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CLERK US DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

BY JK  
DEPUTY

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

**SECURITIES AND EXCHANGE COMMISSION,**

**Plaintiff,**

vs.

**ROBERT A. HELMS, ET AL,**

**Defendants,**

and

**WILLIAM L. BARLOW, and  
GLOBAL CAPITAL VENTURES, LLC,**

**Relief Defendants, solely for the purposes of  
equitable relief.**

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**Civil Action No.:**  
**1:13-cv-1036-LY**

**DEFENDANT JANNIECE S. KAELIN'S ANSWER TO COMPLAINT AND  
REQUEST FOR JURY TRIAL**

NOW COMES Janniece S. Kaelin, Pro Se Defendant herein ("Kaelin") and file this Answer to Complaint and Request for Jury Trial in response to the complaint filed herein on or about December 3, 2013 by Securities and Exchange Commission ("Plaintiff") and hereby answers Plaintiff's Complaint as follows:

**Introductory Statement**

This Court appointed Thomas L. Taylor, III as receiver over the defendant herein and entities that Kaelin controlled or in which Kaelin owned a financial interest. The receiver has custody and control over all of the records of Kaelin and the entities subject to the receivership.

To date, the receiver has not permitted Kaelin any of her personal and business records and other

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information located in Kaelin's business office which is necessary to defend this action. The records and information include, but is not limited to, files and notes containing information regarding investors in Vendetta Partners, the number of partners in Vendetta Partners, the amount of capital raised from its limited partners, the income earned, expenses incurred and paid by Vendetta Partners and the other defendants subject to receivership, distributions and other payments to partners and third parties, legal documents and notes regarding relevant state and federal filings. As a result, Kaelin cannot admit or deny many of Plaintiff's allegations in its complaint, since without access to this information and records, Kaelin does not have knowledge or information sufficient to form a belief as to the truth those allegations. In light of these limitations, Defendant Kaelin answers Plaintiff's Complaint as follows:

**ANSWER TO COMPLAINT**

1. Kaelin denies that she is engaged in fraudulent securities offerings, but Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every remaining allegation contained in Paragraph 1 of the complaint and therefore denies them.
  2. Kaelin denies that she "misappropriated the vast majority of the Vendetta Partners offering proceeds" and denies that she "operated a Ponzi scheme" as alleged in Paragraph 2, but Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every remaining allegation contained in Paragraph 2 of the complaint and therefore denies them.
  3. Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 3 of the complaint and therefore denies them.
  4. Kaelin is without knowledge or information sufficient to form a belief as to the truth of
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each and every allegation contained in Paragraph 4 of the complaint and therefore denies them.

5. Kaelin denies that she “launched two more fraudulent offerings” as alleged, but Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every remaining allegation contained in Paragraph 5 of the complaint and therefore denies them.
6. Kaelin denies that she promoted Iron Rock Partners through (or controls) Lake Rock, LLC, G3 Minerals, LLC or Arcady Resources, LLC. Kaelin denies that Vendetta Royalty Partners is a Ponzi scheme and that she is dishonest and untrustworthy, but Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every remaining allegation contained in Paragraph 6 of the complaint and therefore denies them.
7. Kaelin denies that she violated the anti-fraud provisions of the federal securities laws, but Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every remaining allegation contained in Paragraph 7 of the complaint and therefore denies them.
8. Kaelin denies each and every allegation contained in Paragraph 8 of the complaint.
9. Kaelin denies each and every allegation contained in Paragraph 9 of the complaint.
10. Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 10 of the complaint and therefore denies them.
11. Kaelin admits that Robert A. Helms is a natural person residing in Austin, Texas.
12. Kaelin admits that she is a natural person residing in Austin, Texas.

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13. Kaelin admits the allegations in Paragraph 13.
14. Kaelin admits that Roland Barrera is a natural person, but is without knowledge or information sufficient to form a belief as to the truth of each and every remaining allegation contained in Paragraph 14 of the complaint and therefore denies them.
15. Kaelin admits that Vendetta Partners is a Texas limited partnership, but is without knowledge or information sufficient to form a belief as to the truth of each and every remaining allegation contained in Paragraph 15 of the complaint and therefore denies them.
16. Kaelin admits that Vendetta Management is a Texas limited liability company, but is without knowledge or information sufficient to form a belief as to the truth of each and every remaining allegation contained in Paragraph 16 of the complaint and therefore denies them.
17. Kaelin admits that Vesta Partners is a Texas limited partnership, but is without knowledge or information sufficient to form a belief as to the truth of each and every remaining allegation contained in Paragraph 17 of the complaint and therefore denies them.
18. Kaelin admits that Vesta Management is a Texas limited liability company, but is without knowledge or information sufficient to form a belief as to the truth of each and every remaining allegation contained in Paragraph 18 of the complaint and therefore denies them.
19. Kaelin admits that Iron Rock Partners is a Delaware limited partnership principally operating in Austin, Texas as alleged.
20. Kaelin admits that Iron Rock Management is a Delaware limited liability company principally operating in Austin, Texas as alleged.
21. Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 21 of the complaint and therefore denies

them.

22. Kaelin admits that Barefoot Minerals is a Texas general partnership but denies each and every remaining allegation contained in Paragraph 22 of the complaint.

23. Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 23 of the complaint and therefore denies them.

24. Kaelin admits that Haley Oil Company, Inc. is an Illinois corporation but denies that it operates principally in Austin, Texas.

25. Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 25 of the complaint and therefore denies them.

26. Kaelin admits that SeBud Minerals, LLC is a Texas limited liability company, but denies each and every remaining allegation contained in Paragraph 26 of the complaint.

27. Kaelin admits that Technicolor Minerals is a Texas general partnership but denies each and every remaining allegation contained in Paragraph 27 of the complaint.

28. Kaelin admits the allegations in Paragraph 28.

29. Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 29 of the complaint and therefore denies them.

30. Kaelin admits that she has, through entities she controlled, offered and sold limited partnership interests issued by Vendetta Partners. Kaelin denies that she has, through entities she controlled, offered and sold limited partnership interests in Vesta Partners or

Iron Rock Partners. Kaelin admits that she and Helms control Vendetta Partners through SEC v. Helms, et al

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its general partner Vendetta Management, and Kaelin admits that she, through entities she controls, control Iron Rock Partners through its general partner Iron Rock Management. Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every remaining allegation contained in Paragraph 30 of the complaint and therefore denies them.

31. Kaelin denies that she and Helms operate each limited partnership from an office at 8101 Cameron Road, Suite 109, Austin, Texas but Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every remaining allegation contained in Paragraph 31 of the complaint and therefore denies them.

32. Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 32 of the complaint and therefore denies them.

33. Kaelin denies that she misappropriated funds as described in Paragraph 33. Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every remaining allegation contained in Paragraph 33 of the complaint and therefore denies them.

34. Kaelin admits that she distributed a PPM which purported to explain the investment in Vendetta Partners but denies each and every remaining allegation contained in Paragraph 34 of the complaint.

35. Kaelin denies that any statement regarding Helms' oil and gas experience was misleading and denies that Helms' oil and gas experience came almost entirely from operating Vendetta Partners and its affiliated or predecessor companies. Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every remaining

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allegation contained in Paragraph 35 of the complaint and therefore denies them.

36. Kaelin denies each and every allegation contained in Paragraph 36 of the complaint.

37. Kaelin denies that the PPM contained a false statement with respect to “material pending legal proceedings” but Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every remaining allegation contained in Paragraph 37 of the complaint and therefore denies them.

38. Kaelin denies each and every allegation contained in Paragraph 38 of the complaint.

39. Kaelin denies that she and Helms misappropriated “the vast majority of the funds” as alleged. Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every remaining allegation contained in Paragraph 39 of the complaint and therefore denies them.

40. Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 40 of the complaint and therefore denies them.

41. Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 41 of the complaint and therefore denies them.

42. Kaelin denies that Vendetta Partners is a Ponzi scheme. Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every remaining allegation contained in Paragraph 42 of the complaint and therefore denies them.

43. Kaelin denies that Relief Defendant Barlow and Global Venture had no legitimate claim to the proceeds as alleged in Paragraph 43. Kaelin denies that Helms “orchestrated these transactions to create fictitious income” as alleged. Kaelin is without knowledge or

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information sufficient to form a belief as to the truth of each and every remaining allegation contained in Paragraph 43 of the complaint and therefore denies them.

44. Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 44 of the complaint and therefore denies them.

45. Kaelin admits that she met with “two investors” in 2012 but denies she made false representations to them. Kaelin denies she misappropriated part of the investors’ money as alleged in Paragraph 45. Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 45 of the complaint and therefore denies them.

46. Kaelin denies that she falsely stated that the “financial analyst had a degree” as alleged in Paragraph 46. Kaelin denies that she and Helms “prohibited the financial analyst, under threat of demotion, from telling the investors that he did not actually have a degree” as alleged. Kaelin admits that Emmanuel Salter lied to her and claimed to have graduated from the University of Texas in the summer of 2012 prior to the time that Kaelin met John Morally and Jamie Moore. Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every remaining allegation contained in Paragraph 46 of the complaint and therefore denies them.

47. Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 47 of the complaint and therefore denies them.

48. Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 48 of the complaint and therefore denies

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them.

49. Kaelin denies that Vendetta Partners is a Ponzi scheme as alleged in Paragraph 49. Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every remaining allegation contained in Paragraph 49 of the complaint and therefore denies them.

50. Kaelin admits that Iron Rock Partners filed Form D but is unaware when such filing occurred. Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every remaining allegation contained in Paragraph 50 of the complaint and therefore denies them.

51. Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 51 of the complaint and therefore denies them.

52. Kaelin denies that she was “dishonest and untrustworthy” as alleged in Paragraph 52. Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every remaining allegation contained in Paragraph 52 of the complaint and therefore denies them.

53. Kaelin denies each and every allegation contained in Paragraph 53 of the complaint.

54. Kaelin denies each and every allegation contained in Paragraph 54 of the complaint.

55. Kaelin denies each and every allegation contained in Paragraph 55 of the complaint.

56. Kaelin denies each and every allegation contained in Paragraph 56 of the complaint.

57. Kaelin denies each and every allegation contained in Paragraph 57 of the complaint.

58. Kaelin denies each and every allegation contained in Paragraph 58 of the complaint.

59. Kaelin denies each and every allegation contained in Paragraph 59 of the complaint.

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60. Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 60 of the complaint and therefore denies them.

61. Kaelin is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 61 of the complaint and therefore denies them.

62. Kaelin denies each and every allegation contained in Paragraph 62 of the complaint. Kaelin admits she does not know of any individual or entity by the name of Rizvi or Strategy Partners.

#### **REQUEST FOR JURY TRIAL**

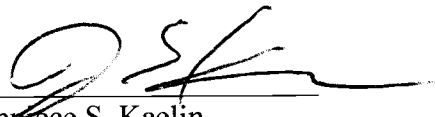
Defendant Janniece S. Kaelin hereby requests a jury trial on all issues raised in the complaint.

#### **REQUEST FOR RELIEF**

WHEREFORE, premises considered, Defendant Janniece S. Kaelin respectfully requests the following:

1. Dismissal of Plaintiff's action with prejudice to re-filing same;
2. An Order that Plaintiff shall take no relief from the Complaint filed herein;
3. The costs of suit incurred herein;
4. Such other and further relief that the Court deems fair and just.

DATED: March 6, 2014.



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Janniece S. Kaelin  
11708 Rydalwater Lane  
Austin, Texas 78754  
(512) 554-2976  
Email: janniecekaelin@gmail.com

**CERTIFICATE OF SERVICE**


I hereby certify that on March 6, 2014 I filed the foregoing document with the Clerk of the Court for the Western District of Texas, Austin Division and that I notified all parties in the manner listed below:

By Email:

Timothy S. McCole  
Christopher Davis  
801 Cherry Street  
Fort Worth, Texas 76102  
*Counsel for the Securities and Exchange Commission*

Thomas L. Taylor III Court-Appointed Receiver  
4550 Post Oak Place Drive, Suite 241  
Houston, Texas 77027-3117  
[info@vendettaroyaltyreceivership.com](mailto:info@vendettaroyaltyreceivership.com)  
*Counsel for Defendants 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.*

Robert A. Helms, Deven Sellers, Roland Barrera and Willlliam Barlow  
*Pro Se Defendants*

  
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Janniece S. Kaelin  
11708 Rydalwater Lane  
Austin, Texas 78754  
(512) 554-2976  
Email: [janniecekaelin@gmail.com](mailto:janniecekaelin@gmail.com)

IN THE UNITED STATES DISTRICT COURT  
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SECURITIES AND EXCHANGE COMMISSION,

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DEFENDANT’S CERTIFICATE OF INTERESTED PARTIES

Defendant Janniece S. Kaelin (“Kaelin”) is aware that the persons or entities which have invested in or through the above named Defendants, or who otherwise have an interest in assets in the possession or control of the Defendants or the Receiver appointed herein, have a financial interest in the outcome of this litigation. Apart from that, Kaelin is unaware of any person or entity, other than the Defendants, who have a financial interest in the outcome of this litigation.

DATED: March 6, 2014.

  
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