

STATE OF ALABAMA
ALABAMA SECURITIES COMMISSION

IN THE MATTER OF:	)	
	)	
LEWIS STANLEY SCOGIN	)	ADMINISTRATIVE ORDER
	)	NO. OB-2009-0040
<u>RESPONDENT</u>	)	

ORDER OF BAR

The Alabama Securities Commission ("Commission"), having authority to administer and provide for the enforcement of all provisions of Title 8, Chapter 6, Code of Alabama 1975, the Alabama Securities Act, upon due consideration of the subject matter hereof, has determined as follows:

RESPONDENT

1. LEWIS STANLEY SCOGIN ("SCOGIN"), CRD number (1037063) was previously registered as a broker-dealer agent with PFS Investments, Inc., from April 28, 1982 through January 18, 1983. SCOGIN is identified as an Agent and Trustee of COVENANT FAMILY TRUST with a business address of 153 Jacque Jim Drive, Huntsville, Alabama 35810. SCOGIN is currently not registered in any capacity with the Alabama Securities Commission.

STATEMENT OF FACTS

2. On March 24, 2009, the Alabama Securities Commission opened an inquiry into WINSOME INVESTMENT TRUST, in regards to complaints received from Alabama residents who alleged that SCOGIN had offered and/or sold unregistered securities to them on various occasions since August 2006.

3. It is alleged that SCOGIN represented himself as a Trustee of COVENANT and represented to investors that COVENANT and WINSOME were offering participation in a "private investment program available only by invitation of a current partner". SCOGIN represented to Alabama residents that all funds invested in the private investment program would be "pooled" and "traded" by WINSOME and ROBERT ANDRES, with the profits divided among the investors.

4. SCOGIN provided each Alabama investor with a booklet titled "U.S. Ventures Investment Program". The booklet explained the investment program as a computerized day trading program that had historically returned an annual average daily earnings rate of 1% or more of the total invested principal per trading day.

5. A "Joint Venture Business Agreement" was executed on behalf of WINSOME, by ANDRES, and SCOGIN with each Alabama investor, in which WINSOME agreed to invest monies on behalf of the Alabama investors utilizing the computer model. The agreements set forth the compensation to be paid to WINSOME and COVENANT as well as WINSOME and COVENANT's management responsibilities.

6. SCOGIN, and COVENANT, solicited prospective investors directly or through meetings, telephones and electronic communication, a website, marketing materials and third party markets. SCOGIN, and COVENANT, used the mail and instrumentalities of interstate commerce in their solicitation of prospective participants. SCOGIN acting directly and/or through others provided prospective investors with a prospectus containing an overview of their "trading program" and describing it as a "joint venture investment".

7. On December 14, 2009, the Alabama Securities Commission issued Administrative Order No. CD-2009-0040 to WINSOME INVESTMENT TRUST, COVENANT FAMILY TRUST, ROBERT JOSEPH ANDRES, and LEWIS STANLEY SCOGIN. Without benefit of registration, SCOGIN, acting in the capacity of a securities agent in the State of Alabama, solicited and sold unregistered securities in a "private investment program available only by invitation of a current partner" to investors.

8. On June 23, 2010, the Commission conducted an informal hearing/meeting via conference call with ROBERT ANDRES and LEWIS SCOGIN. ANDRES, acting as the attorney for all Respondents requested a copy of the Joint Venture Agreement which he denied listed his name. The Commission provided a copy of the Agreement via U.S. Mail and indicated a response in writing would be necessary to dispute the finding. As of the date of this writing, neither ANDRES nor SCOGIN has responded to offer any clarification on their behalf.

9. On February 9, 2011, the Commission made Administrative Order No. CD-2009-0040 a Final Order of the Commission as it pertains to WINSOME INVESTMENT TRUST, COVENANT FAMILY TRUST, ROBERT JOSEPH ANDRES, and LEWIS STANLEY SCOGIN due to their failure to respond to the Commission for additional information.

CONCLUSIONS OF LAW

10. Pursuant to Code of Alabama 1975, § 8-6-3(a), it is unlawful for any person to transact business in this state as an agent or dealer for securities unless such person is registered under the Act. SCOGIN offered and/or sold securities to seven (7) Alabama residents, transacting business as an agent for COVENANT and WINSOME without benefit of registration in violation of the Act.

11. Pursuant to Code of Alabama 1975, §8-6-4, it is unlawful for any person to offer or sell any security in this state unless: it is registered under the Act; the security is exempt from registration under §8-6-10; or the transaction is exempt under §8-6-11. The securities offered and/or sold by SCOGIN, through WINSOME and COVENANT, to wit: investment contracts titled "U.S. VENTURES INVESTMENT PROGRAM", were neither registered nor exempt from registration in violation of the Act.

12. Pursuant to the provisions of Section 8-6-3(j), Code of Alabama 1975, the Alabama Securities Commission may suspend, revoke, deny, censor or bar any applicant or registrant or any officer, director, partner, or person occupying a similar status or performing similar functions if the Commission finds that the Order is in the public interest and the applicant or registrant has willfully violated or willfully failed to comply with any provisions of this article, or a predecessor act, or any rule or order under this article or a predecessor act. SCOGIN willfully violated, the Act by selling unregistered securities and transacting business as an agent without being first registered with the Commission.

This Order is appropriate in the public interest for the protection of investors and consistent with the purposes of the Alabama Securities Act.

ACCORDINGLY, IT IS HEREBY ORDERED:

1. That RESPONDENT be **BARRED** from registration or engaging in securities activities into, within or from the state of Alabama.

2. That in accordance with Section 8-6-19(j)(1), Code of Alabama 1975, RESPONDENT shall pay to the **state of Alabama** an administrative assessment in the total sum of Fifteen Thousand Dollars (\$15,000), said funds to be tendered in certified

funds contemporaneously with the entry of this Order.

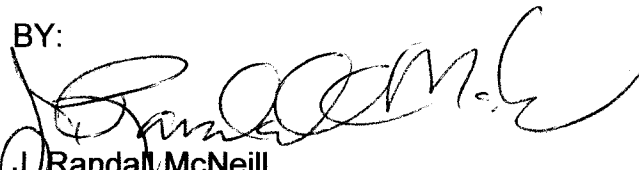
3. That in accordance with Section 8-6-19(k)(1), Code of Alabama 1975, RESPONDENT shall pay to the **Alabama Securities Commission**, as partial reimbursement for the Commission's cost for investigating this matter, the sum of Five Thousand Dollars (\$5000), said funds to be tendered in certified funds contemporaneously with the entry of this Order.

This Order does not prevent the Alabama Securities Commission from seeking such other civil or criminal remedies that are available to it under the Act against the other Respondents in any respect or against SCOGIN for violation by him of the terms of this Order.

Entered at Montgomery, Alabama this 11th day of July, 2011.

ALABAMA SECURITIES COMMISSION
401 Adams Avenue, Suite 280
Montgomery, AL 36104-4700
(334) 242-2984

BY:


J. Randal McNeill
Deputy Director



**STATE OF ALABAMA
ALABAMA SECURITIES COMMISSION**

IN THE MATTER OF:

LEWIS STANLEY SCOGIN

RESPONDENT

**ADMINISTRATIVE ORDER
NO. OB- 2009-0040**

**TO: LEWIS STANLEY SCOGIN
153 JACQUE JIM DRIVE
HUNTSVILLE AL 35801**

NOTICE OF RIGHT TO A HEARING

THE ORDER TO BAR WHICH THIS NOTICE IS ATTACHED, MADE A PART THEREOF AND INCORPORATED THEREIN, IS IMPORTANT AND YOU SHOULD READ IT IN ITS ENTIRETY. You may request a public hearing before the Alabama Securities Commission concerning this Order by making a written request directed to the Commission pursuant to Section 8-6-32, Code of Alabama 1975. Please direct your request to the Commission as follows:

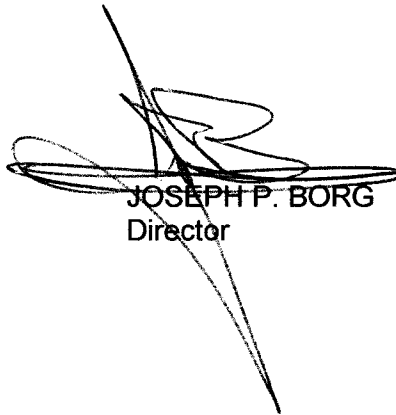
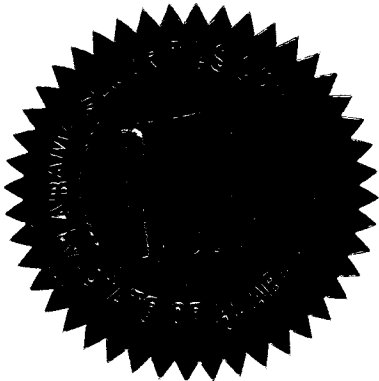
Alabama Securities Commission
ATTN: Legal Department
401 Adams Avenue, Suite 280
Montgomery, Alabama 36130-4700

IF A WRITTEN REQUEST FOR A HEARING BEFORE THE ALABAMA SECURITIES COMMISSION IS NOT SUBMITTED WITHIN 28 DAYS AFTER RECEIPT OF THIS ORDER, THIS ORDER SHALL CONSTITUTE A FINAL ORDER OF THE COMMISSION.

In lieu of a formal hearing, you may request an informal meeting with the Director or the Commission staff to resolve the matter. You will not waive your rights to a formal hearing. The Commission staff requests that you submit a verified statement, setting forth full details concerning your activities giving rise to this Order, no matter whether you are requesting a formal hearing, an informal meeting, or just desire to provide your side of the matter.

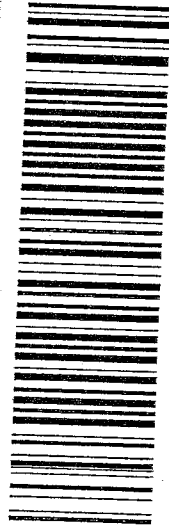
Please identify yourself as a Respondent and refer to the Order number when requesting a hearing, informal meeting, or otherwise corresponding with the Commission staff concerning this matter.

Appeals from any final Order of the Commission shall be made to the Circuit Court of Montgomery County, Alabama.



JOSEPH P. BORG
Director

STATE OF ALABAMA
SECURITIES COMMISSION
P.O. BOX 304700
MONTGOMERY, AL 36130-4700
www.asc.alabama.gov



RE 767 050 317 US



LEWIS STANLEY SCOGIN
153 JACQUE JIM DRIVE
HUNTSVILLE AL 35810

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

MR LEWIS STANLEY SCOGGIN
153 JACQUE JIM DRIVE
HUNTSVILLE AL 35810

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1?
If YES, enter delivery address below: ☐ Yes
☐ No

3. Service Type

- ☐ Certified Mail
- ☒ Registered
- ☐ Insured Mail
- ☐ Express Mail
- ☒ Return Receipt for Merchandise
- ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number
(Transfer from service label)

RE 767 050 317 US

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

C&D made Final on all
2/9/11
Due to no
response

STATE OF ALABAMA
ALABAMA SECURITIES COMMISSION

IN THE MATTER OF:	)	
WINSOME INVESTMENT TRUST	)	ADMINISTRATIVE ORDER
COVENANT FAMILY TRUST	)	NO. CD-2009- 0040
ROBERT JOSEPH ANDRES	)	
LEWIS STANLEY SCOGIN	)	
	)	
<u>RESPONDENTS</u>	)	

CEASE AND DESIST ORDER

The Alabama Securities Commission ("Commission"), having authority to administer and provide for the enforcement of all provisions of Title 8, Chapter 6, Code of Alabama 1975, the Alabama Securities Act ("Act"), upon due consideration of the subject matter hereof, and having confirmed information of the offers for sale and/or sale of securities, into, within or from the state of Alabama, has determined as follows:

RESPONDENTS

1. WINSOME INVESTMENT TRUST ("WINSOME") purports to be a Texas business with a business address of 5644 Westheimer #452, Houston, Texas 77056-4002.
2. COVENANT FAMILY TRUST ("COVENANT") purports to be a Texas business with a business address of 5644 Westheimer Road #452 Houston, Texas. COVENANT has an office located at 153 Jacque Jim Drive, Huntsville, Alabama 35810.
3. ROBERT JOSEPH ANDRES ("ANDRES") is a licensed Texas attorney (Bar# 01237450) and is the main trustee of WINSOME with a business address of 5644 Westheimer Road #452, Houston, Texas 77050-4002.
4. LEWIS STANLEY SCOGIN ("SCOGIN") ("CRD # 1037063") is identified as a Trustee of COVENANT with a business address of 153 Jacque Jim Drive, Huntsville, Alabama 35810. SCOGIN was a registered Broker Dealer Agent with PFS

Investments in Alabama from April 28, 1982, through January 18, 1983, but was not registered in Alabama during any time relevant to this Order.

STATEMENT OF FACTS

5. The Commission has received complaints from seven (7) Alabama residents who allege that SCOGIN has offered and/or sold securities to each of the seven (7) Alabama residents on various occasions since August, 2006.

6. The Alabama residents allege that SCOGIN represented himself as a Trustee of COVENANT and told them that COVENANT and WINSOME were offering participation in a "private investment program available only by invitation of a current partner". SCOGIN told the Alabama residents that all funds invested in the private investment program would be "pooled" and "traded" by WINSOME and ANDRES, with the profits divided among the investors.

7. On September 27, 2006, one of the Alabama residents gave SCOGIN a check for twenty-two thousand dollars (\$22,000.00). The check was forwarded to and deposited in the Winsome Investment Trust bank account held at Bank of America, Houston, Texas, by SCOGIN.

8. SCOGIN provided each of the seven (7) Alabama residents with a booklet titled "U.S. Ventures Investment Program". The booklet explains the investment program as a computerized day trading program that has historically returned an annual average daily earnings rate of 1% or more of the total invested principal per trading day.

9. A "Joint Venture Business Agreement" was executed on behalf of WINSOME, by ANDRES, with each Alabama investor, in which WINSOME agreed to invest monies on behalf of the Alabama investors utilizing a computer model. The agreements set forth the compensation to be paid to WINSOME and COVENANT as well as WINSOME and COVENANT's management responsibilities.

10. On October 19, 2009, a review of the Registration files of the Alabama Securities Commission revealed no current registration for RESPONDENTS WINSOME, COVENANT, ANDRES, or SCOGIN as a Broker Dealer, Securities Agent, Investment Advisor (IA) or Investment Advisor Representative (IAR) in the state of Alabama.

11. On October 19, 2009, a review of the Commission's registration files disclosed no record of registration, or any perfected exemption from registration, in the state of Alabama for the "U.S. Ventures Investment Program" offered and sold to Alabama residents by RESPONDENTS.

12. On November 16, 2009, reviews of the public records of the state of Texas and of the state of Alabama located no records establishing that WINSOME or COVENANT is organized as a trust company and no records establishing that WINSOME or COVENANT is supervised as a trust company by the state of Texas or by the state of Alabama.

CONCLUSIONS OF LAW

13. Code of Alabama 1975, §8-6-2(10) includes in the definition of a "security" any "investment contract". The "U.S. VENTURES INVESTMENT PROGRAM" offered and/or sold to seven (7) Alabama residents by RESPONDENTS is an investment contract and is a security under the statutory definition provided by Code of Alabama 1975, §8-6-2(10).

14. Code of Alabama 1975, §8-6-2(2) defines agent as any individual other than a dealer who represents a dealer or issuer in effecting or attempting to effect sales of securities. SCOGIN represented WINSOME and COVENANT in effecting or attempting to effect sales of securities and is an agent of WINSOME, ANDRES and COVENANT under the statutory definition provided in Code of Alabama 1975, §8-6-2(2).

15. Pursuant to Code of Alabama 1975, § 8-6-3(a), it is unlawful for any person to transact business in this state as an agent or dealer for securities unless such person is registered under the Act. SCOGIN offered and/or sold securities to seven (7) Alabama residents, transacting business as an agent for COVENANT and WINSOME without benefit of registration in violation of Code of Alabama 1975, § 8-6-3(a).

16. Pursuant to Code of Alabama 1975, § 8-6-3(a), it is unlawful for any dealer or issuer to employ an agent for securities unless such person is registered under the Act. COVENANT and WINSOME employed SCOGIN, who was not registered under the Act, to offer and sell securities to Alabama residents in violation of Code of Alabama 1975, § 8-6-3(a).

17. Pursuant to Code of Alabama 1975, §8-6-4, it is unlawful for any person to offer or sell any security in this state unless: it is registered under the Act; the security is exempt from registration under §8-6-10; or the transaction is exempt under §8-6-11. The securities offered and/or sold by SCOGIN, WINSOME and COVENANT, to wit: an investment contract titled "U.S. VENTURES INVESTMENT PROGRAM", were neither registered nor exempt from registration and were offered and/or sold by RESPONDENTS in violation of Code of Alabama 1975, §8-6-4.

18. Pursuant to Code of Alabama 1975, §8-6-2(18), Investment Adviser is defined as any person who, for compensation, engages in the business of advising others as to the value of securities or as to the advisability of investing in, purchasing, or selling securities. WINSOME and COVENANT are investment advisers under the ACT.

19. Pursuant to Code of Alabama 1975, §8-6-2(19), Investment Adviser Representative is defined as any partner, officer, director, or other person occupying a similar status, or performing a similar function of an investment adviser who renders advice, manages accounts or solicits on behalf of an investment adviser. ANDRES is an Investment Adviser Representative of WINSOME and SCOGINS is an Investment Adviser Representative of COVENANT under the ACT.

This Order does not prevent the Commission from seeking such other civil or criminal remedies that are available to it under the Act.

This Order is appropriate in the public interest for the protection of investors and is consistent with the purposes of the Act.

Additionally, if the allegations set forth herein are found to be true, through either administrative adjudication, failure of the RESPONDENTS to make a timely request for hearing, or default of the RESPONDENTS, it is the intention of the Commission to impose sanctions upon the RESPONDENTS. Such sanctions may include, inter alia, an administrative assessment imposed on RESPONDENTS, an additional administrative assessment for investigative cost arising from the investigation of the violation(s) described herein against RESPONDENTS, and a permanent order to bar RESPONDENTS from participation in any securities related industry in the state of Alabama.

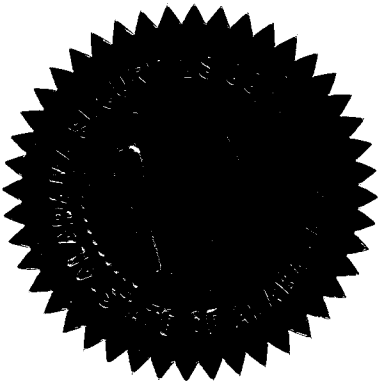
ACCORDINGLY, IT IS HEREBY ORDERED that RESPONDENTS Winsome Investment Trust, Covenant Family Trust, Robert Joseph Andres, and Lewis Stanley Scogin immediately **CEASE AND DESIST** from further offers or sales of any security into, within or from the state of Alabama.

Entered at Montgomery, Alabama, this 14th day of December, 2009.

ALABAMA SECURITIES COMMISSION
P. O. Box 304700
401 Adams Avenue, Ste. 280
Montgomery, AL 36130-4700
(334) 242-2984

BY:

Joseph P. Borg
Director



STATE OF ALABAMA
ALABAMA SECURITIES COMMISSION

IN THE MATTER OF:

WINSOME INVESTMENT TRUST	)	ADMINISTRATIVE ORDER
COVENANT FAMILY TRUST	)	CD-2009-0040
ROBERT JOSEPH ANDERS	)	
LEWIS STANLEY SCOGIN	)	
	)	
<u>RESPONDENTS</u>	)	

TO: Covenant Family Trust
153 Jacque Jim Drive
Huntsville Alabama 35810

NOTICE OF RIGHT TO A HEARING

THE CEASE AND DESIST ORDER TO WHICH THIS NOTICE IS ATTACHED, MADE A PART THEREOF AND INCORPORATED THEREIN, IS IMPORTANT AND YOU SHOULD READ IT IN ITS ENTIRETY. You may request a public hearing before the Alabama Securities Commission concerning this Order by making a written request directed to the Commission pursuant to Section 8-6-32, Code of Alabama 1975. Please direct your request to the Commission as follows:

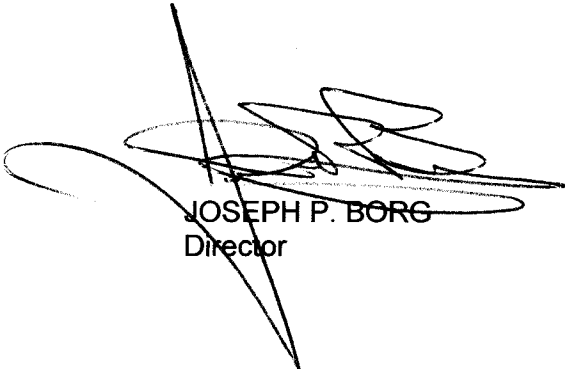
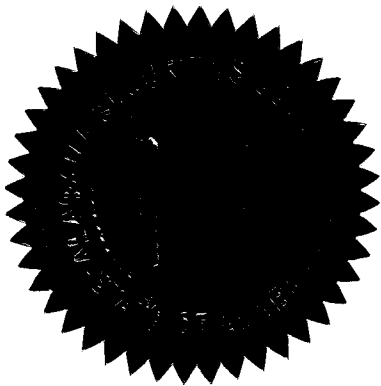
Alabama Securities Commission
401 Adams Avenue Suite 280
Montgomery, Alabama 36130-4700

IF A WRITTEN REQUEST FOR A HEARING BEFORE THE ALABAMA SECURITIES COMMISSION IS NOT SUBMITTED WITHIN 28 DAYS AFTER RECEIPT OF THIS ORDER, THIS ORDER SHALL CONSTITUTE A FINAL ORDER OF THE COMMISSION

In lieu of a formal hearing, you may request an informal meeting with the Director or the Commission staff to resolve the matter. You will not waive your rights to a formal hearing. The Commission staff requests that you submit a verified statement, setting forth full details concerning your activities giving rise to this Order, no matter whether you are requesting a formal hearing, an informal meeting, or just desire to provide your side of the matter.

Please identify yourself as a Respondent and refer to the Order number when requesting a hearing, informal meeting, or otherwise corresponding with the Commission staff concerning this matter.

Appeals from any final Order of the Commission shall be made to the Circuit Court of Montgomery County, Alabama.



JOSEPH P. BORG
Director

STATE OF ALABAMA
ALABAMA SECURITIES COMMISSION

IN THE MATTER OF:

WINSOME INVESTMENT TRUST	)	ADMINISTRATIVE ORDER
COVENANT FAMILY TRUST	)	CD-2009- 0040
ROBERT JOSEPH ANDERS	)	
LEWIS STANLEY SCOGIN	)	
	)	
<u>RESPONDENTS</u>	)	

TO: Lewis Stanley Scogin
Jacque Jim Drive
Huntsville Alabama 35810

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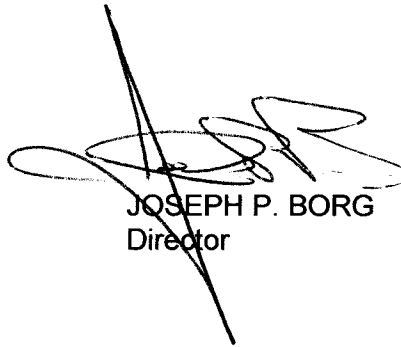
Alabama Securities Commission
401 Adams Avenue Suite 280
Montgomery, Alabama 36130-4700

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JOSEPH P. BORG
Director

STATE OF ALABAMA
ALABAMA SECURITIES COMMISSION

IN THE MATTER OF:

WINSOME INVESTMENT TRUST	)	ADMINISTRATIVE ORDER
COVENANT FAMILY TRUST	)	CD-2009- 0040
ROBERT JOSEPH ANDERS	)	
LEWIS STANLEY SCOGIN	)	
	)	
<u>RESPONDENTS</u>	)	

TO: Robert Joseph Anders
5644 Westheimer Road #452
Houston Texas 77056

NOTICE OF RIGHT TO A HEARING

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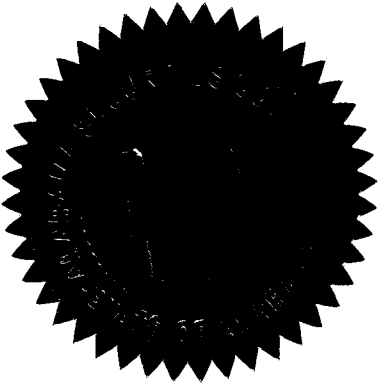
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401 Adams Avenue suite 280
Montgomery, Alabama 36130-4700

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JOSEPH P. BORG
Director

STATE OF ALABAMA
ALABAMA SECURITIES COMMISSION

IN THE MATTER OF:

WINSOME INVESTMENT TRUST	)	ADMINISTRATIVE ORDER
COVENANT FAMILY TRUST	)	CD-2009- 0040
ROBERT JOSEPH ANDERS	)	
LEWIS STANLEY SCOGIN	)	
	)	
RESPONDENTS	)	

TO: Winsome Investment Trust
5644 Westheimer Road #452
Houston Texas 77056

NOTICE OF RIGHT TO A HEARING

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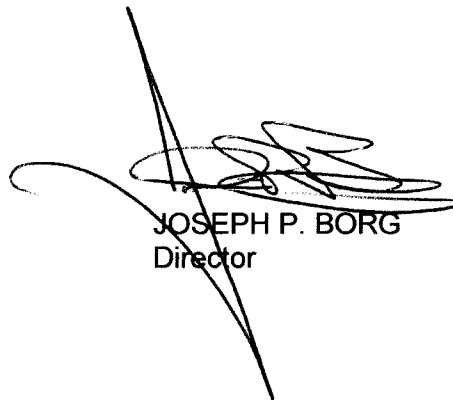
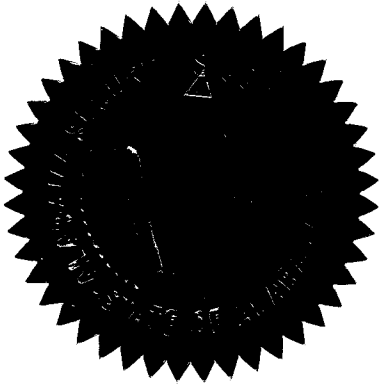
Alabama Securities Commission
401 Adams Avenue Suite 280
Montgomery, Alabama 36130-4700

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Appeals from any final Order of the Commission shall be made to the Circuit Court of Montgomery County, Alabama.



JOSEPH P. BORG
Director

STATE OF ALABAMA
ALABAMA SECURITIES COMMISSION

IN THE MATTER OF:

WINSOME INVESTMENT TRUST	)	ADMINISTRATIVE ORDER
COVENANT FAMILY TRUST	)	CD-2009- 0040
ROBERT JOSEPH ANDERS	)	
LEWIS STANLEY SCOGIN	)	
	)	
RESPONDENTS	)	

TO: Covenant Family Trust
5644 Westheimer Road #452
Houston Texas 77056

NOTICE OF RIGHT TO A HEARING

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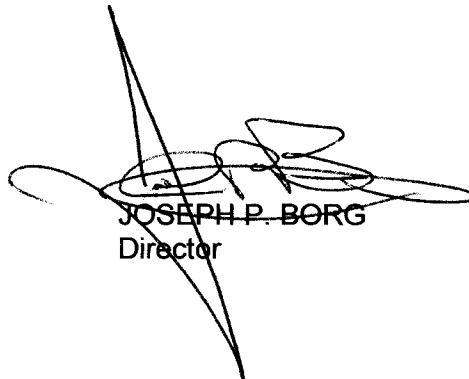
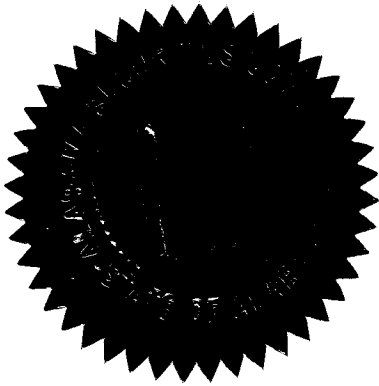
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401 Adams Avenue Suite 280
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IF A WRITTEN REQUEST FOR A HEARING BEFORE THE ALABAMA SECURITIES COMMISSION IS NOT SUBMITTED WITHIN 28 DAYS AFTER RECEIPT OF THIS ORDER, THIS ORDER SHALL CONSTITUTE A FINAL ORDER OF THE COMMISSION

In lieu of a formal hearing, you may request an informal meeting with the Director or the Commission staff to resolve the matter. You will not waive your rights to a formal hearing. The Commission staff requests that you submit a verified statement, setting forth full details concerning your activities giving rise to this Order, no matter whether you are requesting a formal hearing, an informal meeting, or just desire to provide your side of the matter.

Please identify yourself as a Respondent and refer to the Order number when requesting a hearing, informal meeting, or otherwise corresponding with the Commission staff concerning this matter.

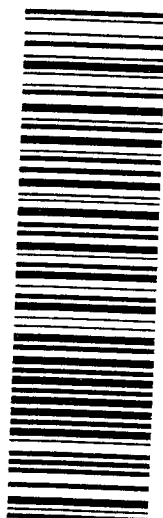
Appeals from any final Order of the Commission shall be made to the Circuit Court of Montgomery County, Alabama.



JOSEPH P. BORG
Director

STATE OF ALABAMA
SECURITIES COMMISSION
P.O. BOX 304700
MONTGOMERY, AL 36130-4700
www.asc.alabama.gov

United States Postal Service
REGISTERED MAIL



RB 992 165 507 US

Label 200 JULY 1999 (102595) 99-M-1904

ROBERT JOSEPH ANDRES
5644 WESTHEIMER ROAD #452
HOUSTON TX 77056-4002

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

ROBERT JOSEPH ANDRES
5644 WESTHEIMER RD #452
HOUSTON TX 77056-4002

COMPLETE THIS SECTION ON DELIVERY

A. Signature

☒ X☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Certified Mail
☒ Registered
☐ Insured Mail
☐ Express Mail
☒ Return Receipt for Merchandise
☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number

(Transfer from service label)

RB 992 165 507 US RP

CP-2009-0040

12/15/09

PS Form 3811, February 2004

Domestic Return Receipt

50A-0137

102595-02-M-1540

STATE OF ALABAMA
SECURITIES COMMISSION
P.O. BOX 304700
MONTGOMERY, AL 36130-4700
www.asc.alabama.gov

United States Postal Service
REGISTERED MAIL



RB 992 165 498 US

Label 200, July 1999

(102595) 99-M-1904

COVENANT FAMILY TRUST
5644 WESTHEIMER ROAD #452
HOUSTON TX 77056-4002

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

COVENANT FAMILY TRUST
5644 WESTHEIMER RD #452
HOUSTON TX 77056-4002

COMPLETE THIS SECTION ON DELIVERY

- A. Signature ☒ Agent ☐ Addressee
- B. Received by (Printed Name) C. Date of Delivery
- D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Certified Mail ☐ Express Mail
☒ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.
4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number
(Transfer from service label)

RB 992 165 498 US

509-0137 12/15/09

PS Form 3811, February 2004

Domestic Return Receipt

RP CD-2009-0049 102595-02-M-1540

STATE OF ALABAMA
SECURITIES COMMISSION
P.O. BOX 304700
MONTGOMERY, AL 36130-4700
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United States Postal Service
REGISTERED MAIL



RB 992 165 484 US

Label 200, July 1999 (102595) 99-M-1904

WINSOME INVESTMENT TRUST
5644 WESTHEIMER #452
HOUSTON TX 77056-4002

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

WINSOME INVESTMENT TRUST
5644 WESTHEIMER #452
HOUSTON TX 77056-4002

COMPLETE THIS SECTION ON DELIVERY

A. Signature ☒ Agent ☐ Addressee
B. Received by (Printed Name) C. Date of Delivery
D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Certified Mail ☐ Express Mail
☒ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.
4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number RB 992 165 484 US CP 2009-0040 12/15/09
(Transfer from service label)
PS Form 3811, February 2004 Domestic Return Receipt RP 509-0137 102595-02-M-1540

I hereby certify that a duplicate original of the within Administrative Order No. 2009-0040, along with notice of Right to a Hearing, attached and made a part thereof, was duly served, personally on the named principal, Lewis Stanley Scogin.

This the 16 day of December 2009.

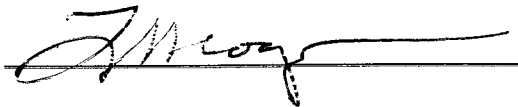


Server Signature

16 December 2009

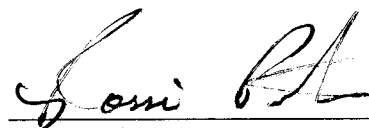
Date

Received By:



I hereby certify that a duplicate original of the within Administrative Order No. 2009-0040, along with notice of Right to a Hearing, attached and made a part thereof, was duly served, personally on the named principal, Covenant Family Trust.

This the 16 day of December 2009.

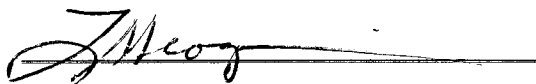


Server Signature

16 December 2009

Date

Received By:



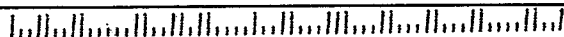
UNITED STATES POSTAL SERVICE



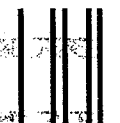
First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

STATE OF ALABAMA
SECURITIES COMMISSION
P. O. BOX 304700
MONTGOMERY AL 36130-4700



UNITED STATES POSTAL SERVICE



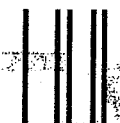
First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

STATE OF ALABAMA
SECURITIES COMMISSION
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MONTGOMERY AL 36130-4700



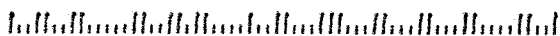
UNITED STATES POSTAL SERVICE



First-Class Mail
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USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

STATE OF ALABAMA
SECURITIES COMMISSION
P. O. BOX 304700
MONTGOMERY AL 36130-4700



SENDER: COMPLETE THIS SECTION

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1. Article Addressed to:

WINSOME INVESTMENT TRUST
5644 WESTHEIMER #452
HOUSTON TX 77056-4002

2. Article Number

(Transfer from service label)

RB 992 165 484 US

PS Form 3811, February 2004

Domestic Return Receipt RP

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *L Eulane*☒ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

12/15/09

- D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Certified Mail☐ Express Mail☒ Registered☒ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

SENDER: COMPLETE THIS SECTION

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

COVENANT FAMILY TRUST
5644 WESTHEIMER RD #452
HOUSTON TX 77056-4002

2. Article Number

(Transfer from service label)

RB 992 165 498 US

PS Form 3811, February 2004

Domestic Return Receipt RP

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *L Eulane*☒ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

12/15/09

- D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Certified Mail☐ Express Mail☒ Registered☒ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

SENDER: COMPLETE THIS SECTION

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

ROBERT JOSEPH ANDRES
5644 WESTHEIMER RD #452
HOUSTON TX 77056-4002

2. Article Number

(Transfer from service label)

RB 992 165 507 US RP

PS Form 3811, February 2004

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *L Eulane*☒ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

12/15/09

- D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Certified Mail☐ Express Mail☒ Registered☒ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

UNITED STATES POSTAL SERVICE

HUNTSVILLE / HVS

AL 358 2-1

15 JUL 2011 PM

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

ALABAMA SECURITIES COMMISSION
ENFORCEMENT DIVISION
PO BOX 304700
MONTGOMERY, AL 36130-4700

700



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- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

MR LEWIS STANLEY SCOGIN
153 JACQUE JIM DRIVE
HUNTSVILLE AL 35810

2. Article Number
(Transfer from service label)

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *[Signature]*

☐ Agent

☒ Addressee

B. Received by (Printed Name)

LEWIS STANLEY SCOGIN

C. Date of Delivery

7-15-11

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below: ☒ No

3. Service Type

☐ Certified Mail

☐ Express Mail

☒ Registered

☒ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

RE 767 050 317 US



JOSEPH P. BORG
Director
J. RANDALL McNEILL
Deputy Director
EDWIN L. REED
General Counsel

ALABAMA SECURITIES COMMISSION

401 ADAMS AVENUE, SUITE 280
MONTGOMERY, ALABAMA 36104

MAIL: POST OFFICE BOX 304700
MONTGOMERY, AL 36130-4700

TELEPHONE (334) 242-2984
1-800-222-1253

FAX (334) 242-0240

E-MAIL asc@asc.alabama.gov

CHAIRMAN
MARCUS J. WOLF
Certified Public Accountant

COMMISSIONERS

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Superintendent of Banks

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Commissioner of Insurance

ANDREW P. CAMPBELL
Attorney at Law

S. DAGNAL ROWE, SR.
Attorney at Law

JAMES L. HART
Certified Public Accountant

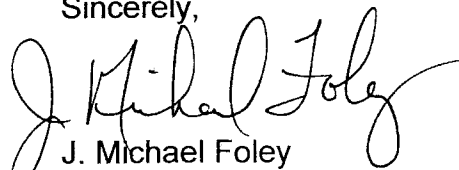
February 9, 2011

Covenant Family Trust
153 Jacque Jim Drive
Huntsville Alabama 35810

Regarding: Administrative Order number CD-2009-0040
Winsome Investment Trust/Covenant Family Trust

On December 14, 2009, the Alabama Securities Commission ("Commission") issued Administrative Order number CD-2009-0040. As noted in the Notice of Right to Hearing, Section 8-6-32 Code of Alabama 1975 allows 28 days to perfect your right to a formal hearing before the Commission. As of the date of this letter, you have not perfected that right. Therefore, the above referenced order has been made a Final Order of the Commission.

Sincerely,


J. Michael Foley
Senior Special Agent



ALABAMA SECURITIES COMMISSION

401 ADAMS AVENUE, SUITE 280
MONTGOMERY, ALABAMA 36104

MAIL: POST OFFICE BOX 304700
MONTGOMERY, AL 36130-4700

TELEPHONE (334) 242-2984
1-800-222-1253

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JOSEPH P. BORG
Director

J. RANDALL McNEILL
Deputy Director

EDWIN L. REED
General Counsel

CHAIRMAN
MARCUS J. WOLF
Certified Public Accountant

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S. DAGNAL ROWE, SR.
Attorney at Law

JAMES L. HART
Certified Public Accountant

February 9, 2011

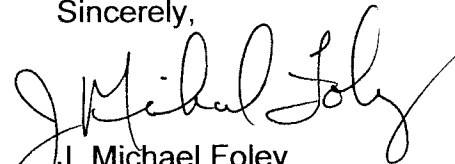
Lewis Stanley Scogin
153 Jacque Jim Drive
Huntsville Alabama 35810

Regarding: Administrative Order number CD-2009-0040
Winsome Investment Trust/Covenant Family Trust

Dear Mr. Scogin:

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Sincerely,


J. Michael Foley
Senior Special Agent



JOSEPH P. BORG
Director
J. RANDALL McNEILL
Deputy Director
EDWIN L. REED
General Counsel

ALABAMA SECURITIES COMMISSION

401 ADAMS AVENUE, SUITE 280
MONTGOMERY, ALABAMA 36104

MAIL: POST OFFICE BOX 304700
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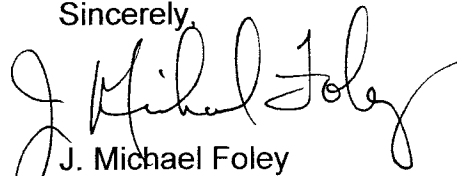
February 9, 2011

Covenant Family Trust
5644 Westheimer Road # 452
Houston Texas 77056

Regarding: Administrative Order number CD-2009-0040
Winsome Investment Trust/Covenant Family Trust

On December 14, 2009, the Alabama Securities Commission ("Commission") issued Administrative Order number CD-2009-0040. As noted in the Notice of Right to Hearing, Section 8-6-32 Code of Alabama 1975 allows 28 days to perfect your right to a formal hearing before the Commission. As of the date of this letter, you have not perfected that right. Therefore, the above referenced order has been made a Final Order of the Commission.

Sincerely,


J. Michael Foley
Senior Special Agent



JOSEPH P. BORG
Director
J. RANDALL McNEILL
Deputy Director
EDWIN L. REED
General Counsel

ALABAMA SECURITIES COMMISSION

401 ADAMS AVENUE, SUITE 280
MONTGOMERY, ALABAMA 36104

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MONTGOMERY, AL 36130-4700

TELEPHONE (334) 242-2984

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CHAIRMAN
MARCUS J. WOLF
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JAMES L. HART
Certified Public Accountant

February 9, 2011

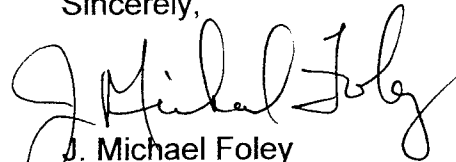
Robert Joseph Anders
5644 Westheimer Road # 452
Houston Texas 77056

Regarding: Administrative Order number CD-2009-0040
Winsome Investment Trust/Covenant Family Trust

Dear Mr. Anders:

On December 14, 2009, the Alabama Securities Commission ("Commission") issued Administrative Order number CD-2009-0040. As noted in the Notice of Right to Hearing, Section 8-6-32 Code of Alabama 1975 allows 28 days to perfect your right to a formal hearing before the Commission. As of the date of this letter, you have not perfected that right. Therefore, the above referenced order has been made a Final Order of the Commission.

Sincerely,


J. Michael Foley
Senior Special Agent



JOSEPH P. BORG
Director

J. RANDALL McNEILL
Deputy Director

EDWIN L. REED
General Counsel

ALABAMA SECURITIES COMMISSION

401 ADAMS AVENUE, SUITE 280
MONTGOMERY, ALABAMA 36104

MAIL: POST OFFICE BOX 304700
MONTGOMERY, AL 36130-4700

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CHAIRMAN
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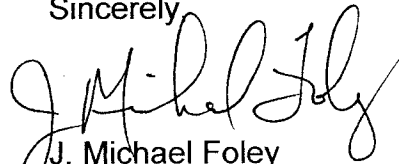
February 9, 2011

Winsome Investment Trust
5644 Westheimer Road # 452
Houston Texas 77056

Regarding: Administrative Order number CD-2009-0040
Winsome Investment Trust/Covenant Family Trust

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Sincerely,


J. Michael Foley
Senior Special Agent

ALABAMA SECURITIES COMMISSION
ENFORCEMENT DIVISION
PO BOX 304700

Check type of mail:
☐ Express
☒ Registered
☐ Insured
☐ COD
☐ Return Receipt (RR) for Merchandise
☐ Certified
☐ Int'l Rec. Del.
☐ Del. Confirmation (DC)
 If Registered Mail, check below:
☐ Insured
☐ Not Insured
 Affix stamp here if issued as certificate of mailing, or for additional copies of this bill.
 Postmark and Date of Receipt

Line	Article Number	Addressee Name, Street, and PO Address	Postage	Fee	Handling Charge	Actual Value (if Reg.)	Insured Value	Due Sender if COD	RR Fee	DC Fee	SC Fee	SH Fee	SD Fee	RD Fee	Remarks
1	RB 992 165	507 US	Robert Joseph Andres												
2			5644 Westheimer Rd # 452												
3			Houston TX 77056-4002												
4	RB 992 165	498 US	Covenant Family Trust												
5			5644 Westheimer Rd # 452												
6			Houston TX 77056-4002												
7	RB 992 165	484	Winsome Investment Trust												
8			5644 Westheimer Rd # 452												
9			Houston TX 77056-4002												
10															
11															
12															
13															
14															
15															
Total Number of Pieces		Total Number of Pieces Received at Post Office	Postmaster, Per (Name of receiving employee)		The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstruction insurance is \$50,000 per piece subject to a limit of \$500,000 per occurrence. The maximum indemnity payable on Express Mail merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R800, S913, and S921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.										

DEC 15 2005