

not have knowledge or information sufficient to form a belief as to the truth of those allegations.

Therefore, Defendant Sellers answers Plaintiff's Complaint as follows:

ANSWER TO COMPLAINT

1. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 1 of the complaint and therefore denies them.
2. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 2 of the complaint and therefore denies them.
3. Sellers 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. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 4 of the complaint and therefore denies them.
5. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 5 of the complaint and therefore denies them.
6. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 6 of the complaint and therefore denies them.
7. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 7 of the complaint and therefore denies them.

them.

8. Sellers denies each and every allegation contained in Paragraph 8 of the complaint.
9. Sellers denies the allegation that venue is proper because he does not reside within the Western District of Texas, nor did any of the allegations of acts or omissions attributable to him occur in the Western District. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every remaining allegation contained in Paragraph 9 of the complaint and therefore denies them.
10. Sellers 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. Sellers admits the allegations in Paragraph 11 of the complaint.
12. Sellers admits the allegations in Paragraph 12 of the complaint.
13. Sellers admits the allegations in Paragraph 13 of the complaint.
14. Sellers admits the allegations in Paragraph 14 of the complaint.
15. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 15 of the complaint and therefore denies them.
16. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 16 of the complaint and therefore denies them.
17. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 17 of the complaint and therefore denies them.

18. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 18 of the complaint and therefore denies them.
19. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 19 of the complaint and therefore denies them.
20. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 20 of the complaint and therefore denies them.
21. Sellers 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. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 22 of the complaint and therefore denies them.
23. Sellers 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. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 24 of the complaint and therefore denies them.
25. Sellers 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. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 26 of the complaint and therefore denies them.

27. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 27 of the complaint and therefore denies them.

28. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 28 of the complaint and therefore denies them.

29. Sellers 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. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 30 of the complaint and therefore denies them.

31. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 31 of the complaint and therefore denies them.

32. Sellers 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. Sellers is without knowledge or information sufficient to form a belief as to the truth of

each and every allegation contained in Paragraph 33 of the complaint and therefore denies them.

34. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 34 of the complaint and therefore denies them.

35. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 35 of the complaint and therefore denies them.

36. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 36 of the complaint and therefore denies them.

37. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 37 of the complaint and therefore denies them.

38. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 38 of the complaint and therefore denies them.

39. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 39 of the complaint and therefore denies them.

40. Sellers 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. Sellers 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. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 42 of the complaint and therefore denies them.
43. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 43 of the complaint and therefore denies them.
44. Sellers 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. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and ever allegation contained in Paragraph 45 of the complaint and therefore denies them.
46. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 46 of the complaint and therefore denies them.
47. Sellers 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. Sellers 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

them.

49. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 49 of the complaint and therefore denies them.

50. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 50 of the complaint and therefore denies them.

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

52. Sellers denies that the proposal is a securities offering as it clearly states in the "Disclaimer" that the summary is for information purposes only and does not constitute an offer to sell or a solicitation of an offer to buy any securities. Sellers 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. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 53 of the complaint and therefore denies them.

54. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 54 of the complaint and therefore denies them.

55. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 55 of the complaint and therefore denies

them.

56. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 56 of the complaint and therefore denies them.

57. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 57 of the complaint and therefore denies them.

58. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 58 of the complaint and therefore denies them.

59. Sellers is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 59 of the complaint and therefore denies them.

60. Sellers 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. Sellers 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. Sellers denies each and every allegation contained in Paragraph 62 of the complaint. Sellers admits he has no knowledge of any individual or entity by the name of Rizvi or Strategy Partners.

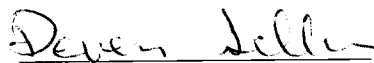
REQUEST FOR RELIEF

Defendant Deven Sellers's Answer to Complaint

WHEREFORE, premises considered, Defendant Roland Sellers 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: April 28, 2014.



Deven Sellers
7607 Coors Court
Arvada CO 80003
720-272-9110
devensellers@comcast.net

CERTIFICATE OF SERVICE

Defendant Deven Sellers's Answer to Complaint

Page 10

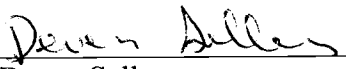
I hereby certify that on April 28, 2014 I filed the foregoing document with the Clerk of the Court for the Western District of Texas, Austin Division and that I notified all parties in the manner listed below:

By Email:

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Christopher Davis
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Fort Worth, Texas 76102
Counsel for the Securities and Exchange Commission

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Robert A. Helms, Janniece S. Kaelin, Roland Barrera and William Barlow
Pro Se Defendants


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