

I. Barrera Replies to Public Interest Factors

1. The egregiousness of the respondent's actions;

Defense: (Definition of Egregious adjective 1. extraordinary in some bad way; glaring; flagrant: an egregious mistake; an egregious liar. Synonyms: gross, outrageous, notorious, shocking.)

Mr. Barrera in no way acted in such an egregious manner. Mr. Barrera has never in his life sold a security. Nor had any desire to do so. Mr. Barrera is a lifelong designer, contractor and music event producer. His lifelong career path has nothing to do with the securities or the securities trade or brokering therein.

Mr. Barrera simply introduced a childhood friend (Mr. Sellers) to another friend (Mr. Moore) regarding a business opportunity. Mr. Barrera had never done any business with either Mr. Moore or Mr. Sellers prior to this introduction.

The introduction starting point was also very cursory. In fact, while Mr. Barrera was driving to lunch with Mr. Moore and his fiancé. A call came in to Mr. Barrera from Mr. Sellers. Mr. Sellers said he was coming into town because his Dad has cancer and wanted to meet up. Before Mr. Barrera got off the phone, Mr. Sellers mentioned something about a business opportunity and if he knew anyone that might be interested in learning more about it. Mr. Barrera, while in the car, mentioned this conversation while on the phone with Mr. Sellers, to Mr. Moore. Mr. Moore said sure he would meet Mr. Sellers. A few days later, Mr. Barrera sent an email to connect Mr. Moore with Mr. Sellers. This email was simply an introduction and nothing more. This introduction led to a lunch meeting and shortly thereafter Mr. Sellers copied Mr. Barrera on an email to Mr. Moore which had some marketing materials attached. That was the last time Mr. Barrera was involved.

At the time of Mr. Sellers initial call to Mr. Barrera he was just hired by The City Of Costa Mesa as a entertainment consultant and was very exited about the new relationship and was soon estimating their *Concerts In The Parks* series, *Snoopy House Christmas Event*, and their 3 day *Food, Music & Art 60 Year Anniversary* event that was to take place in June of 2013 and was to play host to 30,000 to 40,000 guests over the course of 3 days.

This relationship Initially started in 2010 when Mr. Barrera emailed the cities CEO explaining how important in was for the city to get active the live music. Furthermore focus on the arts and restaurant community and bring each element together on one platform. Later in 2011 Mr. Barrera was permitting live music and art events of his own

in and around Costa Mesa, CA. At a press conference in 2011 the late great Mr. Henry Sergerstrom mentioned Mr. Barrera's company as "the future of Costa Mesa's art community". This statement from one of Southern California's most influential real estate developer, farmer and supporter of the arts mogul gave Mr. Barrera's business the push it needed to become successful and was soon able to open multiple critically acclaimed accounts throughout the Orange County community such as The Newport Beach Film Festival & South Coast Plaza. Mr. Barrera created jobs for 3+ individuals and gave 2 college students the credits needed to achieve their MBA's by employing them too through the Cal State Fullerton College Intern program in the same year. Mr. Barrera's passion and main focus is and has always been in the arts and bring culture to his community through these channels. So when Mr. Barrera received a call from a friend that he's known since the third grade he in no way thought anything of asking Mr. Moore if he'd like to hear about an mineral rights opportunity one of his best friends is telling him about, all in the same call and 2 to 3 minutes Mr. Barrera was on this call for. For the record Mr. Barrera, Mr. Moore and Moore's fiancé at that time were all in a car together on their way to lunch and drinks with each other. Their was no exchange of any phone call's or no email form Mr. Barrera that was ever sent to Moore or his partner Mr. Morally that had any type of VRP materials that they requested to make their decision to take the swap based transaction that was in play. An Introduction was sincerely Mr. Barrera's only involvement in this case and one time transaction in the Securities industry since Mr. Barrera was brought into this world back in 1973.

2. The isolated or recurrent nature of the infraction;

Mr. Barrera met up with Moore and introduced Sellers at a lunch meeting for the first time on 7/27/12. It was during this lunch Sellers explains the logistics of the opportunity to Moore. A "swap position" in an oil and gas mutual fund was the transaction discussed at this meeting. This lunch was Mr. Barrera's first time hearing the basics of Sellers business opportunity and moreover did not understand even what they talked about so Mr. Barrera worked on his phone and took phone calls during this meeting. Sellers ends the meeting by stating he would email over Moore materials soon. Mr. Sellers also states at his deposition that Mr. Barrera "was half way paying attention".

3. The degree of scienter involved;

Mr. Barrera hadn't ever heard or even knew what a security official was until his name was published in the press on 12/6/13 for allegedly "orchestrating, duping and luring investors into a 18+ Million dollar Ponzi scheme" and ruined Mr. Barrera's 20 year reputation within the community he lives in and has worked so hard to establish. Therefore without knowledge of what this industry was or furthermore it's regulations at the time of this single transaction was beyond him and his capacity, since this business isn't the business Mr. Barrera has ever been associated with or has ever practiced. Mr. Barrera had to brief himself about this industry when researching SEC law as he attempted to defend himself by filling his own motion for reconsideration of the summary judgment that the court had just embarked upon him. This summary judgment included that Mr. Barrera he was accused of selling and brokering multiple securities and without having anyone or any means to defend Mr. Barrera. He sat and continued to take the defaming articles published within his community.

4. The sincerity of the respondent's assurances against future violations;

As stated here above that Mr. Barrera's profession and sincerest passions are and have always been in the design, construction, cultural arts & entertainment industries. Mr. Barrera doesn't have the desire to try and learn to become a member of a brokerage firm or an employee of any such business that would expect Mr. Barrera to call on a network of businesses or potential clients daily and try to sell securities. Furthermore Mr. Barrera's 3 companies have all suffered sever losses that have exceed 1 Million U.S. dollars in gross revenue that is directly related to being named in this suit. Mr. Barrera has had to work with an attorney to try to settle and reincorporate ownership in one of two of Barrera's projects and creations. This way Mr. Barrera can go back to work in a business and industry that he has been an active staple as a cultural ambassador, managing and prior to these allegations producing jobs and profits in for the last 16+ years. And try to recoup the revenues that these businesses continue to loose each week in and week out. These projects have officially become an investor's worse nightmare and Mr. Barrera is determined to get these businesses back on the right tract before the summary judgment was promoted in the press and this case over all as whole. Mr. Barrera has and isn't in the business of loosing anyone money. Rather the complete opposite. This reason alone is why he was able to secure 16 close business allies of three close partners to support him and his newest endeavor, even after he was falsely accused of what Mr. Moore and Mr. Morally decided to say Mr. Barrera had done. This false report came after Morally extorted Mr. Barrera. It was this act of extortion alone that led Moore and Morally to ultimately name Mr. Barrera in this current SEC filling.

5. The respondent's recognition of the wrongful nature of his or her conduct;

Barrera reiterates today that he still feels the same as he did the day that his motion was filed which was I did not do anything wrong. I just introduced a couple friends. After all was said and done, I realized that my friend (Mr. Moore) got hurt and I am very upset about that. I don't have that friend anymore and my child friend is not my friend anymore too. I wish I never made the introduction. I wish that no one got hurt. I am sorry that my introduction hurt these people. But I don't think I did anything wrong. Friends introduce each other all the time for all kinds of things.

6. The Likelihood that the respondent's occupation will present opportunities for future violations;

Barrera is and has always been involved in design, contracting and music producing. His success have been achieved through passion, integrity, dedication and a solid moral compass. So much so that he received recognition from the likes of Mr. Henry Segerstrom and many other likeminded individuals. His life long path and future are dedicated solely to the cultural arts, and to better the future growth of the community in which he resides in. Mr. Barrera has had double if not triple inclusion and negative press that any other one single individual in this whole case has received, for literally being the furthest degree of separation. Mr. Barrera has lost his 20+ year reputation and there is no percentage or dollar amount that can ever intrigue or trust any friend to get Mr. Barrera to open his contact list to any individual, industry or business that he isn't an expert in. Mr.

Barrera isn't and has never been in the business of ripping people off or being associated with anyone that doesn't have good intention or heart. In the end Mr. Barrera was caught in the crossfire of two business parties, where Lacova sued VRP which led to VRP to sue and prosecute Moore and Morally (Lacova) for series of alleged cyber crimes. Which led in Morally to write Mr. Barrera and fill him in on two cases Mr. Barrera hadn't any Idea about. In the exact same case of Lacova (Moore & Morally) v. VRP filed in Travis County, Texas (Cause No. D-1-GN-13-001120) Barrera wasn't named which was the accurate roll and involvement Mr. Barrera had in all three cases.

Dated March 25, 2016

Respectfully submitted,

Roland Barrera

[REDACTED] - H
[REDACTED], Ca [REDACTED]

E-Mail: [REDACTED]

Telephone: (714) 290-0375

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the forgoing document was served on the ALJ and Timothy S. McCole on March 25th 2016.

Roland Barrera

A handwritten signature in black ink, appearing to read 'Roland Barrera', is written over a solid horizontal line.

APPENDIX

March 17th, 2016
Judge Cameron Elliot
Re: File No. 3-17004

To the Honorable Judge Cameron Elliot,

I would like to attest to the following:

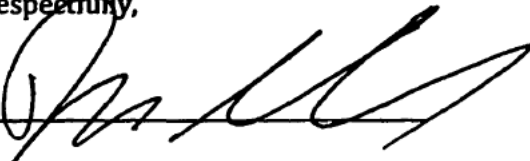
1. Roland Barrera has been a long time dear friend of mine since the third grade and we have never done business together. He is and always been a hardworking and sincere individual. When I called him way back in mid July of 2012 we just spoke about my father and I let him know that I was going to be coming out that way over the next week or so to visit him because he was going through cancer treatment. In closing of this conversation I mentioned that I had a business opportunity that just popped up in the oil and gas industry and if he knew anyone that maybe interested in hearing about it to let me know. I also mentioned that I'd split any commissions that I may receive as a finder for the introduction.
2. About a week later I called him to give him the exact days that I will be flying in and he had mentioned that his friend wants to meet and hear about the business opportunity. Later that weekend the three of us met and he introduced me to Jamie Moore. We sat for about half of an hour and as I stated in my deposition Roland was half way paying attention and on his phone or what have you. The next day I emailed Mr. Moore some VRP materials and decided to cc Roland out of common courtesy and nothing else. There were only a handful of emails before Mr. Moore and my bosses took any or all detailed info so that Moore and Morally may due diligence.
3. Moving forward a few weeks I can also attest that Roland called me just minutes after my boss deposited his finder fee into his bank account asking me to break down how the deposit was legal. I called Janniece Kaelin immediately after this call and asked her to explain as well so that I can relay the exact message. She stated that the Tauber group had already received 3+ years of distribution checks and that she withheld those paid distributions and processed the amount due less distributions so that the Tauber group was paid in full for their current investment. Essentially by exiting early they were not going to be eligible for any returns. Also, since she and Robert Helms were the majority partners in VRP that it was legal to part, gift or payout any of the differences between what has already been paid out and the amount due. She stated that this was how this industry was ran and this is what I relayed to Roland about thirty minutes later.
4. Moving forward almost one year to the date Lacova had started a law suit and VRP countersued for multiple cyber crimes that were allegedly committed by Moore and Morally. Morally had called Roland and gave him an earful to what I believed at the time as lies and It was then that I filled Roland

in on what was going on. I believe he truly felt bad for the introduction and how the two relationships had escalated. Morally emailed Roland and he forwarded on to me and I to Helms and Kaelin. Soon I received an email from Helms asking me to let Roland know not to call or email Morally back and he scheduled a call for us both so that he may have a chance to fill us both in on the case between VRP v Lacova. On the call and email with Helms he stated to us to disregard Morally's threats and that's exactly what Roland did per request of an Attorney at Law Mr. Robert Helms. I sincerely believe that Roland didn't know any better and since we were getting the info from my employer at that time there wouldn't be any reason for Roland to know any better since this is 100% not his field of expertise.

5. Lastly, I can attest for all of his financial losses, his partners financial losses and all of the public articles of defamation he has had to endure within his family and community. He didn't deserve to take on all of that public humility for this single transaction and introduction. In the end if you can't trust your long life friendships then who can we trust.

Please feel free to call or reach out if should you have any more questions regarding this matter.

Respectfully,

X 

Deven Sellers

, NJ 08553

Sworn to and subscribed
before me this

17 day of March 2016



March 17th, 2016
Judge Cameron Elliot
Re: File No. 3-17004

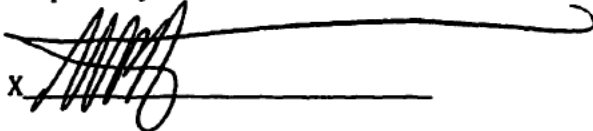
To the Honorable Judge Cameron Elliot,

I would like to attest to the following:

1. I met Roland Barrera in 2002 when I worked for a local boutique retailer in Orange County. He owned and operated a fashion brand that the retailer I worked for carried and sold. Later on in 2009 Roland and I created an events business together and ended up working side-by-side producing over 100 events with one another. By the end of 2010 we moved into our first office where we spent our day to day working on events of our own and other clients within the OC/SoCal area. We occupied this office up until almost the end of 2012. I personally never witnessed any security trading or selling during our time working together.
2. It was in December of 2013 when the press came out when I heard of this securities business being associated with Roland, this was a surprise to me as it was not any type of business we conducted in the time we worked together.
3. In closing I am a witness to Roland Barrera not selling securities, or alluding to selling securities during our time working together.

Please feel free to call or reach out if should you have any more questions regarding this matter.

Respectfully,


X _____

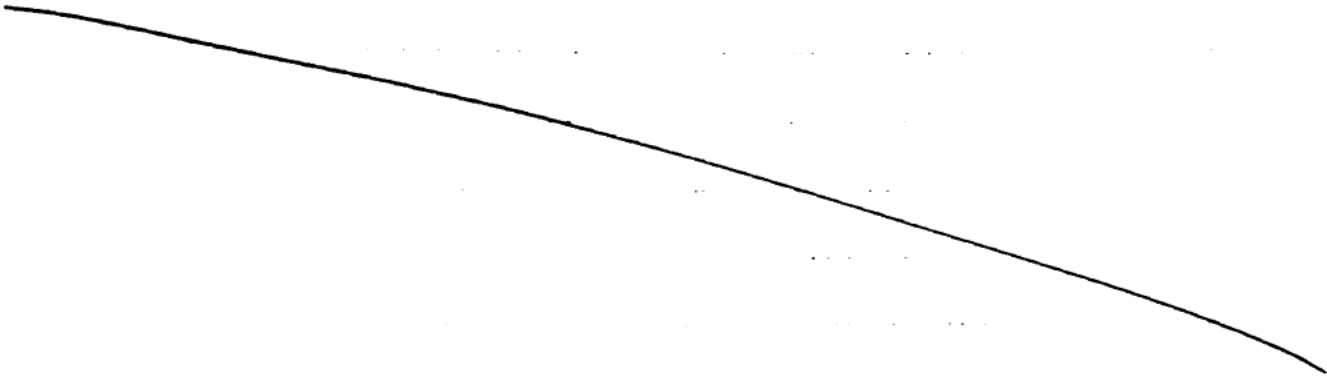
William Brendan Thomas
Costa Mesa, CA

SEE ATTACHED
NOTARIAL CERTIFICATE

CALIFORNIA JURAT WITH AFFIANT STATEMENT

GOVERNMENT CODE § 8202

- See Attached Document (Notary to cross out lines 1-6 below)
- See Statement Below (Lines 1-6 to be completed only by document signer[s], not Notary)



Signature of Document Signer No. 1

Signature of Document Signer No. 2 (if any)

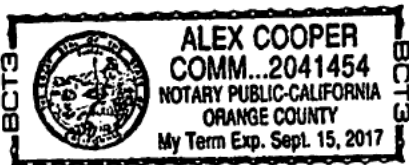
A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California
 County of Orange

Subscribed and sworn to (or affirmed) before me
 on this 25th day of March, 2016,
 by _____
 Date Month Year
 (1) William Brendan Thomas

(and (2) _____),
 Name(s) of Signer(s)

proved to me on the basis of satisfactory evidence
 to be the person(s) who appeared before me.



Signature _____
 Signature of Notary Public

Seal
 Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: Statement Document Date: March 17th, 2016
 Number of Pages: 1 Signer(s) Other Than Named Above: N/A

March 14, 2016
Judge Cameron Elliot
Re: File No. 3-17004

To the Honorable Judge Cameron Elliot,

I would like to attest to the following:

1. Roland Barrera is a long-time friend and we have done business together for a long time as well.
 - He has help build display cabinets, design wallets, design and build custom home furniture and is currently helping me produce a music event for my business.
2. In our business dealings, I can honestly say he has always been a pleasure to work with, honest, and forthright. His experience lies in music production and curation, construction and design. He has great knowledge in these fields and I continue to hire him to this very day. I can honestly say, Roland does not have any security knowledge whatsoever nor has he ever approached me with anything in the like. He is a blue collar worker and that's that.
3. I can also attest to the damage this case has brought onto him. He has lost everything. He had the absolute coolest music venue in the city called "Casa Costa Mesa." Then he was able to build upon that success and begin construction of another like-minded business that was bigger and better. His business life looked like it was sincerely taking off. He was already running the coolest bar in the city and now he was building (by his own hand) another bigger and better version that would have turned into significant and potentially life-long money and success for him. All of that, 100%, is gone because the newspapers printed an article that he was involved in a Ponzi scheme. It was brutal to watch what happened as day by day his life unraveled. Everything he built by his own hand, years and years of hard core work and grit was being dismantled in front of his own eyes. He partnered with friends in these businesses he started and those friends turned on him as the terrifying word "Ponzi" was blasted all around the city. Eventually his friends and partners pushed him out of the business he started. He lost everything, all his money and most of his friendship and business network. He has no money now and is having to build his life back piece by piece with an extreme amount of humility.

Please let me know if you have any questions. I am available to talk on the phone as well.

With Sincere Regards,

Johnny Gehris, Owner | Vestal Watch [REDACTED]

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Orange

Subscribed and sworn to (or affirmed) before me

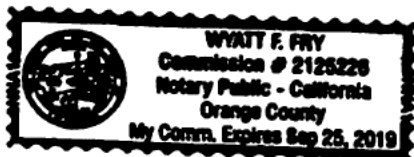
on this 24th day of March, 2016
by _____
Date Month Year

(1) _____

(and (2) _____),
Name(s) of Signer(s)

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature _____
Signature of Notary Public



Seal

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