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

2014 APR 28 PM 4:11

CLERK US DISTRICT COURT
WESTERN DISTRICT OF TEXAS

BY _____ *KCC*
DEPUTY

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 ROLAND BARRERA’S ANSWER TO COMPLAINT

NOW COMES Roland Barrera, Pro Se Defendant herein (“Barrera”) and file his Answer to the complaint filed in this Court on or about December 3, 2013 by the Securities and Exchange Commission (“Plaintiff”) and hereby answers Plaintiff’s Complaint as follows:

Introductory Statement

Defendant Barrera does not possess any ownership or control, nor has he ever possessed any ownership or control, in any of the entities named in this cause or controlled by receiver in this cause. Further, Barrera has never met individual defendants Robert A. Helms, Janniece S. Kaelin, or William L. Barlow. Further, Barrera has never visited the offices of any of the receivership entities. Further, Barrera does not possess any ownership or control, nor has he ever possessed any ownership or control, in Relief Defendant Global Capital Ventures, LLC. As a

result, Barrera has no personal knowledge with respect to most of the allegations made in Plaintiff's complaint, and therefore cannot admit or deny many of Plaintiff's allegations in its complaint as Barrera does not have knowledge or information sufficient to form a belief as to the truth of those allegations. Therefore, Defendant Barrera answers Plaintiff's Complaint as follows:

ANSWER TO COMPLAINT

1. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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.
8. Barrera denies each and every allegation contained in Paragraph 8 of the complaint.
9. Barrera denies the allegation that venue is proper because he does not reside within the Western District of Texas, and no part of the allegations concerning him occurred within the Western District of Texas. Barrera 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. Barrera 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. Barrera is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 11 of the complaint and therefore denies them.
12. Barrera is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 12 of the complaint and therefore denies them.
13. Barrera admits the allegations in Paragraph 13 of the complaint.
14. Barrera admits the allegations in Paragraph 14 of the complaint.
15. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera is without knowledge or information sufficient to form a belief as to the truth of each and every allegation contained in Paragraph 52 of the complaint and therefore denies them.

53. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera 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. Barrera denies each and every allegation contained in Paragraph 62 of the complaint.

Barrera admits he does has no knowledge of any individual or entity by the name of Rizvi or Strategy Partners.

REQUEST FOR RELIEF

WHEREFORE, premises considered, Defendant Roland Barrera 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.



Roland Barrera
1762 Kenwood Place Unit H
Costa Mesa CA 92627
714-290-0325
barrera.roland@gmail.com

CERTIFICATE OF SERVICE

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:

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
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, Janniece S. Kaelin and William Barlow
Pro Se Defendants



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