

October 2, 2019

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OFFICE OF THE SECRETARY

William M. Apostelos
Reg. No.: [REDACTED]
[REDACTED]
Lisbon, Ohio [REDACTED]

United States Securities
And Exchange Commission
Mail Stop 1090
Washington, D.C. 20549

Re: IN Re The Matter of William M. Apostelos
Admin. Proceeding No.: 3-19435

Dear Administrative Judge;

I am completely confused regarding these proceedings. I don't understand the process nor your jurisdiction. I have already been prosecuted by your department and am feeling like a shark victim, during a feeding frenzy, with blood in the water.

It is quite obvious that the government in general and your department simply don't want to hear the truth. You want convictions and the hell with the truth.

It's worth noting and looking into [REDACTED] in this case. If you do, you will see that I was actually [REDACTED] during the time in question (2011-2014) and due to [REDACTED] and the [REDACTED] Steve Scudder, Rick Hanover, and Scott Dak were operating the business, but who cares about the facts, that doesn't promote convictions, now do they.

Beau Townsend Ford embezzled their 401-K funds. You should look into their pleadings in Ohio Court of Common Pleas, Montgomery County, Ohio, Case Number 2018-CV-5142. In said pleading, they claim that the investments I made were legitimate. It should also be noted that they made a 16% return. Also, Steve Scudder set up the plan for them to repay the I.R.S.. Erisa attorneys ran the companies.

Also, there is no agreement on paper - signed by me - showing that I owned 40% of Ovo. That was Doak and Hanover's company with David Zoeliner. However, while your complain claims that I own 40% of these companies, I notice none of the other "owners" are listed on the complaint as co-defendants. I guess it's not their [REDACTED] in the

water. Isn't it interesting that Zoellner made millions and simply [REDACTED]
[REDACTED] I guess the sharks can't reach him. And, lets not forget that his clients seem to have refused to pay taxes or have been exempted from taxes. Why is that?

Further, why was the management team at Beau Townsend Ford not investigated. They made millions for themselves, yet have seemed to avoid all prosecution.

Now while I'm on clients, most clients made over [REDACTED]
[REDACTED] How does that work? Well, it seems that the I.R.S. agents ran around with the F.B.I. [REDACTED] prosecution if they didn't offer "proffers" against ME. After finding out most were lying about payments.

Furthermore, I had two (2) retired Judges as clients, don't you think they asked questions and checked things out before they gave me their money to invest.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Also, the F.B.I.'s seizure of a farm worth over a million dollars in South Vienna, Ohio. The farm was fully paid for and the [REDACTED]
[REDACTED].

Finally, if you [REDACTED]
[REDACTED] legally, yet the [REDACTED]
[REDACTED].

[REDACTED] and [REDACTED] after them all:

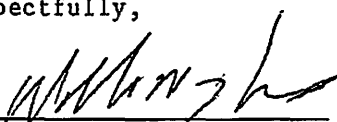
- For example: [REDACTED]
commissions for their involvement.

Please keep in mind that I took three (3) polygraph tests, administered by R.L. Emmons & Associates, in Centerville, Ohio, and passed them all.

As I said, I am [REDACTED] by these proceedings. I don't know what your agency is attempting to accomplish, but I'm tired of taking all the heat and everyone else getting a "free pass."

I hope to hear from you soon.

Respectfully,

A handwritten signature in black ink, appearing to read "William M. Apostelos", written over a horizontal line.

William M. Apostelos