

<p>DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO</p> <p>1437 Bannock Street Denver, CO 80202</p> <hr/> <p>PEOPLE OF THE STATE OF COLORADO,</p> <p>Plaintiff,</p> <p>v.</p> <p>RONALD D. GOLLEHON, DOB: 12/22/1949</p> <p>Defendant.</p>	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
<p>JOHN W. SUTHERS, Attorney General MICHAEL J. BELLIPANNI, Senior Assistant Attorney General* 1300 Broadway, 9<sup>th</sup> Floor Denver, CO 80203 303-508-6000 Registration Number: 24421 *Counsel of Record</p>	<p>Case No.: 13CR0001</p>
<p><b>COLORADO STATE GRAND JURY INDICTMENT</b></p>	

Of the 2013-2014 term of the Denver District Court in the year 2013; the 2013-2014 Colorado State Grand Jurors, chosen, selected and sworn in the name and by the authority of the People of the State of Colorado, upon their oaths, present the following:

**ESSENTIAL FACTS**

Ronald D. Gollehon (“Gollehon”) founded, owned and operated a business which he called Open Source Games, Inc. (“OSG”), as well as several related businesses including: WikiRainforest, Inc.; Open Source Gaming, LLC; and Gameworking, LLC. Gollehon operated OSG and the related entities from his personal residence located in Arapahoe County at [REDACTED] in Littleton, Colorado.

Beginning in or about July of 2010, in Colorado, Gollehon represented that he was developing a game for the internet, and that he was offering an opportunity for investors to purchase shares in his company. Gollehon

further represented that upon the launch of the game; revenues would be generated resulting in profits to the investors.

During and between July of 2010 and July of 2011, Gollehon solicited individual investors for funds which were to be used for game development. Approximately ninety five individuals made investments directly or indirectly through Gollehon, resulting in investor losses of approximately eight hundred eighty five thousand nine hundred thirty dollars (\$885,930).

Gollehon solicited and received investments from Colorado investors resulting in Colorado investor losses of approximately one hundred forty one thousand one hundred dollars (\$141,100). Gollehon solicited Colorado investors in Adams, Arapahoe, Boulder, Delta, Denver, Douglas, Elbert, Jefferson, La Plata, and Weld counties.

Gollehon also solicited and accepted investments from individuals from several other states, and abroad, including: Florida, Connecticut, Mississippi, Kentucky, Washington, Texas, Indiana, Wisconsin, Michigan, Tennessee, New York, Georgia, California, and Louisiana; as well as Romania. The funds for these out-of-state investors were deposited, either by Gollehon or through wire transfer by the individual investors, directly into one of Gollehon's Colorado bank accounts. Gollehon solicited and directed investments from out-of-state investors into his Colorado bank accounts, resulting in out-of-state investor losses of approximately seven hundred forty four thousand eight hundred thirty dollars (\$744,830).

The solicitation for the investments was premised upon the representation that Gollehon had an internet game in development that would be launched quickly. Gollehon represented that this game launch would result in very high returns for the investors. The money collected from investors was to be used for the development of the game.

Gollehon solicited and accepted investment amounts from one thousand dollars (\$1,000) to three hundred thousand dollars (\$300,000). Most investors received a document from Gollehon, signed by Gollehon, and entitled "Agreement" to evidence their investment. The "Agreement" identified the investor as either a "Founder" or an "Associate Founder" of the company. A "Founder" position in the company required an initial investment of three thousand dollars; some "Founder" investors were assessed additional investments of one hundred dollars a month until the game was launched. "Associate Founder" position could be acquired by making an initial one thousand dollar investment; some "Associate

Founder” investors were assessed additional investments of twenty five dollars a month until the game was launched. Gollehon represented to investors that profits would be paid to the investors upon the successful launch of the game, and would be continuing as the game continued to generate revenue.

The OSG investments offered and sold by Gollehon, evidenced in part by the “Agreements”, constitute “securities” pursuant to § 11-51-201(17) C.R.S., and as such, are subject to the provisions of the Colorado Securities Act.

In soliciting investors, Gollehon made material, untrue statements and omissions of material facts. Gollehon failed to disclose that a permanent injunction had been ordered against him by the Securities and Exchange Commission. Gollehon failed to disclose the actual use of the investment funds. Gollehon did not tell investors of his filed bankruptcies. Gollehon failed to disclose to the investors that he had prior and pending lawsuits which resulted in judgments against him. In addition, Gollehon failed to disclose the actual status of the game development and the risks associated with the investment.

Gollehon failed to disclose the fact that a civil complaint seeking an injunction was filed by the Securities and Exchange Commission in US District Court in Denver. Gollehon further failed to disclose that on or about August 22, 1978, he was permanently enjoined from violating the registration and antifraud provisions of the Securities Act of 1933.

Gollehon did not disclose to investors that he had diverted investor funds for uses other than game development. Gollehon failed to disclose that funds would be used for other purposes, including a contract for an outside investment that was not disclosed to investors, and for his own compensation and remuneration. Gollehon failed to disclose the nature and amount of remuneration he received in connection with the sale of the securities in question. Gollehon did not disclose to investors that he was using investor funds to pay himself, through his wife, approximately eighty six thousand dollars during the investment period, or that he was using investor funds to pay household, and other personal expenses.

Gollehon failed to disclose his previous and pending bankruptcies. Gollehon filed personal bankruptcy in Colorado on four separate occasions beginning in 1978. Additionally, Gollehon filed bankruptcy in 1989 and 1998. Gollehon omitted to disclose any of his bankruptcies to investors,

including a Chapter 7 bankruptcy filed in July of 2010, in which Gollehon listed liabilities in excess of two million dollars.

Gollehon failed to inform investors of his involvement in previous and pending civil litigation, including past judgments entered against him, and the existence of outstanding judgments totaling over approximately \$1.5 million dollars. These outstanding judgments include [REDACTED] District Court cases [REDACTED] and [REDACTED]

Gollehon failed to disclose the ongoing nature and actual status of the game development. The service agreement for game development required monthly payments that Gollehon failed to make, jeopardizing the status of the game development. Investors were not given this information by Gollehon.

Gollehon continued the acts, practices and course of business designed to defraud investors in and between July of 2010, and through July of 2011. Gollehon continued to solicit, accept, and hold investor funds while failing to make the necessary disclosures. Gollehon used investor funds to pay personal expenses and continued to make material misstatements and omissions to the investors after their initial investments; inducing investors to make subsequent investments for “Founder’s Monthly Payments” and “Associate Founder’s Monthly Payments.” These resulting business practices operated as a fraud or deceit upon investors in the Open Source Games, Inc.; WikiRainforest, Inc.; Open Source Gaming, LLC; and Gameworking, LLC, and related entities.

**COUNT ONE**  
**(Securities Fraud – F3)**

On or about and between August 3, 2010 and May 16, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as

amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

██████████ invested a total of approximately six thousand dollars (\$6,000.00) in approximately two separate transactions. In connection with the sale of these securities to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT TWO**  
**(Securities Fraud – F3)**

On or about and between August 9, 2010 and October 22, 2010, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to ██████████, directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

██████████ invested a total of approximately three thousand four hundred dollars (\$3,400.00) in approximately two separate transactions. In connection with the sale of these securities to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT THREE**  
**(Securities Fraud – F3)**

On or about and between September 25, 2010 and September 27, 2010, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to ██████████, directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the

statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

██████████ invested a total of approximately three thousand dollars (\$3,000.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT FOUR**  
**(Securities Fraud – F3)**

On or about and between September 24, 2010, and September 27, 2010, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to ██████████, directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

██████████ invested a total of approximately three thousand dollars (\$3,000.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT FIVE**

On or about and between October 1, 2010, and June 30, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to ██████████, directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as

amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

██████████ invested a total of approximately twelve thousand one hundred dollars (\$12,100.00) in approximately five separate transactions. In connection with the sale of these securities to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT SIX**  
**(Securities Fraud – F3)**

On or about and between October 13, 2010, and April 14, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to ██████████, directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

██████████ invested a total of approximately twelve thousand four hundred fifty dollars (\$12,450.00) in approximately eight separate transactions. In connection with the sale of these securities to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT SEVEN**  
**(Securities Fraud – F3)**

On or about and between October 22, 2010, and June 16, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to ██████████, directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such

case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

██████████ invested a total of approximately one thousand six hundred dollars (\$1,600.00) in approximately eight separate transactions. In connection with the sale of these securities to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT EIGHT**  
**(Securities Fraud – F3)**

On or about and between November 29, 2010, and November 30, 2010, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to ██████████, directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

██████████ invested approximately three thousand dollars (\$3,000.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT NINE**  
**(Securities Fraud – F3)**

On or about and between November 29, 2010, and July 11, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to ██████████, directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such

case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

██████████ invested a total of approximately three thousand seven hundred dollars (\$3,700.00) in approximately seven separate transactions. In connection with the sale of these securities to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT TEN**  
**(Securities Fraud – F3)**

On or about and between December 29, 2010, and July 1, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to ██████████, directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

██████████ invested a total of approximately three thousand seven hundred dollars (\$3,700.00) in approximately eight separate transactions. In connection with the sale of these securities to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT ELEVEN**  
**(Securities Fraud – F3)**

On or about and between December 26, 2010, and July 5, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to ██████████, directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they

were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

██████████ invested a total of approximately six thousand seven hundred dollars (\$6,700.00) in approximately nine separate transactions. In connection with the sale of these securities to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT TWELVE**  
**(Securities Fraud – F3)**

On or about and between December 30, 2010, and March 1, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to ██████████, directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

██████████ invested a total of approximately three thousand three hundred dollars (\$3,300.00) in approximately two separate transactions. In connection with the sale of these securities to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT THIRTEEN**  
**(Securities Fraud – F3)**

On or about and between December 30, 2010, and July 11, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to ██████████, directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to

make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

██████████ invested a total of approximately three thousand seven hundred dollars (\$3,700.00) in approximately eight separate transactions. In connection with the sale of these securities to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT FOURTEEN**  
**(Securities Fraud – F3)**

On or about and between January 19, 2011, and March 7, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to ██████████, directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

██████████ invested a total of approximately one thousand dollars (\$1,000.00) in approximately two separate transactions. In connection with the sale of these securities to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT FIFTEEN**  
**(Securities Fraud – F3)**

On or about and between February 16, 2011, and April 28, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to ██████████, directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a

material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

██████████ invested a total of approximately three hundred dollars (\$300.00) in approximately three separate transactions. In connection with the sale of these securities to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT SIXTEEN**  
**(Securities Fraud – F3)**

On or about and between February 5, 2011, and May 12, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to ██████████, directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

██████████ invested a total of approximately three thousand nine hundred dollars (\$3,900.00) in approximately five transactions. In connection with the sale of these securities to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT SEVENTEEN**  
**(Securities Fraud – F3)**

On or about and between February 12, 2011, and May 3, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to ██████████, directly or



**COUNT NINETEEN**  
**(Securities Fraud – F3)**

On or about and between February 23, 2011, and February 25, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately three thousand dollars (\$3,000.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT TWENTY**  
**(Securities Fraud – F3)**

On or about and between February 25, 2011, and May 31, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately four thousand three hundred fifty dollars (\$4,350.00) in approximately five separate transactions. In connection with the sale of these securities to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT TWENTY ONE**  
**(Securities Fraud – F3)**

On or about and between February 27, 2011, and May 23, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately three thousand three hundred dollars (\$3,300.00) in four separate transactions. In connection with the sale of these securities to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT TWENTY TWO**  
**(Securities Fraud – F3)**

On or about and between February 21, 2011, and March 1, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately three thousand dollars (\$3,000.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT TWENTY THREE**  
**(Securities Fraud – F3)**

On or about and between March 1, 2011, and July 11, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately three thousand four hundred dollars (\$3,400.00) in approximately five separate transactions. In connection with the sale of these securities to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT TWENTY FOUR**  
**(Securities Fraud – F3)**

On or about and between March 1, 2011, and March 4, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately one thousand dollars (\$1,000.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT TWENTY FIVE**  
**(Securities Fraud – F3)**

On or about and between March 6, 2011, and March 7, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately three thousand dollars (\$3,000.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT TWENTY SIX**  
**(Securities Fraud – F3)**

On or about and between March 6, 2011, and March 7, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately three thousand dollars (\$3,000.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT TWENTY SEVEN**  
**(Securities Fraud – F3)**

On or about and between March 9, 2011, and April 28, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately one thousand seventy five dollars (\$1,075.00) in approximately three separate transactions. In connection with the sale of these securities to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT TWENTY EIGHT**  
**(Securities Fraud – F3)**

On or about and between February 25, 2011, and March 16, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately one thousand dollars (\$1,000.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT TWENTY NINE**  
**(Securities Fraud – F3)**

On or about and between March 10, 2011, and April 28, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately two thousand seventy five dollars (\$2,075.00) in approximately four separate transactions. In connection with the sale of these securities to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT THIRTY**  
**(Securities Fraud – F3)**

On or about and between March 16, 2011, and March 18, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately one thousand five hundred dollars (\$1,500.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT THIRTY ONE**  
**(Securities Fraud – F3)**

On or about and between March 31, 2011, and April 1, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately three thousand dollars (\$3,000.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT THIRTY TWO**  
**(Securities Fraud – F3)**

On or about and between March 16, 2011, and April 1, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately three thousand dollars (\$3,000.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT THIRTY THREE**  
**(Securities Fraud – F3)**

On or about and between March 22, 2011, and April 1, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately one thousand dollars (\$1,000.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT THIRTY FOUR**  
**(Securities Fraud – F3)**

O On or about and between March 28, 2011, and April 1, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately five hundred dollars (\$500.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT THIRTY FIVE**  
**(Securities Fraud – F3)**

On or about and between March 28, 2011, and April 1, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately one thousand dollars (\$1,000.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT THIRTY SIX**  
**(Securities Fraud – F3)**

On or about and between March 16, 2011, and April 28, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately one thousand fifty dollars (\$1,050.00) in approximately three separate transactions. In connection with the sale of these securities to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT THIRTY SEVEN**  
**(Securities Fraud – F3)**

On or about and between April 3, 2011, and May 3, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately three thousand dollars (\$3,000.00) in approximately two separate transactions. In connection with the sale of these securities to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT THIRTY EIGHT**  
**(Securities Fraud – F3)**

On or about and between April 1, 2011, and April 4, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately three thousand dollars (\$3,000.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT THIRTY NINE**  
**(Securities Fraud – F3)**

n or about and between April 8, 2011, and April 12, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately three thousand dollars (\$3,000.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT FORTY**  
**(Securities Fraud – F3)**

n or about and between April 11, 2011, and April 14, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately one thousand dollars (\$1,000.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT FORTY ONE**  
**(Securities Fraud – F3)**

On or about and between April 27, 2011, and April 28, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately three thousand dollars (\$3,000.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT FORTY TWO**  
**(Securities Fraud – F3)**

On or about and between April 27, 2011, and April 28, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately one thousand five hundred dollars (\$1,500.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT FORTY THREE**  
**(Securities Fraud – F3)**

On or about and between April 29, 2011, and May 3, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately one thousand dollars (\$1,000.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT FORTY FOUR**  
**(Securities Fraud – F3)**

On or about and between May 3, 2011, and May 12, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately one thousand dollars (\$1,000.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT FORTY FIVE**  
**(Securities Fraud – F3)**

On or about May 16, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately one thousand dollars (\$1,000.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT FORTY SIX**  
**(Securities Fraud – F3)**

On or about and between May 22, 2011, and May 23, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately three thousand dollars (\$3,000.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT FORTY SEVEN**  
**(Securities Fraud – F3)**

On or about and between May 24, 2011, and May 31, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately three thousand dollars (\$3,000.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT FORTY EIGHT**  
**(Securities Fraud – F3)**

On or about and between June 6, 2011, and June 10, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately three thousand dollars (\$3,000.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT FORTY NINE**  
**(Securities Fraud – F3)**

On or about and between June 12, 2011, and June 14, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately one thousand dollars (\$1,000.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT FIFTY**  
**(Securities Fraud – F3)**

On or about and between June 12, 2011, and June 14, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately one thousand dollars (\$1,000.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT FIFTY ONE**  
**(Securities Fraud – F3)**

On or about and between June 12, 2011, and June 14, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately one thousand dollars (\$1,000.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT FIFTY TWO**  
**(Securities Fraud – F3)**

On or about and between July 14, 2010, and May 12, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately twenty thousand eight hundred ten dollars (\$20,810.00) in twenty separate transactions. In connection with the sale of these securities to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT FIFTY THREE**  
**(Securities Fraud – F3)**

On or about and between December 1, 2010, and March 8, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately three hundred thirty two thousand dollars (\$332,000.00) in six separate transactions. In connection with the sale of these securities to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT FIFTY FOUR**  
**(Securities Fraud – F3)**

On or about and between March 10, 2011, and March 16, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately twenty five thousand dollars (\$25,000.00) in a single transaction. In connection with the sale of this security to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT FIFTY FIVE**  
**(Securities Fraud – F3)**

On or about April 4, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer, or sale of any security to [REDACTED], directly or indirectly, unlawfully, feloniously and willfully made any untrue statement of a material fact and omitted to state a material fact necessary in order to make the statements made, in light of the circumstance under which they were made, not misleading, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501(1)(b) and 11-51-603(1), as amended, against the peace and dignity of The People of the State of Colorado. (Securities Fraud – Class 3 Felony)

[REDACTED] invested a total of approximately one hundred thousand dollars (\$100,000.00) in two separate transactions. In connection with the sale of these securities to this investor, Gollehon made untrue statements of material fact, and failed to disclose material facts as described in the Narrative of Essential Facts, which is hereby incorporated by reference.

**COUNT FIFTY SIX**  
**(Securities Fraud – F3)**

During and between July 14, 2010, and July 11, 2011, in and triable in the State of Colorado, Ronald D. Gollehon, in connection with the offer or sale of any security to investors in Open Source Games, Inc. and related entities, directly or indirectly, unlawfully, feloniously, and knowingly engaged in any course of business which operated or would operate as a fraud or deceit upon any person, contrary to the form of the statutes in such case made and provided, C.R.S. §§11-51-501 (1) (c) and 11-51-603 (1), as amended, and against the peace and dignity of The People of the State of Colorado, and as more fully set out below:

1. GOLLEHON solicited investors to invest in the fraudulent business activity of Open Source Games, Inc. and related entities. GOLLEHON provided investors an agreement to evidence their investment. GOLLEHON never told investors of the actual risks associated with the investments.
2. In connection with the fraudulent sale of these securities, GOLLEHON conducted business from his residence, located at [REDACTED] in

Littleton, Colorado, county of Arapahoe. In furtherance of the commission of this offense, GOLLEHON used and opened several bank accounts in both his name and in the names of his business entities, including: Open Source Games, Inc.; Open Source Gaming, LLC; WikiRainforest, Inc.; WikiRainforest Development, LLC; and GameWorking, Inc., in the state of Colorado about and between July 14, 2010, and July 11, 2011. GOLLEHON had investors mail or bring investment checks to his above listed residence, or deposit the funds directly through wire transfer into a Colorado bank account used by GOLLEHON.

3. The investments GOLLEHON solicited directly or indirectly, in connection with this count, include one or more of the following:
  - [REDACTED] invested approximately six thousand dollars (\$6,000.00) in approximately two transactions about and between August 3, 2010, and May 16, 2011.
  - [REDACTED] invested approximately three thousand four hundred dollars (\$3,400.00) in approximately two transactions about and between August 9, 2010, and October 22, 2010.
  - [REDACTED] invested approximately three thousand dollars (\$3,000) in a single transaction about and between September 25, 2010, and September 27, 2010.
  - [REDACTED] invested approximately three thousand dollars (\$3,000) in a single transaction about and between September 24, 2010, and September 27, 2010.
  - [REDACTED] invested approximately twelve thousand one hundred dollars (\$12,100.00) in approximately five transactions about and between October 1, 2010, and June 30, 2011.
  - [REDACTED] invested approximately twelve thousand four hundred fifty dollars (\$12,450.00) in approximately eight transactions about and between October 13, 2010, and April 14, 2011.
  - [REDACTED] invested approximately one thousand six hundred dollars (\$1,600.00) in approximately eight transactions on or about and between October 22, 2010, and June 16, 2011.

- [REDACTED] invested approximately three thousand one hundred dollars (\$3,000.00) on or about November 29, 2010.
- [REDACTED] invested approximately three thousand seven hundred dollars (\$3,700.00) in approximately seven transactions about and between November 29, 2010, and July 11, 2011.
- [REDACTED] invested approximately three thousand seven hundred dollars (\$3,700.00) in approximately eight transactions about and between December 29, 2010, and July 1, 2011.
- [REDACTED] invested approximately six thousand seven hundred dollars (\$6,700.00) in approximately nine transactions about and between December 26, 2010, and July 5, 2011.
- [REDACTED] invested approximately three thousand three hundred dollars (\$3,300.00) in approximately two transactions about and between December 30, 2010, and March 1, 2011.
- [REDACTED] invested approximately three thousand seven hundred dollars (\$3,700.00) in approximately eight transactions about and between December 30, 2010 and July 11, 2011.
- [REDACTED] invested approximately one thousand dollars (\$1,000.00) in approximately two transactions about and between January 19, 2011 and March 7, 2011.
- [REDACTED] invested approximately three hundred dollars (\$300.00) in approximately three transactions about and between February 16, 2011 and April 28, 2011.
- [REDACTED] invested approximately three thousand nine hundred dollars (\$3,900.00) in approximately five transactions about and between February 5, 2011 and May 12, 2011.
- [REDACTED] invested approximately six thousand dollars (\$6,000.00) in approximately two transactions about and between February 12, 2011 and May 3, 2011.

- [REDACTED] invested approximately three thousand one hundred dollars (\$3,100.00) in approximately two transactions about and between February 21, 2011 and March 16, 2011.
- [REDACTED] invested approximately three thousand dollars (\$3,000) in a single transaction about and between February 23, 2011 and February 25, 2011.
- [REDACTED] invested approximately four thousand three hundred fifty dollars (\$4,350.00) in approximately five transactions about and between February 25, 2011 and May 31, 2011.
- [REDACTED] invested approximately three thousand three hundred dollars (\$3,300.00) in approximately four transactions about and between February 27, 2011 and May 23, 2011.
- [REDACTED] invested approximately three thousand dollars (\$3,000.00) in a single transaction about and between February 21, 2011 and March 1, 2011.
- [REDACTED] invested approximately three thousand four hundred dollars (\$3,400.00) in approximately five transactions about and between March 1, 2011 and July 11, 2011.
- [REDACTED] invested approximately one thousand dollars (\$1,000.00) in a single transaction on or about and between March 1, 2011 and March 4, 2011.
- [REDACTED] invested approximately three thousand dollars (\$3,000.00) in a single transaction on or about and between March 6, 2011 and March 7, 2011.
- [REDACTED] invested approximately three thousand dollars (\$3,000.00) in a single transaction on or about and between March 6, 2011 and March 7, 2011.
- [REDACTED] invested approximately one thousand seventy five dollars (\$1,075.00) in approximately three transactions about and between March 9, 2011 and April 28, 2011.

- [REDACTED] invested approximately one thousand dollars (\$1,000.00) in a single transaction about and between February 25, 2011 and March 16, 2011.
- [REDACTED] invested approximately two thousand seventy five dollars (\$2,075.00) in approximately four transactions about and between March 10, 2011 and April 28, 2011.
- [REDACTED] invested approximately one thousand five hundred dollars (\$1,500.00) in a single transaction about and between March 16, 2011 and March 18, 2011.
- [REDACTED] invested approximately three thousand dollars (\$3,000.00) in a single transaction about and between March 31, 2011 and April 1, 2011.
- [REDACTED] invested approximately three thousand dollars (\$3,000.00) in a single transaction about and between March 16, 2011 and April 1, 2011.
- [REDACTED] invested approximately one thousand dollars (\$1,000.00) in a single transaction about and between March 22, 2011 and April 1, 2011.
- [REDACTED] invested approximately five hundred dollars (\$500.00) in a single transaction about and between March 28, 2011 and April 1, 2011.
- [REDACTED] invested approximately one thousand dollars (\$1,000.00) in a single transaction about and between March 28, 2011 and April 1, 2011.
- [REDACTED] invested approximately one thousand fifty dollars (\$1,050.00) in approximately three transactions about and between March 16, 2011 and April 28, 2011.
- [REDACTED] invested approximately three thousand dollars (\$3,000.00) in approximately two transactions about and between April 3, 2011 and May 3, 2011.

- [REDACTED] invested approximately three thousand dollars (\$3,000.00) in a single transaction about and between April 1, 2011 and April 4, 2011.
- [REDACTED] invested approximately three thousand dollars (\$3,000.00) in a single transaction about and between April 8, 2011 and April 12, 2011.
- [REDACTED] invested approximately one thousand dollars (\$1,000.00) in a single transaction about and between April 11, 2011 and April 14, 2011.
- [REDACTED] invested approximately three thousand dollars (\$3,000.00) in a single transaction about and between April 27, 2011 and April 28, 2011.
- [REDACTED] invested approximately one thousand five hundred dollars (\$1,500.00) in a single transaction about and between April 27, 2011 and April 28, 2011.
- [REDACTED] invested approximately one thousand dollars (\$1,000.00) in a single transaction about and between April 29, 2011 and May 3, 2011.
- [REDACTED] invested approximately one thousand dollars (\$1,000.00) in a single transaction about and between May 3, 2011 and May 12, 2011.
- [REDACTED] invested approximately one thousand dollars (\$1,000.00) in a single transaction on or about May 16, 2011.
- [REDACTED] invested approximately three thousand dollars (\$3,000.00) in a single transaction about and between May 22, 2011 and May 23, 2011.
- [REDACTED] invested approximately three thousand dollars (\$3,000.00) in a single transaction about and between May 24, 2011 and May 31, 2011.
- [REDACTED] invested approximately three thousand dollars (\$3,000.00) in a single transaction about and between June 6, 2011 and June 10, 2011.

- [REDACTED] invested approximately one thousand dollars (\$1,000.00) in a single transaction about and between June 12, 2011 and June 14, 2011.
  - [REDACTED] invested approximately one thousand dollars (\$1,000.00) in a single transaction about and between June 12, 2011 and June 14, 2011.
  - [REDACTED] invested approximately one thousand dollars (\$1,000.00) in a single transaction about and between June 12, 2011 and June 14, 2011.
4. Additionally, in furtherance of the course of business, GOLLEHON solicited out-of-state investors directly or indirectly, in connection with this count, including one or more of the following:
- [REDACTED] of Ft. Myers Beach, Florida invested approximately twenty thousand eight hundred ten dollars (\$20,810.00) in approximately twenty transactions about and between July 14, 2010 and May 12, 2011.
  - [REDACTED] Ft. Myers Beach, Florida invested approximately three thousand dollars (\$3,000.00) on or about and between July 16, 2010 and July 20, 2010.
  - [REDACTED] Brasov, Romania invested approximately three thousand dollars (\$3,000.00) on or about July 26, 2010.
  - [REDACTED] Ft. Myers Beach, Florida invested approximately six thousand six hundred dollars (\$6,600.00) in approximately four transactions on or about and between August 14, 2010 and December 6, 2010.
  - [REDACTED] Meriden, Connecticut invested approximately four thousand seven hundred fifty dollars (\$4,750.00) in approximately eight transactions on or about and between September 29, 2010 and June 16, 2011.
  - [REDACTED] of Ft. Myers Beach, Florida invested approximately one hundred twenty one thousand two hundred dollars (\$121,200.00) in approximately six transactions on or about and between October 4, 2010 and December 6, 2010.

- [REDACTED] of Madison, Mississippi invested approximately three hundred thirty two thousand dollars (\$332,000.00) in approximately six transactions about and between December 1, 2010 and March 8, 2011.
- [REDACTED] Louisville, Kentucky invested approximately nine thousand dollars (\$9,000.00) in approximately three transactions about and between December 2, 2010 and April 1, 2011.
- [REDACTED] College Place, Washington invested approximately two thousand two hundred dollars (\$2,200.00) in approximately eight transactions about and between December 23, 2010 and July 5, 2011.
- [REDACTED] Walla Walla, Washington invested approximately three thousand seven hundred dollars (\$3,700.00) in approximately eight transactions about and between December 22, 2010 and July 11, 2011.
- [REDACTED] College Place, Washington invested approximately one thousand eight hundred dollars (\$1,800.00) in approximately eight transactions about and between December 29, 2010 and July 11, 2011.
- [REDACTED] Umatilla, Florida invested approximately one thousand dollars (\$1,000.00) about and between January 4, and January 5, 2011.
- [REDACTED] Walla Walla, Washington invested approximately three thousand six hundred dollars (\$3,600.00) in approximately seven transactions about and between January 24, 2011 and July 11, 2011.
- [REDACTED] Irving, Texas invested approximately one thousand four hundred dollars (\$1,400) in approximately three transactions about and between January 27, 2011 and April 14, 2011.
- [REDACTED] Louisville, Kentucky invested approximately three thousand dollars (\$3,000.00) in a single transaction about and between January 9, 2011 and January 28, 2011.

- ██████████ Fort Myers, Florida invested approximately one thousand dollars (\$1,000.00) on or about February 4, 2011.
- ██████████ Naples, Florida invested approximately six thousand dollars (\$6,000.00) in a single transaction about and between January 28, 2011 and February 7, 2011.
- ██████████ of Indianapolis, Indiana invested approximately four hundred dollars (\$400.00) in approximately four transactions about and between January 26, 2011 and May 12, 2011.
- ██████████ Danbury, Wisconsin invested approximately three thousand dollars (\$3,000.00) in a single transaction about and between February 14, 2011 and February 17, 2011.
- ██████████ South Haven, Michigan invested approximately one thousand dollars (\$1,000.00) in a single transaction about and between February 2, 2011 and March 1, 2011.
- ██████████ Cleveland, Tennessee invested approximately one thousand one hundred dollars (\$1,100.00) in approximately two transactions about and between February 23, 2011 and March 9, 2011.
- ██████████ Cleveland, Tennessee invested approximately one thousand one hundred dollars (\$1,100.00) in approximately two transactions about and between February 24, 2011 and April 1, 2011.
- ██████████ Naples, Florida invested approximately one thousand dollars (\$1,000.00) in a single transaction about and between March 1, 2011 and March 4, 2011.
- ██████████ Ft. Myers Beach, Florida invested approximately one thousand dollars (\$1,000.00) in a single transaction about and between March 1, 2011 and March 4, 2011.

- [REDACTED] Ft. Myers Beach, Florida invested approximately one thousand dollars (\$1,000.00) in a single transaction about and between March 1, 2011 and March 4, 2011.
- [REDACTED] Madison, Mississippi invested approximately three thousand dollars (\$3,000.00) in a single transaction about and between March 6, 2011 and March 8, 2011.
- [REDACTED] Ridgeland, Mississippi invested approximately three thousand dollars (\$3,000.00) in a single transaction about and between March 1, 2011 and March 8, 2011.
- [REDACTED] of New York, New York invested in, Gameworking, Inc., approximately twenty five thousand dollars (\$25,000.00) in approximately two transactions about and between March 10, 2011 and March 16, 2011.
- [REDACTED] Spokane, Washington invested approximately fifty thousand dollars (\$50,000.00) in a single transaction about and between March 15, 2011 and March 16, 2011.
- [REDACTED] Ooltewah, Tennessee invested approximately one thousand dollars (\$1,000.00) in a single transaction about and between March 25, 2011 and April 1, 2011.
- [REDACTED] of Chattanooga, Tennessee invested approximately three thousand one hundred dollars (\$3,100.00) in approximately two transactions about and between March 21, 2011 and April 28, 2011.
- [REDACTED] Bay City, Michigan invested approximately two thousand dollars (\$2,000.00) in a single transaction about and between March 26, 2011 and April 1, 2011.
- [REDACTED] Hixon, Tennessee invested approximately one thousand twenty five dollars (\$1,025.00) in approximately two transactions about and between March 23, 2011 and April 28, 2011.

- [REDACTED] Ringgold, Georgia invested approximately three thousand three hundred dollars (\$3,300.00) in approximately four transactions about and between March 17, 2011 and June 30, 2011.
- [REDACTED] Port St. Lucie, Florida invested approximately one thousand dollars (\$1,000.00) in a single transaction about and between March 16, 2011 and April 1, 2011.
- [REDACTED] Port St. Lucie, Florida invested approximately two thousand dollars (\$2,000.00) in approximately two transactions about and between March 10, 2011 and April 1, 2011.
- [REDACTED] Dayton, Tennessee invested approximately one thousand twenty five dollars (\$1,025.00) in approximately two transactions about and between March 21, 2011 and May 16, 2011.
- [REDACTED] Leander, Texas invested approximately one hundred thousand dollars (\$100,000.00) in two separate transactions on or about April 4, 2011, including:
  - Fifty one thousand dollars (\$51,000) for Open Source Games, Inc.; and
  - Forty nine thousand dollars (\$49,000) for GameWorking, Inc.
- [REDACTED] Fort Lauderdale, Florida invested approximately three thousand dollars (\$3,000.00) in a single transaction about and between April 3, 2011 and April 8, 2011.
- [REDACTED] Houston, Texas invested approximately three thousand dollars (\$3,000.00) in a single transaction about and between April 7, 2011 and April 12, 2011.
- [REDACTED] Riverside, California invested approximately two thousand dollars (\$2,000.00) in a single transaction about and between April 7, 2011 and April 12, 2011.
- [REDACTED] New Orleans, Louisiana invested approximately three thousand dollars (\$3,000.00) in a single transaction about and between May 7, 2011 and May 12, 2011.

- [REDACTED] Pompano Beach, Florida invested approximately six thousand dollars (\$6,000.00) in a single transaction about and between May 20, 2011 and May 23, 2011.
5. In connection with the sale of these securities to these investors, GOLLEHON engaged in a course of business which operated as a fraud, in part, by accepting investments for the businesses of Open Source Games, Inc. and related entities. Gollehon failed to use the funds in the represented manner. Gollehon also failed to make the necessary disclosures at any time subsequent to the investments. The circumstances surrounding the sales, acts, practices and course of business engaged in by Gollehon, including the untrue statements of material fact and failure to disclose, are described in the narrative of Essential Facts, and the paragraphs following Counts One through Fifty Five, each of which are hereby incorporated by reference.