

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

THOMAS L. TAYLOR III, solely in his  
capacity as Court-appointed Receiver for  
Robert A. Helms, *et al.*,  
Plaintiff,

§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§

v.

Civil Action No. 15-cv-627-LY

MICHAEL SAMOUCÉ, MARK KYLE and  
APPLIED QUANTITATIVE SOLUTIONS,  
LLC,  
Defendants.

---

**PLAINTIFF RECEIVER'S DISCLOSURE OF INTERESTED PARTIES**

---

Plaintiff Thomas L. Taylor III, solely in his capacity as Court-appointed Receiver for Robert A. Helms, *et al.*, provides the following information pursuant to FED. R. CIV. P. 7.1:

**1. A nongovernmental corporate party must file a disclosure statement that (1) identifies any parent corporation and any publicly held corporation owning 10% or more of its stock; or (2) states that there is no such corporation:**

None.

**2. All persons, associations of persons, firms, partnerships, corporations, affiliates, parent corporations, or other entities that are financially interested in the outcome of this litigation:**

- The Receivership Estate of Robert A. Helms, Janniece S. Kaelin, Deven Sellers, Roland Barrera, Vendetta Royalty Partners, Ltd., Vendetta Royalty Management, LLC, Vesta Royalty Partners, LP, Vesta Royalty Management, LLC, Iron Rock Royalty Partners, LP, Iron Rock Royalty Management, LLC, Arcady Resources, LLC, Barefoot Minerals, G.P., G3 Minerals, LLC, Haley Oil Company, Inc., Lake Rock, LLC, SeBud Minerals, LLC and Technicolor Minerals, G.P., in the civil action styled *SEC v. Robert A. Helms, et al.*, Civil Action No. 1:13-cv-01036-ML, in the United States District Court for the Western District of Texas, Austin Division, and all Claimants thereto;
- The U.S. Securities and Exchange Commission;

- Defendants Michael Samouce, Mark Kyle and Applied Quantitative Solutions, LLC.

Dated: August 14, 2015

Respectfully submitted,

THE TAYLOR LAW OFFICES, P.C.

By: /s/ Andrew M. Goforth

Andrew M. Goforth  
Texas State Bar: 24076405  
*goforth@taylorlaw.com*

4550 Post Oak Place Drive, Suite 241  
Houston, Texas 77027  
Tel: 713.626.5300  
Fax: 713.402.6154

COUNSEL FOR RECEIVER  
THOMAS L. TAYLOR III

**CERTIFICATE OF SERVICE**

On August 14, 2015, I electronically submitted the foregoing document with the Clerk of Court for the U.S. District Court, Western District of Texas, using the CM/ECF electronic filing system. All counsel of record and *pro se* parties have been served electronically via CM/ECF notice, or by other means as listed below and consistent with the Federal Rules of Civil Procedure.

***Via US Certified Mail, RRR:***

Michael Samouce  
Mark Kyle  
Applied Quantitative Solutions, LLC  
2102 Alta Vista Ave.  
Austin, TX 78704

/s/ Andrew M. Goforth  
Andrew M. Goforth