

**DEPARTMENT OF CONSUMER AND BUSINESS SERVICES**  
**DIVISION OF FINANCE AND CORPORATE SECURITIES**  
**ENFORCEMENT SECTION**  
**BEFORE THE DIRECTOR OF THE DEPARTMENT OF CONSUMER AND**  
**BUSINESS SERVICES**

<p>4 <b>In the Matter of:</b></p> <p>5 <b>DOUGLAS GOODRUM, ALPHA</b></p> <p>6 <b>ENERGY, INC., ALLIANCE</b></p> <p>7 <b>RESOURCES GROUP, INC., ALEX</b></p> <p>8 <b>BAILEY, and JAY REYNOLDS,</b></p> <p>9 <b>Respondents.</b></p>	<p>)</p>	<p>No. S-07-0025 (C)</p> <p><b>FINAL ORDER TO CEASE AND</b></p> <p><b>DESIST, DENYING EXEMPTIONS,</b></p> <p><b>AND ASSESSING CIVIL PENALTIES</b></p> <p><b>ENTERED BY CONSENT AS TO</b></p> <p><b>DOUGLAS GOODRUM ONLY</b></p>
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11 **WHEREAS**, the Director of the Oregon Department of Consumer and Business  
12 Services, Division of Finance and Corporate Securities (hereafter the "Director"), acting by and  
13 pursuant to the authority of the Oregon Securities Law, ORS 59.005 *et seq.*, and other applicable  
14 authority, has a pending investigation into the activities of **DOUGLAS GOODRUM** (hereafter  
15 "**GOODRUM**"), **ALPHA ENERGY, INC.** (hereafter "**ALPHA ENERGY**"), **ALLIANCE**  
16 **RESOURCES GROUP, INC.** (hereafter "**ALLIANCE RESOURCES**"), **ALEX BAILEY**  
17 (hereafter "**BAILEY**"), and **JAY REYNOLDS** (hereafter "**REYNOLDS**"),

18 **WHEREAS**, Respondent **GOODRUM** does not wish to incur the expenditure of  
19 additional time or costs on this matter and seeks to obtain finality without invoking his right to a  
20 hearing before the Director;

21 **NOW THEREFORE**, the Director hereby issues the following Findings of Fact,  
22 **Conclusions of Law, and Order**, to which Respondent **GOODRUM** consents, as evidenced by  
23 the Consent to Entry of Order attached hereto.

24 //

25 //

Division of Finance and Corporate Securities  
 Labor and Industries Building  
 350 Winter Street NE, Suite 410  
 Salem, OR 97301-3881  
 Telephone: (503) 378-4387



1 FINDINGS OF FACT

2 The Director **FINDS** that:

3 **Part One: Respondents**

4 1. **DOUGLAS GOODRUM**, at all times material herein, solicited money from  
5 members of the public for investments in oil and gas ventures. Goodrum engaged in these actions  
6 through **ALPHA ENERGY**, an entity that he owned, and **ALLIANCE RESOURCES**, an  
7 entity that he controlled. Goodrum's last known address is 3850 South Hampton Court, West  
8 Linn, Oregon 97068.

9 2. **GOODRUM** was not, at all times material herein, licensed as a securities issuer  
10 salesperson or broker-dealer salesperson in the State of Oregon.

11 3. **ALPHA ENERGY** was, at all times material herein, a Nevada corporation (Nevada  
12 Corporation #C21397-2002). Alpha Energy was incorporated on August 28, 2002. **GOODRUM**,  
13 the corporation's only shareholder, served as the President, Secretary, and Treasurer of Alpha  
14 Energy. Alpha Energy registered with the Oregon Secretary of State as a foreign corporation  
15 authorized to do business in Oregon (Business Registry #247447-99) on October 19, 2004.  
16 Alpha Energy's last known address is 111 SW Fifth Avenue, Suite 2115, Portland, Oregon  
17 97204.

18 4. **ALPHA ENERGY** was not, at all times material herein, licensed as a broker-dealer  
19 in the State of Oregon.

20 5. **ALLIANCE RESOURCES** was, at all times material herein, a Nevada corporation  
21 (Nevada Corporation #C21552-2002). Alliance Resources was incorporated on August 29, 2002.

22 **ALEX BAILEY** served as the President, Secretary, and Treasurer of Alliance Resources.  
23 Alliance Resources's last known address is 111 SW Fifth Avenue, Suite 2115, Portland, Oregon  
24 97204.

25 6. **ALLIANCE RESOURCES** was not, at all times material herein, licensed as a  
26 broker-dealer in the State of Oregon.

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1           7. **ALEX BAILEY** was, at all times material herein, **GOODRUM**'s second in  
2 command at Alliance Resources, aiding Goodrum, who controlled the entity, by handling  
3 administrative matters, managing staff members, and soliciting investments from members of the  
4 public. Bailey's last known address is 5075 Mapleton Drive, West Linn Oregon 97068.

5           8. **BAILEY** was not, at all times material herein, licensed as a securities issuer  
6 salesperson or broker-dealer salesperson in the State of Oregon.

7           9. **JAY REYNOLDS** was, at all times material herein, an Alliance Resources  
8 salesperson. Reynolds's last known address is 111 SW Fifth Avenue, Suite 2115, Portland,  
9 Oregon 97204.

10          10. **REYNOLDS** was not, at all times material herein, licensed as a securities issuer  
11 salesperson or broker-dealer salesperson in the State of Oregon.

12           **Part Two: Douglas Goodrum Sells Unregistered Securities Through Leading Solutions**

13          11. On June 20, 1996, **GOODRUM** incorporated Leading Solutions, Inc. (hereafter  
14 "Leading Solutions") with the Oregon Secretary of State (Business Registry #523563-84).  
15 Goodrum was the President and sole shareholder of Leading Solutions, Inc. Leading Solutions  
16 sold investments in oil and gas projects to members of the public.

17          12. Beginning in 1997, Leading Solutions sold investments in oil and gas projects  
18 operated by Energy 2000, Inc. (hereafter "Energy 2000"), a Texas corporation that purportedly  
19 acquired and managed oil and gas wells in Texas and Oklahoma. The President of Energy 2000  
20 is Jim Morisett.

21          13. Energy 2000 was responsible for operating and managing the wells of its oil and gas  
22 projects, including but not limited to installing necessary equipment, pumping the oil or gas,  
23 selling the oil or gas, and engaging in required equipment maintenance. Leading Solutions  
24 undertook no activity with respect to the Energy 2000 oil or gas projects beyond soliciting  
25 money from members of the public.  
26

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1           14. **GOODRUM** solicited money for Energy 2000 projects from members of the public  
2 by contacting individuals throughout the United States by telephone to tout oil and gas  
3 investments (so called "cold calling"). Goodrum had no pre-existing business or personal  
4 relationship with the individuals he contacted. Rather, Goodrum obtained lists of names,  
5 addresses, and telephone numbers of potential sales prospects by purchasing such data from  
6 direct marketing companies.

7           15. **GOODRUM** employed salespersons to aid his solicitation efforts. Goodrum  
8 required salespersons to closely adhere to scripts he authored during sales calls. Salespersons  
9 typically earned commissions of between twelve percent (12%) and fifteen percent (15%) of  
10 each sale.

11           16. Members of the public that invested in Energy 2000 oil and gas projects through  
12 **GOODRUM** and Leading Solutions did so on the belief that they might receive substantial  
13 profits and immediate tax "write offs." Investors had no role in the management or operation of  
14 the oil and gas projects they invested in.

15           17. Confining her analysis exclusively to the period from March, 1999 through April,  
16 2001, the Director of the Oregon Department of Consumer and Business Services issued an  
17 Order to Cease and Desist against **GOODRUM** and Leading Solutions on September 18, 2002  
18 for numerous violations of the Oregon Securities Law. Goodrum and Leading Solutions  
19 consented to the entry of the Order. The conclusions included:

- 20           • The investments **GOODRUM** and Leading Solutions marketed and sold to members of  
21 the public in Energy 2000 oil and gas projects from March 1999 through April 2001  
22 constituted "securities", as defined by ORS 59.015 (19) (a).
- 23           • **GOODRUM** and Leading Solutions sold securities in and from Oregon without a  
24 securities license from March 1999 through April 2001, in violation of ORS 59.165.
- 25           • **GOODRUM** and Leading Solutions sold unregistered securities in Oregon from March  
26 1999 through April 2001, in violation of ORS 59.055.

1 • **GOODRUM** and Leading Solutions made material misrepresentations or omissions in  
2 connection with the sale of securities in or from Oregon from March 1999 through April  
3 2001, in violation of ORS 59.135.

4 18. The Director ordered that, effective September 18, 2002, **GOODRUM**, Leading  
5 Solutions, and any successor business immediately cease and desist from violating any provision  
6 of the Oregon Securities Law.

7 **Part Three: Goodrum Continues Selling Oil and Gas Investments**

8 19. In August 2002 **GOODRUM** was aware that the Director would soon issue her Cease  
9 and Desist Order because his attorney was in the midst of settlement negotiations with the  
10 Director's staff. Nevertheless, during this period Goodrum formulated a two part scheme  
11 designed to continue his highly profitable sales of investments in Energy 2000 oil and gas  
12 projects to members of the general public after entry of the Cease and Desist Order. First,  
13 Goodrum sought a "safe harbor" from securities registration requirements by preparing  
14 documents for filing with the United States Securities and Exchange Commission (hereafter  
15 "SEC") under Regulation D, Rule 506 (hereafter "506D"). 506D permits the sale of unregistered  
16 securities under limited circumstances so long as "general solicitation" (for example, advertising  
17 on television or "cold calling" by telephone), is not utilized. Second, Goodrum created several  
18 intermediate entities to mask his cold calling sales operation from public and regulatory view.

19 20. On August 28, 2002, three weeks before the issuance of the Director's Cease and  
20 Desist Order, **GOODRUM** incorporated **ALPHA ENERGY**. Goodrum was the company's sole  
21 shareholder. Alpha Energy received funds from the sale of investments in Energy 2000 oil and  
22 gas projects to members of the public.

23 21. **GOODRUM** created **ALLIANCE RESOURCES** for the purpose of managing his  
24 sales operation, filing 506D related documents with the SEC, and issuing offering memoranda to  
25 potential investors.

26

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1           22. At some point in August, 2002, **GOODRUM** informed **BAILEY** that he was  
2 interested in “stepping back from the business” and “moving towards retirement.” Goodrum  
3 asked Bailey, then a Leading Solutions salesperson whose previous work experience was as a  
4 restaurant manager, to manage and operate **ALLIANCE RESOURCES** on his behalf, with the  
5 inference that Bailey would take over full ownership at some unspecified point in the future.

6           23. **GOODRUM** retained an agent to prepare corporate formation documents for  
7 **ALLIANCE RESOURCES**, which **BAILEY** signed at his request. Bailey was putatively the  
8 sole shareholder of Alliance Resources, yet he did not contribute capital, time, or expertise to the  
9 new entity in return for his “ownership” interest. **GOODRUM** forwarded Alliance Resources  
10 incorporation documents for filing concurrent with the filing of incorporation materials for  
11 **ALPHA ENERGY**.

12           24. **GOODRUM**, **ALPHA ENERGY**, **ALLIANCE RESOURCES**, **BAILEY**, and  
13 **REYNOLDS** were all located in the same Portland, Oregon office.

14           25. **ALLIANCE RESOURCES** performed the same activities Leading Solutions had  
15 engaged in prior to the Director’s Cease and Desist Order. Under **GOODRUM**’s overall  
16 direction and control, the firm had salespersons that, using purchased lists of names and phone  
17 numbers, contacted members of the public and, closely adhering to sales scripts, solicited  
18 investments in Energy 2000 oil and gas projects.

19           26. Although **BAILEY** was nominally the President and owner of **ALLIANCE**  
20 **RESOURCES**, **GOODRUM** exercised complete authority over Alliance Resources and its day  
21 to day operations. Goodrum provided startup funding for Alliance Resources. Goodrum  
22 interviewed and hired Alliance Resources salespersons. Goodrum authored the sales scripts  
23 employed by Alliance Resources. Goodrum provided all training for Alliance Resources  
24 salespersons. Goodrum moderated all staff meetings. Goodrum occupied the only corner suite in  
25 the office. Goodrum approved and authorized all expenditures. Goodrum “loaned” funds to  
26 Alliance Resources when it was short of money to meet its payroll. Goodrum determined staff

1 policies and procedures. Goodrum – and not Bailey - offered Alliance Resources salespersons  
2 monetary incentives for increased sales activity. Goodrum presided over Alliance Resources  
3 Christmas parties, handing out awards for company activity - including one to **BAILEY**, his  
4 putative boss.

5 27. **ALLIANCE RESOURCES** paid for a portion of **GOODRUM**'s business related  
6 expenses, including expenses incurred by **ALPHA ENERGY**.

7 28. **GOODRUM** jealously guarded his professional relationship with Jim Morisett and  
8 Energy 2000. He strictly prohibited **BAILEY**, the putative owner of Alliance Resources, from  
9 engaging in any communications with Morisett. In point of fact, Goodrum required Bailey to  
10 sign a non-compete agreement to ensure that Bailey would not have the ability to usurp his  
11 authority.

12 29. **GOODRUM** rarely initiated telephone sales calls to members of the public directly.  
13 Rather, Goodrum had **ALLIANCE RESOURCES** salespersons “open” prospective purchasers,  
14 using the sales script and training he provided. Goodrum's role was to communicate with  
15 prospective investors by telephone for the purpose of “closing” the sale.

16 30. **GOODRUM** was compensated for his activities in two ways. First, Goodrum was  
17 paid the sum of three thousand dollars (\$3,000.00) a month by **ALLIANCE RESOURCES** as  
18 an “employee.” Second, **GOODRUM**, through **ALPHA ENERGY**, received a commission,  
19 which consisted of a percentage of each sale **ALLIANCE RESOURCES** made, on every  
20 transaction. **GOODRUM**'s commission was higher in instances in which he personally “closed”  
21 a sale.

#### 22 **Part Four: Benavides #1 Limited Partnership**

23 31. **GOODRUM**, through **ALLIANCE RESOURCES**, solicited investments from  
24 hundreds of members of the general public for an Energy 2000 single natural gas well project in  
25 Laredo, Texas called “Benavides #1 Limited Partnership” (hereafter “Benavides partnership.”)  
26





1           32. **ALLIANCE RESOURCES** served as general partner and issuer of the Benavides  
2 partnership. Alliance Resources filed a "Form D" for this entity with the SEC on October 15,  
3 2002, permitting it to engage in securities sales *in compliance with strict 506D guidelines*.

4           33. In January 2003, Jay Reynolds, an **ALLIANCE RESOURCES** salesperson,  
5 telephoned Jack Lipsky, a resident of the State of New York. Reynolds did not have a previous  
6 business or personal relationship with Lipsky. In contravention of 506D requirements, Reynolds  
7 "cold called" Lipsky to attempt to sell him an investment in the Benavides partnership. While  
8 somewhat receptive, Lipsky was not willing to commit to making an investment at the time of  
9 his telephone conversations with Reynolds.

10           34. On January 23, 2003 **ALLIANCE RESOURCES** mailed Lipsky written materials  
11 about the Benavides partnership, including its offering memorandum (dated September 1, 2002)  
12 and a Benavides "Project Summary." The project summary stated that in March 1985 the  
13 Benavides well had to be sealed due to *overproduction*, as it was eliciting twice its "allowable"  
14 quantity of gas. Furthermore, the summary noted that since the seals on the well had been  
15 removed, new compressors produced "consistent results."

16           35. In February, 2003 **GOODRUM**, in an effort to "close" the sale of a Benavides unit to  
17 Lipsky, spoke with the New York resident by telephone on several occasions. Goodrum and  
18 Lipsky had substantive discussions about the Benavides investment. During those discussions:

19           • Lipsky explicitly asked **GOODRUM** whether the limited partnership interests in  
20 question were registered for sale with New York State authorities. Goodrum responded  
21 that they were indeed so registered. In point of fact, the Benavides partnership offering  
22 memorandum had not been registered, or otherwise reviewed, by any regulatory body in  
23 New York.

24           • **GOODRUM** did not disclose to Lipsky that he had been the subject of a Cease and  
25 Desist Order issued by the Oregon Division of Finance and Corporate Securities with  
26 respect to his sale of investments in oil and gas projects less than six (6) months



1           39. Respondents offered for sale and/or sold securities that were not registered with the  
2 Oregon Division of Finance and Corporate Securities from the State of Oregon, in violation of  
3 ORS 59.055.

4           40. Respondents offered for sale and/or sold securities from the State of Oregon without  
5 being licensed as a broker-dealer or broker-dealer salesperson, in violation of ORS 59.165 (1).

6           41. In connection with the sale of securities to Jack Lipsky in February 2003,  
7 Respondents made an untrue statement of a material fact, in violation of ORS 59.135 (2), by  
8 falsely representing that Benavides partnership units were registered for sale with the State of  
9 New York.

10           42. In connection with the sale of securities to Jack Lipsky in February 2003,  
11 Respondents omitted to state a material fact necessary in order to make the statements made, in  
12 the light of the circumstances under which they are made, not misleading, in violation of ORS  
13 59.135 (2), by failing to inform Lipsky that **GOODRUM** had been the subject of a Cease and  
14 Desist Order issued by the Oregon Division of Finance and Corporate Securities on September  
15 11, 2002.

16           43. In connection with the sale of securities to Jack Lipsky in February 2003,  
17 Respondents omitted to state a material fact necessary in order to make the statements made, in  
18 the light of the circumstances under which they are made, not misleading, in violation of ORS  
19 59.135 (2), by failing to inform Lipsky that **GOODRUM** owned **ALPHA ENERGY**.

20           44. In connection with the sale of securities to Jack Lipsky in February 2003,  
21 Respondents omitted to state a material fact necessary in order to make the statements made, in  
22 the light of the circumstances under which they are made, not misleading, in violation of ORS  
23 59.135 (2), by failing to inform Lipsky that a substantial portion of the Benavides offering's  
24 gross proceeds, which had been earmarked for the development and maintenance of the gas well,  
25 would actually be tendered to Alpha Energy as a sales commission for **GOODRUM**.

26

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1 45. In connection with the sale of securities to Jack Lipsky in February 2003,  
2 Respondents omitted to state a material fact necessary in order to make the statements made, in  
3 the light of the circumstances under which they are made, not misleading, in violation of ORS  
4 59.135 (2), by failing to inform Lipsky that **GOODRUM** controlled the operations of the  
5 Benavides general partner, **ALLIANCE RESOURCES**.

6 46. **GOODRUM** willfully or repeatedly violated, or failed to comply with, an Order of  
7 the Director, in violation of ORS 59.205 (3), by selling securities of a type that were the subject  
8 of a September 11, 2002 Order to Cease and Desist by the Director.

9 **ORDER**

10 Therefore, the Director **ORDERS** that:

11 47. **GOODRUM** shall, pursuant to the authority granted by ORS 59.245, **CEASE AND**  
12 **DESIST** from offering and/or selling securities to persons in or from the State of Oregon in  
13 violation of the Oregon Securities Law, ORS 59.005 *et seq*, and accompanying administrative  
14 rules.

15 48. **GOODRUM, ALPHA ENERGY, and ALLIANCE RESOURCES** are, pursuant to  
16 the authority contained in ORS 59.995, ordered, jointly and severally, to pay the sum of  
17 **TWENTY THOUSAND DOLLARS** (\$20,000) as a civil penalty for each violation of ORS  
18 59.055, ORS 59.135, and ORS 59.165 involving the sale of the Benavides partnership unit to  
19 Jack Lipsky described herein, for a civil penalty of **ONE HUNDRED FORTY THOUSAND**  
20 **DOLLARS** (\$140,000). Furthermore, **GOODRUM, ALPHA ENERGY, and ALLIANCE**  
21 **RESOURCES** are ordered, jointly and severally, to pay the sum of **TWO HUNDRED**  
22 **THOUSAND DOLLARS** (\$200,000) as a civil penalty for continuing violations of ORS 59.055  
23 and ORS 59.165 involving the offer of Benavides partnership units to members of the general  
24 public described herein, for a total civil penalty of **THREE HUNDRED FORTY THOUSAND**  
25 **DOLLARS** (\$340,000). Of this sum, **NINETY THOUSAND DOLLARS** (\$90,000) shall be  
26 **SUSPENDED** so long as **GOODRUM** does not violate federal or state securities laws – or the

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1 terms of this Order - for a period of **SEVEN (7) YEARS** from the date of entry of this Order, in  
2 which case said amount shall be deemed to be **WAIVED**. (In the event that **GOODRUM**  
3 violates federal or state securities laws or the terms of this Order the entire civil penalty of  
4 **THREE HUNDRED FORTY THOUSAND DOLLARS** (\$340,000), minus amounts paid,  
5 shall be immediately due and owing.) The remaining **TWO HUNDRED FIFTY THOUSAND**  
6 **DOLLARS** (\$250,000) shall be paid in monthly installment payments of **THREE HUNDRED**  
7 **THIRTY-THREE DOLLARS** (\$333), due on or before the tenth (10<sup>th</sup>) calendar day of each  
8 month, with the first payment due on or before March 10, 2009 (timely payment shall be deemed  
9 to be of the essence; failure to make a payment in a timely fashion will constitute a violation of  
10 this Order), until the entire **TWO HUNDRED FIFTY THOUSAND DOLLARS** (\$250,000)  
11 portion of the civil penalty has been paid. Furthermore, this Final Order To Cease and Desist,  
12 Denying Exemptions, and Assessing Civil Penalties may be filed with any Oregon county clerk's  
13 recording division, or equivalent, to serve as a lien on any real property owned by **GOODRUM**.  
14 Proceeds from the satisfaction of said lien shall be applied to the balance of this civil penalty, yet  
15 satisfaction of the lien shall not discharge this civil penalty unless proceeds from the satisfaction  
16 constitute the entirety of the civil penalty.

17 49. **GOODRUM** is, for the protection of the public, **PERMANENTLY BARRED** from  
18 having any management, consulting, employment, sales, or ownership role with a broker-dealer,  
19 investment adviser, mortgage lending firm, insurance company, or any other entity licensed by  
20 the Oregon Department of Consumer and Business Services, other than as specifically described  
21 below.

22 50. **GOODRUM** may be employed by a mortgage lending firm as a loan originator, as  
23 defined by ORS 59.840 (4), but not as a mortgage broker or mortgage banker, so long as he  
24 remains under heightened supervision by the mortgage lending firm throughout his employment.  
25 Said heightened supervision shall include, at a minimum, a requirement that (A) the owner of the  
26 mortgage lending firm, or a compliance official that reports directly to the owner, shall

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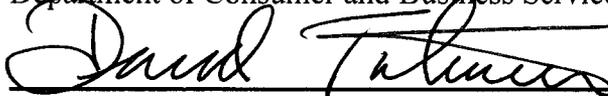
1 communicate directly with at least one out of three consumers that submit applications for a loan  
2 through **GOODRUM** to verify that the information on the consumer's application, including  
3 data with respect to the applicant's employer, position or title, monthly income, and assets and  
4 liabilities listed on the application are accurate; (B) the owner of the mortgage lending firm, or a  
5 compliance official that reports directly to the owner, shall keep written records memorializing  
6 the date, time, and representations made by each consumer contacted, and provide the contents  
7 of same to the Division at the conclusion of each calendar year; (C) the owner of the mortgage  
8 lending firm, or a compliance official that reports directly to the owner, shall contact the  
9 Division within five (5) business days of learning of any discrepancy between information listed  
10 on the application and information provided by the consumer, or of any other violation by  
11 **GOODRUM** of the Oregon Mortgage Lending Law, ORS 59.840 *et seq.*

12 51. **GOODRUM**, and any entity that he is employed by, consulting for, or acting on  
13 behalf of, whether in a sales or non-sales capacity – with the exception of any licensed mortgage  
14 lending firm employing Goodrum under the terms of paragraph fifty (50) of this Order - is  
15 hereby **PERMANENTLY DENIED THE USE OF EXEMPTIONS** authorized by ORS  
16 59.025 and ORS 59.035, until further order of the Director, pursuant to ORS 59.045.

17 **IT IS SO ORDERED.**

18 Dated this 8<sup>th</sup> day of March, 2009 at Salem, Oregon.

19  
20 CORY STREISINGER, Director  
Department of Consumer and Business Services

21 

22 David C. Tatman, Administrator  
Division Of Finance And Corporate Securities

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1 **CONSENT TO ENTRY OF ORDER**

2 Respondent **GOODRUM** states: that he has read the foregoing Order and fully  
3 understands the contents thereof; that he has been advised of his right to a hearing and of his  
4 right to be represented by counsel at any such hearing; that he, voluntarily, and without any force  
5 or duress, consents to the entry of this Order, expressly waiving any right to a hearing in this  
6 matter; that he understands that the Director reserves the right to take further actions to enforce  
7 this Order or to take appropriate action upon discovery of other violations of the Oregon  
8 Securities Law; and that he will fully comply with the terms and conditions stated herein.

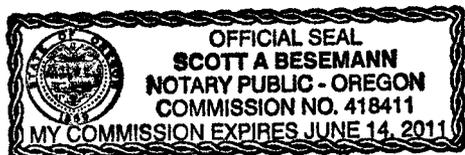
9 Furthermore, **GOODRUM** expressly consents to the reduction of this Order to a  
10 judgment, or other legal document, to the extent necessary to record the civil penalty contained  
11 in this Order as a lien against any realty titled in his name with any county clerk recording  
12 division, or equivalent, and agrees to execute any document(s) that is required for this purpose.

13 Furthermore, **GOODRUM** understands that this Consent Order is a public document.

14 Dated this 19 day of February, 2009.

15 

16 DOUGLAS GOODRUM



18 Scott Besemann  
(Printed Name of Notary Public)

19 Notary Public  
for the State of: Oregon  
My commission expires: June 14, 2011

20 Division of Finance and Corporate Securities  
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