



1 Mr. Steven J. Muehler  
2 [REDACTED]  
3 Marina Del Rey, California [REDACTED]  
4 Phone: [REDACTED]  
5 [REDACTED]

6 UNITED STATES OF AMERICA  
7 BEFORE THE  
8 SECURITIES AND EXCHANGE COMMISSION

9 IN THE MATTER OF:  
10  
11 STEVEN J. MUEHLER,  
12 ALTERNATIVE SECURITIES MARKETS GROUP  
13 CORPORATION, AND BLUE COAST SECURITIES  
14 CORPORATION, DBA GLOBALCROWDTV, AND  
15 BLUE COAST BANC.  
16

ADMINISTRATIVE PROCEEDING.: FILE NO. 3-16836  
  
MOTION FOR SUMMARY JUDGMENT

17  
18 Mr. Steven J. Muehler, in his individual capacity and as the sole shareholder of Alternative  
19 Securities Markets Group Corporation and Blue Coast Securities Corporation (aka: "GlobalCrowdTV" and  
20 "Blue Coast Banc") each move the Administrative Law Judge ("ALJ") for an Order granting Summary  
21 Judgment on his (MUEHLER's) claims that the Administrative Law Process violates MUEHLER's  
22 Constitutional Rights, that the Members of the United States Securities and Exchange Commission failed in  
23 its requirement to make available to a respondent (MUEHLER) the discovery afforded in an administrative  
24 proceeding which was required to be given to MUEHLER seven days after the Order Instituting Proceedings  
25 ("OIP") was issued, and that the ALJ lacks Subject Matter Jurisdiction Over the United States Securities and  
26 Exchange Commission's Claims against MUEHLER.  
27

1 PRELIMINARY STATEMENT

2  
3 1. On September 28<sup>th</sup>, 2015, the United States Securities and Exchange Commission (the  
4 “Commission”) formally alleged that Mr. Steven J. Muehler engaged in: (i) a Fraudulent Scheme and Unlawful  
5 Broker-Dealer Activity pursuant to Section 15(b) and 21C of the Securities Exchange Act of 1934 with an Order  
6 Instituting Cease-and-Desist Proceedings pursuant to Section 21C of the Securities and Exchange Act of 1934 (the  
7 “OIP) (*In the Matter of Steven J. Muehler, Alternative Securities Markets Group Corporation, and Blue Coast  
8 Securities Corporation, dba GlobalCrowdTV, Inc. and Blue Coast Banc, Administrative Proceeding File Number 3-  
9 16836*) before an SEC Administrative Law Judge (“SEC ALJ”) at the Commission to determine, inter alia, whether  
10 Mr. Muehler should be ordered to pay a civil penalty pursuant to Section 21B(a) of the Exchange Act and whether  
11 Mr. Muehler should be ordered to pay disgorgement pursuant to Sections 21B(e) and 21C(e) of the Act.

12  
13 2. Pursuant to the Commission’s Rules of Practice, Mr. Muehler is required to submit this  
14 Amended Answer to the OIP on or about December 18th, 2015.

15  
16 3. SEC Administrative proceedings violate Article II of the United States Constitution, which  
17 states that the “Executive Power shall be vested in a President of the United States of America”.

18  
19 4. An SEC ALJ, appointed for a life-term tenure, presides over an administrative proceeding.  
20 Statutes and regulations make clear that SEC ALJs are Executive Branch “Officers” within the meaning of Article  
21 II. SEC ALJs are NOT mere recommenders to the Commission or mere employees performing fact-gathering  
22 exercises for final review by the Commission; rather, they have enormous and practically unchecked authority.  
23 Moreover, there is no obvious constitutional warrant for such unchecked or unbalanced administrative power. See  
24 *SEC v Citigroup Global Markets, Inc., 11-CV-7387 JSR, 2014 WL 3827497* (S.D.N.Y. Aug 5, 2014).

25  
26 5. The SEC ALJ position is established by law and the duties, salary, and means of appointment  
27 for the office are specified by statute. They have the power to take testimony, conduct hearings, rule on the  
28 admissibility of evidence, and have the power to enforce compliance with discovery orders. The SEC ALJ can  
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1 render punishment, including civil money penalties and ban an individual for life from the securities business. In the  
2 course of carrying out those functions, the SEC ALJs exercise significant discretion.

3  
4 6. The SEC ALJs cannot be removed “at will” by the Commission but can only be removed for  
5 “good cause”. The SEC’s own Rules of Practice provide the SEC ALJs with enormous authority over Mr. Muehler  
6 in this proceeding and the Commission’s review of the SEC ALJs’ decision affords that judgment with tremendous  
7 deference. In effect and practice, the SEC ALJ renders the decision of the Commission in Administrative  
8 Proceedings. An appointee exercising significant authority pursuant to the Laws of the United States is an Officer of  
9 the United States. *Landry v. FDIC*, 204 F.3d 1125, 1133, 340 U.S. App. D.C. 237, 245 (2000) (citing *Buckley v.*  
10 *Valeo*, 424 U.S. 1, 216n. 162, 96S. Ct. 612 (1976)).

11  
12 7. The Supreme Court has held that such Officers – charged with executing the Laws, a power  
13 vested by the Constitution solely in the President – may not be separated from Presidential Supervision and removal  
14 by more than one layer of tenure protection. *Free Enterprise Fund v. Pub. Co. Accounting Oversight Bd.*, 130 S. Ct.  
15 3138, 561 U.S. 477 (2010) (“*Free Enterprise*”). In particular, if an officer can only be removed from office for good  
16 cause, then the decision to remove that officer cannot be vested in another official, who, too, enjoys good-cause  
17 tenure.

18  
19 8. Yet, SEC ALJ’s enjoy at least two (and potentially more) layers of tenure protection. The SEC  
20 Administrative Proceeding therefore violate Article II and are unconstitutional.

21  
22 9. Additionally, as discussed herein, the Commission has singled out Mr. Muehler for disparate  
23 treatment in comparison to similarly situated persons, and there is no rational relationship between the disparate  
24 treatment and a legitimate government interest.

25  
26 10. Without any rational basis, the Commission seeks, among other things, civil penalties from  
27 Mr. Muehler in an Administrative Proceeding rather than a Federal Court Action, in doing so, the Commission has  
28 unfairly and unconstitutionally singled out Mr. Muehler.

1                    11. Mr. Muehler DENIES all allegations of wrongdoing and stands ready to mount a defense  
2 against each and every one of the Commission's allegations. Yet, under current Commission rules, Mr. Muehler will  
3 be deprived of a Jury Trial, the right to use the discovery procedures of the Federal Court to shape his defense, and  
4 the protections of the Federal Rules of Evidence which were crafted to bar unreliable evidence. The Commission is  
5 denying Mr. Muehler these rights.

6  
7                    12. Mr. Muehler faces a proceeding where the rules prevent the Administrative Law Judge from  
8 setting a reasonable trial schedule and issuing other appropriate rulings given the nature and potential complexity of  
9 the case.

10  
11                    13. Mr. Muehler has conferred with representatives of the Commission, and they have offered no  
12 explanation as to why Mr. Muehler is being singled out for disparate treatment, even when presented with clear data  
13 showing disparate treatment, or to articulate a reason why it was proper to bring the case against Mr. Muehler in an  
14 Administrative Proceeding rather than in District Court. In the absence of an explanation, Mr. Muehler is left with  
15 the Commission's apparent motives and they are improper.

16  
17                    14. DECLARATORY JUDGMENT IN FAVOER OF MUEHLER IS NECESSARY TO  
18 PREVENT MUEHLER FROM BEING COMPELLED TO SUBMIT TO AN UNCONSTITUTIONAL  
19 PROCEEDING.

20  
21                    **PROPER JURISDICTION, VENUE, AND PARTIES**

22                    15. The Federal Court for the Southern District of California has subject matter jurisdiction  
23 pursuant to 28 U.S.C. §§ 1331, 1337, 1346, 1651, 2201 and 5 U.S.C. §§ 702 and 706. Venue is proper in this district  
24 pursuant to 28 U.S.C. § 1391 (b) and (e).

25  
26                    16. It is necessary and appropriate for this Court (the Federal Court for the Southern District of  
27 California) to exercise jurisdiction over the Securities and Exchange Commission's claim against MUEHLER claim  
28

1 because (a) without judicial review by this court at this stage, meaningful judicial review of the claim asserted herein  
2 will be foreclosed; (b) MUEHLER's claim is wholly collateral to the review of provisions of the Securities Laws;  
3 and (c) MUEHLER's claim is not within the particular expertise of the SEC.  
4

5 17. MUEHLER is a citizen of the State of California and a resident of Los Angeles County. At all  
6 times relevant to this Complaint, MUEHLER worked as a member of Blue Coast Securities Corporation and/or  
7 Alternative Securities Markets Group Corporation, each a California Stock Corporation.  
8

9 18. The SEC is an agency of the United States Government, headquartered in Washington, D.C.  
10

11  
12 **BACKGROUND**

13 19. MUEHLER formed the California Stock Corporation BLUE COAST SECURITIES  
14 CORPORATION on APRIL 03, 2012. The Primary Business Function of BLUE COAST SECURITIES  
15 CORPORATION was the drafting and registration of Regulation D Private Placements and Regulation A Public  
16 Offerings for Issuers. BLUE COAST SECURITIES CORPORATION would work with the Company to secure a  
17 Licensed Broker Dealer for the sales of the Securities. No functions of BLUE COAST SECURITIES  
18 CORPORATION required the firm to be a licensed broker dealer or investment advisor. BLUE COAST  
19 SECURITIES CORPORATION during its operations ever offered a security for sale or participated in sale of any  
20 securities. BLUE COAST SECURITIES CORPORATION ceased its business operations in October of 2014.  
21

22 20. MUEHLER formed the California Stock Corporation ALTERNATIVE SECURITIES  
23 MARKETS GROUP CORPORATION on October 02, 2014. The Primary Business Function of ALTERNATIVE  
24 SECURITIES MARKETS GROUP CORPORATION was initially the continuation of BLUE COAST  
25 SECURITIES CORPORATION's business of the drafting and registration of Regulation D Private Placements and  
26 Regulation A Public Offerings for Issuers, with the added services of S-1, S-3, S-11 and SEC Form D Drafting and  
27 Registration Services, with placement with a Licensed Broker Dealer or OTC Market Maker post SEC Qualification  
28 of the Registration Statement. ALTERNATIVE SECURITIES MARKETS GROUP planned to further its operations  
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1 with the filing of SEC FORM 1 for the subsidiary ALTERNATIVE SECURITIES MARKET EXCHANGE, INC., a  
2 California Stock Exchange, to operate as an “Over-the-Counter / Alternative Securities Exchange”; and with the  
3 filings of SEC FORM BD for ALTERNATIVE SECURITIES MARKET, LLC, a California Limited Liability  
4 Company, to become a Licensed Broker Dealer.

5  
6 21. On September 28<sup>th</sup>, 2015, the United States Securities and Exchange Commission (the  
7 “Commission”) formally alleged that Mr. Steven J. Muehler engaged in: (i) a Fraudulent Scheme and Unlawful  
8 Broker-Dealer Activity pursuant to Section 15(b) and 21C of the Securities Exchange Act of 1934 with an Order  
9 Instituting Cease-and-Desist Proceedings pursuant to Section 21C of the Securities and Exchange Act of 1934 (the  
10 “OIP) (*In the Matter of Steven J. Muehler, Alternative Securities Markets Group Corporation, and Blue Coast  
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12 16836*) before an SEC Administrative Law Judge (“SEC ALJ”) at the Commission to determine, inter alia, whether  
13 Mr. Muehler should be ordered to pay a civil penalty pursuant to Section 21B(a) of the Exchange Act and whether  
14 Mr. Muehler should be ordered to pay disgorgement pursuant to Sections 21B(e) and 21C(e) of the Act.

15  
16 **SEC COMPLAINT “RESPONDENTS FRAUDULENT SCHEME AND**  
17 **UNLAWFUL BROKER DEALER ACTIVITY”**  
18

19  
20 22. B-1 of SEC Complaint against MUEHLER states “Since at least August 2013, Muehler and  
21 his companies, Blue Coast and ASMG, have offered to help small business raise money from investors. The  
22 Respondents offer to structure and prepare securities offerings, shepherd the offerings through the Commission  
23 review process, and then market the securities to the investing public. Although none of them was registered as a  
24 broker-dealer, and Muehler was not associated with a registered broker-dealer, during this time, they have offered  
25 and agreed to effect securities transactions for customers over the Internet, primarily under Regulation A in  
26 connection with proposed securities offerings”.

1           23. MUEHLER has successfully drafted more than 100 Private Placements Memorandums for  
2 clients over the past ten years for companies looking to raise more than ONE HUNDRED MILLION DOLLARS in  
3 investment capital.

4  
5           24. To date, MEUEHLER has successfully drafted and filed with the United States Securities &  
6 Exchange Commission more than twenty Regulation A Public Securities Offerings.

7  
8           25. As of the date of this Amended Response to the Complaint, MUEHLER has drafted, filed and  
9 cleared all SEC Comments for FOUR SEC Regulation A Registration Statements, which is the most of any single  
10 source during calendar year 2015. Drafting, filing and working with an Issuer to qualify a public offering of  
11 securities DOES NOT require an individual to be a Registered Broker Dealer, Registered Investment Advisor or an  
12 attorney.

13  
14           26. All of MUEHLER's Regulation A Registration Statements filed with the Commission were,  
15 and are, all "*Direct Public Offerings from the Issuer to the public*", where NO PUBLIC SOLICIATION FOR THE  
16 SALE OF ANY SECURITIES was ever conducted, except for under the "TEST THE WATERS" provision of  
17 Regulation A, and ONLY AFTER all required TEST THE WATERS ITEMS were filed with the Commission. The  
18 Commission has subpoenaed and deposed more than TEN of MUEHLER's Issuers, each have verified this  
19 information under oath. The Commission's Dept of Enforcement has access to all of MUEHLER's Issuers filings  
20 with the Commission, and has had more than EIGHTEEN MONTHS to verify this information.

21  
22           27. In countless responses to comments to Examiners of the Commission, each of MUEHLER's  
23 Issuers responded to each Examiner letting them know that no sales of securities would be made until AFTER SEC  
24 qualification and completion of State Registrations. The Commission has subpoenaed and deposed more than TEN  
25 of MUEHLER's Issuers, and each has verified this information under oath, and the Commission's Dept of  
26 Enforcement has access to all of MUEHLER's Issuers response to comment letters submitted to SEC Examiners,  
27 and has had more than EIGHTEEN MONTHS to verify this as fact.

1           28. At no time were any Securities going to sold through the Alternative Securities Markets  
2 Group's Website until the "Alternative Securities Market" was either qualified as a National Securities Exchange, or  
3 as a Securities Market exempt from Federal Registration, and until ASMG become a Licensed Broker Dealer, or  
4 until ASMG become associated with a Licensed Broker Dealer. MUEHLER Filed SEC FORM ONE for the  
5 Alternative Securities Market to become an Exempt from Federal Registration Securities Market on January 26<sup>th</sup>,  
6 2015 (see attached confirmation of application received by the Securities and Exchange Commission).

7  
8           29. In a written correspondence, written and mailed to the Securities and Exchange Commission  
9 on April 29<sup>th</sup>, 2015, MUEHLER states that "The Alternative Securities Market is to be wholly owned and operated  
10 by Alternative Securities Market, Inc., a newly formed California Stock Corporation. Alternative Securities Market,  
11 Inc. is a wholly owned subsidiary of Alternative Securities Markets Group Corporation, a California Stock  
12 Corporation in Good Standing. Alternative Securities Market, LLC will be the exclusive BROKER DEALER for all  
13 Issuer Transactions on the Alternative Securities Market, and will begin its BROKER DEALER registration and  
14 approval process beginning next week, with the submission of its SEC FORM BD to the State of California.  
15 SHOULD THE BROKER DEALER APPLICATION NOT BECOME APPROVED PRIOR TO JUNE 1<sup>st</sup>, 2015,  
16 THE ALTERNATIVE SECURITIES MARKET WILL DELAY THE BEGINNING OF OPERATIONS, AND  
17 ONLY ALLOW ISSUERS TO "TEST THE WATERS" ON MARKET STARTING JUNE 1<sup>ST</sup>, 2015, WITH NO  
18 SECURITIES TRANSACTIONS HAPPENING ON MARKET UNTIL POST APPROVAL OF THE  
19 ALTERNATIVE SECURITIES MARKET, LLC'S BROKER DEALER APPLICATION". (see attached).

20  
21           30. In July of 2015, MUEHLER hired Mr. Koorosh "Danny" Rahimi to head the Broker Dealer  
22 Operations of the Alternative Securities Market. Mr. Rahimi was properly licensed with a Series 7, 6 & 63 license,  
23 and SEC Form BD was submitted to FINRA in July of 2015. As part of his employment with Alternative Securities  
24 Markets Group, Mr. Rahimi was tasked with studying and passing the Series 24 examination.

25  
26           31. Also in July of 2015, MUEHLER hired Mr. Weslie Watt Johnson as the Chief Executive  
27 Officer of Alternative Securities Markets Group Corporation, and Mr. David Dobkin as head of Investment Banking  
28 of Alternative Securities Markets Group Corporation. During Mr. Johnson's and Mr. Dobkin's time at Alternative  
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1 Securities Markets Group Corporation, the firm entered into an Agreement with “Newport Coastal Securities  
2 Corporation” of Irvine, California to be the Broker Dealer of securities offered on the Alternative Securities Market.

3  
4 32. An Amended SEC FORM ONE was filed with the United States Securities & Exchange  
5 Commissions Dept of Market Regulation on September 16<sup>th</sup>, 2015 (see attached).

6  
7 33. MUEHLER’s first Regulation A Registration Statement for an Issuer of the Alternative  
8 Securities Market became qualified in November of 2015, therefore, no securities would have been sold on the  
9 Alternative Securities Market without a licensed broker dealer.

10  
11 34. NO SECURITIES WERE EVER SOLD BY ANY ISSUER OF MUEHLER OR THE  
12 ALTERNATIVE SECURITIES MARKET.

13  
14 35. Mr. Rahimi left Alternative Securities Markets Group in September of 2015.

15  
16 36. After the filing of this baseless complaint by the SEC against MUEHLER, MUEHLER was  
17 fired from Alternative Securities Markets Group.

18  
19 37. Mr. Johnson and Mr. Dobkin resigned from Alternative Securities Markets Group in October  
20 of 2015, and founded ASMX Capital, LLC, and continued the Broker Dealer partnership with Newport Coastal  
21 Securities Corporation that was created at Alternative Securities Markets Group.

22  
23 38. B-2 of SEC Complaint against MUEHLER states “To persuade small businesses to sign up for  
24 their services, Respondents falsely claim they have helped other small businesses raise millions of dollars from  
25 investors, and that they work with securities counsel to ensure the offerings are lawful. They have also failed to  
26 disclose sanctions against Muehler by state securities regulators for acting as an unregistered broker-dealer and  
27 defrauding business customers in past iterations of Muehler’s fraudulent scheme. Through their scheme.

1 Respondents have signed more than thirty small business as customers, collected more than \$50,000 in fees, and  
2 acquired common stock from their customers as part of payment for their services”.

3  
4 39. MUEHLER has prepared more than 100 Private Placement Memorandums for Companies  
5 looking to raise in excess of ONE HUNDER MILLION DOLLARS in Investment Capital over a period greater than  
6 ten years. Mr. Muehler has not been part of any securities offering since August of 2010. Because MUEHLER has  
7 only prepared Private Placement offerings for Issuers as part of a services agreement, the amount of capital raised by  
8 these companies is not known by Mr. Muehler.

9  
10 40. All of MUEHLER’s Issuers must get a Legal Opinion by a third party Attorney that is not  
11 associated with MUEHLER. A couple of those opinion letters are attached this Amended Response Letter.  
12 MUEHLER has never acted as an attorney, has never stated he is an attorney, has never provided legal advice or  
13 counsel, or has ever entered into an agreement to provide any kind of legal services. This fact has been verified by  
14 the Commission though collection of Documents from MUEHLER and the Subpoenaed parties related to this  
15 compliant, and through the MUEHLER’s Issuers who have verified this fact to the Commission under oath during  
16 depositions.

17  
18 41. As has been clearly evidenced throughout this amended response, MUEHLER only prepares  
19 Public and Private Offering Registration Statements and Offering Memorandums, and does not act in any capacity in  
20 any capital raising process. As a preparing agent (or as an SEC Edgar Filing Agent), MUEHLER is not required  
21 under any law to disclose any sanctions against him as they relate to the sales of any securities. MUEHLER has also  
22 never hidden the fact, and when asked about the Minnesota Order and the California Order, MUEHLER freely  
23 provides the information. This fact has been verified by the Commission through its collection of documents and  
24 through its depositions of MUEHLER Issuers. MUEHLER was never part, and was never going to be part, or the  
25 Alternative Securities Market, LLC Broker Dealer Division.

26  
27 42. MUEHLER’s California Cease and Desist Order DOES NOT STOP MUEHLER FROM  
28 TAKING PART IN SECURITIES OFFERINGS! Page 4, lines 18-21 or the order States “Mr. Muehler is hereby  
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1 ordered to desist and refrain from the further offer or sale of securities, in the State of California, including but not  
2 limited to interest in limited liability companies, investment contracts, and/or membership units UNLESS AND  
3 UNTIL QUALIFICATION HAS BEEN MADE UNDER SAID LAW OR UNLESS EXEMPT". The Commission is  
4 shameful in its continued statements that MUEHLER has an order in the State of California not allowing him to  
5 participate in securities offerings.

6  
7 43. MUEHLER does have a Cease and Desist order stating he is not to participate in securities  
8 offerings in the State of Minnesota. MUEHLER has never received a copy of this order, MUEHLER has never  
9 offered for sale or sold a security in the State of Minnesota, and MUEHLER (without admitting any guilty or  
10 knowledge of the case in question) agrees to simply never sell a security in the State of Minnesota.

11  
12 44. The Commissions claim that MUEHLER, or any other entity, has received any "Common  
13 Stock", or any other securities is a FALSE CLAIM that has been verified by countless documents produced to the  
14 Commission, through its many depositions for MUEHLER's Issuers, and through its investigations. To date, the  
15 Commission has provided no evidence of this claim, and MUEHLER highly doubts the Commission's ability to do  
16 so.

17  
18 45. B-3 of SEC Complaint against MUEHLER states "Upon signing issuer customers,  
19 Respondents take significant steps to offer and sell securities to investors, including filing Regulation A offering  
20 statements with the Commission and marketing the offering to investors. Commission staff have notified  
21 Respondents that there are significant deficiencies in the offering statements filed by Muehler, many of which  
22 Muehler has not meaningfully addressed. Nonetheless, Respondents continue to operate their scheme and to lull  
23 issuer customers by assuring them that they are on the verge of qualifying under Regulation A and raising investor  
24 funds".

25  
26 46. Mr. Muehler has filed More than TWENTY Regulation A Registration Statements.

1           47. Mr. Muehler has cleared Comments on FOUR Regulation A Registration Statements (the most  
2 of any filer for 2015) – Broadcast 3DTV, Inc. (qualified), Stepone Personal Health, Inc. (all comments clear, has  
3 submitted letter for qualification), AdvantaMeds Solutions USA Fund I, Inc. (all comments clear, has submitted  
4 letter for qualification to be the first Recreational Marijuana Public Securities Offering) and Chameleon Media  
5 Group (got only ONE COMMENT on a first submission, has filed final amendment asking for qualification).  
6 MUEHLER believes he would have cleared all comments for all issuers of Alternative Securities Markets Group by  
7 this time, but more than FIFTEEN ISSUERS of Alternative Securities Markets Group discontinued its relationship  
8 with Muehler and Alternative Securities Markets Group during this baseless SEC inquiry.

9  
10           48. Filing a Regulation A Registration Statement is not a form of public solicitation, and the  
11 Commission should be shameful in its comments above that it is a form of public solicitation.

12  
13           49. Issuers ONLY ENGAGED in TEST THE WATERS Publications, and ABSOLUTELY NO  
14 EFFORT WAS EVER engaged for the promotion or sales of the securities to the investing public. NO  
15 SECURITIES BY ANY ISSUER OF MUEHLER WAS EVER SOLD!

16  
17           50. B-7 of the SEC Complaint Against Muehler states “In addition to offering broker-dealer  
18 services to the prospective customers, Respondents have undertaken significant efforts to effect securities  
19 transactions between their issuer customers and investors, including helping issuers structure the terms of proposed  
20 offerings”.

21  
22           51. MUEHLER has NEVER had any communications between an Issuer and an Investor, though  
23 MUEHLER has provided Referrals to Broker Dealers, Registered Investment Advisors and Investment Bankers, for  
24 which MUEHLER has never been compensated, nor did MUEHLER ever expect to be compensated.

25  
26           52. Assisting an Issuer “Structure terms of an offering” is not limited to licensed Broker Dealers,  
27 and the Commission’s claim that it is unlawful for MUEHLER to work with an Issuer to structure the terms of a  
28

1 potential offering is baseless and shameful, and part of a continued effort in this complaint to smear MUEHLER and  
2 portray his business activities as a “fraudulent scheme”.

3  
4 53. B-8 of the Complaint against MUEHLER states (in part) “Mr. Muehler ..... ASMG expects  
5 the securities of companies listed on the Alternative Securities Market to become quoted on the OTCQB, OTCQX  
6 or the NASDAQ Capital Markets within approximately one to four years of IPO on the Alternative Securities  
7 Market”

8  
9 54. In all Qualified, Cleared of Comments and New Submissions of MUEHLER Issuers, all  
10 Registration Statements clearly define a liquidity strategy for all offerings is a future listing on the OTCQB,  
11 OTCQX and/or NASDAQ. All companies MUEHLER files Regulation A Registration Statements for would  
12 QUALIFY for an OTCQB listing on the date of filing SEC Form 1-A to the Commission should the company have  
13 chosen to proceed with a financial audit, retain the services of a Stock Transfer Agent, and that Stock Transfer  
14 Agent successfully processes a DTC Eligibility Application, and an OTC Market Maker associated with MUEHLER  
15 files form 211 with FINRA and the issuer complete the OTCQB Application (and submits both application fee and  
16 first year dues to OTC Markets Group). This statement by MUEHLER was very true when it was made, and is still  
17 very true today, and the SEC’s statement that this is, and or was, unlawful is again shameful on the part of the  
18 Commission, and it is shameful that the Commission is continuing to attempt to portray this as anything unlawful.

19  
20 55. B-8 of the SEC’s complaint against MUEHLER States (in part): “The version of the Website  
21 that was available to the public in July of 2014, and which MUEHLER marketed to investors over the internet,  
22 provided a webpage for each customer that listed the terms of the proposed offering, provided a webpage for each  
23 customer that listed the terms of the proposed offering, included a link to the customer’s offering statement, and  
24 included an “Invest” button that lead to an investor login page. As of at least June 2015, the Website listed eighteen  
25 companies as purportedly available for ‘trading’ on the Alternative Securities Market”.

26  
27 56. Each webpage for each Issuer of listed on the Alternative Securities Market was the sole  
28 property of the Issuer, and all content on that page was authorized by the Issuer.

1           57. All Alternative Securities Market Issuers filed a copy of the Company's webpage on the  
2 Alternative Securities Market with the United States Securities & Exchange Commission as its "TEST THE  
3 WATERS" publication, and all Issuer Company pages on the Alternative Securities Market provided all required  
4 disclaimers and information required for public test the waters. NO ISSUERS of the Alternative Securities Market  
5 published any information that was in violation of the TEST THE WATERS provisions of Regulation A, and if any  
6 prohibited material was published, it was immediately removed upon finding that it was prohibited.

7  
8           58. The "Invest" tabs on the Alternative Securities Market were never directed to any  
9 Subscription Agreement, only to a User Login Screen, for which only the ISSUER had access. NO ACCESS to any  
10 investors was ever granted, issued or authorized. The Commission has confirmed this fact through its document  
11 collection and depositions, and it is shameful that the Commission tries to portray the Alternative Securities Market  
12 as an "active" trading market.

13  
14           59. MUEHLER NEVER marketed any securities to any investors, and the Commission to date has  
15 never provided any evidence that it has that MUEHLER ever marketed any of the Issuers securities to any investors.  
16 The Commission has verified through documents collected and through depositions with MUEHLER Issuers, that  
17 MUEHLER has NEVER marketed any Issuer's Securities, other than to provide a referral to a Licensed Broker  
18 Dealer, Registered Investment Advisor or Investment Banker at no compensation to MUEHLER.

19  
20           60. NO SECURITIES OF ANY ISSUER ON THE ALTERNATIVE SECURITIES MARKET  
21 EVER SOLD TO AN INVESTOR.

22  
23           61. B-9 of the Complaint against MUEHLER states: "Respondents have also marketed their  
24 customers' securities in promotional videos made available to the public on the Website and Youtube, in which  
25 Muehler recommended specific offerings to potential investors and directed them to the website to invest. In a video  
26 for at least one customer, Muehler stated that the customer's securities were already available for sale on the  
27 Alternative Securities Market to accredited investors, and would be available to all investors upon qualification  
28 under Regulation A".

1                   62. For approximately three months in 2014, MUEHLER hosted a web series called "On the  
2 Corner of Main Street and Wall Street".

3  
4                   63. MUEHLER spoke to listeners about the current state of the market, his oppositions to  
5 "CrowdFunding", reviewed laws and legislation affecting private and public offerings, and changes to the world of  
6 Alternative Investments.

7  
8                   64. MUEHLER regularly had guests on the show, which included securities attorneys, investment  
9 bankers, financial industry reporters and bloggers, and each show concluded with an interview with an issuer of  
10 Alternative Securities.

11  
12                   65. MUEHLER NEVER recommended any invests, Muehler NEVER gave investment advice,  
13 MUEHLER NEVER solicited for investment dollars for himself, any company that MUEHLER was associated, and  
14 never for an issuer of securities. All broadcasts were free to the public, and MUEHLER never received any  
15 compensation (cash or gift) for the broadcasts.

16  
17                   66. B-10 of the SEC's Complaint against MUEHLER (partial): "Through 'Listing & Direct Public  
18 Offering and Marketing Agreement' with customers (the customer "Customer Agreements"), Respondents offer  
19 their Broker-Dealer services in return for up-front fees, monthly fees, a percentage of funds raised, and an equity  
20 state in each issuer, the size of which depends on the offering's success."

21  
22                   67. Each of these stated agreements with Alternative Securities Market Issuers started in the  
23 Spring of 2015, after MUEHLER filed the Firm's Form ONE with the United States Securities and Exchange  
24 Commission's Dept of Market Regulation for the Alternative Securities Market to become an exempt securities  
25 exchange.

26  
27                   68. All Issuer clients knew at the time of execution, that ASMG was NOT a licensed Broker  
28 Dealer, but was in the process of becoming a Licensed Broker Dealer, or becoming an affiliate of a Broker Dealer.

1 The Commission has verified that all Issuers were aware at the time of execution that MUEHLER, nor Alternative  
2 Securities Markets Group Corporation, or any of its subsidiaries, were a Broker Dealer, or associated with a Broker  
3 Dealer though its document collection and depositions of MUEHLER Issuers.

4  
5 69. MUEHLER, as part of Alternative Securities Markets Group Corporation, filed to become a  
6 Licensed Broker Dealer with FINRA in July of 2015.

7  
8 70. MUEHLER, as part of Alternative Securities Markets Group, became affiliated with Newport  
9 Coastal Securities Corporation, or Irvine, California (through the efforts of Mr. Johnson and Mr. Dobkin) to be the  
10 Broker Dealer of Securities of Issuers on the Alternative Securities Market (which is today ASMX Capital).

11  
12 71. All compensations detailed in the agreements were, and are today, acceptable and lawful forms  
13 of compensation to Licensed Broker Dealers.

14  
15  
16 **RESPONSE TO ALLEGED VIOLATION ONE OF TWO**

17  
18 72. The Commission alleges MUEHLER "*willfully violated Section 10(b) of the Exchange Act*  
19 *Rule 10b-5 thereunder, which makes it unlawful to employ any manipulate or deceptive devices in connection with*  
20 *the purchase or sale of securities*"

21  
22 73. Since August of 2010, MUEHLER has NEVER Sold a Security, nor has MUEHLER offered a  
23 Security for Sale, and is thus not subject to the enforcement of the United States Securities and Exchange  
24 Commission's Administrative Law Process.

25  
26 74. To date, since August of 2010, MUEHLER, nor any Company under the Direction of  
27 MUEHLER, has NEVER been given any securities for any Company for which services have been rendered, and is  
28



1 thus not subject to the enforcement of the United States Securities and Exchange Commission's Administrative Law  
2 Process.

3  
4 75. The Commission to date has not presented any evidence to support its claim that Mr.  
5 MUEHLER has offered a Security for Sale, or that Mr. Muehler has sold a security, and is thus not subject to the  
6 enforcement of the United States Securities and Exchange Commission's Administrative Law Process.

7  
8 76. MUEHLER is neither a Broker Dealer or a Registered Investment Advisor, and has not acted  
9 as a Broker Dealer or an Investment Advisors, and is thus not subject to the enforcement of the United States  
10 Securities and Exchange Commission's Administrative Law Process.

11  
12 77. To the best of MUEHLER's knowledge, no complaints of any issuers who have retained  
13 MUEHLER's services have lodged any complaints with the Commission against MUEHLER, and if any complaints  
14 have been filed, those matters are the jurisdiction of the Federal or State Courts, not the jurisdiction of the United  
15 States Securities and Exchange Commission's Administrative Law process.

16  
17  
18 **RESPONSE TO ALLEGED VIOLATION TWO OF TWO**

19  
20 78. The Commission alleges MUEHLER "*willfully violated Section 15(a)(1) of the Exchange Act,*  
21 *which makes it unlawful for any Broker or Dealer to use the mails or any other means of interstate commerce to*  
22 *'effect any transactions in, or attempt to induce the purchase or sale of, any security unless that broker or dealer is*  
23 *registered with the Commission in accordance with Section 15(b) of the Exchange Act'*"

24  
25 79. Since August of 2010, MUEHLER has NEVER Sold a Security, nor has MUEHLER offered a  
26 Security for Sale, and is thus not subject to the enforcement of the United States Securities and Exchange  
27 Commission's Administrative Law Process.

1           80. To date, since August of 2010, MUEHLER, nor any Company under the Direction of  
2 MUEHLER, has NEVER been given any securities for any Company for which services have been rendered, and is  
3 thus not subject to the enforcement of the United States Securities and Exchange Commission's Administrative Law  
4 Process.

5  
6           81. The Commission to date has not presented any evidence to support its claim that MUEHLER  
7 has offered a Security for Sale, or that Mr. Muehler has sold a security, and is thus not subject to the enforcement of  
8 the United States Securities and Exchange Commission's Administrative Law Process.

9  
10           82. MUEHLER is neither a Broker Dealer or a Registered Investment Advisor, and has not acted  
11 as a Broker Dealer or an Investment Advisors, and is thus not subject to the enforcement of the United States  
12 Securities and Exchange Commission's Administrative Law Process.

13  
14           82. To the best of MUEHLER's knowledge, no complaints of any issuers who have retained  
15 MUEHLER's services have lodged any complaints with the Commission against MUEHLER, and if any complaints  
16 have been filed, those matters are the jurisdiction of the Federal or State Courts, not the jurisdiction of the United  
17 States Securities and Exchange Commission's Administrative Law process.

18  
19  
20                           **SEC ADMINISTRATIVE PROCEEDINGS**

21  
22           83. An administrative proceeding before an SEC ALJ is markedly different from a civil action  
23 litigated in federal court.

24  
25           84. Unlike a Federal Court, a respondent in an administrative proceeding is not entitled to a trial  
26 by jury. Instead, in an administrative proceeding, the SEC ALJ serves as finder of fact and of law.

1           85. SEC administrative proceedings are governed by the SEC's Rules of Practice ("Rules of  
2 Practice"), which differ from the Federal Rules of Civil Procedure ("Federal Rules") that apply to civil actions in  
3 Federal Court.

4  
5           86. In contrast with a proceeding in Federal Court under the Federal Rules, the Rules of Practice  
6 do not provide respondents the opportunity to test the legal sufficiency of the SEC's administrative complaint by  
7 way of a motion to dismiss, which are available in Federal Courts.

8  
9           87. The Rules of Practice prohibit respondents from asserting counterclaims against the SEC,  
10 whereas, in Federal Court, a defendant may assert counterclaims against a plaintiff.

11  
12           88. The Rules of Practice provide for limited discovery. Unlike in Federal Court, depositions are  
13 generally not permitted. *Rules of Practice* 233, 234.

14  
15           89. Administrative hearings occur on a more expedited schedule than civil actions in Federal  
16 Court. The Rules of Practice require the hearing to take place, at most, approximately four months from the issuance  
17 of the SEC's Order Instituting Proceedings ("OIP"). In its discretion, the SEC can require the hearing to occur as  
18 early as one month after the OIP is issued. The SEC is not required to begin making available to a respondent the  
19 limited discovery afforded in an administrative proceeding until seven days after the OIP is issued.

20  
21           90. Unlike in Federal Court, the Federal Rules of Evidence do not apply in administrative  
22 proceedings. Instead, any evidence, including hearsay, that "can conceivably throw any light upon the controversy  
23 should normally be admitted in [administrative] proceedings". *In the matter of Donald T. Sheldon, et al.*, Release  
24 No. 275 (Mar. 19, 1987).

25  
26           91. Any appeal from the SEC ALJ's decision would be heard by the SEC itself, the very body that  
27 earlier determined that an enforcement action was warranted, and the SEC is empowered to decline to hear the  
28

1 appeal or to impose even greater sanctions. See Rules of Procedure 410, 411. A final order of the Commission, after  
2 it is effective, may then be appealed to a United States Court of Appeals. See 15 U.S.C. § 78y(a)(1), 15 U.S.C. § 77i.

3  
4  
5 **THE BROAD AND SUBSTANTIAL POWERS OF THE ALJ**

6  
7 92. SEC ALJ's who preside over administrative proceedings, exercise the type and degree of  
8 authority and discretion that render them officers for purposes of Article II of the U.S. Constitution.

9  
10 93. SEC ALJ's are empowered with broad discretion to exercise significant authority regarding  
11 administrative proceedings. Under the SEC Rules of Practice, and SEC ALJ – referred to in the Rules of Practice as  
12 the “hearing officer” – is empowered, within his or her discretion, to perform the following functions, among other  
13 things:

- 14  
15 a) Regulate the course of a proceeding and the conduct of the parties and their counsel  
16 (*Rules of Practice* 111(d));  
17 b) Receive “Relevant Evidence” and rule upon “the Admission of Evidence and Offers of  
18 Proof” (*Rules of Practice* 111(c));  
19 c) Issue subpoenas and order production of evidence (*Rules of Practice* 111(b); 230(a)(2);  
20 232);  
21 d) Issue orders, including orders to show-cause (*Rules of Practice* 141(b); *see In the Matter*  
22 *of China Everhealth Corp., Genovabiotherapeutics, Inc., Glacier Enterprises, Inc., Green*  
23 *Asia Res., Inc., Jesup & Lamount, Inc., & Panoshan Mktg., Corp.* Release No. 661 (Sept  
24 2<sup>nd</sup>, 2014));  
25 e) Rule on Requests and Motions, including pre-trial motions for Summary Disposition  
26 (See, e.g., *Rules of Practice* 250);  
27 f) Amend the SEC's OIP (*Rules of Practice* 200(d)(2));  
28 g) Impose sanction on parties for Contemptuous Conduct (*Rules of Practice* 180(a));

- 1 h) Enter orders of default, and rule on motions to set aside default (*Rules of Practice 155*);
- 2 i) Consolidate proceedings (*Rules of Practice 201(a)*);
- 3 j) Require the SEC to file a more definite statement of specified matters of fact or law to be
- 4 considered or determined (*Rules of Practice 220(d)*);
- 5 k) Order depositions, and act as the “deposition officer” (*Rules of Practice 233, 234*)
- 6 l) Regulate the production of documents in the proceeding (*Rules of Practice 230(g)*);
- 7 m) Issue Protective Orders governing confidentiality of documents (*Rules of Practice 322*);
- 8 and
- 9 n) Regulate the Scope of cross-examination (*Rules of Procedure 326*).

10  
11 94. At the close of an administrative proceeding, the SEC ALJ issues a decision, referred to in the  
12 Rules of Practice as the “initial decision”. Rules of Practice 360. The initial decision states the time period within  
13 which a petition for Commission review of the initial decision may be filed.

14  
15 95. The initial decision becomes the final decision of the SEC after the period to petition for  
16 review expires, unless the Commission determines to review the SEC ALJ’s decision.

17  
18 96. With certain exceptions that do not apply to this matter, the Commission is not required to  
19 review any SEC ALJ’s decision for review.

20  
21 97. As applied to this matter, Commission review is entirely discretionary. The Commission may  
22 deny a petition for review for any reason, after considering whether the petition for review makes a reasonable  
23 showing that (i) the decision embodies a clearly erroneous finding of material fact, an erroneous conclusion of law,  
24 or an exercise of discretion of decision of law or policy that is “important”; or (ii) a prejudicial error was committed  
25 during the proceeding. *Rules of Procedure 411*.

26  
27 98. If no party requests review, and if the Commission does not undertake review on its own  
28 initiative, no Commission review occurs. Instead, the Commission enters an Order that the decision has become  
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1 final, and “the action of [the] administrative law judge..... shall, for all purposes, including appeal or review thereof,  
2 be deemed the action of the Commission.” 15 U.S.C. § 78d-1(c). The order of finality states the date on which  
3 sanctions imposed by the SEC ALJ, if any, will become effective. *Rules of Practice* 360(d)(2)

4  
5  
6 **THE POSITION OF THE SEC ALJ**  
7

8 99. The SEC is a “Department” of the Executive Branch of the United States Government. The  
9 individual Commissioners are the “heads” of the Department. *Free Enterprise*, 130 S. Ct. at 3163.

10  
11 100. Pursuant to the authority granted to the SEC by 5 U.S.C. § 3105, the Commissioners appoint  
12 SEC ALJs. *See* 5 U.S.C. § 3105 (“Each agency shall appoint as many administrative law judges as are necessary for  
13 proceedings required to be conducted in accordance with Sections 556 and 557 of this title.”).

14  
15 101. The Administrative Procedure Act (“APA”), 5 U.S.C. § et seq., establishes ALJ’s powers  
16 with respect to adjudication. 5 U.S.C. §§ 556, 557. The Securities Laws empowers the SEC to delegate certain  
17 function to SEC ALJ’s, including those listed above at paragraphs 93a to 93n. *See* 15 U.S.C. §78d-1.

18  
19 102. SEC regulation establishes the “Office of Administrative Law Judges”, and outlines their  
20 authority. *See, e.g.,* 17 C.F.R. § 200.14; 17 C.F.R. § 200.30-9; 17 C.F.R. § 201.111. Those regulations provide that  
21 SEC ALJ’s authority with respect to adjudications is to be as broad as the APA allows. 17 C.F.R. § 201.111 (“No  
22 provision of these Rules of Practice shall be construed to limit the powers of the hearing officer provided by the  
23 Administrative Procedure Act, 5 U.S.C. 556, 557.”).

24  
25 103. The salary of SEC ALJs is specified by statute. There are eight levels of basic pay for ALJs,  
26 the lowest of which may not be less than 65% of the rate of basic pay for level IV of the Executive Schedule, and the  
27 highest of which may not be more than the rate of basic pay for level IV of the Executive Schedule. 5 U.S.C. § 5372.

1 (The Executive Schedule is a system of salaries given to the highest-ranked appointed positions in the executive  
2 branch of the United States Government, 5 U.S.C. § 5311.)

3  
4 104. The manner of appointment of an ALJ is specified by statute. Appointments are made by  
5 agencies based on need. 5 U.S.C. § 3105. By regulation, ALJs may be appointed only from a list of eligible  
6 candidates provided by the Office of Personnel Management (“OPM”) or with prior approval of OPM. 5 C.F.R. §  
7 930.204. OPM selects eligible candidates based on a competitive exam, which OPM develops and administers. The  
8 SEC, like other agencies, selects ALJs from OPM’s list of eligible candidates, based on the SEC’s need. 5 U.S.C. §  
9 3105; 5 C.F.R. § 930.204.

10  
11 105. All ALJs receive career appointments and are exempt from probationary periods that apply to  
12 certain other government employees. 5 C.F.R. § 930.204(a). They do not serve time-limited terms.

13  
14 106. Under the statutory and regulatory regime governing their duties and authority, their  
15 appointment, and salary, and their power, in certain instances, to issue the final decision of the agency, SEC ALJs  
16 are “Officers” of the United States. They exercise significant authority, are empowered with broad discretion, are  
17 appointed as career adjudicators, and are appointed by the heads of an Executive Department.

18  
19  
20 **REMOVAL OF SEC ALJs**

21 107. SEC ALJs are removable from their position by the SEC “only” for “good cause”, which  
22 must be “established and determine” by the Merit Systems Protection Board (“MSPB”). 5 U.S.C. § 7521(a).

23  
24 108. This removal procedure involves two or more “levels” of tenure protection, as referred to in  
25 *Free Enterprise*.

1           109. First, as noted, SEC ALJs are protected by statute from removal absent “good cause.” 5  
2 U.S.C. § 7521(a).

3  
4           110. Second, the SEC Commissioners, who exercise the power of removal, are themselves  
5 protected by tenure. They may not be removed by the President from their position except for “inefficiency, neglect  
6 of duty, or malfeasance in office.” *See, e.g., Free Enterprise*, 130 S. Ct. at 3148; *MFS SEC Corp. v. SEC*, 380 F.3d  
7 611, 619-20 (2d Cir. 2004).

8  
9           111. Third, Members of the MSPB, who determine whether sufficient “good cause” exists to  
10 remove an SEC ALJ, are also protected by tenure. They are removable by the President “only for inefficiency,  
11 neglect of duty, or malfeasance in office.” 5 U.S.C. § 1202(d).

12  
13  
14           **THE REMOVAL REGIME APPLICABLE TO SEC ALJS VIOLATES ARTICLE II’S CONFERRAL OF**  
15           **EXECUTIVE POWER IN THE PRESIDENT OF THE UNITED STATES.**

16  
17           112. As executive officers, in accordance with the Supreme Court’s analysis and holding in *Free*  
18 *Enterprise*, SEC ALJs may not be protected by more than one layer of tenure protection.

19  
20           113. Article II of the United States Constitution vests “[t]he Executive Power.... In a President of  
21 the United States of America,” who must “take care that the Laws be faithfully executed.” U.S. Const. art. II, § 1, cl.  
22 1; *id.*, § 3. In light of “[t]he impossibility that one man should be able to perform all the great business of the State,”  
23 the Constitution of the United States provides for executive officers to “assist the supreme Magistrate in discharging  
24 the duties of his trust.” 30 Writings of George Washington 334 (J. Fitzpatrick ed. 1939); *see also Free Enterprise*,  
25 561 U.S. 477, 130 S. Ct. at 3146.

26  
27           114. Article II’s vesting authority requires that the principal and inferior officers of the Executive  
28 Branch be answerable to the President and not be separated from the President by attenuated chains of  
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1 accountability. In particular, as the Supreme Court held in *Free Enterprise*, Article II requires that executive officers,  
2 who exercise significant executive power, be unprotected from removal by their superiors at will, when those  
3 superiors are themselves protected from removal by the President at will.

4  
5 115. SEC ALJs, both generally and in this matter, exercise significant executive power.

6  
7 116. The removal standards applicable to SEC ALJs are unconstitutional because SEC ALJs are  
8 inferior officers for purposes of Article II, Section 2 of the United States Constitution, and because:

- 9  
10 a) SEC ALJs are protected from removal by a statutory “good cause” standard;  
11 b) The SEC Commissioners who are empowered to seek removal of SEC ALJs – within  
12 the constraints of the “good cause” standard – are themselves protected from  
13 removal by a standard of “inefficiency, neglect of duty, or malfeasance in office;”  
14 and  
15 c) The MSPB members who are empowered to effectuate the removal decision – again  
16 governed and limited by a “good cause” standard – are themselves protected from  
17 removal by an “inefficiency, neglect of duty, or malfeasance in office” standard.

18  
19 117. Under this attenuated removal scheme, “the President cannot remove an officer who enjoys  
20 more than one level of good-cause protection, even if the President determines that the officer is neglecting his  
21 duties or discharging them improperly. That judgment is instead committed to another officer, who may or may not  
22 agree with the President’s determination, and whom the President cannot remove simply because that officer  
23 disagrees with him. This contravenes the President’s ‘constitutional obligation to ensure the faithful execution of the  
24 laws.’” *Free Enterprise*, 130 S. Ct. at 3417 (quoting *Morrison v. Olson*, 487 U.S. 654, 693 (1988)).

25  
26 118. Because the President cannot oversee SEC ALJs in accordance with Article II, SEC  
27 administrative proceedings violate the Constitution.

1       **THE SEC'S CONTINUATION OF AN ADMINISTRATIVE PROCEEDING WILL CAUSE MUEHLER**  
2                               **SEVERSE AND IRREPARABLE HARM**

3  
4               119. Absent a Summary Judgment from the ALJ, MUEHLER will be required to submit to an  
5 unconstitutional proceeding. This constitutional violation, standing alone, constitutes an irreparable injury. The  
6 absence of traditional procedural safeguards in SEC administrative proceedings further exacerbates that irreparable  
7 harm.

8  
9               120. Additionally, were the SEC permitted to pursue its administrative proceeding, MUEHLER  
10 would be denied any possibility of review until an appeal to a Federal Circuit Court of Appeals. The substantial  
11 litigation and resource burdens incurred during an administrative proceeding would eventually be for naught, given  
12 the unconstitutionality of the administrative proceeding, and then, after time-consuming and burdensome  
13 administrative proceedings, the SEC likely would attempt to bring a new case in Federal Court. Two litigations of  
14 this matter would compound costs, lost time, and continued reputational risk to MUEHLER.

15  
16              121. And, were MUEHLER to fail to prevail in an administrative proceeding, the damage could  
17 be severe and irreversible. The result would be public, thus damaging MUEHLER's reputation, and any sanctions  
18 could cause damage well before MUEHLER could obtain meaningful judicial review of his Article II claim. The  
19 availability of an appeal after an administrative proceeding to a Federal Circuit Court of Appeals does not address  
20 this harm because the administratively-imposed sanction already may have taken effect – and the damage therefore  
21 already substantially and harmfully done – by the time the appellate court was to rule.

22  
23              122. Likewise, the harm threatened here cannot be remedied after the fact by money damages.  
24 Governmental immunity doctrines substantially constrain MUEHLER's ability to seek damages from the SEC.  
25 Furthermore, even if money damages were available, the reputational harm to MUEHLER should the SEC impose  
26 should the SEC impose administrative sanctions would likely be impossible to monetize.

1           123. By contrast, the SEC will suffer no harm from a pause in an administrative proceeding  
2 against MUEHLER and filing a claim in Federal Court. Indeed, any such claim of harm would be fanciful, given  
3 that the SEC may proceed now in Federal Court. Moreover, MUEHLER has never sold any securities, nor has  
4 MUEHLER participated in the solicitation of the sales of any securities for more than six years, and MUEHLER has  
5 no intentions to sell any securities in the future, therefore, no investor would be adversely affected by the requested  
6 Summary Judgment from the ALJ.

7  
8  
9           **THE MEMBERS OF THE SECURITIES AND EXCHANGE COMMISSION'S INTENTIONAL**  
10           **VIOLATION OF DISCOVERY RULES OF THE ADMINISTRATIVE LAW PROCESS**

11  
12           124. Upon receipt of the OIP, MUEHLER received an email from a Member of the United States  
13 Securities and Exchange Commission inviting MUEHLER to the Los Angeles Offices of the Securities and  
14 Exchange Commission to copy any and all discovery documents in support of the Securities and Exchange  
15 Commission's claims against MUEHLER.

16  
17           125. MUEHLER responded to the email, an email that was copied to Mr. Searles, stating that  
18 MUEHLER had two available dates that met the Commission's dates of availability, as stated in the email from the  
19 Member of the Securities and Exchange Commission, for MUEHLER to come to the Los Angeles offices of the  
20 Securities and Exchange Commission to copy the discovery documents that were gathered during the Securities and  
21 Exchange Commission's investigation of MUEHLER, discovery documents that are allegedly in support of the  
22 SEC's claims against MUEHLER.

23  
24           126. In the first Meet and Confer between MUEHLER and Mr. Searles & Mr. Jasper, not having  
25 gotten a reply to the email sent to the Securities and Exchange Commission and Mr. Searles about dates when  
26 MUEHLER would be able to come to the Los Angeles Office of the Securities and Exchange Commission to copy  
27 the discovery documents, MUEHLER stated to Mr. Searles and Mr. Jasper that he (MUEHLER) again had the two  
28 open dates in which he (MUEHLER) was available to come to the Los Angeles Office of the Securities and

1 Exchange Commission to copy the discovery documents. Mr. Searles stated that was not necessary, as he (Mr.  
2 Searles) and Mr. Jasper would have copies of the related discovery documents delivered to MUEHLER

3  
4 127. On or about the 15<sup>th</sup> day of October, MUEHLER received via UPS Delivery, a Computer  
5 External Hard Drive, which allegedly contains all of the Securities and Exchange Commission's gathered discovery  
6 documents supporting its Claim(s) against MUEHLER.

7  
8 128. The External Hard Drive received by MUEHLER is Passcode Protected, and no Passcode(s)  
9 were received with the External Hard Drive delivered to MUEHLER.

10  
11 129. In MUEHLER's first reply to the complaint, MUEHLER informed the ALJ, Mr. Searles and  
12 Mr. Jasper that he (MUEHLER) was not in possession of the passcode(s) for the received External Hard Drive, and  
13 he (MUEHLER) was replying to the complaint without having had access to the discovery documents on the  
14 received External Hard Drive.

15  
16 130. In a November Pre-Hearing Conference Call between MUEHLER and Mr. Searles & Mr.  
17 Jasper of the United Securities and Exchange Commission, MUEHLER again stated he had not received the  
18 passcode(s) to the received External Hard Drive. Mr. Searles, while searching his computer emails during the call,  
19 responded to MUEHLER that an email was sent to MUEHLER on October 15<sup>th</sup>, 2015 that allegedly contained the  
20 passcode(s) for access to the received External Hard Drive, and that he (Mr. Searles) has evidence that MUEHLER  
21 opened the alleged email on October 15<sup>th</sup>, 2015, and that MUEHLER should search his emails for this alleged email.

22  
23 131. After a search of MUEHLER's Gmail Inbox, Spam Folder and Deleted Items Box, no email  
24 sent by any of the Members of the United States Securities and Exchange Commission could be found that  
25 contained any Passcode(s).

26  
27 132. MUEHLER routinely receives countless letters mailed to him by Mr. Searles, Mr. Jasper, Mr.  
28 Kassabgui, other Members of the United States Securities and Exchange Commission, as well as mail sent by

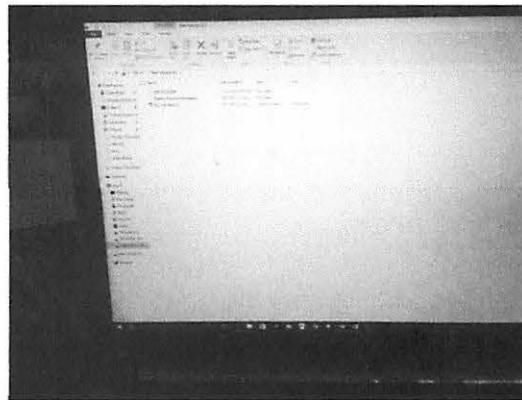
1 members of the ALJ. MUEHLER never received any stamped mail delivered to him that contained any passcode(s)  
2 for access to the External Hard Drive, nor have any of the Member of the United States Securities and Exchange  
3 Commission ever confirmed that one was delivered or mailed.

4  
5 127. During a Pre-Hearing Conference call between MUEHLER, the Members of the United  
6 States Securities and Exchange Commission (Mr. Jasper & Mr. Searles), and the ALJ, where the ALJ verbally  
7 issued an order for Mr. Jasper and Mr. Commission to issue to MUEHLER the Passcode(s) for the External Hard  
8 Drive. The Formal Written Order was received by MUEHLER on January 5<sup>th</sup>, 2016.

9  
10 128. On the Afternoon of Monday, January 4<sup>th</sup>, 2016, MUEHLER was in receipt of an email from  
11 Mr. Searles with the Passcode [REDACTED]

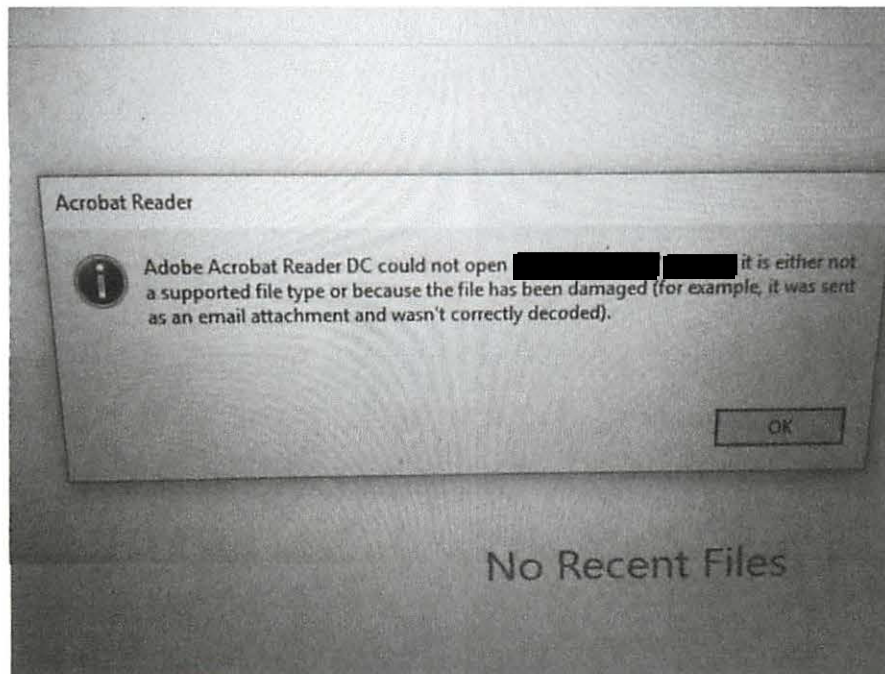
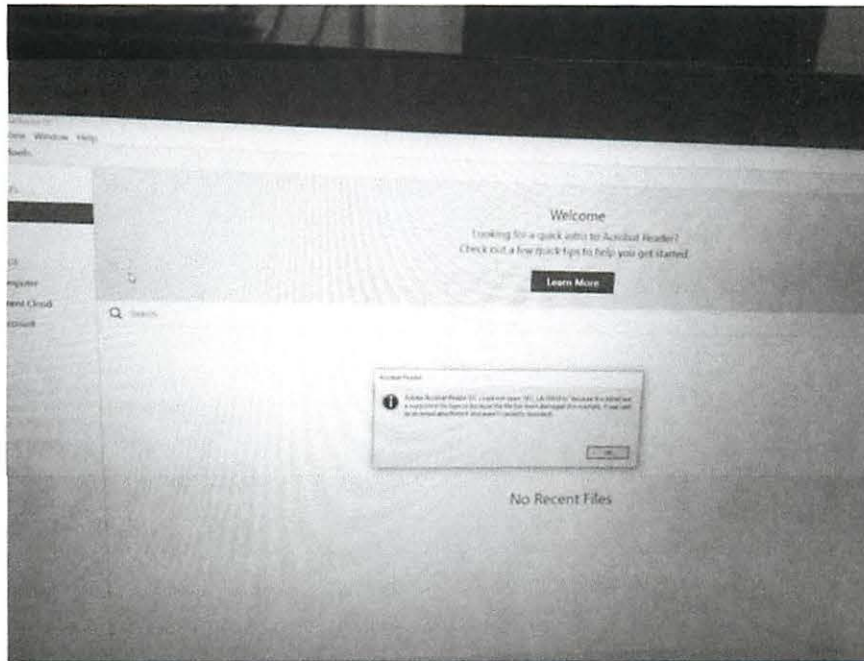
12  
13 129. Upon MUEHLER accessing the External Hard Drive for the first time on the evening of  
14 January 4<sup>th</sup>, 2016, there are three documents on the Hard Drive, "Recycle Bin", "System Volume Information" and

15 [REDACTED].



23  
24  
25 130. The "Recycle Bin" and "System Volume Information" are empty folders with no documents.  
26 Upon attempting to open [REDACTED] the following error message is displayed: "ADOBE ACROBAT  
27 READER DC COULD NOT OPEN 'SEC\_LA-04435.tc' BECAUSE IT IS EITHER NOT A SUPPORTED FILE  
28

1 TYPE OR BECAUSE THE FILE HAS BEEN DAMAGED (FOR EXAMPLE, IT WAS SENT AS AN EMAIL  
2 ATTACHMENT AND WASN'T CORRECTLY DECODED".



1  
2  
3  
4  
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131. As of the date of this document, MUEHLER has not had access to the Discovery Documents.

132. As the Deadlines Loom for Exhibits, Documents, Witnesses and for Hearing, MUEHLER fears that by the time that the Members of the United States Securities and Exchange Commission provide full and verified access to the required discovery items, there will be little, if no time to adequately prepare for the Hearing. MUEHLER is in the position of being potentially prejudiced by the Members of the United States Securities and Exchange Commission.

1 COUNT ONE:

2 **APPLICATION FOR SUMMARY JUDGMENT / IMPROPER VENUE**

3  
4 133. MUEHLER (MUEHLER also for Alternative Securities Markets Group Corporation, Blue  
5 Coast Securities Corporation, GlobalCrowdTV and Blue Coast Banc) repeats and re-alleges paragraphs 1 - 132 as if  
6 set forth in full.

7  
8 134. MUEHLER's (MUEHLER also for Alternative Securities Markets Group Corporation, Blue  
9 Coast Securities Corporation, GlobalCrowdTV and Blue Coast Banc) constitutional rights will be irreparably  
10 harmed if a Summary Judgment in favor of MUEHLER from the ALJ is **not** granted. MUEHLER (MUEHLER also  
11 for Alternative Securities Markets Group Corporation, Blue Coast Securities Corporation, GlobalCrowdTV and  
12 Blue Coast Banc) has a substantial likelihood of success on the merits of his claim in its proper venue, which is the  
13 United States Federal Court for the Southern District of California. MUEHLER (MUEHLER also for Alternative  
14 Securities Markets Group Corporation, Blue Coast Securities Corporation, GlobalCrowdTV and Blue Coast Banc)  
15 will be irreparably injured without the granting of the Summary Judgment in his (MUEHLER's (MUEHLER also  
16 for Alternative Securities Markets Group Corporation, Blue Coast Securities Corporation, GlobalCrowdTV and  
17 Blue Coast Banc)) favor, as described above, and the harm to MUEHLER (MUEHLER also for Alternative  
18 Securities Markets Group Corporation, Blue Coast Securities Corporation, GlobalCrowdTV and Blue Coast Banc),  
19 absent a Summary Judgment in MUEHLER's MUEHLER also for Alternative Securities Markets Group  
20 Corporation, Blue Coast Securities Corporation, GlobalCrowdTV and Blue Coast Banc) favor, far outweighs any  
21 harm to the SEC (of which there can be none in this case) arising from a Summary Judgment from the ALJ in  
22 MUEHLER's (MUEHLER also for Alternative Securities Markets Group Corporation, Blue Coast Securities  
23 Corporation, GlobalCrowdTV and Blue Coast Banc) favor and a refileing of the case in its proper venue, which is the  
24 United States Federal Court for the Southern District of California. Finally, issuance of the Summary Judgment will  
25 serve the public interest in protecting the rights of MUEHLER (MUEHLER also for Alternative Securities Markets  
26 Group Corporation, Blue Coast Securities Corporation, GlobalCrowdTV and Blue Coast Banc), of citizens under the  
27 Constitution, and promoting respect for law.



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**COUNT TWO:**

**DECLARATORY JUDGMENT / ALJs ARE UNCONSTITUTIONAL**

135. MUEHLER (MUEHLER also for Alternative Securities Markets Group Corporation, Blue Coast Securities Corporation, GlobalCrowdTV and Blue Coast Banc) repeats and re-alleges paragraphs 1 - 132 as set forth in full.

136. MUEHLER (MUEHLER also for Alternative Securities Markets Group Corporation, Blue Coast Securities Corporation, GlobalCrowdTV and Blue Coast Banc) respectfully requests a Summary Judgment in favor MUEHLER (MUEHLER also for Alternative Securities Markets Group Corporation, Blue Coast Securities Corporation, GlobalCrowdTV and Blue Coast Banc) on the grounds that the statutory and regulatory provisions providing for the position and tenure protection of SEC ALJs are unconstitutional.

**COUNT THREE:**

**DECLARATORY JUDGMENT / MEMBERS OF THE UNITED STATES SECURITIES AND EXCHANGE COMMISSION KNOWINGLY VIOLATED, AND CONTINUE TO KNOWINGLY VIOLATE, THE ADMINISTRATIVE LAW PROCEEDINGS DISCOVERY RULES**

137. MUEHLER (MUEHLER also for Alternative Securities Markets Group Corporation, Blue Coast Securities Corporation, GlobalCrowdTV and Blue Coast Banc) repeats and re-alleges paragraphs 1 - 132 as set forth in full.

138. MUEHLER (MUEHLER also for Alternative Securities Markets Group Corporation, Blue Coast Securities Corporation, GlobalCrowdTV and Blue Coast Banc) respectfully requests a Summary Judgment in favor of MUEHLER (MUEHLER also for Alternative Securities Markets Group Corporation, Blue Coast Securities Corporation, GlobalCrowdTV and Blue Coast Banc) that the Members of the United States Securities and Exchange

1 Commission failed in its requirement to make available to a respondent (MUEHLER (MUEHLER also for  
2 Alternative Securities Markets Group Corporation, Blue Coast Securities Corporation, GlobalCrowdTV and Blue  
3 Coast Banc)) the discovery afforded in an administrative proceeding which was required to be given to MUEHLER  
4 )MUEHLER also for Alternative Securities Markets Group Corporation, Blue Coast Securities Corporation,  
5 GlobalCrowdTV and Blue Coast Banc) within seven days after the Order Instituting Proceedings (“OIP”) was  
6 issued. To date, MUEHLER (MUEHLER also for Alternative Securities Markets Group Corporation, Blue Coast  
7 Securities Corporation, GlobalCrowdTV and Blue Coast Banc) has not received any of the required discovery  
8 documents from the Members of the United States Securities and Exchange Commission, some four months after  
9 the issuance of the OIP, and after repeated requests to receive it.

10  
11  
12 **COUNT FOUR:**

13 **DECLARATORY JUDGMENT / THE SECURITIES AND EXCHANGE COMMISSION LACKS**  
14 **JURISDICTION TO BRING CLAIMS AGAINST MUEHLER**

15  
16 139. MUEHLER (MUEHLER also for Alternative Securities Markets Group Corporation, Blue  
17 Coast Securities Corporation, GlobalCrowdTV and Blue Coast Banc) repeats and re-alleges paragraphs 1 - 132 as  
18 set forth in full.

19  
20 140. MUEHLER ( MUEHLER also for Alternative Securities Markets Group Corporation, Blue  
21 Coast Securities Corporation, GlobalCrowdTV and Blue Coast Banc) respectfully requests a Summary Judgment for  
22 MUEHLER (MUEHLER also for Alternative Securities Markets Group Corporation, Blue Coast Securities  
23 Corporation, GlobalCrowdTV and Blue Coast Banc) on the grounds that the Members of the United States  
24 Securities and Exchange Commission failed show its jurisdiction over its claims against MUEHLER (MUEHLER  
25 also for Alternative Securities Markets Group Corporation, Blue Coast Securities Corporation, GlobalCrowdTV and  
26 Blue Coast Banc). MUEHLER (MUEHLER also for Alternative Securities Markets Group Corporation, Blue Coast  
27 Securities Corporation, GlobalCrowdTV and Blue Coast Banc) never offered for sale a security during the dates  
28 stated in the OIP, and MUEHLER has not sold any securities during the dates stated in the OIP, and the Commission

1 has not provided any evidence that any securities were ever sold, or even offered for sale by MUEHLER  
2 (MUEHLER also for Alternative Securities Markets Group Corporation, Blue Coast Securities Corporation,  
3 GlobalCrowdTV and Blue Coast Banc), and the Commission has not provided any evidence of any investors  
4 holdings any securities who are now, or may in the future, be in any jeopardy. Any Issuer who retained any of  
5 MUEHLER's (MUEHLER also for Alternative Securities Markets Group Corporation, Blue Coast Securities  
6 Corporation, GlobalCrowdTV and Blue Coast Banc) Private or Public Offering Documentation Preparation Services  
7 (*a service that does not require any state or federal securities licensing, nor does it involve being part of any private*  
8 *or public offering of securities*) or any of MUEHLER's (MUEHLER also for Alternative Securities Markets Group  
9 Corporation, Blue Coast Securities Corporation, GlobalCrowdTV and Blue Coast Banc) SEC Registration Services,  
10 who may feel they have been damaged in any way by MUEHLER (MUEHLER also for Alternative Securities  
11 Markets Group Corporation, Blue Coast Securities Corporation, GlobalCrowdTV and Blue Coast Banc), **have**  
12 **proper venue in the State or Federal Courts, not** as part of the Securities and Exchange Commission's  
13 Enforcement Divisions, and certainly **not** part of the Securities and Exchange Commission's Administrative Law  
14 Proceedings.

1 WHEREFORE, MUEHLER, ALTERNATIVE SECURITIES MARKETS GROUP CORPORATION, BLUE  
2 COAST SECURITIES CORPORATION, GLOBALCROWDTV AND BLUE COAST BANC each prays for  
3 Summary Judgment from the ALJ as follows:

- 4
- 5 A. An order of Summary Judgment in favor of MUEHLER (MUEHLER also for Alternative  
6 Securities Markets Group Corporation, Blue Coast Securities Corporation, GlobalCrowdTV  
7 and Blue Coast Banc) declaring unconstitutional the statutory and regulatory provisions  
8 providing for the position and tenure of the SEC ALJ.
- 9 B. An order of Summary Judgment in favor of MUEHLER (MUEHLER also for Alternative  
10 Securities Markets Group Corporation, Blue Coast Securities Corporation, GlobalCrowdTV  
11 and Blue Coast Banc) enjoining the Commission from carrying out an administrative  
12 proceeding against MUEHLER (MUEHLER also for Alternative Securities Markets Group  
13 Corporation, Blue Coast Securities Corporation, GlobalCrowdTV and Blue Coast Banc).
- 14 C. Proper Sanctions against Members of the United States Securities and Exchange Commission  
15 for the willful and intentional withholding of discovery items from MUEHLER (MUEHLER  
16 also for Alternative Securities Markets Group Corporation, Blue Coast Securities  
17 Corporation, GlobalCrowdTV and Blue Coast Banc), in clear violation of the Administrative  
18 Proceedings Rules.
- 19 D. Such other further relief as the ALJ may deem just and proper.
- 20
- 21

22 Dated this 4th Day of January 2016

23  
24 /s/ Steven J. Muehler

25 Mr. Steven Joseph Muehler for himself, Alternative  
26 Securities Markets Group Corporation, Blue Coast  
27 Securities Corporation, GlobalCrowdTV and Blue  
28 Coast Banc.

1 **On the following pages, you will find the following items:**

- 2 1. SEC Form 1 Cover Letter – Received by the Commission on January 26<sup>th</sup>, 2015  
3 2. SEC Form 1 Application Cover – Received by the Commission on January 26<sup>th</sup>, 2015  
4 3. Alternative Securities Market Commencement Notice – Received by the Commission on April 29<sup>th</sup>, 2015  
5 4. Amended SEC Form 1 Application – Received by the Commission on Sept 16<sup>th</sup>, 2015  
6 5. Amended SEC Form 1 Cover Letter – Received by the Commission on September 19<sup>th</sup>, 2015  
7 6. AdvantaMeds Solutions USA Fund I, Inc. Legal Opinion Letter  
8 7. Broadcast 3DTV, Inc. Legal Opinion Letter  
9 8. StepOne Personal Health, Inc. Legal Opinion Letter  
10 9. MUEHLER California Cease and Desist Letter  
11 10. Broadcast 3DTV Plan for Distribution from QUALIFIED SEC Form 1-A  
12 11. StepOne Personal Health, Inc. Plan for Distribution from SEC Form 1-A (Cleared all comments)  
13 12. AdvantaMeds Solutions USA Fund I, Inc. Plan for Distribution from SEC Form 1-A (Cleared all  
14 comments).  
15 13. Maloney Securities Investment Banking Letter of Intent issued to Accelera Innovations Fund I, Inc., a  
16 client of MUEHLER with Alternative Securities Markets Group Corporation that MUEHLER prepared and  
17 filed Accelera Innovations Fund I, Inc's SEC Form 1-A for a Public Securities Offering  
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Corporate: [REDACTED] Marina Del Rey, California [REDACTED]  
Office: (213) 407-4386 / Email: Legal@AlternativeSecuritiesMarket.com  
<http://www.AlternativeSecuritiesMarket.com>

United States Securities and Exchange Commission  
Division of Market Regulation  
Office of Market Supervision  
450 Fifth Street, N.W.  
Washington, DC 20549

SEC  
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Dear United States Securities & Exchange Commission:

Enclosed you will find an Application for Registration for the "Alternative Securities Market" as Stock Exchange Exempt from Registration pursuant to Section 5 of the Exchange Act. The Alternative Securities Market does not expect to have trade volume the required trade volume for a number of years that would require it to register as a Stock Exchange.

Immediately following this introduction letter you will find:

- SEC Form 1
- Exhibit A: Articles of Incorporation & Bylaws
- Exhibit B: Alternative Securities Market Rulebook
- Exhibit C: Individual Investor Membership Application
- Exhibit D: Institutional Investor Membership Application
- Exhibit E: Financial Statement for the Alternative Securities Market

Exhibit Items required to be submitted pursuant to SEC Form 1:

- Requested Exhibit A as requested by SEC Form 1
  - See Exhibit A of the Alternative Securities Market Registration Package
- Requested Exhibit B as requested by SEC Form 1
  - See Exhibit B of the Alternative Securities Market Registration Package
- Requested Exhibit C as requested by SEC Form 1
  - Not Applicable, there are no Subsidiaries of the Alternative Securities Market, Inc.
- Requested Exhibit D as requested by SEC Form 1
  - Not Applicable, there are no Subsidiaries of the Alternative Securities Market, Inc.
- Requested Exhibit E as requested by SEC Form 1
  - See Exhibit B of the Alternative Securities Market Registration Package
- Requested Exhibit F as requested by SEC Form 1
  - See Exhibits C & D of the Alternative Securities Market Registration Package
- Requested Exhibit G as requested by SEC Form 1
  - See Exhibits C & D of the Alternative Securities Market Registration Package
- Requested Exhibit G as requested by SEC Form 1
  - See Exhibits B, C & D of the Alternative Securities Market Registration Package
- Requested Exhibit H as requested by SEC Form 1
  - See Exhibits B, C & D of the Alternative Securities Market Registration Package
- Requested Exhibit I as requested by SEC Form 1
  - See Exhibit E of the Alternative Securities Market Registration Package
- Requested Exhibit J as requested by SEC Form 1
  - See Exhibits B & E of the Alternative Securities Market Registration Package
- Requested Exhibit K as requested by SEC Form 1
  - Not Applicable, there is only one owner of the Alternative Securities Market, Inc.
- Requested Exhibit L as requested by SEC Form 1
  - See Exhibits B, C & D of the Alternative Securities Market Registration Package
- Requested Exhibit M as requested by SEC Form 1
  - See Exhibits B & E of the Alternative Securities Market Registration Package

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Form 1 Page 1 Execution Page	UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549 APPLICATION FOR, AND AMENDMENTS TO APPLICATION FOR, REGISTRATION AS A NATIONAL SECURITIES EXCHANGE OR EXEMPTION FROM REGISTRATION PURSUANT TO SECTION 5 OF THE EXCHANGE ACT	Date filed (MM/DD/YY):	OFFICIAL USE ONLY
<p>WARNING: Failure to keep this form current and to file accurate supplementary information on a timely basis, or the failure to keep accurate books and records or otherwise to comply with the provisions of law applying to the conduct of the applicant would violate the federal securities laws and may result in disciplinary, administrative, or criminal action.</p> <p>INTENTIONAL MISSTATEMENTS OR OMISSIONS OF FACTS MAY CONSTITUTE CRIMINAL VIOLATIONS</p>			
<p><input checked="" type="checkbox"/> APPLICATION <input type="checkbox"/> AMENDMENT</p>			
1. State the name of the applicant: <u>Alternative Securities Market, Inc.</u>			
2. Provide the applicant's primary street address (Do not use a P.O. Box): <u>[REDACTED], Marina del Rey, CA [REDACTED]</u>			
3. Provide the applicant's mailing address (if different): _____			
4. Provide the applicant's business telephone and facsimile number: _____ (Telephone) _____ (Facsimile)			
5. Provide the name, title, and telephone number of a contact employee: <u>Mr. Steven J. Muehler, CEO 213-407-4386</u> (Name) (Title) (Telephone Number)			
6. Provide the name and address of counsel for the applicant: _____			
7. Provide the date applicant's fiscal year ends: <u>12/31</u>			
8. Indicate legal status of applicant: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Proprietorship <input type="checkbox"/> Partnership <input type="checkbox"/> Limited Liability Company <input type="checkbox"/> Other (specify): _____			
If other than a sole proprietor, indicate the date and place where applicant obtained its legal status (e.g. state where incorporated, place where partnership agreement was filed or where applicant entity was formed):			
(a) Date (MM/DD/YY): <u>Jan 2015</u> (b) State/Country of formation: <u>California</u>			
(c) Statute under which applicant was organized: _____			
<p>EXECUTION: The applicant consents that service of any civil action brought by, or notice of any proceeding before, the Securities and Exchange Commission in connection with the applicant's activities may be given by registered or certified mail or confirmed telegram to the applicant's contact employee at the main address, or mailing address if different, given in Items 2 and 3. The undersigned, being first duly sworn, deposes and says that he/she has executed this form on behalf of, and with the authority of, said applicant. The undersigned and applicant represent that the information and statements contained herein, including exhibits, schedules, or other documents attached hereto, and other information filed herewith, all of which are made a part hereof, are current, true, and complete.</p>			
Date: <u>1/14/15</u> (Name of applicant) <u>Alternative Securities Market, Inc.</u>			
By: _____ (Signature) _____ (Printed Name and Title)			
Subscribed and sworn before me this _____ day of _____ by _____ (Notary Public) <u>Please See Attached</u>			
My Commission expires _____ (Month) _____ (Year) _____ (Notary Public) <u>CA - Just Form</u>			
County of _____ State of _____ <u>1-14-2015</u>			
<p>This page must always be completed in full with original, manual signature and notarization. Affix notary stamp or seal where applicable.</p>			

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Corporate: [REDACTED], Marina Del Rey, California [REDACTED]  
Office: (213) 407 - 4386 / Email: [Legal@AlternativeSecuritiesMarket.com](mailto:Legal@AlternativeSecuritiesMarket.com)  
<http://www.AlternativeSecuritiesMarket.com>

United States Securities and Exchange Commission  
Division of Market Regulation  
Office of Market Supervision  
450 Fifth Street NW  
Washington, DC 20549



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Dear United States Securities and Exchange Commission;

This letter is to serve notice to the United States Securities and Exchange Commission that the "Alternative Securities Market" intends to begin its general public operations as an **exempt from registration securities market on JUNE 1<sup>st</sup>, 2015 (Low Trade Volume Exemption)**. The United States Securities and Exchange Commission on MONDAY, JANUARY 26<sup>th</sup>, 2015 received via U.S. Priority Mail the SEC Form 1 Application and Alternative Securities Market Rulebook for "Alternative Securities Market, Inc."

Pursuant to the Securities Exchange Act of 1934, the United States Securities and Exchange Commission has 90 Days to accept or deny any application for an Exchange. This letter is to serve notice to the United States Securities and Exchange Commission that the Alternative Securities Market will begin general market operations pursuant to the filed SEC Form 1 and the Amended Alternative Securities Market Rulebook attached to this letter.

Attached to this letter is an amended copy of the Alternative Securities Market Rulebook. In response to the change of Regulation A announced by the Securities and Exchange Commission in March of 2015, we have changed the market capitalization requirements for our "ASM Venture" and "ASM Main" Markets to more reflect the new Regulation A Tier I and Regulation A Tier II requirements.

The Alternative Securities Market is to be wholly owned and operated by Alternative Securities Market, Inc., a newly formed California Stock Corporation. Alternative Securities Market, Inc. is a wholly owned subsidiary of Alternative Securities Markets Group Corporation, a California Stock Corporation in good standing. Alternative Securities Market, LLC will be the exclusive Broker Dealer for all Issuer Transactions on the Alternative Securities Market, and will complete its broker dealer registration and approval process beginning the next week, with the submission of its SEC Form BD to the State of California. Should the Broker Dealer application not become approved prior to June 1<sup>st</sup>, 2015, the Alternative Securities Market, Inc. will delay the beginning of operations, and only allow issuers to "test the waters" on market starting June 1<sup>st</sup>, 2015, with no securities transactions happening on market until post approval of the Alternative Securities Market, LLC's Broker Dealer application.

Thank you,

  
Mr. Steven J. Muehler  
Founder and Chief Executive Officer  
Alternative Securities Markets Group  
[REDACTED]  
Marina Del Rey, California [REDACTED]  
Direct: (213) 407-4386  
Email: [Legal@AlternativeSecuritiesMarket.com](mailto:Legal@AlternativeSecuritiesMarket.com)  
Web: <http://www.AlternativeSecuritiesMarket.com>





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Corporate: [REDACTED], Marina Del Rey, California  
Office: (800) 366 - 0908 / Email: Legal@ASMGCORP.COM  
http://www.ASMGCORP.COM  
http://www.ASMX.CO

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SEP 16 2015  
Washington DC  
404

United States Securities and Exchange Commission  
Division of Market Regulation  
Office Market Supervision  
450 Fifth Street, NW  
Washington, DC 20549

Dear United States Securities & Exchange Commission:

Enclosed you will find a SEC Form 1 Application for Registration for the ALTERNATIVE SECURITIES MARKET EXCHANGE, INC. (the "ASMEX") to become a fully qualified Securities Exchange pursuant to Section 5 of the Exchange Act.


The ALTERNATIVE SECURITIES MARKET EXCHANGE previously submitted SEC Form 1 for registration of the ALTERNATIVE SECURITIES MARKET EXCHANGE to operate as an exempt securities exchange pursuant to Section 5 of the Exchange Act, as the ALTERNATIVE SECURITIES MARKET EXCHANGE did not anticipate having the trade volume required for National Registration.

The ALTERNATIVE SECURITIES MARKET EXCHANGE, INC. is at this time applying for Registration as a National Securities Exchange pursuant to Section 5 of the Exchange Act as it is the belief of management that the ASMEX will exceed the trade volume for National Registration within the next six months.

The ASMEX will continue its operations under the Exemption from Registration during this Registration and Qualification process to become a National Securities Exchange.

Attached you will find a complete SEC Form 1 for the ALTERNATIVE SECURITIES MARKET EXCHANGE, INC. (the "ASMEX").

Thank you,

  
Mr. Steven J. Muchler  
Director of Capital Markets  
Alternative Securities Markets Group  
[REDACTED]  
Marina Del Rey, California [REDACTED]  
Direct: (800) 366-0908  
Email: Legal@ASMGCORP.COM  
Web: http://www.ASMGCORP.COM

Peter Berkman  
Attorney at Law, PLLC

[REDACTED]  
Lutz, Florida [REDACTED]  
[Peter@PeterBerkmanLaw.com](mailto:Peter@PeterBerkmanLaw.com)

Office: 813.600.2971  
Cell/Text : 813.447.7737  
FAX: 888.413.0890

December 16, 2015

AdvantaMeds Solutions USA Fund I. Inc.  
20511 Abbey Drive  
Frankfort, IL 60423

Re: AdvantaMeds Solutions USA Fund I. Inc.  
Offering Statement on Form 1-A  
SEC File No. 024-10494

To The Board of Directors:

This office has been asked to review and provide an opinion with respect to the legality of the sale and issuance by AdvantaMeds Solutions USA Fund I. Inc. (the "Company") of up to 200,000 Shares of 9% Convertible Preferred Stock pursuant to an Offering Statement on Form 1-A filed with the U.S. Securities and Exchange Commission on November 6, 2015 (the "Offering Statement").

In connection with this opinion, I have examined and am familiar with originals or copies, certified, or otherwise identified to my satisfaction, of the Offering Statement, the Certificate of Incorporation and Bylaws of the Company, the records of corporate proceedings of the Company and such other statutes, certificates, instruments and such other documents relating to the Company and matters of law as I have deemed necessary to the issuance of this opinion.

In such examination, I have assumed, without independent investigation, the genuineness of all signatures, the legal capacity of all individuals who have executed any of the aforesaid documents, the authenticity of all documents submitted to us as originals, the conformity with originals of all documents submitted to me as copies (and the authenticity of the originals of such copies), and all public records reviewed are accurate

ADVANTAMEDS VALIDITY

PETER BERKMAN, ESQ

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and complete. As to factual matters, I have relied upon statements or representations of officers and other representatives of the Company, public officials or others and have not independently verified the matters stated therein. Insofar as this opinion relates to securities to be issued in the future, we have assumed that all applicable laws, rules and regulations in effect at the time of such issuance are the same as such laws, rules and regulations in effect as of the date hereof.

Based upon an examination and review of such corporate documents and records, certificates and other documents as I have deemed necessary, relevant, or appropriate, I am of the opinion that the shares of 9% Convertible Preferred Stock issuable pursuant to the Offering Statement, will, when issued, be validly issued, fully paid and non-assessable.

This opinion is limited in all respects to the Corporation Law of the State of Nevada [Ch. 78, Nevada Revised Statutes] (including the statutory provisions, all applicable provisions of the Nevada constitution and reported judicial decisions interpreting the foregoing), and I express no opinion as to the laws, statutes, rules or regulations of any other jurisdiction.

I hereby consent to the inclusion of this opinion letter as an exhibit to the Offering Statement and the reference to me under the caption "Validity of Securities" in the Offering Statement. In giving these consents, I do not thereby admit that I am within the category of persons whose consent is required under Section 7 of the Securities Act of 1933. This opinion is expressly limited to the matters set forth above and I render no opinion, whether by implication or otherwise, as to any other matters relating to the Company.

Very truly yours,

LAW OFFICE OF PETER BERKMAN PLLC

By:   
PETER BERKMAN, ESQ.  
Florida Bar No. 110330

ADVANTAMEDS VALIDITY

PETER BERKMAN, ESQ

Page 2



Pacific Northwest Office  
805 SW Broadway,  
Suite 2440  
Portland, Oregon 97205

Telephone: 503/419-3000 ~  
Facsimile: 503/419-3001 [www.white-summers.com](http://www.white-summers.com)

Direct Dial: 503/419-3002

February 20th, 2015

Broadcast 3DTV Inc.  
1020 Hollywood Way, Suite 120  
Burbank, CA 91505

Re: Registration of

Securities Ladies and

Gentlemen:

We have examined the Offering Circular on Form 1-A/A of Broadcast 3DTV Inc., a California corporation (the "Company"), in connection with the qualification under the Securities Act of 1933, as amended (the "Act") of the offer and sale of up to Ten Thousand (10,000) shares of Convertible Preferred Stock Unit of the Company (the "Securities") by the Company, proposed to be sold at a price of One Hundred Dollars (\$100) per share of Convertible Preferred Stock Unit with a proposed minimum offering of One Hundred Thousand Dollars (\$100,000).

We have reviewed such corporate proceedings and other matters as we have deemed necessary for the opinions expressed in this letter. Based upon the foregoing, we are of the opinion that upon payment for, and delivery of the Securities in accordance with the Offering Circular, the Securities will be validly issued, fully paid and non-assessable.

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We hereby consent to the filing of this opinion letter as an exhibit to the Offering Circular and as an exhibit to the registration form. In giving this consent, we do not thereby admit that we are within the category of persons whose consent is required under Section 7 of the Act or the rules and regulations of the Securities and Exchange Commission promulgated thereunder.

Very truly yours,  
**WHITE SUMMERS CAFFEE &  
JAMES, LLP**

William H. Caffee

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**Business Law Group**

3100 Donald Douglas Loop N., Suite 205  
Santa Monica, California 90405  
TEL (310) 664-8000  
FAX (310) 510-6769

Dennis J. Hawk  
email: dennis@dhwk.com

December 8, 2015

Craig Brandman, M.D.  
Chief Executive Officer  
StepOne Personal Health, Inc.  
509 South Wall Avenue  
Joplin, Missouri 64801

Re: Option/Regulation A Offering Statement

Dear Dr. Brandman:

This firm has acted as special counsel to StepOne Personal Health, Inc., a Delaware corporation ("Corporation"), in connection with the proposed sale ("Sale") of certain shares of preferred stock of the Corporation ("Stock") pursuant to the terms of a Regulation A Offering Statement on Form 1-A/A, Amendment No. 7 ("Transaction Document"). Unless otherwise defined herein, the capitalized terms used herein shall have the meanings assigned to such terms in the Transaction Document.

We have made such inquiry of the officers of the Corporation and have examined such corporate and other records, documents, agreements and instruments, certificate of an officer of the Corporation and have examined such questions of law as we have deemed necessary for the purposes of this Opinion Letter. In rendering our opinions, we have relied, as to all questions of fact material to these opinions, upon certificates of public officials and officers of the Corporation. We have assumed the genuineness of all signatures and the authenticity of all documents submitted to us as originals and the conformity to original documents of all documents submitted to us as copies, whether certified or not.

In rendering our opinions, we have reviewed and are relying on the following documents:

- (A) The Transaction Document;

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Craig Brandman, M.D.  
StepOne Personal Health, Inc.

(B) The corporate book, including the Corporation's Certificate of Incorporation, Certificate of Conversion, Bylaws, Certificate of Designation of Preferred Stock, and the minutes of the board of directors and shareholders contained therein;

(C) A Certificate dated December 8, 2015 from David Clymer as the Secretary of the Corporation affirming certain factual matters related to the Corporation and the Sale;

The documents identified in clauses (A) through (C) above are collectively herein referred to as the "Documents."

In rendering these opinions, we have assumed the following to be true:

(1) The authenticity and completeness of all Documents submitted to us as originals and the conformity to original documents of all documents submitted to us as copies;

(2) Regarding Documents executed by parties, that such parties (if they are corporations or limited liability companies) have the corporate or such other power to enter into and perform all obligations under those Documents, the due authorization by all requisite corporate or such other action of the execution, delivery, and performance of the Documents by such parties (if they are corporations or limited liability companies);

(3) Physical delivery of the Documents where delivery is a prerequisite to their enforceability;

(4) The capacity of all natural persons; and

(5) The the Corporation has obtained all necessary permits to consummate the Sale as described in the Transaction Document, and is otherwise in compliance with all federal, state, and local laws applicable to it and its business.

We disclaim any responsibility for any changes that may have occurred with respect to the status of the Corporation, or any other factual matters addressed in the Certificates from and after the respective dates of the Certificates. We also assume that the Certificates from public officials and the records upon which they are based are accurate and complete.

Based on the foregoing, and in reliance on and subject to the assumptions, qualifications, exceptions, and limitations set forth in the letter, we are of the opinion that:



1  
2 Craig Brandman, M.D.  
3 StepOne Personal Health, Inc.  
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5 1. The Corporation is a corporation duly organized and validly  
6 existing under the laws of the State of Delaware. The Corporation has all requisite power  
7 and authority to own and operate its business as presently conducted and to own and hold  
8 the assets and properties used in connection therewith and to carry out its obligations  
9 under the Transaction Document.

10 2. To our knowledge, the Stock intended to be issued as provided in  
11 the Transaction Document is free and clear of all liens, claims, and encumbrances of any  
12 kind, and, upon the delivery thereof to a Purchaser, such Purchaser will acquire good and  
13 valid title thereto, free and clear of all liens, claims, and encumbrances of any kind.

14 3. The Corporation has the full right, power, and authority to enter  
15 into and perform the obligations on its part to be performed as contained in the  
16 Transaction Document.

17 4. The Corporation's authorized preferred stock consists of 21,000  
18 shares ("Preferred Shares"), of which no Preferred Shares are issued and outstanding on  
19 the date hereof and all Preferred Shares are intended to be issued and sold pursuant to the  
20 Transaction Document. The relative rights, restrictions, privileges and preferences of the  
21 Preferred Shares are stated in the Certificate of Designation of Preferred Stock as filed on  
22 October 29, 2015 by the Corporation. To the best of our knowledge and except as  
23 contemplated by the Transaction Document, the Corporation has no options, warrants or  
24 rights to purchase or acquire shares of its capital stock, authorized, issued or outstanding.  
25 To the best of our knowledge, there are no preemptive rights with respect to the issuance  
26 or sale of the Corporation's capital stock, other than those imposed by the Corporation's  
27 Certificate of Incorporation and by relevant federal and state securities laws.

28 5. The execution, delivery and performance by the Corporation of the  
Documents have been duly authorized and approved by all necessary corporate action on  
the part of the Corporation; and the Documents constitute valid and binding obligations  
of the Corporation and each is enforceable in accordance with their respective terms. The  
execution, delivery and performance of the Documents will not violate any existing  
provision of law and will not conflict with, or result in a breach of any of the terms of, or  
constitute a default under the articles of incorporation or bylaws, each as amended to  
date, of the Corporation or of any contract, agreement or any other instrument known to  
us to which the Corporation is now a party or by which it may be bound.

The opinions expressed in this letter are qualified to the extent that the  
validity, binding effect, or enforceability of the Documents may be limited or affected by  
the following:

(1) Bankruptcy, insolvency, reorganization, arrangement, moratorium,  
fraudulent conveyance, equity of redemption, or other similar statutes, laws, rules of law,  
or court decisions now or hereafter in effect affecting the rights of creditors generally;

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Craig Brandman, M.D.  
StepOne Personal Health, Inc.

(2) General principles of equity and public policy under applicable law, including among other things, implied obligations of materiality, reasonableness, good faith, and fair dealing, and equitable principles that may limit or prohibit the specific enforceability of some remedies, covenants, or other provisions of the Documents or that may limit or prohibit the availability of specific performance, injunctive relief, or other equitable remedies, regardless of whether such enforceability is considered in a proceeding in equity or at law; and

(3) Procedural requirements to be complied with at the time of enforcement, not otherwise reflected in the Documents, that may restrict or condition rights and remedies otherwise therein stated to be available.

This Opinion Letter is provided to you as a legal opinion and not as a guarantee of the matters discussed herein. Our opinions are limited to the matters expressly stated herein, and no other opinions may be implied or inferred.

These opinions are rendered as of the date set forth above. We expressly disclaim any obligation to advise you of any changes in the circumstances, laws, or events that may occur after this date or otherwise to update these opinions.

A copy of this Opinion Letter is being delivered to the Corporation only in connection with the intended Sale as described in the Transaction Document.

Very truly yours,

BUSINESS LAW GROUP



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**JAMES H. SEYMOUR**  
COUNSELLOR AT LAW  
POST OFFICE BOX 1757  
CRYSTAL SPRING NEVADA 89402-1757

TELEPHONE  
(650) 886-3726

5 December 2014

Remington Energy Group Corporation  
737 James Lane  
Incline Village, Nevada 89450

**Re: Remington Energy Group Corporation  
Qualification and Registration of Securities**

Ladies and Gentlemen:

At your request, we have examined the Offering Statement ("Offering Statement") on Form 1-A (File No. 024-10380) of Remington Energy Group Corporation, a Nevada Stock Corporation, (Company) in connection with the qualification under the Securities of 1933, as amended, of the offer and sale of up to FIFTY THOUSAND (50,000) Cumulative 9% Convertible Preferred Stock Units of the Company (the Securities) by the Company.

In rendering the opinion below, we examined originals of those corporate and other records and documents we considered appropriate. We assumed the genuineness of all signatures, the authenticity of all documents submitted to us as originals and the conformity with originals of all documents submitted to us as copies.

Based on this examination, we are of the opinion that the Securities have been duly authorized by all necessary corporate action on the part of the Company and, upon payment for, and delivery of the Securities in accordance with the Offering Documents, the Securities will be validly issued, fully paid, and non-assessable.

This opinion letter is limited to the standard requirements placed upon corporations and their directors and officers generally in connection with the issuance of securities such as the Securities.

We hereby consent to the use of this opinion letter as an Exhibit to the Offering Statement and as an exhibit to the Registration Form.

Sincerely,

*/s/ James H. Seymour*

James H. Seymour

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State of California - Department of Corporations

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STATE OF CALIFORNIA  
BUSINESS, TRANSPORTATION AND HOUSING AGENCY  
DEPARTMENT OF CORPORATIONS

TO: Steven J. Muehler  
LA Investment Capital, LLC *Not operating*  
Beverly Hills, California  
4139 Via Marina, Suite 1208  
Marina Del Rey, California 90292  
LA Investment Capital Alternative Investment Fund I, LLC *Not operating*  
Beverly Hills, California 90210  
Marina Del Rey, California  
LA Investment Capital BioFuels Fund I, LLC *Not operating*  
Beverly Hills, California  
4050 Glencoe Ave., Suite 210  
Marina Del Rey, California 90292  
LA Investment Capital Energy Fund I, LLC *Not operating*  
Beverly Hills, California  
4050 Glencoe Ave., Suite 210  
Marina Del Rey, California 90292  
LA Investment Capital Entertainment & Media Fund, LLC *Not operating*  
Beverly Hills, California *Does Not Exist*  
LA Investment Capital Oil & Natural Gas Fund I, LLC *Not operating*  
Beverly Hills, California  
LA Investment Capital Real Estate Fund I, LLC *Not operating*  
Beverly Hills, California

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-1-  
DESIST AND REFRAIN ORDER

**DESIST AND REFRAIN ORDER**

**(For violations of section 25110 of the Corporations Code)**

The California Corporations Commissioner finds that:

1. At all relevant times, LA Investment Capital, LLC ("LA Investment Capital"), a California limited liability company, conducted business at 9107 Wilshire Blvd., Unit 450, Beverly Hills, California and/or 4139 Via Marina, Suite 1208, Marina Del Rey, California. LA Investment Capital was a purported Los Angeles-based high-performance, commercial real estate, energy, biofuels, oil and natural gas investment banking firm. LA Investment Capital acted as the managing member of several private equity funds, named below.

2. Steven J. Muehler ("Muehler") was the founder of LA Investment Capital.

3. LA Investment Capital maintained a website at [www.lainvestmentbanc.com](http://www.lainvestmentbanc.com).

4. At all relevant times, LA Investment Capital Alternative Investment Fund I, LLC ("Alternative Investment Fund"), a California limited liability company, conducted business at 9107 Wilshire Blvd., Unit 450, Beverly Hills, California and/or 4050 Glencoe Avenue, Suite 210, Marina Del Rey, California. Alternative Investment Fund was an investment fund formed for the purpose of operating as an early and growth stage worldwide mining and mineral rights investment. The Alternative Investment Fund was to act as a private equity provider to small and middle market worldwide mining and mineral rights companies throughout the United States. According to its offering materials, LA Investment Capital acted as Alternative Investment Fund's managing member.

5. At all relevant times, LA Investment Capital BioFuels Fund I, LLC ("BioFuels Fund"), a California limited liability company, conducted business at 9107 Wilshire Blvd., Unit 450, Beverly Hills, California and/or 4050 Glencoe Avenue, Suite 210, Marina Del Rey, California. BioFuels Fund was an investment fund formed for the purpose of operating as an early and growth stage biofuels investment. The BioFuels Fund was to act as a private equity provider to small and middle market biofuels companies throughout the United States. According to its offering materials, LA Investment Capital acted as the BioFuels Fund's managing member.

6. At all relevant times, LA Investment Capital Energy Fund I, LLC ("Energy Fund"), a California limited liability company, conducted business at 9107 Wilshire Blvd., Unit 450, Beverly

1 Hills, California and/cr 4050 Glencoe Avenue, Suite 210, Marina Del Rey, California. Energy Fund  
2 was an investment fund formed for the purpose of operating as an early and growth stage green  
3 energy investment. The Energy Fund was to act as a private equity provider to small and middle  
4 market green energy companies throughout the United States. According to its offering materials,  
5 LA Investment Capital acted as the Energy Fund's managing member.

6 7. At all relevant times, LA Investment Capital Entertainment & Media Fund, LLC  
7 ("Entertainment & Media Fund"), a purported California limited liability company, conducted  
8 business at 9107 Wilshire Blvd., Unit 450, Beverly Hills, California. Entertainment & Media Fund  
9 was an investment fund formed for the purpose of operating as an early and growth stage  
10 entertainment investment. The Entertainment & Media Fund was to act as a private equity provider  
11 to small and middle market entertainment companies throughout Los Angeles. According to its  
12 offering materials, LA Investment Capital acted as the Entertainment & Media Fund's managing  
13 member.

14 8. At all relevant times, LA Investment Capital Oil & Natural Gas Fund I, LLC ("Oil &  
15 Natural Gas Fund"), a purported California limited liability company, conducted business at 9107  
16 Wilshire Blvd., Unit 450, Beverly Hills, California. Oil & Natural Gas Fund was an investment fund  
17 formed for the purpose of operating as an early and growth stage oil and natural gas investment. The  
18 Oil & Natural Gas Fund was to act as a private equity provider to small and middle market oil and  
19 natural gas companies throughout the United States. According to its offering materials, LA  
20 Investment Capital acted as the Oil & Natural Gas Fund's managing member.

21 9. At all relevant times, LA Investment Capital Real Estate Fund I, LLC ("Real Estate  
22 Fund"), a purported Nevada limited liability company, conducted business at 9107 Wilshire Blvd.,  
23 Unit 450, Beverly Hills, California. Real Estate Fund was an investment fund formed for the purpose  
24 of operating as an early and growth stage real estate investment. The Real Estate Fund was to act as a  
25 private equity provider to small and middle market real estate companies throughout the United  
26 States. According to its offering materials, LA Investment Capital acted as the Real Estate Fund's  
27 managing member.

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State of California - Department of Corporations

1 10. Beginning in at least January 2010, Muehler and LA Investment Capital offered  
2 interests in limited liability companies and/or investment contracts to at least one California investor  
3 in the form of "membership units" in LA Investment Capital and the Alternative Investment Fund,  
4 BioFuels Fund, Energy Fund, Entertainment & Media Fund, Oil & Natural Gas Fund, and the Real  
5 Estate Fund.

6 11. Muehler and LA Investment Capital solicited the investor by means of the Internet.

7 12. These membership units were offered in this state in issuer transactions. The  
8 Department of Corporations has not issued a permit or other form of qualification authorizing any  
9 person to offer or sell these securities in this state.

10 Based upon the foregoing findings, the California Corporations Commissioner is of the  
11 opinion that these interests in limited liability companies, investment contracts and/or membership  
12 units are subject to qualification under the California Corporate Securities Law of 1968 and are being  
13 or have been offered without first being qualified. Pursuant to Section 25532 of the Corporate  
14 Securities Law of 1968, Steven J. Muehler; LA Investment Capital, LLC; LA Investment Capital  
15 Alternative Investment Fund I, LLC; LA Investment Capital BioFuels Fund I, LLC; LA Investment  
16 Capital Energy Fund I, LLC; LA Investment Capital Entertainment & Media Fund, LLC; LA  
17 Investment Capital Oil & Natural Gas Fund I, LLC; and LA Investment Capital Real Estate Fund I,  
18 LLC are hereby ordered to desist and refrain from the further offer or sale of securities, in the State of  
19 California, including but not limited to interests in limited liability companies, investment contracts,  
20 and/or membership units unless and until qualification has been made under said law or unless

21 exempt.

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DESIST AND REFRAIN ORDER

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State of California - Department of Corporations

1                    This Order is necessary, in the public interest, for the protection of investors and consistent  
2 with the purposes, policies, and provisions of the Corporate Securities Law of 1968.  
3 Dated: August 25, 2010  
4                    Los Angeles, California

PRESTON DuFAUCHARD  
California Corporations Commissioner

By \_\_\_\_\_  
ALAN S. WEINGER  
Deputy Commissioner  
Enforcement Division

-5-  
DESIST AND REFRAIN ORDER



2 **ITEM 5. PLAN OF DISTRIBUTION**

3 The Offering will commence promptly after the date of this Offering Circular and will close (terminate) upon the earlier of (1)  
4 the sale of 50,000 9% Convertible Preferred Stock Shares, (2) One Year from the date this Offering begins, or (3) a date prior to  
one year from the date this Offering begins that is so determined by the Company's Management (the "Offering Period").

5 The 9% Convertible Preferred Stock Shares are being offered by the Company on a "Best Efforts" basis with no minimum and  
6 without the benefit of a Placement Agent. The Company can provide no assurance that this Offering will be completely sold out.  
If less than the maximum proceeds are available, the Company's business plans and prospects for the current fiscal year could be  
adversely affected.

7 The Company has not made any arrangements to place funds raised in this Offering in an escrow, trust or similar account. Any  
8 investor who purchases securities in this Offering will have no assurance that other purchasers will invest in this Offering.  
Accordingly, if the Company should file for bankruptcy protection or a petition for insolvency bankruptcy is filed by creditors  
against the Company, Investor funds may become part of the bankruptcy estate and administered according to the bankruptcy  
laws.

9 The Securities to be offered with this proposed offering shall be initially offered by Company, mainly by Messers, Zanetos and  
10 Kassouf, each Executive Officers of the Company. The Company anticipates engaging members of the Financial Regulatory  
Authority ("FINRA") to sell the Securities for the Company, though the Company has not yet engaged the Services of any  
11 FINRA Broker Dealers. The Company intends to engage a FINRA Broke Dealer to offer the Securities to prospective investors  
on a "best efforts" basis, and the Company's Broker Dealers will have the right to engage such other FINRA Broker Dealer  
12 member firms as it determines to assist in the Offering. The Company will update this Registration Statement via an amendment  
to this Registration Statement upon any engagement of a FINRA Broker Dealer to offer the securities.

13 The Company anticipates that any FINRA Broker Dealer Manager will receive selling commissions of FIVE TO TEN  
14 PERCENT of the Offering Proceeds, which it may re-allow and pay to participating FINRA Broker Dealers who sell the  
Company's Securities. The Company's FINRA Broker Dealer Manager may also sell the Securities as part of a selling group,  
15 thereby becoming entitled to retain a greater portion of the selling commissions. Any portion of the selling commissions retained  
by the FINRA Broker Dealer Manager would be included within the amount of selling commissions payable by the Company  
and not in addition to.

16 The Company anticipates that that its FINRA Broker Dealer Manager may enter into an agreement with the Company to  
purchase "Underwriter Warrants". Should the Company enter into an Underwriter Warrants Agreement with its FINRA Broker  
17 Dealer Manager, a copy of the agreement will be filed with the United States Securities and Exchange Commission as an Exhibit  
to an amended Registration Statement of which this Offering is part.

18 The Company anticipates that the Company and any FINRA Broker Dealer will each enter into a Broker Dealer Manager  
19 Agreement, which will be filed with the United States Securities and Exchange Commission as an Exhibit to an amended  
Registration Statement of which this Offering is part, for the sale of the Company's Securities. FINRA Broker Dealers desiring to  
become members of a Selling Group will be required to execute a Participating Broker Dealer Agreement with the Company's  
20 FINRA Broker Dealer, either before or after the date of this Registration Statement.

21 In order to subscribe to purchase the Securities, a prospective Investor must complete, sign and deliver the executed Subscription  
Agreement, Investor Questionnaire and Form W-9 to Broadcast 3DTV, Inc. and either mail or wire funds for its subscription  
22 amount in accordance with the instructions included in the Subscription Package.

23 The Company reserves the right to reject any Investor's subscription in whole or in part for any reason. If the Offering terminates  
or if any prospective Investor's subscription is rejected, all funds received from such Investors will be returned without interest or  
24 deduction.

25 In addition to this Offering Circular, subject to limitations imposed by applicable securities laws, we expect to use additional  
26 advertising, sales and other promotional materials in connection with this Offering. These materials may include public  
advertisements and audio-visual materials, in each case only as authorized by the Company. Although these materials will not  
27 contain information in conflict with the information provided by this Offering and will be prepared with a view to presenting a  
balanced discussion of risk and reward with respect to the Securities, these materials will not give a complete understanding of  
28 this Offering, the Company or the Securities and are not to be considered part of this Offering Circular. This Offering is made  
only by means of this Offering Circular and prospective Investors must read and rely on the information provided in this Offering  
Circular in connection with their decision to invest in the Securities.

1 STEPONE PERSONAL HEALTH PLAN FOR DISTRIBUTION FROM CLEARED COMMENTS FORM 1-A

2 DRAFTED BY MUEHLER

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4 The Offering will commence promptly after the date of this Offering Circular and will close (terminate) upon the earlier of (1) the sale of 100,000 9% Convertible Preferred Stock Shares, (2) One Year from the date this Offering begins, or (3) a date prior to one year from the date this Offering begins that is so determined by the Company's Management (the "Offering Period").

5 The 9% Convertible Preferred Stock Shares are being offered by the Company on a "Best Efforts" basis with no minimum and without the benefit of a Placement Agent. The Company can provide no assurance that this Offering will be completely sold out. If less than the maximum proceeds are available, the Company's business plans and prospects for the current fiscal year could be adversely affected.

7 The Company has not made any arrangements to place funds raised in this Offering in an escrow, trust or similar account. Any investor who purchases securities in this Offering will have no assurance that other purchasers will invest in this Offering. Accordingly, if the Company should file for bankruptcy protection or a petition for insolvency bankruptcy is filed by creditors against the Company, Investor funds may become part of the bankruptcy estate and administered according to the bankruptcy laws.

10 The Securities to be offered with this proposed offering shall be initially offered by Company, mainly by Messers, Clymer and Brandman, each Executive Officers of the Company. The Company anticipates engaging members of the Financial Regulatory Authority ("FINRA") to sell the Securities for the Company, though the Company has not yet engaged the Services of any FINRA Broker Dealers. The Company intends to engage a FINRA Broke Dealer to offer the Securities to prospective investors on a "best efforts" basis, and the Company's Broker Dealers will have the right to engage such other FINRA Broker Dealer member firms as it determines to assist in the Offering. The Company will update this Registration Statement via an amendment to this Registration Statement upon any engagement of a FINRA Broker Dealer to offer the securities.

13 The Company anticipates that any FINRA Broker Dealer Manager will receive selling commissions of FIVE TO TEN PERCENT of the Offering Proceeds, which it may re-allow and pay to participating FINRA Broker Dealers who sell the Company's Securities. The Company's FINRA Broker Dealer Manager may also sell the Securities as part of a selling group, thereby becoming entitled to retain a greater portion of the selling commissions. Any portion of the selling commissions retained by the FINRA Broker Dealer Manager would be included within the amount of selling commissions payable by the Company and not in addition to.

16 The Company anticipates that that its FINRA Broker Dealer Manager may enter into an agreement with the Company to purchase "Underwriter Warrants". Should the Company enter into an Underwriter Warrants Agreement with its FINRA Broker Dealer Manager, a copy of the agreement will be filed with the United States Securities and Exchange Commission as an Exhibit to an amended Registration Statement of which this Offering is part.

18 The Company anticipates that the Company and any FINRA Broker Dealer will each enter into a Broker Dealer Manager Agreement, which will be filed with the United States Securities and Exchange Commission as an Exhibit to an amended Registration Statement of which this Offering is part, for the sale of the Company's Securities. FINRA Broker Dealers desiring to become members of a Selling Group will be required to execute a Participating Broker Dealer Agreement with the Company's FINRA Broker Dealer, either before or after the date of this Registration Statement.

21 NOTE: The Company had previously entered into an Underwriting Agreement with "Alternative Securities Markets Group Corporation" for the registration and qualification of this Registration Statement. The Company terminated this agreement with Alternative Securities Markets Group Corporation, and all of its subsidiaries and its affiliates, effective Tuesday, October 13<sup>th</sup> 2015. There is currently no underwriting agreements or broker dealer agreements in place with Alternative Securities Markets Group Corporation, or any subsidiary or affiliate of Alternative Securities Markets Group Corporation, nor are there any relationships between the Company and Alternative Securities Markets Group Corporation or any of its subsidiaries or affiliates.

24 In order to subscribe to purchase the Securities, a prospective Investor must complete, sign and deliver the executed Subscription Agreement, Investor Questionnaire and Form W-9 to StepOne Personal Health, Inc. and either mail or wire funds for its subscription amount in accordance with the instructions included in the Subscription Package.

26 The Company reserves the right to reject any Investor's subscription in whole or in part for any reason. If the Offering terminates or if any prospective Investor's subscription is rejected, all funds received from such Investors will be returned without interest or deduction.

28 In addition to this Offering Circular, subject to limitations imposed by applicable securities laws, we expect to use additional advertising, sales and other promotional materials in connection with this Offering. These materials may include public

1 advertisements and audio-visual materials, in each case only as authorized by the Company. Although these materials will not  
2 contain information in conflict with the information provided by this Offering and will be prepared with a view to presenting a  
3 balanced discussion of risk and reward with respect to the Securities, these materials will not give a complete understanding of  
4 this Offering, the Company or the Securities and are not to be considered part of this Offering Circular. This Offering is made  
5 only by means of this Offering Circular and prospective Investors must read and rely on the information provided in this Offering  
6 Circular in connection with their decision to invest in the Securities.  
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1 ADVANTAMEDS SOLUTIONS USA FUND I, INC. PLAN FOR DISTRIBUTION FROM CLEARED  
2 COMMENTS FORM 1-A - DRAFTED BY MUEHLER

3 The Offering will commence promptly after the date of this Offering Circular and will close (terminate) upon the earlier of (1)  
4 the sale of 200,000 9% Convertible Preferred Stock Shares, (2) One Year from the date this Offering begins, or (3) a date prior to  
one year from the date this Offering begins that is so determined by the Company's Management (the "Offering Period").

5 The 9% Convertible Preferred Stock Shares are being offered by the Company on a "Best Efforts" basis with no minimum and  
6 without the benefit of a Placement Agent. The Company can provide no assurance that this Offering will be completely sold out.  
If less than the maximum proceeds are available, the Company's business plans and prospects for the current fiscal year could be  
adversely affected.

7 The Company has not made any arrangements to place funds raised in this Offering in an escrow, trust or similar account. Any  
8 investor who purchases securities in this Offering will have no assurance that other purchasers will invest in this Offering.  
Accordingly, if the Company should file for bankruptcy protection or a petition for insolvency bankruptcy is filed by creditors  
against the Company, Investor funds may become part of the bankruptcy estate and administered according to the bankruptcy  
laws.

9 The Securities to be offered with this proposed offering shall be initially offered by Company, mainly by Mr. Thompson and Mr.  
10 Custardo, each Executive Officers of the Company. The Company anticipates engaging members of the Financial Regulatory  
Authority ("FINRA") to sell the Securities for the Company, though the Company has not yet engaged the Services of any  
11 FINRA Broker Dealers. The Company intends to engage a FINRA Broke Dealer to offer the Securities to prospective investors  
on a "best efforts" basis, and the Company's Broker Dealers will have the right to engage such other FINRA Broker Dealer  
12 member firms as it determines to assist in the Offering. The Company will update this Registration Statement via an amendment  
to this Registration Statement upon any engagement of a FINRA Broker Dealer to offer the securities.

13 The Company anticipates that any FINRA Broker Dealer Manager will receive selling commissions of FIVE TO TEN  
14 PERCENT of the Offering Proceeds, which it may re-allow and pay to participating FINRA Broker Dealers who sell the  
Company's Securities. The Company's FINRA Broker Dealer Manager may also sell the Securities as part of a selling group,  
15 thereby becoming entitled to retain a greater portion of the selling commissions. Any portion of the selling commissions retained  
by the FINRA Broker Dealer Manager would be included within the amount of selling commissions payable by the Company  
and not in addition to.

16 The Company anticipates that that its FINRA Broker Dealer Manager may enter into an agreement with the Company to  
purchase "Underwriter Warrants". Should the Company enter into an Underwriter Warrants Agreement with its FINRA Broker  
17 Dealer Manager, a copy of the agreement will be filed with the United States Securities and Exchange Commission as an Exhibit  
to an amended Registration Statement of which this Offering is part.

18 The Company anticipates that the Company and any FINRA Broker Dealer will each enter into a Broker Dealer Manager  
19 Agreement, which will be filed with the United States Securities and Exchange Commission as an Exhibit to an amended  
Registration Statement of which this Offering is part, for the sale of the Company's Securities. FINRA Broker Dealers desiring to  
20 become members of a Selling Group will be required to execute a Participating Broker Dealer Agreement with the Company's  
FINRA Broker Dealer, either before or after the date of this Registration Statement.

21 In order to subscribe to purchase the Securities, a prospective Investor must complete, sign and deliver the executed Subscription  
22 Agreement, Investor Questionnaire and Form W-9 to AdvantaMeds Solutions USA Fund I, Inc. and either mail or wire funds  
for its subscription amount in accordance with the instructions included in the Subscription Package.

23 The Company reserves the right to reject any Investor's subscription in whole or in part for any reason. If the Offering terminates  
or if any prospective Investor's subscription is rejected, all funds received from such Investors will be returned without interest or  
deduction.

24 In addition to this Offering Circular, subject to limitations imposed by applicable securities laws, we expect to use additional  
25 advertising, sales and other promotional materials in connection with this Offering. These materials may include public  
advertisements and audio-visual materials, in each case only as authorized by the Company. Although these materials will not  
26 contain information in conflict with the information provided by this Offering and will be prepared with a view to presenting a  
balanced discussion of risk and reward with respect to the Securities, these materials will not give a complete understanding of  
27 this Offering, the Company or the Securities and are not to be considered part of this Offering Circular. This Offering is made  
only by means of this Offering Circular and prospective Investors must read and rely on the information provided in this Offering  
28 Circular in connection with their decision to invest in the Securities.



1381 HERMITAGE ROAD  
MANAKIN-SABOT, VIRGINIA 23103  
804.918.9666

#### TERM SHEET

ISSUER: Accelera Innovations, Inc., 20511 Abbey Drive, Frankfort, IL 60423

PROPOSED OFFERING: Minimum amount \$20,000,000 and maximum amount \$50,000,000 as exempt from registration under Regulation A+ and federal securities laws. Moloney to act as placement agent/underwriter on a "best efforts" undertaking of cumulative convertible preferred stock of the Issuer. Closings will occur in increments at the Minimum amount and every \$5 million thereafter to the Maximum amount.

VALUATION: Estimated share price at \$10/share, subject to market conditions and valuation. Valuation determined by independent analysis of projected funds from operations, subject to approval of Moloney, in its sole discretion.

ISSUER'S COUNSEL: TBD. Issuer's selection conditioned upon law firm having appropriate experience in Federal securities law offerings, subject to reasonable approval of Moloney.

UNDERWRITER'S (MOLONEY) COUNSEL: Sands Anderson PC, Richmond, VA

UNDERWRITER'S FEE: 7% commission on Offering, plus Expenses described below. Moloney will have option to provide selling group members portion of commission or management fee from Moloney commission.

EXPENSES: In addition to Underwriter's Fee, Underwriter's Expenses of 2% , subject to credit for Retainer, shall be paid at closing (initial and subsequent incremental closings) composed of 1% of Offering for non-accountable expenses to be paid to Underwriter from Issuer and 1% of accountable expenses paid to Underwriter. Issuer is responsible for all other expenses, including but not limited to Issuer's Counsel, auditors, valuation, bank escrow, research reports, federal and state filing fees and expenses, printing, CUSIP, DTC, etc. Issuer understands it will be responsible for all ongoing fees and costs relating to preparation, filing, reporting and other fees required of Issuer.

WARRANTS: Underwriter will have warrants to be determined and in compliance with FINRA regulations.

MARKETING MATERIAL: Underwriter shall approve any marketing material for Offering.

#### GENERAL CONDITIONS:

- Audited financials of Issuer required in compliance with SEC regulations, with no material adverse change in business or financial condition of Issuer.
- Appropriate opinions from Issuer's counsel, acceptable to Moloney and its counsel with respect to all relevant terms, conditions, and circumstances relating

MEMBER FINRA

A REGISTERED BROKER/DEALER

MEMBER SIPC

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to the Offering as well as the results of Underwriter's due diligence investigation, and 10b-5 opinion of Issuer's counsel.

- Comfort and consent letters from Issuer's auditors.
- No adverse change in capital markets, financial crisis, suspension or moratorium on trading or legislation or regulations are proposed or adopted which materially limit or adversely affect the ability of the Underwriter to complete the Offering, its pricing or which have such an affect on similar offerings, in the reasonable opinion of Moloney.
- No adverse change in the financial condition, operations or business of Issuer in the reasonable opinion of Moloney.
- Due diligence review and approval by Moloney.

**EXCLUSIVE CONTRACT:** Underwriter has exclusive agreement for any offering of Issuer under Regulation A or Regulation A+ for 18 months from execution of term sheet through completion of this Offering.

**PROJECTED CLOSING DATE:** (90) days following effective date of filing with SEC

**RETAINER:** 1- \$40,000 paid to Moloney and will be fully credited against Underwriter's Counsel fees as well as other fees and expenses incurred by Underwriter in relation to this engagement. 2- In addition, issuer shall pay to Moloney \$6,000 to be used for valuation services provided by Cornerstone Valuation, LLC, Richmond, VA. \$6,000 is due at the signing of this agreement and underwriters counsel will be engaged upon receipt of \$40,000.

**BLUE SKY:** 50 States, exemption for Regulation A+ from registration, but filing fees/notice apply as required.

**DIVIDEND:** Projected to be \$0.20 cents quarterly (\$0.80 per year)

**DTC ELIGIBILITY:** Underwriter will attempt to obtain prior to closing.

**THIRD PARTY DUE DILIGENCE REPORTS:** Two reports to be delivered by Issuer from provider acceptable to both Issuer and Underwriter to be used by syndicate and selling group at Issuer's expense. Ongoing research to be provided by a firm acceptable to Moloney at Issuer's expense.

**SALES PERIOD:** Expected from TBD

**QUIET PERIOD:** No trading of newly issued securities for a period of 90 days while sales activities are ongoing.

**ESCROW AGENT:** SunTrust Bank

**CUSIP NUMBER:** Required

**NON-CIRCUMVENT AGREEMENT:** Required

	A REGISTERED BROKER/DEALER	
MEMBER FINRA		MEMBER SIPC
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Agreed:

ACCELERA INNOVATIONS, INC.

MOLONEY SECURITIES CO., INC.

By: \_\_\_\_\_

By: \_\_\_\_\_

Title: \_\_\_\_\_

Title: \_\_\_\_\_

MEMBER FINRA

A REGISTERED BROKER/DEALER

MEMBER SIPC

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CERTIFICATE OF SERVICE



I Steven Joseph Muehler, do hereby Certify that a true and correct copy of the foregoing has been furnished by U.S. Mail (manner of service, i.e., U.S. Mail, electronic mail, etc.) on this 6<sup>th</sup> day of January 2016, to:



Commissioner's office of the Secretary  
United States Securities and Exchange Commission  
100 F Street / Mail Stop 1090  
Washington, DC 20594

1-6-2016  
Date

  
Signature



<b>P</b>	US POSTAGE & FEES PAID PRIORITY MAIL Medium FRB COMMERCIAL BASE PRICING	062S0009662736 FROM 90292
		stamps.com 01/06/2016
<b>PRIORITY MAIL 2-DAY™</b>		
STEVEN MUEHLER 4050 GLENCOE AVENUE APT 210 MARINA DEL REY CA 90292		<b>0023</b>
<b>C000</b>		
<b>SHIP TO:</b>	Commission's Office of the Secretary United States Securities and Exchange Commission 100 F Street Mail Stop 1090 Washington DC 20594-0001	
		
<b>USPS TRACKING #</b>		
		
<b>9405 5118 9956 3324 3710 23</b>		
<b>Summary Judgment / Motion to Compel</b>		

<b>stamps.com</b>	<b>Shipping Label Receipt</b>	
<b>Tracking Number:</b>		
<b>9405 5118 9956 3324 3710 23</b>		
PRIORITY MAIL 2-DAY with Tracking *		
Electronic Service Fee: \$0.00		
Total Postage and Fees: \$11.30		
Weight: 0 lbs 1 oz		
Print Date: 01/05/2016	Mailing Date: 01/06/2016	
<b>From:</b>	STEVEN MUEHLER  MARINA DEL REY CA 	
<b>To:</b>	Commission's Office of the Secretary United States Securities and Exchange Commission 100 F Street Mail Stop 1090 Washington DC 20594-0001	USPS Postmark Here
*Regular PRIORITY MAIL 2-DAY Service postage rates apply. There is no fee for Tracking service on PRIORITY MAIL 2-DAY services with use of this electronic shipping label. Postmark required if fee refund requested. Delivery information is not available by phone for the electronic option.		

**Instructions:**

1. Adhere shipping label to package with tape or glue - DO NOT TAPE OVER BARCODE. Be sure all edges are secured. Self-adhesive label is recommended.
2. Place the label so it does not wrap around the edge of the package.
3. This package may be deposited in any collection box, handed to your mail carrier, or presented to a clerk at your local Post Office.
4. Each confirmation number is unique and can be used only once - DO NOT PHOTOCOPY.
5. You must mail this package on the "mail date" that is specified on this label.




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I Steven Joseph Muehler, do hereby Certify that a true and correct copy of the foregoing has been furnished by U.S. Mail (manner of service, i.e., U.S. Mail, electronic mail, etc.) on this 6<sup>th</sup> day of January 2016, to:

United States Securities and Exchange Commission  
Mr. Donald Segler  
444 South Flower Street  
Los Angeles, CA 90071

1-6-2016  
Date

  
Signature

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US POSTAGE & FEES PAID  
PRIORITY MAIL  
LGL FRE  
COMMERCIAL BASE PRICING

062S0009662736  
FROM 90292



stamps.com  
01/06/2016

**PRIORITY MAIL 1-DAY™**

STEVEN MUEHLER  
4050 GLENCOE AVENUE APT 210  
MARINA DEL REY CA 90292

0006

C014

SHIP TO: United States Securities and Exchange Commission  
Mr. Lance Jasper  
444 South Flower Street  
Los Angeles CA 90071-2901



**USPS TRACKING #**



9405 5118 9956 3324 3943 74

Summary Judgment / Motion to Compel

stamps.com

**Shipping Label Receipt**

**Tracking Number:**

9405 5118 9956 3324 3943 74

PRIORITY MAIL 1-DAY with Tracking \*

Electronic Service Fee: \$0.00

Total Postage and Fees: \$5.25

Weight: 0 lbs 1 oz

Print Date: 01/05/2016

Mailing Date: 01/06/2016

From: STEVEN MUEHLER

MARINA DEL REY CA

To: United States Securities and Exchange Commission  
Mr. Lance Jasper  
444 South Flower Street  
Los Angeles CA 90071-2901

USPS  
Postmark  
Here

\*Regular PRIORITY MAIL 1-DAY Service postage rates apply. There is no fee for Tracking service on PRIORITY MAIL 1-DAY services with use of this electronic shipping label. Postmark required if fee refund requested. Delivery information is not available by phone for the electronic option.

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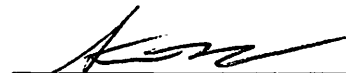
United States Securities and Exchange Commission

Mr. Lance Jusper

4441 South Flower Street

Los Angeles, CA 90071

1-5-2016  
Date

  
Signature

<b>P</b>	US POSTAGE & FEES PAID PRIORITY MAIL LGL FRE COMMERCIAL BASE PRICING	062S0009662736 FROM 90292
		stamps.com 01/06/2016
<b>PRIORITY MAIL 1-DAY™</b>		
STEVEN MUEHLER 4050 GLENCOE AVENUE APT 210 MARINA DEL REY CA 90292		<b>0006</b>
<b>C014</b>		
<b>SHIP TO:</b>	United States Securities and Exchange Commission Mr. Donald Searles 444 South Flower Street Los Angeles CA 90071-2901	
		
<b>USPS TRACKING #</b>		
		
<b>9405 5118 9956 3324 3929 67</b>		
<b>Summary Judgment / Motion to Compel</b>		

**stamps.com** Shipping Label Receipt

**Tracking Number:**

**9405 5118 9956 3324 3929 67**

PRIORITY MAIL 1-DAY with Tracking \*

Electronic Service Fee: \$0.00

Total Postage and Fees: \$5.25

Weight: 0 lbs 1 oz

Print Date: 01/05/2016

Mailing Date: 01/06/2016

**From:** STEVEN MUEHLER  
4050 GLENCOE AVENUE APT 210  
MARINA DEL REY CA 90292

**To:** United States Securities and Exchange Commission  
Mr. Donald Searles  
444 South Flower Street  
Los Angeles CA 90071-2901

**USPS  
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