/87	AMEND	
NATIONAL HEALTHCARE INC	DE					X		X	07/20/87		
NECO ENTERPRISES INC	RI					X			08/11/87		
OIL SECURITIES INC	NV					X			08/20/87		
OZG DIVERSIFIED AUTOMATION INC /CO/	CO					X			08/12/87		
PACIFIC INTERNATIONAL FUTURES FUND/CA	CA					X	X		06/03/87		
PANGEA PETROLEUM CO	DE					X	X		08/19/87		
PHI ENTERPRISES INC	CA		X					X	12/31/86		
PGNDEROSA INC	DE					X	X	X	08/06/87		
PCSTMASTERS INC /FL/	FL					X			06/19/87		
PRICE T ROWE REALTY INCOME FUND II	DE		X					X	07/30/87		
PROFIT TECHNOLOGY INC	DE							X	05/08/87	AMEND	
PRUDENTIAL REALTY ACQUISITION FUND II LP	DE		X					X	03/30/87		
PUBLIC SERVICE CO OF NEW MEXICO	NM					X			08/14/87		
PURGLATOR COURIER CORP	NY					X	X		08/18/87		
ROWLEY SCHER REPROGRAPHICS INC	DC					X			08/24/87		
SAWYER ADECOR INTERNATIONAL INC			X					X	08/10/87		
SEARCH 1981-A DRILLING PROGRAM	TX	X				X	X	X	08/01/87		
SGLITRON DEVICES INC	NY					X		X	08/11/87		
SOUTHWEST AIRLINES CO	TX		X					X	08/12/87		
SPECTRADYNE INC	TX					X	X	X	08/18/87		
SPCRTC CORP	MA		X					X	07/01/87		
STUFF YER FACE INC	NJ							X	08/24/87		
SUMMIT TAX EXEMPT L P II	DE		X					X	08/07/87		
TELE COMMUNICATIONS INC	DE		X					X	08/11/87		
TEXAS COMMERCE BANCSHARES INC	DE					X	X	X	08/17/87		
TWIN CITY BARGE INC	DE					X		X	08/14/87		
TYCO LABORATORIES INC	MA		X					X	08/10/87		
VANZETTI SYSTEMS INC	MA							X	12/24/86	AMEND	
VAUGHN COMMUNICATIONS INC	MN		X					X	08/11/87		
VMS MORTGAGE INVESTORS L P II	DE							X	06/02/87	AMEND	
VMS MORTGAGE INVESTORS L P III	DE		X						08/11/87		
WINDJAMMER SOFTWARE INC	NJ		X			X	X	X	08/18/87		

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused a copy of the within and foregoing Respondent Liberty Petroleum Corporation's Answer and Motion to Dismiss to be served upon all parties to this action as follows:

Original and three copies via Federal Express to: Brent Fields, Secretary  
Office of the Secretary  
100 F Street, NE  
Washington, DC 20549-1090

Copy via E-mail to: David S. Frye, Senior Counsel  
Division of Enforcement  
Securities and Exchange Commission  
Room 6104  
100 F Street, NE  
Washington, DC 20549-6010  
[fryed@sec.gov](mailto:fryed@sec.gov)

Copy via E-mail to: Cameron Elliot, Administrative Law Judge  
Jessica Neiterman, Legal Assistant  
[alj@sec.gov](mailto:alj@sec.gov)  
[neitermanj@sec.gov](mailto:neitermanj@sec.gov)

This 20<sup>th</sup> day of July, 2015.

*Ethan H Cohen with express permission*  
Ethan H. Cohen BJ