

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

SECURITIES AND EXCHANGE COMMISSION :

Plaintiff, :

v. :

Civil Action No.: 4:17-cv-00336-ALM

THURMAN P. BRYANT, III, :
BRYANT UNITED CAPITAL FUNDING, INC., :
ARTHUR F. WAMMEL, :
WAMMEL GROUP, LLC, :
CARLOS GOODSPEED a/k/a SEAN PHILLIPS :
a/k/a GC d/b/a TOP AGENT ENTERTAINMENT :
d/b/a MR. TOP AGENT ENTERTAINMENT, :

Defendants, :

THURMAN P. BRYANT, JR., :

Relief Defendant. :

**PLAINTIFF’S MOTION FOR SHOW CAUSE ORDER AGAINST DEFENDANT
CARLOS GOODSPEED, AND BRIEF IN SUPPORT**

Plaintiff Securities and Exchange Commission (the “Commission”) respectfully files this Motion for Show Cause Order against Defendant Carlos Goodspeed, and Brief in Support (the “Motion”). Pursuant to FED. R. CIV. P. 30(d)(2) and 37(b)(2)(A) and (d)(1), the Commission moves the Court for an order requiring Defendant Carlos Goodspeed a/k/a Sean Phillips d/b/a Top Agent Entertainment d/b/a Mr. Top Agent Entertainment (“Goodspeed”) to appear and show cause why he should not be held in contempt for his refusal to comply with the Court’s November 9, 2017 Order [Dkt. No. 135], which granted the Commission’s Motion to Compel the Deposition of and Discovery Responses From Relief Defendant Carlos Goodspeed (“Motion to

Compel”) [Dkt. No. 125]. In support of this Motion, the Commission respectfully shows the Court the following:

I. SUMMARY

On November 9, 2017, this Court entered an Order [Dkt. No. 135] compelling Goodspeed to respond to the Commission’s first request for production of documents and to appear for a deposition. Regrettably and after accepting service of the Order, Goodspeed has repeatedly defied the Order. In spite of its best efforts to avoid burdening the Court with this issue, the Commission has been unable to convince Goodspeed to comply with the Court’s November 9, 2017 Order. As a result, the Commission now requests that the Court: (1) order Goodspeed to appear before the Court in person to show cause why he should not be held in contempt; (2) after such hearing, hold Goodspeed in contempt of the Court’s November 9, 2017 Order; (3) order Goodspeed to immediately produce, without objection, all documents requested in the Commission’s Request for Production; (4) order Goodspeed to appear for his continued deposition on a specific date and location without the time limitations of FED. R. CIV. P. 30(d)(1) and to remain at the deposition until excused by counsel for the Commission; (5) order such relief at law or in equity that is appropriate to compel Goodspeed’s compliance with the Court’s November 9, 2017 Order, including but not limited to the incarceration of Goodspeed until such time as the contempt is purged, and the payment a fine sufficient to compel future compliance; ; (6) order Goodspeed to pay costs and attorneys’ fees incurred by the Commission in seeking this relief; and (7) grant any such further relief at law or in equity to which the Commission is otherwise entitled.

II. RELEVANT BACKGROUND

A. The Commission's Complaint.

1. On May 15, 2017, the Commission filed its Complaint alleging that Defendants Thurman P. Bryant, III ("Bryant") and Bryant United Capital Funding, Inc. ("BUCF") (collectively, "Bryant Defendants") violated the antifraud provisions of the federal securities laws. [Dkt. No. 1.] The Commission alleged that the Bryant Defendants made various misrepresentations to BUCF investors, *inter alia*, as to the Bryant Defendants' business operations and the use of investor funds. The Commission specifically alleged that, while the Bryant Defendants told investors that their money would be used in a short-term mortgage financing program, they actually used the money for unauthorized, undisclosed purposes, including, but not limited to, transferring \$1.37 million to Goodspeed for alleged investments in Drake and Taylor Swift concert series. The Commission named Goodspeed as a relief defendant in its Complaint because he received ill-gotten proceeds from the Bryant Defendants' fraudulent scheme.

2. On January 26, 2018, the Commission filed its First Amended Complaint [Dkt. No. 154], recasting Goodspeed as a defendant (from a relief defendant) and asserting claims against him for violations of Section 17(a) of the Securities Act of 1933 (the "Securities Act") and Section 10(b) of the Securities Exchange Act of 1934 (the "Exchange Act") and Rule 10b-5 thereunder. The claims against Goodspeed are based on misrepresentations and omissions he made in connection with his sale of securities (investment contracts for the Drake and the Taylor Swift concert series).

B. The Commission's Discovery to Goodspeed.

3. Given the Commission's allegations in this case and the Court's appointment of a

receiver over BUCF [Dkt. No. 17], key issues in this lawsuit include (1) the facts and circumstances surrounding the Bryant Defendants' investments of BUCF investor funds with Goodspeed, and (2) the current location and/or disposition by Goodspeed of \$1.37 million of BUCF investor funds. Towards that end, the Commission has made significant efforts to discover these underlying facts and circumstances. For example, on August 9, 2017, the Commission personally served a Notice of Deposition on Goodspeed. *A true and correct copy of the Notice of Deposition Return of Service is attached as Exhibit A.* Similarly, on August 10, 2017, the Commission served Goodspeed with its First Request for Production to Relief Defendant Carlos Goodspeed (the "Request for Production"). *A true and correct copy of the Request for Production is attached hereto as Exhibit B.* In response to these discovery efforts, Goodspeed: (a) refused to appear for his deposition as required by the Notice of Deposition and FED. R. CIV. P. 30; and (b) failed to respond to the Request for Production.

4. Goodspeed's initial refusal to participate in discovery forced the Commission to bring these matters to the Court's attention on October 5, 2017 in the Motion to Compel [Dkt. No. 125], which details the Commission's unsuccessful efforts to engage Goodspeed in discovery.

5. On November 9, 2017, the Court entered the Order, which granted the Commission's Motion to Compel in its entirety. The Order states, in relevant part:

IT IS HEREBY ORDERED that Relief Defendant Carlos Goodspeed shall respond to Plaintiff's First Request for Production by November 20, 2017.

IT IS FURTHER ORDERED that Relief Defendant Carlos Goodspeed shall appear in person before counsel for the Securities and Exchange Commission at 801 Cherry Street, Suite 1900, Fort Worth, Texas 76102, on November 27, 2017, at 9:00 a.m. for the purpose of taking his videotaped deposition.

6. Initially, Goodspeed feigned that he would abide by the Court's Order and participate in discovery, acknowledging receipt of the Order and indicating that he would attend his November 27, 2017 deposition. *A true and correct copy of the email re: Activity in Case 4:17-cv-00336-ALM Securities and Exchange Commission v. Bryant et al Order on Motion to Compel dated November 9, 2017 from Jason Reinsch to Goodspeed is attached hereto as Exhibit C.*

7. While Goodspeed initially appeared for his deposition, he prematurely terminated the deposition over the objections of the Commission and the Receiver, indicating without notice that he could not stay for the entirety of his deposition because he needed to pick up his children. Counsel for the Commission attempted to be understanding of this alleged obligation given that Goodspeed was representing himself *pro se* and he may not have appreciated the time allotment for depositions as provided by the Federal Rules of Civil Procedure. To balance the deposition the Commission was entitled to take with an attempt to accommodate Goodspeed's unexpected, premature termination of the deposition, the Commission and the Receiver agreed with Goodspeed to not seek immediate redress from the Court so long as Goodspeed returned on December 4, 2017 for the continuation of his deposition. *See Transcript of the Videotaped Deposition of Carlos Goodspeed dated November 27, 2017 (the "Goodspeed Transcript") at 228:17-230:6. A true and correct copy of the cited excerpts of the Goodspeed Transcript is attached to as Exhibit D.*

8. However, in spite of Goodspeed's discovery obligations and the accommodation afforded him by the Commission and the Receiver, Goodspeed has failed to appear to complete his continued deposition. In fact, on December 4, 2017, counsel for the Commission and counsel for the Receiver appeared for the continued deposition, as agreed to by the parties, but

Goodspeed did not show up. As a result, counsel for the Commission sought to contact Goodspeed multiple times to determine whether he intended to appear. *A true and correct copy of the email chain re: SEC v. Bryant, et al. - Continuance of Deposition and Discovery Responses from Jason Reinsch to Goodspeed from November 29, 2017 to December 6, 2017 is attached hereto as Exhibit E.* Goodspeed did not respond to any of these attempts, and the Commission proceeded to obtain a Statement of Non-appearance at that time. *A true and correct copy of the December 4, 2017 Statement of Nonappearance re: Carlos Goodspeed is attached hereto as Exhibit F.*

9. Following Goodspeed's nonappearance, counsel for the Commission sent numerous emails and made multiple phone calls to Goodspeed to schedule another time for his deposition and to convince him to abide by his agreement and the Order. *See, e.g., email re: SEC v. Bryant, et al. - Motion for Show Cause and for Sanctions from Jason Reinsch to Goodspeed dated January 11, 2018, a true and correct copy of which is attached hereto as Exhibit G.* However, Goodspeed has never responded to any of these inquiries.

10. Moreover, Goodspeed's answers to many of the questions posed to him before he terminated the November 27, 2017 deposition were non-responsive and evasive. For example, counsel for the Commission tried to solicit information regarding Goodspeed's alleged efforts to plan and promote the Taylor Swift concert series that formed the basis of one of the Bryant Defendants' investments with him. Goodspeed responded with generic, evasive, and non-responsive answers and then ultimately refused to identify persons that might corroborate his alleged efforts, if any, to promote a Taylor Swift concert series.

Q. Who approached you about investing with -- whoever has approached you about making investments concerning Taylor Swift?

A. A number of people, people call me all the time.

[. . .]

Q. First, let's take it one bite at a time. In 2017, did anyone approach you about investments in Taylor Swift concerts?

A. Yeah, I know a couple of guys that did.

Q. What are their names?

A. I don't know. Well, Mike is one guy, Mike is the main guy.

Q. What's Mike's last name?

A. Mike Touchins, Michael Touchins.

Q. T-O-T -- do your best to -- where would we be able to find his name?

A. I don't know, he's just a guy, he's just a guy that has connections, man.

Q. He's a guy that has connections with Taylor Swift?

A. He has connections with a lot of people.

[. . .]

Q. Do you have Mike's telephone number?

A. No.

Q. You don't?

A. No.

Q. So if you wanted to call or communicate with Mike, how would you find his phone number?

A. I got ways to get in touch with him. I wouldn't talk to him on the phone.

Q. If you want to speak with Mr. Touchins right now, how would you contact him?

A. I got somebody that would call him and get in touch with him for me.

Q. Who is that?

A. A friend.

Q. Okay. Who is that?

A. It's a friend. So a friend, that's something I shouldn't have to reveal.

Ex. D at 192:24-194:23.

11. As another example, in an effort to determine the authenticity of Goodspeed's claim that he had previously, successfully invested in Taylor Swift concert promotions, counsel for the Commission asked questions about those alleged investments. But Goodspeed refused to provide the details of this investment.

Q. Who did you give your money to?

A. A guy of mine, a guy of mine. That's irrelevant.

Q. My question is who, who did you give the money to?

A. A guy of mine that was dealing with some people that dealt with [Taylor Swift] that he knew.

Q. Who was that guy?

A. A friend of mine. He has nothing do with anything.

Q. He does.

A. No. There's no way that he does. This has nothing to do with nothing.

Q. Are you refusing --

A. Jason, it really doesn't. It has nothing to do with anything.

Q. Are you refusing to answer that question?

A. Yeah. There's nothing to answer. You just asked me did I ever deal with Taylor Swift shows. I said, yes, I invested in a show. I invested in a lot of shows. But that's neither here nor there. That doesn't -- I've invested in a lot of shows with my own personal money.

Ex. D at 203:10–204:6.

12. As another example, Goodspeed was also questioned about any ongoing efforts to promote the Taylor Swift concert series with the \$600,000 in BUCF investor funds which should be in Goodspeed's control, but he again refused to answer the questions.

Q. Did Taylor Swift ever play those concerts in June of 2017?

A. No, sir.

Q. Is there still an effort to schedule those concerts?

A. Yes.

Q. Who is making that effort?

A. We're working on that effort.

Q. Who is "we"?

A. Like me and the guys. I already answered all those questions.

Q. No.

A. Yes, I did, I answered those questions.

Q. Okay. Well, who at this point?

A. I already answered that question.

Q. No. You're going to answer the question again.

A. I answered it already.

Q. Mr. Goodspeed, as you sit here today, we talked about Mr. Touchins when you brought the opportunity. We have not discussed who the actual alleged or hopeful promoters are for the Taylor Swift concert in 2017.

A. Depends on who you choose to go with. It could be a number of people. It depends on who you choose to go with, whatever is the best deal, whatever works the best situation for me and my people involved.

Q. So who as you sit here today is working to promote Taylor Swift concerts in those five locations on Exhibit 13?

A. Myself, nobody, nobody, I already told you.

Q. Anyone besides you?

A. What did you say?

Q. Anyone other than you that is trying to coordinate this?

A. No.

Q. Who are you working with?

A. I'm working with myself right now. That's who I'm working with.

Q. But who are you -- obviously, you're not going to -- you'll have to speak with somebody, a representative of Taylor Swift to make that concert happen, correct?

A. The people that need to take care of that.

Q. And who are those people?

A. That's irrelevant.

Ex. D at 206:10–208:2.

13. In addition, the Order required Goodspeed to respond to the Request for Production no later than November 20, 2018. As of the filing of this Motion, Goodspeed has neither responded to the Request for Production nor produced a single document. Goodspeed testified in November 2017 that he had made no effort to locate responsive documents. *See id.* at 212:16-214:17. Goodspeed's unwillingness to conduct a good faith search for documents as required by the Court in its November 9, 2017 Order is troubling given that throughout his deposition Goodspeed acknowledged the existence of emails and other documents that only he has access to and that are responsive to the Request for Production. *See., e.g., id.* at 157:14-158:14 (unproduced email from unidentified third party with profit and loss projections for the Drake concert series); 212:4-14 (unproduced document identifying the BUCF investments.)

III. LEGAL AUTHORITY

“A party commits contempt when he violates a definite and specific order of the court requiring him to perform or refrain from performing a particular act or acts with knowledge of the court’s order.” *SEC v. First Fin. Group of Texas, Inc.*, 659 F.2d 660, 669 (5th Cir. 1981) (acknowledging a court’s power to punish for contempt is “a necessary and integral part of the independence of the judiciary, and is absolutely essential to the performance of the duties imposed on them by law”); *see also* FED. R. CIV. P. 30(d)(2), 37(b)(2)(A) & (d)(1).

In a civil contempt proceeding, the movant bears the burden of establishing the elements of contempt by clear and convincing evidence.¹ *SEC v. Resource Dev. Int’l LLC*, 217 F. App’x 296, 298 (5th Cir. 2007) (citing *Petroleos Mexicanos v. Crawford Enter., Inc.*, 826 F.2d 392, 401 (5th Cir. 1987)). “Clear and convincing evidence is that weight of proof which produces in the mind of the trier of fact a firm belief or conviction . . . so clear, direct and weighty and convincing as to enable the fact finder to come to a clear conviction, without hesitancy, of the truth of the precise facts of the case.” *Shafer v. Army & Air Force Exch. Serv.*, 376 F.3d 386, 396 (5th Cir. 2004). The elements of contempt that the movant must prove by clear and convincing evidence are: (1) a court order is or was in effect, (2) the order requires certain conduct, and (3) the opposing party fails to comply with the court order.² *See Martin v. Trinity Indus., Inc.*, 959 F.2d 45, 47 (5th Cir. 1992); *see also SEC v. ABC Viaticals, Inc.*, 2013 WL 1288168, *4 (N.D. Tex. Mar. 28, 2013). In the context of a violation of a court order requiring

¹ The clear and convincing evidence standard is higher than the “preponderance of evidence” standard, but not as high as “beyond a reasonable doubt.” *U.S. v. Rizzo*, 539 F.2d 458, 465 (5th Cir. 1976).

² The conduct at issue need not be willful; the Commission need only show that the Defendants actually failed to comply with the court’s order. *See American Airlines, Inc. v. Allied Pilots Ass’n*, 228 F.3d 574, 581 (5th Cir. 2000).

the production of documents, “the court simply asks whether the respondent has produced the documents. If he has not, the burden shifts to the respondent to rebut this conclusion, demonstrate an inability to comply, or present other relevant defenses.” *F.D.I.C. v. LeGrand*, 43 F.3d 163, 170 (5th Cir. 1995)

“Upon a finding of contempt, the district court has broad discretion in assessing sanctions to protect the sanctity of its decrees and the legal process.” *Test Masters Educ. Servs., Inc. v. Singh*, 428 F.3d 559, 582 (5th Cir. 2005) (citing *American Airlines*, 228 F.3d at 585). “Judicial sanctions in civil contempt proceedings, may in a proper case, be employed for either or both of two purposes: to coerce the defendant into compliance with the court’s order, and to compensate the complainant for losses sustained.” *American Airlines*, 228 F.3d at 585 (quoting *United States v. United Mine Workers of Am.*, 330 U.S. 258, 303-04 (1947)).

IV. ANALYSIS

A. A Court Order is in Effect.

As discussed, the Court entered the Order on November 9, 2017. [Dkt. No. 135.] Thus, the Commission has established the first element of contempt.

B. The Order Requires Certain Conduct.

The Order contains definite and specific directives to Goodspeed, clearly requiring that he (1) respond to the Commission’s Request for Production by November 20, 2017; and (2) appear for a deposition on November 27, 2018. The Commission has established the second contempt element.

C. Goodspeed Failed to Comply With the Order.

Finally, Goodspeed has failed to comply with the Order. First, Goodspeed has not responded to the Commission’s Requests for Production and, according to his deposition

testimony, has not undertaken a good-faith search for any responsive documents. *See* Ex. D at 212:16-214:17. Goodspeed's explanation for not searching for documents is, "I don't have any documents, like, you-all have all the documents. Any documents you-all have, I don't have anything else for you." *Id.* at 212:19-21. This, however, is not an appropriate justification for failing to conduct a good-faith search. Goodspeed has no way of knowing what documents the Commission has or does not have.³ Moreover, Goodspeed testified that he has at least some documents that are responsive to the Request for Production and that are not in the Commission's possession. *See., e.g., id.* at 157:14-158:14 (unproduced email from unidentified third party with profit and loss projections for the Drake concert series); 212:4-14 (unproduced document identifying the BUCF investments.)

Second, Goodspeed failed to appear for a complete deposition as required by the Order. Goodspeed prematurely terminated the deposition over the Commission's and Receiver's objections. *Id.* at 228:17-230:6. However, in attempt to be understanding of Goodspeed's apparent obligation to pick up his children from school, the Commission and the Receiver agreed to not seek redress from the Court so long as Goodspeed appeared on December 4, 2017 for the completion of his deposition. *Id.* Goodspeed agreed to this accommodation; however, he failed to appear on that date and has since refused to respond to the repeated requests by counsel for the Commission for Goodspeed to complete his deposition. *See* Ex. F.

³ The documents that are responsive to the Request for Production are not limited to those concerning the Drake and the Taylor Swift concert series investments by the Bryant Defendants. For example, the Request for Production also seek materials concerning another investment by the Bryant Defendants with Goodspeed concerning an alleged Lil Wayne Super Bowl After Party, materials concerning other events Goodspeed touted to the Bryant Defendants and others as evidence of his expertise in the concert promotion and booking industry, and materials concerning Goodspeed's financial institution accounts with which he received and utilized the Bryant Defendants' and others' investment capital. *See* Ex. B at Request Nos. 33-68, and 74.

In addition, during the portion of his deposition that Goodspeed appeared, he refused to answer questions concerning his efforts to carry out the purpose of the BUCF investment: specifically, to promote the Drake and the Taylor Swift concert series. Goodspeed confirmed that neither the Drake concert series nor the Taylor Swift concert series came to fruition. *See* Ex. D at 159:20-23 (Drake concerts); 208:7-13 (Taylor Swift concerts). He further testified that he is continuing to make efforts to schedule those concerts. *Id.* at 159:24-160:1 (Drake concerts); 209:3-6 (Taylor Swift concerts). However, Goodspeed was unwilling to provide any details regarding his ongoing efforts in this regard. When asked about the persons his he is working with to schedule these concerts, he refused to identify any details. *See, e.g., id.* at 206:10–208:2. Thus, even though Goodspeed appeared for a portion of his deposition, Goodspeed has not complied with the Order in that he: (a) refused to respond to proper deposition questions; (b) terminated the deposition under objection from the Commission and the Receiver; and (c) has not appeared for the continued deposition as he agreed to do.

Thus, Goodspeed's unwillingness to participate in discovery and his defiance of the Order has forced the Commission to bring this matter to the Court's attention for a second time.

V. CONCLUSION

For the foregoing reasons, the Commission respectfully requests that the Court grant this Motion and order Goodspeed to appear at a hearing to show cause why he is not in contempt of this Court's November 9, 2017 Order. Because of Goodspeed's violations of this Court's order, after a hearing on this matter, Goodspeed should be held in contempt and ordered to (i) immediately produce, without objection, all documents requested in the Commission's Request for Production; (ii) appear for his continued deposition on a specific date and location without the time limitations of FED. R. CIV. P. 30(d)(1) and remain at the deposition until excused by

counsel for the Commission; (iii) order such relief at law or in equity that is appropriate to compel Goodspeed's compliance with the Court's November 9, 2017 Order, including but not limited to the incarceration of Goodspeed until such time as the contempt is purged, and the payment a fine sufficient to compel future compliance; (iv) pay costs and attorneys' fees incurred by the Commission in seeking this relief; and (v) grant any such further relief at law or in equity to which the Commission is otherwise entitled.

Dated: March 2, 2018

Respectfully submitted,

/s/ Jason P. Reinsch

JASON P. REINSCH
Texas Bar No. 24040120

United States Securities and Exchange
Commission
Fort Worth Regional Office
Burnett Plaza, Suite 1900
801 Cherry Street, Unit #18
Fort Worth, TX 76102-6882
Ph: 817-900-2601 (jpr)
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reinschj@sec.gov

ATTORNEYS FOR PLAINTIFF
SECURITIES AND EXCHANGE
COMMISSION

CERTIFICATE OF CONFERENCE

In accordance with FED. R. CIV. P. 37(d)(1)(B), I hereby certify that on November 27, 2017 and multiple instances before then, I conferred with Goodspeed in good faith in an effort to obtain the documents responsive to the Request for Production and answers to questions posed at his deposition. In additional, I further certify that on November 27, 2017, December 6, 2017, January 11, 2018, and March 1, 2018 I emailed Goodspeed to further confer in good faith regarding the matters at issue in this Motion. As of the time of this filing, Goodspeed has not responded and, therefore, the Motion is presented to the Court as opposed.

/s/ Jason P. Reinsch

Jason P. Reinsch

CERTIFICATE OF SERVICE

I hereby certify that, on March 2, 2018, I electronically filed the foregoing *Plaintiff's Motion for Show Cause Hearing to Hold Defendant Carlos Goodspeed in Contempt, and Brief in Support* with the Clerk of Court for the Eastern District of Texas, Sherman Division using the CM/ECF system, which will send a notice of electronic filing to all counsel of record who have consented to electronic notification. I further certify that I mailed the foregoing document and the notice of electronic filing by first-class mail to all non-CM/ECF participants.

/s/ Jason P. Reinsch

Jason P. Reinsch

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

SECURITIES AND EXCHANGE COMMISSION :

Plaintiff, :

v. :

Civil Action No.: 4:17-cv-00336-ALM

**THURMAN P. BRYANT, III, and
BRYANT UNITED CAPITAL FUNDING, INC.**

Defendants, :

**ARTHUR F. WAMMEL,
WAMMEL GROUP, LLC
THURMAN P. BRYANT, JR.,
CARLOS GOODSPEED a/k/a SEAN PHILLIPS
d/b/a TOP AGENT ENTERTAINMENT d/b/a
MR. TOP AGENT ENTERTAINMENT**

Relief Defendants. :

**NOTICE OF DEPOSITION OF RELIEF DEFENDANT
CARLOS GOODSPEED a/k/a SEAN PHILLIPS**

To: Carlos D. Goodspeed a/k/a Sean Phillips, 1300 Cottonwood Valley Circle, South, Irving, Texas 75038

Please take notice that, in accordance with Federal Rule of Civil Procedure 30(a), Plaintiff Securities and Exchange Commission will take the oral and videotaped deposition of **Relief Defendant Carlos Goodspeed a/k/a Sean Phillips** at 9:00 a.m. on **Thursday, August 17, 2017**.

The deposition will be taken in person at the following location:

U.S. Securities and Exchange Commission
801 Cherry St., Suite 1900
Fort Worth, TX 76102

Exhibit

A

The deposition will be taken before a certified court reporter or another person authorized by law and will be videotaped. All parties and their counsel are invited to attend and cross-examine.

5/17

Dated: August 7, 2017

Respectfully submitted,



JASON P. REINSCH

Texas Bar No. 24040120

JESSICA B. MAGEE

Texas Bar No. 24037757

TIMOTHY L. EVANS

Texas Bar No. 24065211

United States Securities and Exchange Commission

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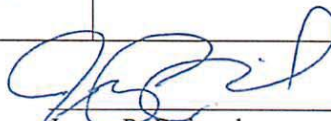
ATTORNEYS FOR PLAINTIFF

SECURITIES AND EXCHANGE COMMISSION

CERTIFICATE OF SERVICE

I certify that on August 7, 2017, I served *Plaintiff's Notice of Deposition of Relief Defendant Carlos Goodspeed a/k/a Sean Phillips* on all parties or their counsel via email and/or UPS as detailed below:

<p>Thurman P. Bryant, III 1535 Sun Mountain San Antonio, TX 78258 <i>Pro Se Defendant</i></p>	<p>Toby Galloway Kelly Hart & Hallman LLP 201 Main St., Suite 2500 Fort Worth, Texas 76102 Toby.Galloway@kellyhart.com</p> <p>Jimmy Ardoin Ardoin Law PLLC 2118 Smith St., Suite 200 Houston, Texas 77002 Jimmy@ardoinlawpllc.com <i>Attorneys for Relief Defendants Arthur M. Wammel and Wammel Group LLC</i></p>
<p>Thurman P. Bryant, Jr. 2 Dogwood Lane Hilltop Lakes, TX 77871 <i>Pro Se Relief Defendant</i></p>	<p>Carlos D. Goodspeed a/k/a Sean Phillips d/b/a Top Agent Entertainment d/b/a Mr. Top Agent Entertainment 1300 Cottonwood Valley Circle, South Irving, TX 75038 <i>Pro Se Relief Defendant</i></p>
<p>Jennifer R. Ecklund Tim Hudson Thompson & Knight One Arts Plaza 1722 Routh Street, Suite 1500 Dallas, TX 75201 Jennifer.Ecklund@tklaw.com <i>Court-Appointed Receiver</i></p> <p>Timothy E. Hudson Thompson & Knight One Arts Plaza 1722 Routh Street, Suite 1500 Dallas, TX 75201 Tim.Hudson@tklaw.com <i>Counsel for Court-Appointed Receiver for Bryant United Capital Funding</i></p>	



Jason P. Reinsch

RETURN OF SERVICE

**UNITED STATES DISTRICT COURT
Eastern District of Texas**

Case Number: 4:17-CV-336

Plaintiff:
Securities and Exchange Commission

vs.

Defendant:
Bryant III, Thurman P; et al

For:
U.S. Securities and Exchange Commission
100 F St NE
Washington, DC 20549

Received by Cavalier Courier & Process Service to be served on **Carlos Goodspeed, 1300 Cottonwood Valley Circle, South, Irving, TX.**

I, Johanna Christophel, do hereby affirm that on the **9th day of August, 2017 at 12:37 pm, I:**

Served Notice of Deposition of Relief Defendant Carlos Goodspeed a/k/a Sean Phillips personally to Carlos Goodspeed at Sewell Cadillac Dealership, 7310 Lemmon Ave, Dallas, TX 75209.

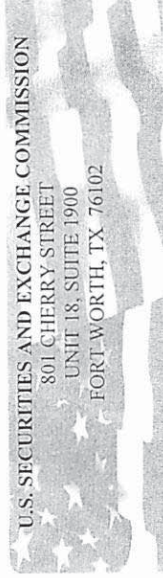
I certify that I am a natural person over the age of eighteen, not a party to or otherwise interested in the subject matter in controversy, and am authorized to serve process in accordance with the laws of the jurisdiction where service was made.


Johanna Christophel
Process Server

**Cavalier Courier & Process Service
823-C South King Street
Leesburg, VA 20175
(703) 431-7085**

Our Job Serial Number: CAV-2017006086
Ref: FWRO-57039





TO: Carlos D. Goodspeed a/k/a Sean Phillips d/b/a
Top Agent Entertainment d/b/a Mr. Top Agent
Entertainment
1300 Cottonwood Valley Circle, South
Irving, TX 75038

Minnick, Deborah

From: Minnick, Deborah
Sent: Monday, August 07, 2017 4:49 PM
To: 'treybryant03@gmail.com'; 'sonny_103@hotmail.com'; 'Toby.Galloway@kellyhart.com'; 'jimmy@ardoinlawpllc.com'; 'Jennifer.Ecklund@tklaw.com'; 'Tim.Hudson@tklaw.com'
Cc: Reinsch, Jason; Evans, Timothy; Fairchild, Rebecca R. (FairchildR@sec.gov)
Subject: SEC v. Bryant, III, et al.
Attachments: Depo Notice.Goodspeed.pdf

Please find attached Plaintiff's *Notice of Deposition of Relief Defendant Carlos Goodspeed a/k/a Sean Phillips* regarding the above-reference case. Please be advised that this deposition is scheduled for **Thursday, August 17, 2017 at 9:00 a.m.**

Respectfully,
Deborah A. Minnick
Senior Trial Paralegal
U.S. Securities and Exchange Commission
Fort Worth Regional Office
801 Cherry Street, Suite 1900
Fort Worth, Texas 76102
(817) 900-2617
(817) 978-4927 (fax)

UPS CampusShip: View/Print Label

1. Ensure there are no other shipping or tracking labels attached to your package. Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.
2. Fold the printed label at the solid line below. Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.
3. GETTING YOUR SHIPMENT TO UPS
Customers with a Daily Pickup
Your driver will pickup your shipment(s) as usual.

Customers without a Daily Pickup

Take your package to any location of The UPS Store®, UPS Access Point™ location, UPS Drop Box, UPS Customer Center, Staples® or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the Resources area of CampusShip and select UPS Locations.

Schedule a same day or future day Pickup to have a UPS driver pickup all your CampusShip packages. Hand the package to any UPS driver in your area.

UPS Access Point™
THE UPS STORE
209 W 2ND ST
FORT WORTH, TX 76102

UPS Access Point™
THE UPS STORE
2830 S HULEN ST
FORT WORTH, TX 76109


UPS Access Point™
THE UPS STORE
6387 CAMP BOWIE BLVD
FORT WORTH, TX 76116


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DEBORAH MINNICK 817/9002617 SEC FORT WORTH 801 CHERRY ST FORT WORTH TX 76102	SHIP TO: THURMAN P. BRYANT, III BRYANT UNITED CAPITAL FUNDING, INC. 1535 SUN MOUNTAIN SAN ANTONIO TX 78258-7359	0.0 LBS LTR	1 OF 1
		TX 782 9-03 	
UPS NEXT DAY AIR		1	
TRACKING #: 1Z A37 81X 24 9635 4082			
BILLING: P/P SIGNATURE REQUIRED			
Reference #1: FW-4150 Depo Notice Goodspeed		CS 19.5.40. WNTNVS0 00.0A 07/2017	

Minnick, Deborah


From: UPS Quantum View <pkginfo@ups.com>
Sent: Tuesday, August 08, 2017 9:43 AM
To: Minnick, Deborah
Subject: UPS Update: Follow My Delivery



 **A signature is required for package delivery**

You have a package coming.
Select Follow My Delivery to view its progress on a live map.

Scheduled Delivery Date: Tuesday, 08/08/2017 [Sign Now](#)




[Change Delivery](#) [Follow My Delivery](#) [View Delivery Planner](#)

This message was sent to you at the request of SEC FORT WORTH REG OFFICE to notify you that your shipment is on its way. To view the status of your shipment, click on the tracking link below.

Shipment Details

From: SEC FORT WORTH REG OFFICE
Tracking Number: [1ZA3781X2496354082](#)
UPS Service: UPS NEXT DAY AIR

 [Download the UPS mobile app](#)

Minnick, Deborah

From: UPS Quantum View <pkginfo@ups.com>
Sent: Tuesday, August 08, 2017 10:33 AM
To: Minnick, Deborah
Subject: UPS Delivery Notification, Tracking Number 1ZA3781X2496477477



Your package has been delivered.

Delivery Date: Tuesday, 08/08/2017
Delivery Time: 10:26 AM

At the request of SEC FORT WORTH REG OFFICE this notice alerts you that the status of the shipment listed below has changed.

Shipment Detail

Tracking Number:	<u>1ZA3781X2496477477</u>
Ship To:	Toby M. Galloway, Esq. Kelly Hart & Hallman LLP 201 MAIN ST FLOOR 25 ROOM 2500 FORT WORTH, TX 76102 US
UPS Service:	UPS NEXT DAY AIR
Number of Packages:	1
Shipment Type:	Letter
Delivery Location:	MAIL ROOM FLIPPEN
Signature Required:	A signature is required for package delivery
Reference Number 1:	FW-4150 - Depo Notice Goodspeed



[Download the UPS mobile app](#)

UPS CampusShip: View/Print Label

1. Ensure there are no other shipping or tracking labels attached to your package. Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.
2. Fold the printed label at the solid line below. Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.
3. GETTING YOUR SHIPMENT TO UPS
Customers with a Daily Pickup
Your driver will pickup your shipment(s) as usual.

Customers without a Daily Pickup

Take your package to any location of The UPS Store®, UPS Access Point(TM) location, UPS Drop Box, UPS Customer Center, Staples® or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the Resources area of CampusShip and select UPS Locations.

Schedule a same day or future day Pickup to have a UPS driver pickup all your CampusShip packages.
Hand the package to any UPS driver in your area.

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UPS Access Point™
THE UPS STORE
2830 S HULEN ST
FORT WORTH, TX 76109

UPS Access Point™
THE UPS STORE
6387 CAMP BOWIE BLVD
FORT WORTH, TX 76116

FOLD HERE

DEBORAH MINNICK 8179002617 SEC FORT WORTH 801 CHERRY ST FORT WORTH TX 76102	SHIP TO: TOBY M. GALLOWAY, ESQ. KELLY HART & HALLMAN LLP SUITE 2500 201 MAIN STREET FORT WORTH TX 76102-3129	0.0 LBS LTR	1 OF 1
		TX 761 9-05 	
UPS NEXT DAY AIR		1	
TRACKING #: 1Z A37 81X 24 9647 7477			
BILLING: P/P SIGNATURE REQUIRED			
Reference #1: FW-4150 - Depo Notice Goodspeed		CS 19.5.40. WNTNVS0 90.0A 07/2017	

Minnick, Deborah

From: UPS Quantum View <pkginfo@ups.com>
Sent: Tuesday, August 08, 2017 10:28 AM
To: Minnick, Deborah
Subject: UPS Delivery Notification, Tracking Number 1ZA3781X2498742293



Your package has been delivered.

Delivery Date: Tuesday, 08/08/2017

Delivery Time: 10:16 AM

At the request of SEC FORT WORTH REG OFFICE this notice alerts you that the status of the shipment listed below has changed.

Shipment Detail

Tracking Number:	<u>1ZA3781X2498742293</u>
Ship To:	Jimmy Ardoin Ardoin Law PLLC 2118 SMITH ST HOUSTON, TX 77002 US
UPS Service:	UPS NEXT DAY AIR
Number of Packages:	1
Shipment Type:	Letter
Delivery Location:	RECEPTION GOLDSMITH
Signature Required:	A signature is required for package delivery
Reference Number 1:	FW-4150 Depo Notice Goodspeed



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1. Ensure there are no other shipping or tracking labels attached to your package. Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.
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3. **GETTING YOUR SHIPMENT TO UPS**
Customers with a Daily Pickup
Your driver will pickup your shipment(s) as usual.

Customers without a Daily Pickup

Take your package to any location of The UPS Store®, UPS Access Point(TM) location, UPS Drop Box, UPS Customer Center, Staples® or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the Resources area of CampusShip and select UPS Locations.

Schedule a same day or future day Pickup to have a UPS driver pickup all your CampusShip packages.

Hand the package to any UPS driver in your area.

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UPS Access Point™
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2830 S HULEN ST
FORT WORTH, TX 76109

UPS Access Point™
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FORT WORTH, TX 76116

FOLD HERE

DEBORAH MINNICK 8179002617 SEC FORT WORTH 801 CHERRY ST FORT WORTH, TX 76102	SHIP TO: JIMMY ARDOIN ARDOIN LAW PLLC SUITE 200 2118 SMITH STREET HOUSTON TX 77002-8628	0.0 LBS LTR	1 OF 1
		TX 775 9-02 	
UPS NEXT DAY AIR		1	
TRACKING #: 1Z A37 81X 24 9874 2293			
BILLING: P/P SIGNATURE REQUIRED			
Reference #1: FW-4150 Depo Notice Goodspeed		CS 19-5-40 WNTNVS0 90.0A 07/2017	

Minnick, Deborah

From: UPS Quantum View <pkginfo@ups.com>
Sent: Tuesday, August 08, 2017 2:23 PM
To: Minnick, Deborah
Subject: UPS Delivery Notification, Tracking Number 1ZA3781X2496738104



Your package has been delivered.

Delivery Date: Tuesday, 08/08/2017
Delivery Time: 02:16 PM



[Set Delivery Instructions](#)

[Track Package Status](#)

[View Delivery Planner](#)

At the request of SEC FORT WORTH REG OFFICE this notice alerts you that the status of the shipment listed below has changed.

Shipment Detail

Tracking Number:	<u>1ZA3781X2496738104</u>
Ship To:	Thurman P. Bryant, Jr. 2 DOGWOOD HILLTOP LAKES, TX 77871 US
UPS Service:	UPS NEXT DAY AIR
Number of Packages:	1
Package Weight:	0.0 LBS
Delivery Location:	RESIDENTIAL
Signed by:	BRYANT

Signature Required:

A signature is required for package delivery

Reference Number 1:

FW-4150 Depo Notice Goodspeed



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UPS CampusShip: View/Print Label

1. Ensure there are no other shipping or tracking labels attached to your package. Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.
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3. **GETTING YOUR SHIPMENT TO UPS**
Customers with a Daily Pickup
Your driver will pickup your shipment(s) as usual.

Customers without a Daily Pickup

Take your package to any location of The UPS Store®, UPS Access Point(TM) location, UPS Drop Box, UPS Customer Center, Staples® or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the Resources area of CampusShip and select UPS Locations.

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Hand the package to any UPS driver in your area.

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FORT WORTH, TX 76109

UPS Access Point™
THE UPS STORE
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FORT WORTH, TX 76116

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DEBORAH MINNICK 8179002617 SEC FORT WORTH 801 CHERRY ST FORT WORTH TX 76102	0.0 LBS LTR	1 OF 1
SHIP TO: THURMAN P. BRYANT, JR. 2 DOGWOOD LANE HILLTOP LAKES TX 77871		
TX 778 0-02 		
UPS NEXT DAY AIR 1 TRACKING #: 1Z A37 81X 24 9673 8104		
		
BILLING: P/P SIGNATURE REQUIRED		
Reference #1: PW-4150 Depo Notice Goodspeed CS 19.5.40. WNTN50 90.0A 07/2017		
		

Minnick, Deborah

From: Sonny B <sonny_103@hotmail.com>
Sent: Tuesday, August 08, 2017 5:00 PM
To: Reinsch, Jason; Ecklund, Jennifer; Hudson, Timothy E.
Cc: Toby M. Galloway; Jimmy Ardoin; Minnick, Deborah
Subject: Change of mailing address

I have been traveling looking for a job and having interviews. I am away from the Hilltop Lakes address and currently in Midland, Texas.. I am in my RV and at a local RV Park. They accept mail. The address is:

c/o W CR 60 RV Park
9501 W CR 60
Site K-1
Midland, TX 79707

Regards,

Sonny
Thurman "Sonny" Bryant Jr
936 245-2322

UPS CampusShip: View/Print Label

1. Ensure there are no other shipping or tracking labels attached to your package. Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.
2. Fold the printed label at the solid line below. Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.

3. GETTING YOUR SHIPMENT TO UPS

Customers with a Daily Pickup

Your driver will pickup your shipment(s) as usual.

Customers without a Daily Pickup

Take your package to any location of The UPS Store®, UPS Access Point(TM) location, UPS Drop Box, UPS Customer Center, Staples® or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the Resources area of CampusShip and select UPS Locations.

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Hand the package to any UPS driver in your area.

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UPS Access Point™
THE UPS STORE
2830 S HULEN ST
FORT WORTH, TX 76109



UPS Access Point™
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6387 CAMP BOWIE BLVD
FORT WORTH, TX 76116

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DEBORAH MINNICK 8179002617 SEC FORT WORTH 801 CHERRY ST FORT WORTH TX 76102	0.0 LBS LTR	1 OF 1
SHIP TO: THURMAN BRYANT, JR. C/O W CR 60 RV PARK 9501 W CR 60, SITE K-1 MIDLAND TX 79707		
TX 797 9-02 		
UPS NEXT DAY AIR TRACKING #: 1Z A37 81X 24 9791 7347		
		
BILLING: P/P SIGNATURE REQUIRED		
Reference #1: FW-4150 Depo Notice for Goodspeed CS 19.5-40 WNTNVS0 90.0A 07/2017		
		

Minnick, Deborah

From: UPS Quantum View <pkginfo@ups.com>
Sent: Wednesday, August 09, 2017 10:14 AM
To: Minnick, Deborah
Subject: UPS Delivery Notification, Tracking Number 1ZA3781X2497917347

Your package has been delivered.

Delivery Date: Wednesday, 08/09/2017

Delivery Time: 10:06 AM

[Set Delivery Instructions](#)

[Track Package Status](#)

[View Delivery Planner](#)

At the request of SEC FORT WORTH REG OFFICE this notice alerts you that the status of the shipment listed below has changed.

Shipment Detail

Tracking Number:	<u>1ZA3781X2497917347</u>
Ship To:	c/o W CR 60 RV Park 9501 W COUNTY ROAD 60 ROOM K1 MIDLAND, TX 79707 US
UPS Service:	UPS NEXT DAY AIR
Number of Packages:	1
Package Weight:	0.0 LBS
Delivery Location:	RESIDENTIAL
Signed by:	BRYANT

Signature Required:

A signature is required for package delivery

Reference Number 1:

FW-4150 Depo Notice for Goodspeed



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Minnick, Deborah

From: UPS Quantum View <pkginfo@ups.com>
Sent: Tuesday, August 08, 2017 1:58 PM
To: Minnick, Deborah
Subject: UPS Delivery Notification, Tracking Number 1ZA3781X2496336520



Your package has been delivered.

Delivery Date: Tuesday, 08/08/2017
Delivery Time: 01:50 PM

At the request of SEC FORT WORTH REG OFFICE this notice alerts you that the status of the shipment listed below has changed.

Shipment Detail

Tracking Number:	<u>1ZA3781X2496336520</u>
Ship To:	Jennifer R. Ecklund Thompson & Knight 1722 ROUTH ST ROOM 250 DALLAS, TX 75201 US
UPS Service:	UPS NEXT DAY AIR
Number of Packages:	1
Shipment Type:	Letter
Delivery Location:	MAIL ROOM VANESSA
Signature Required:	A signature is required for package delivery
Reference Number 1:	FW-4150 Depo Notice Goodspeed



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UPS CampusShip: View/Print Label

1. **Ensure there are no other shipping or tracking labels attached to your package.** Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.
2. **Fold the printed label at the solid line below.** Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.
3. **GETTING YOUR SHIPMENT TO UPS**
Customers with a Daily Pickup
 Your driver will pickup your shipment(s) as usual.

Customers without a Daily Pickup

Take your package to any location of The UPS Store®, UPS Access Point(TM) location, UPS Drop Box, UPS Customer Center, Staples® or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the Resources area of CampusShip and select UPS Locations.

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UPS Access Point™
 THE UPS STORE
 209 W 2ND ST
 FORT WORTH, TX 76102

UPS Access Point™
 THE UPS STORE
 2830 S HULEN ST
 FORT WORTH, TX 76109

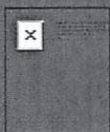
UPS Access Point™
 THE UPS STORE
 6387 CAMP BOWME BLVD
 FORT WORTH, TX 76116

FOLD HERE

<p>DEBORAH MINNICK 8179002617 SEC FORT WORTH 801 CHERRY ST FORT WORTH, TX 76102</p> <p>SHIP TO: JENNIFER R. ECKLUND THOMPSON & KNIGHT ONE ARTS PLAZA 1722 ROUTH STREET, STE 1500 DALLAS TX 75201-2532</p>	<p>0.0 LBS LTR</p> <p>1 OF 1</p>	<p>TX 752 9-33</p> 	<p>UPS NEXT DAY AIR</p> <p>1</p> <p>TRACKING #: 1Z A37 81X 24 9633 6520</p>		
<p>BILLING: P/P SIGNATURE REQUIRED</p> <p>Reference #1: FW-4150 Depo Notice Goodspeed</p> <p style="font-size: small;">CS 19.5.40. WNTNVS0 00.0A 07/2017</p>					

Minnick, Deborah

From: UPS Quantum View <pkginfo@ups.com>
Sent: Tuesday, August 08, 2017 1:58 PM
To: Minnick, Deborah
Subject: UPS Delivery Notification, Tracking Number 1ZA3781X2496331132



Your package has been delivered.

Delivery Date: Tuesday, 08/08/2017

Delivery Time: 01:50 PM

At the request of SEC FORT WORTH REG OFFICE this notice alerts you that the status of the shipment listed below has changed.

Shipment Detail

Tracking Number:	<u>1ZA3781X2496331132</u>
Ship To:	Timothy E. Hudson Thompson & Knight 1722 ROUTH ST ROOM 250 DALLAS, TX 75201 US
UPS Service:	UPS NEXT DAY AIR
Number of Packages:	1
Shipment Type:	Letter
Delivery Location:	MAIL ROOM VANESSA
Signature Required:	A signature is required for package delivery
Reference Number 1:	FW-4150 Depo Notice Goodspeed



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UPS CampusShip: View/Print Label

1. Ensure there are no other shipping or tracking labels attached to your package. Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.
2. Fold the printed label at the solid line below. Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.
3. GETTING YOUR SHIPMENT TO UPS
Customers with a Daily Pickup
Your driver will pickup your shipment(s) as usual.

Customers without a Daily Pickup

Take your package to any location of The UPS Store®, UPS Access Point(TM) location, UPS Drop Box, UPS Customer Center, Staples® or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the Resources area of CampusShip and select UPS Locations.

Schedule a same day or future day Pickup to have a UPS driver pickup all your CampusShip packages.

Hand the package to any UPS driver in your area.

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FORT WORTH, TX 76109

UPS Access Point™
THE UPS STORE
6387 CAMP BOWIE BLVD
FORT WORTH, TX 76116

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1 OF 1

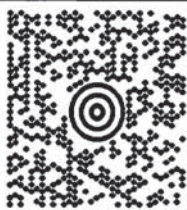
0.0 LBS LTR

DEBORAH MINNICK
8179002617
SEC FORT WORTH
801 CHERRY ST
FORT WORTH, TX 76102

SHIP TO:

TIMOTHY E. HUDSON
THOMPSON & KNIGHT
ONE ARTS PLAZA
1722 ROUTH STREET, STE 1500
DALLAS TX 75201-2532

TX 752 9-33



UPS NEXT DAY AIR

1

TRACKING #: 1Z A37 81X 24 9633 1132



BILLING: P/P
SIGNATURE REQUIRED

Reference #1: FW-4150 Depo Notice Goodspeed

CS 19.5.40 WNTNVS0 90.0A 07/2017



**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

SECURITIES AND EXCHANGE COMMISSION :

Plaintiff, :

v. :

Civil Action No.:

**THURMAN P. BRYANT, III, and
BRYANT UNITED CAPITAL FUNDING, INC.**

4:17-CV-00336-ALM

Defendants, :

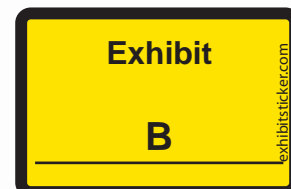
**ARTHUR F. WAMMEL,
WAMMEL GROUP, LLC,
THURMAN P. BRYANT, JR.,
CARLOS GOODSPEED a/k/a SEAN PHILLIPS
d/b/a TOP AGENT ENTERTAINMENT d/b/a
MR. TOP AGENT ENTERTAINMENT**

Relief Defendants. :

**PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S FIRST DOCUMENT
REQUEST TO RELIEF DEFENDANT CARLOS GOODSPEED**

Plaintiff Securities and Exchange Commission ("Commission") requests that Relief Defendant Carlos Goodspeed a/k/a Sean Phillips a/k/a GC a/k/a Golden Child d/b/a Top Agent Entertainment d/b/a Mr. Top Agent Entertainment produce the documents described herein by 5:30 p.m., September 12, 2017, to the below address pursuant to Rule 34(b)(2) of the Federal Rules of Civil Procedure:

*Jason P. Reinsch
U.S. Securities and Exchange Commission
801 Cherry St., Suite 1900
Fort Worth, Texas 76102
reinschj@sec.gov*



I. Definitions

For purposes of this document request, and not necessarily for any other purpose, the following definitions shall apply:

A. “You,” “your,” and “Goodspeed” shall refer to Carlos D. Goodspeed a/k/a Sean Phillips a/k/a GC a/k/a Golden Child d/b/a Top Agent Entertainment d/b/a Mr. Top Agent Entertainment and any and all of his present or former agents, advisors, employees, representatives, staff, attorneys, and all other persons or entities acting on his behalf or under his control.

B. “Bryant” shall refer to Defendant Thurman P. Bryant, III a/k/a Trey Bryant and any and all of his present or former agents, advisors, employees, representatives, staff, attorneys, and all other persons or entities acting on his behalf or under his control.

C. “BUCF” shall refer to Bryant United Capital Funding, Inc. including parents, subsidiaries, affiliates (including but not limited to Bryant United Holdings, Inc. and Proliquidation Services LLC), predecessors, successors, officers, directors, employees, agents, general partners, limited partners, partnerships and aliases, code names, or trade or business names used by any of the foregoing. “BUCF” also includes investment vehicles, funds, or any other investment entities managed, controlled, or created by BUCF.

D. “Defendant(s)” shall refer to Bryant and BUCF.

E. “Wammel” shall refer to Arthur F. Wammel and any and all of his present or former agents, advisors, employees, representatives, staff, attorneys, and all other persons or entities acting on his behalf or under his control.

F. “Wammel Group” shall refer to Wammel Group LLC including parents, subsidiaries, affiliates predecessors, successors, officers, directors, employees, agents, general

partners, limited partners, partnerships and aliases, code names, or trade or business names used by any of the foregoing. “Wammel Group” also includes investment vehicles, funds, or any other investment entities managed, controlled, or created by Wammel Group.

G. “Bryant Jr.” shall refer to Thurman P. Bryant Jr. and any and all of his present or former agents, advisors, employees, representatives, staff, attorneys, and all other persons or entities acting on his behalf or under his control.

H. “Brandi Bryant” shall refer to Brandi N. Bryant and any and all of her present or former agents, advisors, employees, representatives, staff, attorneys, and all other persons or entities acting on her behalf or under her control.

I. “Judy Bryant” shall refer to Judy K. Bryant and any and all of her present or former agents, advisors, employees, representatives, staff, attorneys, and all other persons or entities acting on her behalf or under her control.

J. “ProB” shall refer to Pro B Entertainment Group, LLC including parents, subsidiaries, affiliates predecessors, successors, officers, directors, employees, agents (including but not limited to Bryant, Bryant, Jr., Judy Bryant, and Brandi Bryant), general partners, limited partners, partnerships and aliases, code names, or trade or business names used by any of the foregoing. “ProB” also includes investment vehicles, funds, or any other investment entities managed, controlled, or created by ProB.

K. “Relief Defendant(s)” shall refer to Wammel, Wammel Group, and Bryant Jr.

L. “Taylor Swift” shall refer to Taylor Swift and any and all of her present or former agents, advisors, employees, representatives, staff, attorneys, and all other persons or entities acting on her behalf or under her control, including but not limited to 13 Management LLC.

M. “Drake” shall refer to Aubrey Drake Graham a/k/a Drake and any and all of his

present or former agents, advisors, employees, representatives, staff, attorneys, and all other persons or entities acting on his behalf or under his control, including but not limited to WME IMG, LLC.

N. “Lil Wayne” shall refer to Dwayne Michael Carter, Jr. a/k/a Lil Wayne a/k/a Weezy and any and all of his present or former agents, advisors, employees, representatives, staff, attorneys, and all other persons or entities acting on his behalf or under his control including but not limited to Cash Money Records, Young Money Entertainment, Aspire Music Group, LLC, and Cortez Bryant.

O. “Trey Songz” shall refer to Tremaine Aldon Neverson a/k/a Trey Songz and any and all of his present or former agents, advisors, employees, representatives, staff, attorneys, and all other persons or entities acting on his behalf or under his control.

P. “Chris Brown” shall refer to Christopher Maurice Brown and any and all of his present or former agents, advisors, employees, representatives, staff, attorneys, and all other persons or entities acting on his behalf or under his control.

Q. “Waka Flocka” shall refer to Juaquin James Malphurs a/k/a Waka Flocka Flame a/k/a Waka Flocka and any and all of his present or former agents, advisors, employees, representatives, staff, attorneys, and all other persons or entities acting on his behalf or under his control.

R. “De La Ghetto” shall refer to Rafael Castillo a/k/a De La Ghetto and any and all of his present or former agents, advisors, employees, representatives, staff, attorneys, and all other persons or entities acting on his behalf or under his control.

S. “Person” means a natural person, firm, association, organization, partnership, business, trust, corporation, bank or any other private or public entity.

T. A “Representative” of a Person means any present or former family members, officers, executives, partners, joint-venturers, directors, trustees, employees, consultants, accountants, attorneys, agents, or any other representative acting or purporting to act on behalf of the Person.

U. “And” as well as “or” shall be construed disjunctively as well as conjunctively, as necessary, to bring within the scope of the paragraphs and subparagraphs contained under the heading below entitled “Documents to be Produced” all documents which might otherwise be construed to be outside their scope.

V. Each singular noun or pronoun shall be considered to include within its meaning its plural form and vice versa.

W. Each verb shall be considered to include within its meaning all tenses.

X. “Communication” means any correspondence, contact, discussion, e-mail, instant message, or any other kind of oral or written exchange or transmission of information (in the form of words, numbers, ideas, opinions, thoughts, concepts, graphs, symbols, images, or other information, emotion, feeling, or sentiment, whether complete or partial) and any response thereto between two or more Persons or entities, including, without limitation, all telephone conversations, face-to-face meetings or conversations, internal or external discussions, or exchanges of a Document or Documents.

Y. As used herein, the terms “reflecting,” “regarding,” and “relating to” mean, in addition to their common meaning, concerning, relating to, referring to, reflecting, describing, evidencing, or constituting, comprising, containing, discussing, evidencing, summarizing, stating, recording, noting, embodying, involving, mentioning, studying, analyzing, modifying, contradicting, quoting, criticizing, showing, describing, creating or maintaining, setting forth,

referring to, bearing upon, prepared by, originating from, received from, sent from, impinging or impacting upon, or affecting, directly or indirectly, in whole or in part. A document “reflects,” “regards,” “relates to” a subject matter even if the document merely mentions or alludes to the subject matter and does not discuss the subject matter directly or exclusively.

Z. “Documents” is defined to have the same meaning and be equal in scope to the usage of the term in Rule 34(a) of the Federal Rules of Civil Procedure and shall also encompass “writings” as defined by Rule 1001(a) of the Federal Rules of Evidence, and shall include all records and other tangible form of expression in your actual or constructive possession, custody or control (including documents sent to or obtained from any person by subpoena, letter request, or otherwise), including drafts, encryptions, final or finished versions, originals, copies or annotated copies, backup copies, backup logs, identical copies from different files, however and by whomever created, compiled, produced, sent, received, dated, used, maintained or stored (manually, mechanically, electronically, or otherwise), including, but not limited to, books, papers, writings, recordings, illustrations, charts, lists, numerical or textual data, encryption keys, decryption keys, graphs, graphics, pictures, symbolic representations, files, notes, transcriptions, offers, solicitations, audio and video records, electronic mail (e-mail), instant message, text message, SMS, MMS, e-mail headers, word processor documents, hypertext (text containing HTML, GML, XHTML, DHTML, XML, or any other text formatting markup, or control tags), website data, database files, electronic newsletters, computer data, confirmations, reports, presentations, memoranda, opinions, information packages, journals, ledgers, worksheets, telegrams, telexes, faxes, wire messages, telephone bills, messages, logs, notes or minutes of conversation of meetings, contracts, agreements, proposals, advice, letters of intent, calendars, date books, diaries, schedules, agendas, time tables, itineraries, travel logs, account statements,

bank statements, financial analysis, financial and marketing reviews, press releases, news stories, summaries, budgets, invoices, bills, record of billings, wire transfers, drafts of money, record of payment, checks, tape recordings, or information stored on hard drive, diskette, CD-ROM, DVD or other discs, microfilm, magnetic tape, microfiche, any electronic media, any magnetic media, any laser media, or any other storage device.

AA. "Each" means each and every.

BB. "Including" means including, but not limited to.

II. Instructions

A. This request covers all documents described in Section III, below, subject to your possession, custody, and control, including all responsive documents that you have the ability to obtain.

B. Produce all documents, including electronically stored documents, as they are kept in the usual course of business or organized and labeled to correspond to the document categories to which they are responsive.

C. Documents not otherwise responsive shall be produced if such documents concern the documents called for by the Request and constitute routing slips, transmittal memoranda, letters, comments, evaluations, or similar documents.

D. If any requested document is not or cannot be produced in full, produce it to the extent possible, indicating what document or portion of any such document is not or cannot be produced and the reason it will not be produced.

E. Each category and subparagraph or subdivision thereof shall be construed independently, and no other category or subparagraph or subdivision thereof shall be referred to or relied on for the purpose of limiting its scope except insofar as the category or subparagraph

or subdivision construed expressly refers to another category or subparagraph or subdivision thereof.

F. If you claim any privilege as a basis for not producing responsive documents, please identify the document as follows: (i) the type of document (e.g., letter, memorandum, report, etc.); (ii) the date (or, if the date is unknown, the approximate date) of the document; (iii) its title and file reference, if any; (iv) a description of the document sufficient to identify it without revealing the information for which the privilege is claimed; (v) a description of the subject matter of the document sufficient in detail to allow the court to adjudicate the validity of the claim of privilege; (vi) the name, title, employer, and address (or last known title, employer and address if current information is unavailable) of each person who drafted, revised, signed, provided information for, was listed as a recipient, or received the document, and state for each such person whether he or she is an attorney, and if so, on whose behalf he or she was acting; and (vii) the basis of your claim of privilege, and each fact upon which you rely in claiming privilege.

G. If you contend that it would be unreasonably burdensome to provide all of the documents described in any category, then you shall produce the following: (i) all documents and information available to you without undertaking what you contend to be an unreasonable burden; and (ii) the grounds on which you contend that additional efforts to obtain such documents and information would be unreasonably burdensome.

H. This request shall be deemed to be continuing. Any additional documents or information different from that which you provide in response to this request, that you acquire subsequent to the date of responding to this request, up to and including the date of trial, shall be furnished promptly.

III. Documents to be Produced

Goodspeed Investors:

1. All Documents regarding Communications between you and any of your present, former, or potential investors.
2. All Documents regarding any of your present, former, or potential investors.
3. Documents sufficient to identify all of your investors by name, address, and telephone number.
4. For each investor identified in response to Item 3 above, Documents sufficient to disclose:
 - a. the total amount invested;
 - b. the date and amount initially invested;
 - c. the payment method of the initial investment (e.g., check, wire);
 - d. the date and amount of any additional investments;
 - e. the payment method of any additional investments (e.g., check, wire);
 - f. total of payments to each investor;
 - g. the date and amount of monthly or periodic payments to each investor; and
 - h. the amount of principal returned.
5. For each investor identified in response to Item 3 above, Documents sufficient to disclose:
 - a. the event for which the invested funds would be used (e.g., concert, celebrity appearance; event after party);
 - b. the date(s) and time(s) of the event;
 - c. the location of the event including but not limited to the venue, city, and

state;

- d. the performer(s) for each event, including but not limited to headline or featured performers and opening acts or supporting performers; and
- e. the date invested funds and profits (if any) were to be paid to the investor.

6. For each investor identified in response to Item 3 above, all agreements or contracts between you and the investor.

7. For each investor identified in response to Item 3 above, all Documents regarding agreements or contracts between you and the investor and all Documents that reflect terms of investments.

8. For each investor identified in response to Item 3 above, all periodic or other account statements.

9. For each investor identified in response to Item 3 above, all tax forms or tax schedules provided to the investor from tax years 2010 to present.

10. For each investor identified in response to Item 3 above, all Documents regarding the investment of (or other use of) their funds by you and the current location of investor funds.

Bryant and BUCF:

11. All Documents regarding Communications between you on the one hand and Bryant or BUCF on the other.

12. All Documents regarding any present, former, or potential investors in BUCF.

13. All Documents regarding agreements or contracts between you and Bryant or BUCF.

14. All Documents regarding the investment of (or other use of) funds provided to you by Bryant or BUCF and the current location of investor funds.

ProB:

15. All Documents regarding Communications between you and ProB.
16. All Documents regarding any present, former, or potential investors in ProB.
17. All Documents regarding agreements or contracts between you and ProB.
18. All Documents regarding the investment of (or other use of) funds provided to you by ProB and the current location of investor funds.

Taylor Swift:

****Please be sure to pay attention to the meaning of and Persons included in the term "Taylor Swift" as stated in the Definitions section of this document.****

19. Documents sufficient to identify the nature of your relationship with Taylor Swift.
20. All agreements or contracts between you and Taylor Swift.
21. All Documents regarding agreements or contracts between you and Taylor Swift.
22. All Documents regarding agreements or contracts between you and Persons purporting to represent or act on behalf of Taylor Swift.
23. All Documents related to any investments by you or on behalf of others in relation to any concerts, tours, or other events in and at which Taylor Swift might appear or perform.
24. All Documents related to any concerts, tours, or other events in and at which Taylor Swift might appear or perform from January 1, 2016 to December 31, 2018.
25. All Documents related to interests you have in the revenue (e.g., ticket sales, merchandise, concessions) generated by any concerts, tours, or other events in and at which Taylor Swift might appear or perform.

Drake:

****Please be sure to pay attention to the meaning of and Persons included in the term “Drake” as stated in the Definitions section of this document.****

26. Documents sufficient to identify the nature of your relationship with Drake.
27. All agreements or contracts between you and Drake.
28. All Documents regarding agreements or contracts between you and Drake.
29. All Documents regarding agreements or contracts between you and Persons purporting to represent or act on behalf of Drake.
30. All Documents related to any investments by you or on behalf of others in relation to any concerts, tours, or other events in and at which Drake might appear or perform.
31. All Documents related to any concerts, tours, or other events in and at which Drake might appear or perform from January 1, 2016 to December 31, 2018.
32. All Documents related to interests you have in the revenue (e.g., ticket sales, merchandise, concessions) generated by any concerts, tours, or other events in and at which Drake might appear or perform.

Lil Wayne:

****Please be sure to pay attention to the meaning of and Persons included in the term “Lil Wayne” as stated in the Definitions section of this document.****

33. Documents sufficient to identify the nature of your relationship with Lil Wayne.
34. All agreements or contracts between you and Lil Wayne.
35. All Documents regarding agreements or contracts between you and Lil Wayne.
36. All Documents regarding agreements or contracts between you and Persons purporting to represent or act on behalf of Lil Wayne.
37. All Documents related to any investments by you or on behalf of others in relation

to any concerts, tours, or other events in and at which Lil Wayne might appear or perform.

38. All Documents related to any concerts, tours, or other events in and at which Lil Wayne might appear or perform from January 1, 2016 to December 31, 2018.

39. All Documents related to interests you have in the revenue (e.g., ticket sales, merchandise, concessions) generated by any concerts, tours, or other events in and at which Lil Wayne might appear or perform.

40. All Documents related to a 2017 Super Bowl Party at which Lil Wayne appeared or was scheduled to appear or perform.

Trey Songz:

****Please be sure to pay attention to the meaning of and Persons included in the term “Trey Songz” as stated in the Definitions section of this document.****

41. Documents sufficient to identify the nature of your relationship with Trey Songz.

42. All agreements or contracts between you and Trey Songz.

43. All Documents regarding agreements or contracts between you and Trey Songz.

44. All Documents regarding agreements or contracts between you and Persons purporting to represent or act on behalf of Trey Songz.

45. All Documents related to any investments by you or on behalf of others in any concerts, tours, or other events in and at which Trey Songz might appear or perform.

46. All Documents related to any concerts, tours, or other events in and at which Trey Songz might appear or perform from January 1, 2016 to December 31, 2018.

47. All Documents related to interests you have in the revenue (e.g., ticket sales, merchandise, concessions) generated by any concerts, tours, or other events in and at which Trey Songz might appear or perform.

Chris Brown:

****Please be sure to pay attention to the meaning of and Persons included in the term “Chris Brown” as stated in the Definitions section of this document.****

- 48. Documents sufficient to identify the nature of your relationship with Chris Brown.
- 49. All agreements or contracts between you and Chris Brown.
- 50. All Documents regarding agreements or contracts between you and Chris Brown.
- 51. All Documents regarding agreements or contracts between you and Persons purporting to represent or act on behalf of Chris Brown.

52. All Documents related to any investments by you or on behalf of others in any concerts, tours, or other events in and at which Chris Brown might appear or perform.

53. All Documents related to any concerts, tours, or other events in and at which Chris Brown might appear or perform from January 1, 2016 to December 31, 2018.

54. All Documents related to interests you have in the revenue (e.g., ticket sales, merchandise, concessions) generated by any concerts, tours, or other events in and at which Chris Brown might appear or perform.

Waka Flocka:

****Please be sure to pay attention to the meaning of and Persons included in the term “Waka Flocka” as stated in the Definitions section of this document.****

- 55. Documents sufficient to identify the nature of your relationship with Waka Flocka.
- 56. All agreements or contracts between you and Waka Flocka.
- 57. All Documents regarding agreements or contracts between you and Waka Flocka.
- 58. All Documents regarding agreements or contracts between you and Persons purporting to represent or act on behalf of Waka Flocka.

59. All Documents related to any investments by you or on behalf of others in any concerts, tours, or other events in and at which Waka Flocka might appear or perform.

60. All Documents related to any concerts, tours, or other events in and at which Waka Flocka might appear or perform from January 1, 2016 to December 31, 2018.

61. All Documents related to interests you have in the revenue (e.g., ticket sales, merchandise, concessions) generated by any concerts, tours, or other events in and at which Waka Flocka might appear or perform.

De La Ghetto:

****Please be sure to pay attention to the meaning of and Persons included in the term “De La Ghetto” as stated in the Definitions section of this document.****

62. Documents sufficient to identify the nature of your relationship with De La Ghetto.

63. All agreements or contracts between you and De La Ghetto.

64. All Documents regarding agreements or contracts between you and De La Ghetto.

65. All Documents regarding agreements or contracts between you and Persons purporting to represent or act on behalf of De La Ghetto.

66. All Documents related to any investments by you or on behalf of others in any concerts, tours, or other events in and at which De La Ghetto might appear or perform.

67. All Documents related to any concerts, tours, or other events in and at which De La Ghetto might appear or perform from January 1, 2016 to December 31, 2018.

68. All Documents related to interests you have in the revenue (e.g., ticket sales, merchandise, concessions) generated by any concerts, tours, or other events in and at which De La Ghetto might appear or perform.

“Dallas Starfest”:

69. All Documents regarding an event currently or formerly referred to as “Dallas Starfest”, “Plano Starfest”, “Addison Starfest”, “Allen Starfest”, or some similar name.

70. All Documents regarding any planned or contemplated music festival in Dallas, Tarrant, Collin or Denton Counties for which you have sought investors.

71. All Documents regarding any planned or contemplated music festival in Dallas, Tarrant, Collin or Denton Counties at which The Chainsmokers might appear or perform.

72. All Documents regarding any planned or contemplated music festival in Dallas, Tarrant, Collin or Denton Counties at which Usher Raymond, IV a/k/a Usher might appear or perform.

Wammel and Wammel Group:

73. All Documents regarding Communications between you on one hand and Wammel or Wammel Group on the other.

General:

74. All documents, since January 1, 2010, relating to each bank, brokerage, or other financial institution account you own, control, share, or benefit from, including account statements, canceled checks, wire-transfer records, correspondence, notices, deposit records, withdrawal records, applications, account-opening forms, signature cards, account-closing forms, and transfer records.

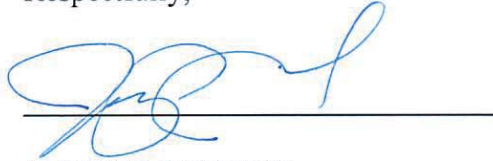
75. Documents sufficient to disclose all of your other assets over \$1,000 in value, including the current location of all such assets.

76. For each year from January 1, 2010 through present, Documents sufficient to disclose your annual income and all sources of income.

77. All documents required to be provided or described by you pursuant to Rule 26(a)(1)(ii) of the Federal Rules of Civil Procedure.

Dated: August 10, 2017

Respectfully,



JASON P. REINSCH
Texas Bar No. 24040120
JESSICA B. MAGEE
Texas Bar No. 24037757
TIMOTHY L. EVANS
Texas Bar No. 24065211

United States Securities and Exchange Commission
Fort Worth Regional Office
Burnett Plaza, Suite 1900
801 Cherry Street, Unit #18
Fort Worth, TX 76102-6882
Ph: 817-900-2601 (jpr)
Fax: 917-978-4927
reinschj@sec.gov

ATTORNEYS FOR PLAINTIFF
SECURITIES AND EXCHANGE COMMISSION

CERTIFICATE OF SERVICE

I certify that on August 10, 2017, I served *Plaintiff's First Request for Production to Relief Defendant Carlos Goodspeed* on all parties or their counsel via email and/or UPS as detailed below:

Thurman P. Bryant, III 1535 Sun Mountain San Antonio, TX 78258 <i>Pro Se Defendant</i>	Toby Galloway Kelly Hart & Hallman LLP 201 Main St., Suite 2500 Fort Worth, Texas 76102 Toby.Galloway@kellyhart.com Jimmy Ardoin Ardoin Law PLLC 2118 Smith St., Suite 200 Houston, Texas 77002 Jimmy@ardoinlawpllc.com <i>Attorneys for Relief Defendants Arthur M. Wammel and Wammel Group LLC</i>
Thurman P. Bryant, Jr. c/o W CR 60 RV Park 9501 W CR 60 Site K-1 Midland, TX 79707 <i>Pro Se Relief Defendant</i>	Carlos D. Goodspeed a/k/a Sean Phillips d/b/a Top Agent Entertainment d/b/a Mr. Top Agent Entertainment 1300 Cottonwood Valley Circle, South Irving, TX 75038 <i>Pro Se Relief Defendant</i>
Jennifer R. Ecklund Tim Hudson Thompson & Knight One Arts Plaza 1722 Routh Street, Suite 1500 Dallas, TX 75201 Jennifer.Ecklund@tklaw.com <i>Court-Appointed Receiver</i> Timothy E. Hudson Thompson & Knight One Arts Plaza 1722 Routh Street, Suite 1500 Dallas, TX 75201 Tim.Hudson@tklaw.com <i>Counsel for Court-Appointed Receiver for Bryant United Capital Funding</i>	



Jason P. Reinsch

Reinsch, Jason

From: G C <mrtopagent@yahoo.com>
Sent: Thursday, November 09, 2017 7:28 PM
To: Reinsch, Jason
Cc: Hudson, Timothy E.; Salenger, Mackenzie; Banowsky, William L.; Toby.galloway@kellyhart.com; Jimmy Ardoin; treybryant03@gmail.com; Sonny B <sonny_103@hotmail.com>; Evans, Timothy; Fairchild, Rebecca R.
Subject: Re: Activity in Case 4:17-cv-00336-ALM Securities and Exchange Commission v. Bryant et al Order on Motion to Compel

I received email and will be there on the 27th sir.

[Sent from Yahoo Mail on Android](#)

On Thu, Nov 9, 2017 at 5:02 PM, Reinsch, Jason <reinschj@SEC.GOV> wrote:

Mr. Goodspeed,

Attached you will find the Order entered by Judge Mazzant granting the Commission's motion to compel your compliance with the discovery requests and your attendance at a deposition. You will also notice that Judge Mazzant ordered that you pay the Commission's attorney's fees that it incurred in seeking the Order.

I strongly urge you to immediately and carefully review the Order because it requires IMMEDIATE action on your part. Amongst other things you need to immediately collect the documents requested by the Commission in its First Document Request to you and send those to me. I've attached another copy of these requests for your quick access. Please note that the Order requires you to respond to the Commission's request no later than November 20, 2017—one week from Monday.

Also, the Order requires you to appear at the Commission's office in Fort Worth on November 27, 2017 at 9:00 a.m. to give sworn testimony. I look forward to seeing you at that time.

Should you fail to comply with the Order, you will leave me with no choice but to ask the Court to hold you in contempt and to seek further relief, which will likely include requesting that a warrant be issued for your arrest.

Regards,

Jason P. Reinsch



Attorney | Division of Enforcement

U.S. Securities and Exchange Commission

Fort Worth Regional Office

801 Cherry Street, Suite 1900

Fort Worth, Texas 76102

Main: (817)978-3821 | Direct: (817)900-2601

reinschj@sec.gov

From: txedCM@txed.uscourts.gov [mailto:txedCM@txed.uscourts.gov]

Sent: Thursday, November 09, 2017 3:27 PM

To: txedcmcc@txed.uscourts.gov

Subject: Activity in Case 4:17-cv-00336-ALM Securities and Exchange Commission v. Bryant et al Order on Motion to Compel

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

*****NOTE TO PUBLIC ACCESS USERS***** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court [LIVE]

Eastern District of TEXAS

Notice of Electronic Filing

The following transaction was entered on 11/9/2017 at 3:26 PM CST and filed on 11/9/2017

Case Name: Securities and Exchange Commission v. Bryant et al

Case Number: [4:17-cv-00336-ALM](#)

Filer:

Document Number: [135](#)

Docket Text:

ORDER granting [125] Motion to Compel. Relief Defendant Carlos Goodspeed shall respond to Plaintiffs First Request for Production by November 20, 2017. Relief Defendant Carlos Goodspeed shall appear in person before counsel for the Securities and Exchange Commission at 801 Cherry Street, Suite 1900, Fort Worth, Texas 76102, on November 27, 2017, at 9:00 a.m. for the purpose of taking his videotaped deposition. Signed by District Judge Amos L. Mazzant, III on 11/9/2017. (cm,)

4:17-cv-00336-ALM Notice has been electronically mailed to:

William L Banowsky bill.banowsky@tklaw.com, patti.pyles@tklaw.com

Timothy E Hudson tim.hudson@tklaw.com, christi.durden@tklaw.com, ed.sanchez@tklaw.com,
janice.graves@tklaw.com, natalie.clark@tklaw.com, notice+BRY1@asgllc.us

Jessica B Magee mageej@sec.gov, fairchildr@sec.gov, justicet@sec.gov, minnickd@sec.gov,
stewartan@sec.gov

Jason Patrick Reinsch reinschj@sec.gov, fairchildr@sec.gov, justicet@sec.gov, minnickd@sec.gov,
stewartan@sec.gov

Katharine Battaia Clark katie.clark@tklaw.com, dannette.johnson@tklaw.com, shannon.savage@tklaw.com

James Madison Ardoin, III jardoin@joneswalker.com, ardoinlaw@gmail.com, kmorton@joneswalker.com

Toby M Galloway toby.galloway@kellyhart.com, lancia.hoover@kellyhart.com

Timothy L Evans evanstim@sec.gov, fairchildr@sec.gov, minnickd@sec.gov, stewartan@sec.gov

Mackenzie Simpson Wallace mackenzie.wallace@tklaw.com, mackenzie.salenger@tklaw.com,
mackenzieleewallace@gmail.com

Thurman P Bryant, Jr sonny_103@hotmail.com

4:17-cv-00336-ALM Notice will not be electronically mailed to:

Bryant United Capital Funding, Inc.

Thurman P Bryant, III
1535 Sun Mountain
San Antonio, TX 78258

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1041545818 [Date=11/9/2017] [FileNumber=11119903-0] [4f4fae1ab91c0746407363ad6b85652b76d84374b6d2b71ffdf613d2365e15156e3f019f8a297477d8e55e6b8ac1fd38aeafbb5610356c067dfc76d284e40935]]

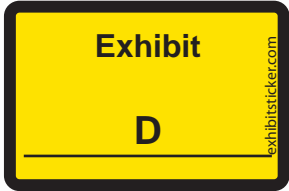
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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

- - - - -
SECURITIES AND EXCHANGE)
COMMISSION,)
Plaintiff,) CASE NO.
v.) 4:17-CV-00336-ALM
THURMAN P. BRYANT, III, and)
BRYANT UNITED CAPITAL FUNDING,)
INC.,)
Defendants,)
ARTHUR F. WAMMEL, WAMMEL GROUP,)
LLC, THURMAN P. BRYANT JR., ET AL.)
Relief Defendants.)
- - - - -

VIDEOTAPED DEPOSITION OF CARLOS GOODSPEED

a/k/a SEAN PHILLIPS
MONDAY, NOVEMBER 27, 2017
PAGES 1 - 274; VOLUME 1



BEHMKE REPORTING AND VIDEO SERVICES, INC.
BY: LESLIE McDONALD WILKINS, RPR NO. 029319
160 SPEAR STREET, SUITE 300
SAN FRANCISCO, CALIFORNIA 94105
(415) 597-5600

1 Q. What's his -- how do you communicate with
2 Chauncey?

3 A. I talk to him through the phone and I talk to him
4 in person.

5 Q. Now, the last page of Exhibit 10, do you see a
6 signature; is that your signature?

7 A. Yes.

8 Q. And on the second to last page, you see at
9 paragraph 18, after-party events. Investor shall have
10 the first rights of refusal for any concert after-party
11 for Drake with a 50 percent partnership on any dates,
12 etcetera; did I read that correctly?

13 A. Yes.

14 Q. At the bottom of that page, the second to last
15 page of Exhibit 11, there appears expenses for the five
16 concert events and there's an insert titled P and L
17 projections. Where did you get that?

18 A. This was sent over to me.

19 Q. How was that sent over to you?

20 A. I'm saying through e-mail.

21 Q. Do you still have that e-mail?

22 A. I don't know.

23 Q. Did you look for that e-mail?

24 A. That's old, that came a long time ago, it's old.

25 That was people that just put together -- they put

1 together the expense sheet. That's all it was is an
2 expense sheet.

3 Q. Who put this together?

4 A. I don't know who did that, I don't know. They
5 just gave it -- you can get anybody to put together an
6 expense sheet for you that somebody have to know how to
7 do it. I don't know who did it.

8 Q. You don't know who did this?

9 A. Huh-uh.

10 Q. But you received it in an e-mail from Chauncey?

11 A. Yeah, I think -- no, the person who did it. I
12 don't remember who I got the e-mail from. That's how
13 they did it. It was somebody they got to do an expense
14 sheet for them.

15 Q. Did you do any independent investigation to see
16 if this was accurate?

17 A. It's pretty accurate, something you just know.
18 It's really less. It really can be less money.

19 Q. Now, go back to the second page of Exhibit 11,
20 which is the first page of the contract. The last line,
21 last portion of the sentence on paragraph 2 -- pardon
22 me, just paragraph 2 reads:

23 Investors shall be responsible for the total
24 payment of \$850,000 to promoter and the payment shall be
25 due on or before Wednesday, February 8th, 2017, which

1 will be immediately used for the initial deposit for the
2 concert events. Did I read that correctly?

3 A. Yes.

4 Q. Was the \$850,000 used for an initial deposit for
5 the concert events?

6 A. It's supposed to go to whatever the deposit is
7 when it's done, when it's ready to go, when it's all
8 final.

9 Q. Well, the contract says it will immediately be
10 used.

11 A. Yeah, when it's final, it's got to be when it's
12 final.

13 Q. And you would -- strike that.

14 How would you be notified once there was an
15 initial deposit to be paid?

16 A. I'm sure they would let me know, like, everybody
17 involved would let me know.

18 Q. Who is "they"?

19 A. Chauncey and his people.

20 Q. Did this event ever -- did any of these --

21 A. That hasn't happened yet.

22 Q. Hasn't happened yet?

23 A. No, sir.

24 Q. When are they -- what's the plan going forward
25 for this?

1 A. We're working on this and other stuff, too.

2 Q. So where is Bryant United's \$800,000?

3 A. That's involved in different events, involved in
4 different investments.

5 Q. So if you were called upon to refund the \$850,000
6 that Bryant United gave you for this event, when can you
7 pay that back?

8 A. If they wanted to get a refund of the money, we
9 can get it paid back. We can get it paid back ASAP, but
10 then nobody would make any money.

11 Q. How would, if Bryant United is to request from
12 you pursuant to this contract to receive the \$850,000
13 refund, how should that communication be made to you?

14 A. How should it be made to me?

15 Q. Yeah.

16 A. I'm saying, me and him, we talk about it.

17 Q. So your sworn testimony is that 850, you could
18 find that \$850,000 --

19 A. I don't know about finding it. That's something
20 I work out with my investor.

21 Q. As you sit here today, do you have -- is that
22 money readily accessible to pay back?

23 A. I have access to it, yes. If I need to have
24 access to it, yes, I can access to it, but it could mess
25 up other business. But I could have access to it.

1 some of the money, that was it.

2 Q. Did you ever pay Rutt Capital back all the money?

3 A. Yes.

4 Q. Because at the bottom of that page, we see two
5 additional \$10,000 transfers to Rutt Capital?

6 A. Okay.

7 Q. Why did you have those three different payments
8 to Rutt Capital?

9 A. I don't know why we did that in threes like that.
10 But it was just money he needed. He was requesting some
11 of the money back.

12 Q. Let's press on. Do you know who Taylor Swift is?

13 A. Yeah.

14 Q. Who is Taylor Swift?

15 A. She's an artist.

16 Q. Do you know Taylor Swift?

17 A. No.

18 Q. Do you ever promote concerts for Ms. Swift?

19 A. I have invested in stuff.

20 Q. You have invested in concerts for her?

21 A. Yes.

22 Q. Who have you invested with?

23 A. Just different people.

24 Q. Who approached you about investing with --

25 whoever has approached you about making investments

1 concerning Taylor Swift?

2 A. A number of people, people call me all the time.

3 Q. So start with the first person, who is the first
4 person that called you about Taylor Swift?

5 A. Are you talking about now, recently?

6 Q. I'm talking period.

7 A. Period. Shoot, I wouldn't even know.

8 Q. First, let's take it one bite at a time. In
9 2017, did anyone approach you about investments in
10 Taylor Swift concerts?

11 A. Yeah, I know a couple of guys that did.

12 Q. What are their names?

13 A. I don't know. Well, Mike is one guy, Mike is the
14 main guy.

15 Q. What's Mike's last name?

16 A. Mike Touchins, Michael Touchins.

17 Q. How do you spell that?

18 A. Touchins.

19 Q. T-O-T -- do your best to -- where would we be
20 able to find his name?

21 A. I don't know, he's just a guy, he's just a guy
22 that has connections, man.

23 Q. He's a guy that has connections with Taylor
24 Swift?

25 A. He has connections with a lot of people.

1 Q. Where does Mike live? I'll call him Mike?

2 A. He lives in Miami.

3 Q. How do you know Mike?

4 A. Just through mutual friends.

5 Q. And that is? What are those mutual friends?

6 A. Some people in Miami.

7 Q. Do you have Mike's telephone number?

8 A. No.

9 Q. You don't?

10 A. No.

11 Q. So if you wanted to call or communicate with
12 Mike, how would you find his phone number?

13 A. I got ways to get in touch with him. I wouldn't
14 talk to him on the phone.

15 Q. If you want to speak with Mr. Touchins right now,
16 how would you contact him?

17 A. I got somebody that would call him and get in
18 touch with him for me.

19 Q. Who is that?

20 A. A friend.

21 Q. Okay. Who is that?

22 A. It's a friend. So a friend, that's something I
23 shouldn't have to reveal.

24 Q. No, it is because we need to understand.

25 A. I can't involve these people, they don't have

1 concert promotion before?

2 A. Yes. I've invested in it. I've invested in it.

3 Q. When was that?

4 A. 2014, I think it was.

5 Q. And was that a successful investment?

6 A. Yes, it worked. It took a while but it worked
7 out.

8 Q. Who did you invest in?

9 A. What do you mean?

10 Q. Who did you give your money to?

11 A. A guy of mine, a guy of mine. That's irrelevant.

12 Q. My question is who, who did you give the money
13 to?

14 A. A guy of mine that was dealing with some people
15 that dealt with her that he knew.

16 Q. Who was that guy?

17 A. A friend of mine. He has nothing do with
18 anything.

19 Q. He does.

20 A. No. There's no way that he does. This has
21 nothing to do with nothing.

22 Q. Are you refusing --

23 A. Jason, it really doesn't. It has nothing to do
24 with anything.

25 Q. Are you refusing to answer that question?

1 A. Yeah. There's nothing to answer. You just asked
2 me did I ever deal with Taylor Swift shows. I said,
3 yes, I invested in a show. I invested in a lot of
4 shows. But that's neither here nor there. That doesn't
5 -- I've invested in a lot of shows with my own personal
6 money.

7 Q. Did you have a return on your investment for that
8 show in 2014?

9 A. Yes, I did.

10 Q. Who is 13 management?

11 A. 13 management, that I don't know.

12 Q. Have you heard the name Jay Shawdees?

13 A. No, don't know what that is.

14 (Deposition Exhibit No. 14 marked for identification.)

15 Q. I'm going to show you exhibits -- I'm showing you
16 what's been marked as Exhibit 14. I'm showing you
17 what's been marked as Deposition Exhibit 14, Bates
18 labeled SEC/Comerica/E. It's slightly cut off, but I
19 believe the number is 166.

20 What is this Exhibit 13?

21 A. It's a wire.

22 Q. I'm sorry, Exhibit 14.

23 A. It's a wire for 200,000.

24 Q. And the wire is dated March 9th, 2017, correct?

25 A. Right.

1 A. Right.

2 Q. And the agreement we just looked at that was
3 Exhibit 13, I believe, was the \$600,000 contract for an
4 investment by Bryant United for the Taylor Swift
5 concerts, correct?

6 A. Right.

7 Q. So you did in fact receive the \$600,000 in wires
8 for those concerts?

9 A. Yes.

10 Q. Did Taylor Swift ever play those concerts in June
11 of 2017?

12 A. No, sir.

13 Q. Is there still an effort to schedule those
14 concerts?

15 A. Yes.

16 Q. Who is making that effort?

17 A. We're working on that effort.

18 Q. Who is "we"?

19 A. Like me and the guys. I already answered all
20 those questions.

21 Q. No.

22 A. Yes, I did, I answered those questions.

23 Q. Okay. Well, who at this point?

24 A. I already answered that question.

25 Q. No. You're going to answer the question again.

1 A. I answered it already.

2 Q. Mr. Goodspeed, as you sit here today, we talked
3 about Mr. Touchins when you brought the opportunity. We
4 have not discussed who the actual alleged or hopeful
5 promoters are for the Taylor Swift concert in 2017.

6 A. Depends on who you choose to go with. It could
7 be a number of people. It depends on who you choose to
8 go with, whatever is the best deal, whatever works the
9 best situation for me and my people involved.

10 Q. So who as you sit here today is working to
11 promote Taylor Swift concerts in those five locations on
12 Exhibit 13?

13 A. Myself, nobody, nobody, I already told you.

14 Q. Anyone besides you?

15 A. What did you say?

16 Q. Anyone other than you that is trying to
17 coordinate this?

18 A. No.

19 Q. Who are you working with?

20 A. I'm working with myself right now. That's who
21 I'm working with.

22 Q. But who are you -- obviously, you're not going to
23 -- you'll have to speak with somebody, a representative
24 of Taylor Swift to make that concert happen, correct?

25 A. The people that need to take care of that.

1 Q. And who are those people?

2 A. That's irrelevant.

3 Q. Mr. Goodspeed, I'll tell you right now,
4 especially if you want to leave here very soon --

5 A. We already talked about. I've been very
6 respectful --

7 Q. Stop, stop. You're going to have to answer those
8 questions. We're talking about Bryant United gave you
9 \$600,000 to fund in part Taylor Swift concerts in June
10 2017, correct?

11 A. Uh-huh.

12 Q. Those concerts did not happen?

13 A. Right.

14 Q. You still have Mr. Bryant's \$600,000, correct?

15 A. Right. All that will be -- everything will come
16 back. That's the thing, everything will come back.

17 Q. Where is that \$600,000 right now?

18 A. It's moved where it needs to be. We're working
19 on it to make money.

20 Q. So your sworn testimony is that --

21 A. So we're waiting for it to come back.

22 Q. But you got to wait for my question.

23 So your sworn testimony is that you took that
24 \$600,000 that Bryant United gave you and you moved it,
25 in your words, to where it needs to be to help promote

1 those concerts?

2 A. Yeah, I moved my money, yes.

3 Q. And as of today, you are the only person
4 continuing to work to make those concert arrangements?

5 A. There is other people involved, but it's not
6 names that I have to give you.

7 Q. Are 13 management involved?

8 A. I don't know.

9 Q. If I represented to you that 13 management is the
10 company owned by Taylor Swift that is her exclusive
11 concert promoter and booking agent --

12 A. That doesn't matter in this business.

13 Q. Whoa, whoa. If I represent to you that 13
14 management is Taylor Swift's company that is her
15 exclusive booking agent and concert promoter, would you
16 have any reason to disagree with that?

17 A. I don't know. I don't know if they are or not.
18 If they are it's irrelevant to me. You don't get the
19 business then because that doesn't matter either. You
20 can still book her, people can still go around that and
21 book her, the same thing I told you about Brent Smith.

22 Q. But 13 management is her.

23 A. And people still can go -- if you're her friend
24 and you're close friends with somebody who is real close
25 friends with her, you can deal directly with her. And

1 A. I have a lot of situations where I'm making
2 money. I'm making money. I have stuff out that's been
3 going on since the top of this year.

4 Q. So with the Drake and the Taylor Swift
5 investments, with those two alone, you are responsible
6 for 1.45 million --

7 A. 1.3 something.

8 Q. 1.45 million because you received --

9 A. I know exactly what the number is. I have it
10 wrote down, I know what it is.

11 Q. Where do you have it broken down?

12 A. I'm just saying, I know what it is. I have it
13 wrote down on a sheet of paper. I know exactly what it
14 is.

15 Q. On that note, let's set the Taylor Swift aside.

16 Prior to coming to this deposition, what effort,
17 if any, did you make to collect documents that were
18 requested in the first set of discovery requests to you?

19 A. I don't have any documents, like, you-all have
20 all the documents. Any documents you-all have, I don't
21 have anything else for you.

22 Q. So the answer is --

23 A. I don't have any documents, I don't have anything
24 for you.

25 Q. So the answer is you did nothing?

1 A. It's not that I did nothing. I have no
2 documents. You said what did I do to collect documents.
3 I don't have any documents to collect.

4 Q. About 23 seconds ago you said that you have a
5 sheet of paper that lists all the money --

6 A. No, I didn't. I said a sheet of paper with the
7 exact amount, a sheet of paper with the exact amount
8 that supposed to be taken care of with that man.

9 Q. Okay. And what is the number on that piece of
10 paper?

11 A. I just said I don't know it off the top of my
12 head, but I have it wrote down. That's exactly what I
13 said.

14 Q. When you get home will you send me a copy of that
15 piece of paper?

16 A. A copy of it? It's just like a sheet of paper,
17 like it's a sheet of paper like this, like just knowing
18 the amount.

19 Q. Okay. Will you send me that piece of paper?

20 MR. BRYANT: It's 850 plus 600.

21 MR. REINSCH: Whoa, whoa, whoa, Mr. Bryant,
22 we're asking questions here.

23 Q. We're talking about a valid request for
24 production of documents that was sent to you. And from
25 your testimony, it sounds that you made no effort to

1 identify any documents because you don't believe you
2 have any documents; is that correct?

3 A. I guess, I don't know.

4 Q. Did you search your e-mail for the word "Bryant"
5 or "Bryant United"?

6 A. You have all the documents there is to have.
7 There's no other documents for me to have.

8 Q. Do you know what documents I do have?

9 A. Yeah, I know a lot of the documents you have.
10 Tim even made a lot of stuff to me when I bumped into
11 him.

12 Q. So your testimony is that you didn't search for
13 documents because either you don't have any or because
14 any documents you would have the SEC already has
15 possession of those?

16 A. I guess so. I don't have any documents for you,
17 that's all I'm saying.

18 (Deposition Exhibit No. 16 marked for identification.)

19 Q. So let's go back to Taylor Swift for a minute.
20 I'm going to show you -- I'm going to show you what's
21 being marked as Deposition Exhibit 16.

22 Exhibit 16 purports to be your Comerica bank
23 account statements for the month of March 2017. It's
24 Bates labeled SEC/Comerica/E/000036 through 40. Take a
25 look at this for a moment.

1 with anything, Jason. That's crazy, I'm not going to
2 talk about my kids.

3 Q. Sir, are you refusing to answer the question?

4 A. Yes. These are my kids. My kids have nothing to
5 do with this. That's weird. No disrespect, that's
6 weird, like, talking about my kids.

7 Q. I'll withdraw the question, I'll withdraw the
8 question about car seats.

9 But so you're going to go directly there to pick
10 them up?

11 A. Yes.

12 Q. What I'm getting at after that poorly worded
13 question, which I withdraw, is that we still have
14 several issues that we need to discuss. And per the
15 Federal Rules of Civil Procedure, I have more time to
16 ask you questions on those issues.

17 The problem is I understand, though I disagree
18 with, I understand the need for you to pick up your kids
19 from school. And as I understand it, correct, there's
20 no other opportunities or no one else that can pick them
21 up?

22 A. No, that's not happening. I take them to school
23 and pick them up every day.

24 Q. So this what I'd like to do at this time. First
25 of all, counsel for the receiver for Bryant United

1 hasn't had an opportunity to ask questions. And to the
2 extent that there is some time to ask you questions, I
3 will turn over the floor to receiver's counsel.

4 That said, I'm doing that under objection because
5 I understand that you're going to leave. So what we
6 need to do is to continue the deposition at and
7 immediately at the next available date. You said
8 Wednesday you are available?

9 A. This week is bad. I set this when I found out
10 about this, I found out weeks before. I made it work
11 where I definitely was going to be able to make it
12 today. This week is bad. Mondays are pretty decent to
13 me.

14 That's the thing, Mondays are decent for me.
15 Like that's the most free time for me during the day,
16 just being honest. When I found out about this, I saw
17 the e-mail just said the 27th, I was like, hey, I'm
18 going to do whatever I got to do to make sure that I
19 make it for the 27th and I did that.

20 Q. If we continue the deposition today, again, under
21 my objection, but if we continue it to next Monday,
22 which I believe is December 4th, if we continue it to
23 December 4th, will you be able to attend that deposition
24 so that I can --

25 A. I'll definitely work it out with you. I know

1 exactly. That's what I was telling her, we're going to
2 come back. That will be Monday the 4th.

3 Q. So you'll commit to return on December the 4th?

4 A. I will let you know for sure, but right now I
5 would say yes. Right now, I would say yes, I'm good
6 with that.

7 Q. The difficulty here is we have a federal judge
8 who told us to do it today, which we started, but it's
9 not finished.

10 A. I didn't know that it took this long. I've never
11 done anything like this so I didn't know. I don't want
12 to take up nobody's time. I didn't feel like I should
13 have been here. I don't know how I got involved in all
14 of this. I'm kind of understanding, but it's just.

15 Q. Then let me -- I'm going to pass the reins to
16 counsel for the receivers for whatever time. So I'm
17 going to pass the reins to them for now.

18 That said, we will continue the deposition next
19 Monday, December 4th.

20 A. If anything changes, I'll let you know ahead of
21 time. I'll confirm with you way ahead of time.

22 Q. And I'm going to confer with you on the record
23 right now that one of your obligations by the court's
24 rule was to respond to those discovery requests.


25 And what that requires is for you to make a good

1 STATE OF TEXAS)
2) ss.
3 COUNTY OF TARRANT)

4 I hereby certify that the witness in the
5 foregoing deposition, CARLOS GOODSPEED, was by me duly
6 sworn to testify to the truth, the whole truth, and
7 nothing but the truth, in the within-entitled cause;
8 that said deposition was taken at the time and place
9 herein named; and that the deposition is a true record
10 of the witness's testimony as reported by me, a duly
11 registered professional shorthand reporter and a
12 disinterested person, and was thereafter transcribed
13 into typewriting by computer.

14 I further certify that I am not interested in the
15 outcome of the said action, not connected with nor
16 related to any of the parties in said action, nor to
17 their respective counsel.

18 IN WITNESS WHEREOF, I have hereunto set my hand
19 this 28th day of November, 2017.
20 Reading and Signing was requested.

21
22 
23

24 LESLIE McDONALD WILKINS, RPR NO. 029319
25

Reinsch, Jason

From: Reinsch, Jason
Sent: Wednesday, December 06, 2017 2:42 PM
To: Hudson, Timothy E.; mrtopagent@yahoo.com
Cc: Trey Bryant; Evans, Timothy; Salenger, Mackenzie; Wallace, Mackenzie; Toby.galloway@kellyhart.com; Jimmy Ardoin; Sonny B <sonny_103@hotmail.com>
Subject: RE: SEC v. Bryant, et al. - Continuance of Deposition and Discovery Responses
Importance: High

Mr. Goodspeed,

I have yet to hear from you regarding your non-appearance at your continued deposition on Monday as well as your failure to respond to the Commission's document requests.

I implore you to contact me immediately to address these issues. I have no interest in disturbing the Court to deal with what should be an easily avoidable problem. But you are leaving me with no choice but to do that and seek that you be held in contempt for violating the Court's Order.

This is a very serious issue, and you need to contact me ASAP.

Regards,

Jason P. Reinsch
Attorney | Division of Enforcement
U.S. Securities and Exchange Commission
Fort Worth Regional Office
801 Cherry Street, Suite 1900
Fort Worth, Texas 76102
Main: (817)978-3821 | Direct: (817)900-2601
reinschj@sec.gov



From: Reinsch, Jason
Sent: Monday, December 04, 2017 10:53 AM
To: 'Hudson, Timothy E.'; 'mrtopagent@yahoo.com'
Cc: 'Trey Bryant'; Evans, Timothy; 'Salenger, Mackenzie'; 'Wallace, Mackenzie'; 'Toby.galloway@kellyhart.com'; 'Jimmy Ardoin'; 'Sonny B <sonny_103@hotmail.com>'
Subject: RE: SEC v. Bryant, et al. - Continuance of Deposition and Discovery Responses
Importance: High

Mr. Goodspeed,

I am sending you this final email in an attempt to ascertain whether or not you are intending to appear for your deposition this morning. I and counsel for the receiver have gone on the record to note your non-appearance. But I want to give you another 15 minutes before we conclude today's session.

Please contact me as soon as possible. Please call either 817-978-3820 or my phone number below.

Regards,

Jason P. Reinsch

Attorney | Division of Enforcement
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Fort Worth, Texas 76102
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From: Reinsch, Jason

Sent: Monday, December 04, 2017 10:11 AM

To: 'Hudson, Timothy E.'; mrtopagent@yahoo.com

Cc: Trey Bryant; Evans, Timothy; Salenger, Mackenzie; Wallace, Mackenzie; Toby.galloway@kellyhart.com; Jimmy Ardoin; Sonny B <sonny_103@hotmail.com>

Subject: RE: SEC v. Bryant, et al. - Continuance of Deposition and Discovery Responses

Mr. Goodspeed,

We are convened at your continued deposition, but you are not here. Are you on your way? In any event, please call me as soon as possible at 817-978-3820.

Regards,

Jason P. Reinsch

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From: Hudson, Timothy E. [<mailto:Tim.Hudson@tklaw.com>]

Sent: Thursday, November 30, 2017 1:59 PM

To: Reinsch, Jason; mrtopagent@yahoo.com

Cc: Trey Bryant; Evans, Timothy; Salenger, Mackenzie; Wallace, Mackenzie; Toby.galloway@kellyhart.com; Jimmy Ardoin; Sonny B <sonny_103@hotmail.com>

Subject: RE: SEC v. Bryant, et al. - Continuance of Deposition and Discovery Responses

The Receiver does intend to appear and ask additional questions at the deposition. The time frame set out below seems reasonable provided that we take limited breaks and forego lunch. My recommendation is that we bring a snack and work through lunch. We will make every effort to be as efficient as possible and endeavor to conclude at 2:30 pm.

Tim Hudson | Thompson & Knight LLP
Partner

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This message may be confidential and attorney-client privileged. If received in error, please do not read. Instead, reply to me that you have received it in error and delete the message.

From: Reinsch, Jason [<mailto:reinschj@SEC.GOV>]
Sent: Thursday, November 30, 2017 12:41 PM
To: mrtopagent@yahoo.com
Cc: Trey Bryant; Evans, Timothy; Hudson, Timothy E.; Salenger, Mackenzie; Wallace, Mackenzie; Toby.galloway@kellyhart.com; Jimmy Ardoin; Sonny B <sonny_103@hotmail.com>
Subject: RE: SEC v. Bryant, et al. - Continuance of Deposition and Discovery Responses

Mr. Goodspeed,

I write to follow up with our telephone conversation yesterday afternoon. As we discussed you will appear for you continued deposition next Monday, December 4, 2018. Further to our discussion, for your planning purposes, I would like to give you a more precise time frame for your deposition. I suggest 10:00 am to 2:30 pm. However, the Receiver (as well as any other party) may appear for your deposition and ask questions. In that regard, I must defer to the Receiver to see if that schedule works for her.

Also, I want to be clear that the Commission is not waiving any rights it may have with regard to seeking additional time for the Court for additional deposition time pursuant to the Federal Rules of Civil Procedure.

Regards,

Jason P. Reinsch
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From: Reinsch, Jason
Sent: Wednesday, November 29, 2017 9:37 AM
To: 'mrtopagent@yahoo.com'
Cc: 'Trey Bryant'; 'Evans, Timothy (EvansTim@SEC.GOV)'; 'Hudson, Timothy E.'; Mackenzie.Salenger@tklaw.com; Mackenzie.Wallace@tklaw.com; Toby.galloway@kellyhart.com; Jimmy Ardoin; Sonny B <sonny_103@hotmail.com>
Subject: SEC v. Bryant, et al. - Continuance of Deposition and Discovery Responses
Importance: High

Mr. Goodspeed,

I write with regard to two important issues.

First, as discussed on the record at your deposition yesterday, because you were obligated to pick up your children prior to the conclusion of your deposition, the Commission was unable to avail itself of its deposition time as provided for in the Federal Rules of Civil Procedure. And, over its objection, the Commission was forced to prematurely terminate your deposition. As we discussed, you agreed to return to the Commission's office to conclude your deposition on Monday, December 4, 2017, though you qualified that agreement by saying that "as of right now" you were free. Please confirm that you will return for the conclusion of your deposition on Monday, December 4, 2017. If it would assist you, we could start at 10:00 am.

Second, I write to confirm our on-the-record conference for a potential Motion for Contempt concerning your non-compliance with the Court's Order dated November 9, 2017. The Order states in relevant part, "IT IS HEREBY ORDERED that Relief Defendant Carlos Goodspeed shall respond to Plaintiff's First Request for Production by November 20, 2017." In your testimony you indicated you made no effort to search for responsive documents. Your basis for not searching for documents was the assumption that the Commission already had any responsive documents and/or that you didn't think you would have any responsive materials. However, you separately testified that you had some document or "sheet of paper" on which you tracked the investments made by Bryant United. We also know that you have draft and final, executed investment contracts and email communications with Mr. Bryant regarding certain investments.

I by no means want to have to burden the Court with additional discovery issues. So before your testimony resumes, I strongly urge you to conduct a good-faith search for responsive documents. I would expect at a minimum that you search your computers and phones for emails and text message with keywords including but not limited to "Bryant", "rutt", "invest", "drake", "swift", and "wayne". During your testimony you also named a number of individuals that you communicated with regarding relevant investments such as "chauncey", "Jake", "Smith", "Dre", "Miko", and others. Please carefully review the Commission's request for documents (which I have again attached to this email) and ensure that you have complied with the Court's order. I should also note that some of your social media postings appear to show that you maintain business records, so I would expect that you conduct a good faith search in those materials as well.

Regards,

Jason P. Reinsch

Attorney | Division of Enforcement

U.S. Securities and Exchange Commission

Fort Worth Regional Office

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In The Matter Of:
Securities and Exchange Commission v.
Thurman P. Bryant, III, et al.

Statement of Nonappearance Re: Carlos Goodspeed
December 4, 2017

Behmke Reporting and Video Services, Inc.
160 Spear Street, Suite 300
San Francisco, California 94105
(415) 597-5600



Securities and Exchange Commission v.
Thurman P. Bryant, III, et al.

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<p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE EASTERN DISTRICT OF TEXAS</p> <p>3 SHERMAN DIVISION</p> <p>4 - - - - -</p> <p>5 SECURITIES AND EXCHANGE)</p> <p>6 COMMISSION,)</p> <p>7 Plaintiff,) CASE NO.</p> <p>8 v.) 4:17-CV-00336-ALM</p> <p>9 THURMAN P. BRYANT, III, and)</p> <p>10 BRYANT UNITED CAPITAL FUNDING,)</p> <p>11 INC.,)</p> <p>12 Defendants,)</p> <p>13 ARTHUR F. WAMMEL, WAMMEL GROUP,)</p> <p>14 LLC, THURMAN P. BRYANT JR., ET AL.)</p> <p>15 Relief Defendants.)</p> <p>16 - - - - -</p> <p>17 STATEMENT OF NONAPPEARANCE</p> <p>18 RE: CARLOS GOODSPEED a/k/a SEAN PHILLIPS</p> <p>19 MONDAY, DECEMBER 4, 2017</p> <p>20</p> <p>21 BEHMKKE REPORTING AND VIDEO SERVICES, INC.</p> <p>22 BY: KAREN L.D. SCHOEVE, CSR NO. 3354</p> <p>23 160 SPEAR STREET, SUITE 300</p> <p>24 SAN FRANCISCO, CALIFORNIA 94105</p> <p>25 (415) 597-5600</p>	<p>1 APPEARANCES OF COUNSEL:</p> <p>2 FOR PLAINTIFF SECURITIES AND EXCHANGE COMMISSION:</p> <p>3 U.S. SECURITIES AND EXCHANGE COMMISSION</p> <p>4 BY: JASON REINSCH, ATTORNEY AT LAW</p> <p>5 801 Cherry Street, Suite 1900</p> <p>6 Fort Worth, Texas 76102</p> <p>7 Telephone: (817) 978-6442</p> <p>8 Email: reinschj@sec.gov</p> <p>9</p> <p>10 FOR COURT-APPOINTED RECEIVER:</p> <p>11 THOMPSON & KNIGHT, LLP</p> <p>12 BY: MACKENZIE S. WALLACE, ATTORNEY AT LAW</p> <p>13 MACKENZIE SALENGER, ATTORNEY AT LAW</p> <p>14 TIMOTHY E. HUDSON, ATTORNEY AT LAW</p> <p>15 1722 Routh Street, Suite 1500</p> <p>16 Dallas, Texas 75201</p> <p>17 Telephone: (214) 969-1404</p> <p>18 Email: mackenzie.salenger@tklaw.com</p> <p>19 tim.hudson@tklaw.com</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
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<p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9 Statement of Nonappearance, RE: CARLOS</p> <p>10 GOODSPEED a/k/a SEAN PHILLIPS taken on behalf</p> <p>11 PLAINTIFF, at 801 Cherry Street, Suite 1900,</p> <p>12 Fort Worth, Texas, commenced at 10:44 A.M.,</p> <p>13 MONDAY, DECEMBER 4, 2017, before Karen L. D.</p> <p>14 Schoeve, Shorthand Reporter No. 3354, RDR, CRR,</p> <p>15 pursuant to Notice.</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 INDEX</p> <p>2 MONDAY, DECEMBER 4, 2017 PAGE</p> <p>3 STATEMENT OF NONAPPEARANCE</p> <p>4 RE: CARLOS GOODSPEED a/k/a SEAN PHILLIPS</p> <p>5 PROCEEDINGS 6</p> <p>6</p> <p>7 --oOo</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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<p>1 EXHIBIT</p> <p>2 RE: CARLOS GOODSPEED a/k/a SEAN PHILLIPS</p> <p>3 Number Description Page</p> <p>4 Exhibit 19 E-mail thread dated 12/04/17</p> <p>5 from Jason Reinsch to Timothy</p> <p>6 Hudson, et al.</p> <p>7 Subject: SEC v Bryant, et al.</p> <p>8 Continuance of Deposition and</p> <p>9 Discovery Responses - 3 pages 9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 e-mail address, as well as counsel for the Receiver,</p> <p>2 to Mr. Goodspeed's e-mail address.</p> <p>3 Also I had separate telephone</p> <p>4 conversations with -- or a telephone conversation</p> <p>5 with Mr. Goodspeed in the late afternoon of</p> <p>6 Wednesday, November 29th, 2017.</p> <p>7 At this time, we are going to go off</p> <p>8 the record and attempt to contact Mr. Goodspeed</p> <p>9 again.</p> <p>10 This morning, already, I have sent him</p> <p>11 two separate e-mails, as well as -- or pardon me,</p> <p>12 I've sent him one e-mail and have left him three</p> <p>13 voicemails.</p> <p>14 I'm going to attempt to contact him</p> <p>15 one last time via e-mail and telephone, and if we do</p> <p>16 not hear from him in 15 minutes from now, then we</p> <p>17 will take a Certificate of Nonappearance.</p> <p>18 Counsel for the Receiver, do you have</p> <p>19 anything to add in that regard?</p> <p>20 MR. HUDSON: No.</p> <p>21 MS. SALENGER: No, we do not.</p> <p>22 MR. REINSCH: And also so the record's</p> <p>23 clear, present counsel right now is, again, I am</p> <p>24 Jason P. Reinsch, representing the U.S. Securities</p> <p>25 and Exchange Commission.</p>
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<p>1 MONDAY, DECEMBER 4, 2017, 10:44 A.M.</p> <p>2</p> <p>3 MR. REINSCH: Today's date is</p> <p>4 December 4th, 2017. The current time is 10:44 a.m.</p> <p>5 We have reconvened for the deposition</p> <p>6 of Carlos Goodspeed, Relief Defendant, in the matter</p> <p>7 of Securities and Exchange Commission v Thurman P.</p> <p>8 Bryant, III, et al., Civil Action Number</p> <p>9 4:17-cv-00336-ALM in the Eastern District of Texas,</p> <p>10 United States District Court for the Sherman</p> <p>11 Division.</p> <p>12 And we have, again, reconvened the</p> <p>13 deposition of Mr. Goodspeed. Mr. Goodspeed is not</p> <p>14 present at this time.</p> <p>15 So the record is clear, at the</p> <p>16 previous deposition, which concluded on</p> <p>17 November 27th, 2017, Mr. Goodspeed had to leave the</p> <p>18 deposition under the objection of the Receiver, as</p> <p>19 well as myself as counsel for the Securities and</p> <p>20 Exchange Commission.</p> <p>21 We agreed to reconvene the deposition</p> <p>22 for this morning, December 4th, 2017, at 10 a.m.</p> <p>23 That agreement was both on the record at the</p> <p>24 previous deposition, as well as evidenced by</p> <p>25 multiple e-mails from myself to Mr. Goodspeed's</p>	<p>1 And will counsel for the Receiver also</p> <p>2 identify themselves.</p> <p>3 MS. SALENGER: Mackenzie Salenger from</p> <p>4 Thompson & Knight, counsel for the Receiver, along</p> <p>5 with my co-counsel Tim Hudson, counsel for the</p> <p>6 Receiver.</p> <p>7 MR. REINSCH: Again, let's go off the</p> <p>8 record. I will attempt to contact Mr. Goodspeed.</p> <p>9 And we're off the record at this time.</p> <p>10 THE COURT REPORTER: Off the record.</p> <p>11 (Recess taken.)</p> <p>12 THE COURT REPORTER: Back on the</p> <p>13 record.</p> <p>14 MR. REINSCH: We are back on the</p> <p>15 record. The time is now 11:08 on December 4, 2017.</p> <p>16 This is, again, the continued</p> <p>17 deposition of Carlos Goodspeed.</p> <p>18 The deposition was noticed by</p> <p>19 agreement, over a continued objection from the</p> <p>20 previous deposition setting, for 10 a.m. this</p> <p>21 morning and Mr. Goodspeed has not appeared.</p> <p>22 As referenced on the record earlier</p> <p>23 this morning, there have been multiple e-mails and</p> <p>24 phone calls with Mr. Goodspeed over the last week</p> <p>25 since the conclusion of the deposition last Monday,</p>

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<p style="text-align: right;">Page 9</p> <p>1 November 27th, 2017.</p> <p>2 (Deposition Exhibit 19 was marked for</p> <p>3 identification.)</p> <p>4 Q. (BY MR. REINSCH) I'm now introducing</p> <p>5 what's being marked as Deposition Exhibit 19 to the</p> <p>6 record.</p> <p>7 Deposition Exhibit 19 is an e-mail</p> <p>8 chain including myself, Jason Reinsch, Counsel for</p> <p>9 the Receiver; Tim Hudson, as well as MacKenzie</p> <p>10 Salenger and MacKenzie Wallace; including the</p> <p>11 defendant, Trey Bryant, amongst other interested</p> <p>12 parties in the litigation.</p> <p>13 The e-mail reads – or includes on the</p> <p>14 second page of the document, initially an e-mail</p> <p>15 from – excuse me.</p> <p>16 The third page of Exhibit 19 is the</p> <p>17 initial e-mail from myself to Carlos Goodspeed at</p> <p>18 his e-mail address, mrtopagent@yahoo.com, on</p> <p>19 Wednesday, November 29th, 2017, at 9:37 a.m., in</p> <p>20 which I notify Mr. Goodspeed – or to confirm our</p> <p>21 discussion on the record at the deposition last</p> <p>22 Monday, November 27th, that he is obligated to</p> <p>23 continue the deposition and that we will do so on</p> <p>24 Monday, December 4th, 2017.</p> <p>25 I follow up my initial e-mail with an</p>	<p style="text-align: right;">Page 11</p> <p>1 had convened the deposition.</p> <p>2 In the e-mail I wrote, "We are</p> <p>3 convened at your continued deposition, but you are</p> <p>4 not here. Are you on your way?</p> <p>5 "In any event, please call me as soon</p> <p>6 as possible at 817-978-3820." End of e-mail. That</p> <p>7 phone number is the telephone number for this</p> <p>8 conference room.</p> <p>9 Let the record reflect that</p> <p>10 Mr. Goodspeed did not call at any time to this room</p> <p>11 or to my direct office.</p> <p>12 And finally, at 10:53 this morning, I</p> <p>13 sent Mr. Goodspeed a second e-mail, which states in</p> <p>14 part, "I'm sending you this final e-mail in an</p> <p>15 attempt to ascertain whether or not you were</p> <p>16 intending to appear for your deposition this</p> <p>17 morning. I and counsel for the Receiver have gone</p> <p>18 on the record to note your nonappearance, but I want</p> <p>19 to give you another 15 minutes before we conclude</p> <p>20 today's session.</p> <p>21 "Please contact me as soon as</p> <p>22 possible.</p> <p>23 "Please call either 817-978-3820 or my</p> <p>24 phone number below."</p> <p>25 And, again, so the record's clear,</p>
<p style="text-align: right;">Page 10</p> <p>1 e-mail from Thursday, November 30th, 2017, at</p> <p>2 12:41 p.m., again, from myself to Mr. Goodspeed.</p> <p>3 That e-mail follows up with a</p> <p>4 telephone conversation that Mr. Goodspeed and I had</p> <p>5 on Wednesday, November 29th, in which Mr. Goodspeed</p> <p>6 acknowledged that he would attend the deposition</p> <p>7 this morning, beginning at 10:00 a.m.</p> <p>8 Then counsel for the Receiver's</p> <p>9 response to that e-mail confirming that the Receiver</p> <p>10 does not intend to appear and ask additional</p> <p>11 questions at the deposition – pardon me. I misread</p> <p>12 that.</p> <p>13 An e-mail from Tim Hudson, Counsel for</p> <p>14 Receiver, to myself and to Mr. Goodspeed on</p> <p>15 Thursday, November 30th, 2017, at 1:59 p.m.</p> <p>16 Mr. Hudson writes, "The Receiver does</p> <p>17 intend to appear and ask additional questions at the</p> <p>18 deposition. The time frame set out below seems</p> <p>19 reasonable provided that we take limited breaks and</p> <p>20 forego lunch. My recommendation is that we bring a</p> <p>21 snack and work through lunch. We'll make every</p> <p>22 effort to be as efficient as possible. Endeavor to</p> <p>23 conclude at 2:30 p.m."</p> <p>24 This morning I e-mailed Mr. Goodspeed</p> <p>25 again at 10:11 a.m., notifying Mr. Goodspeed that we</p>	<p style="text-align: right;">Page 12</p> <p>1 Mr. Goodspeed has neither responded to any of these</p> <p>2 e-mails or attempted to contact us by phone this</p> <p>3 morning to indicate any sort of reason he's not able</p> <p>4 to attend the deposition; therefore, we are taking a</p> <p>5 Certificate of Nonappearance and will reserve all of</p> <p>6 our rights with regards to this proceedings and with</p> <p>7 the Court.</p> <p>8 That is all.</p> <p>9 Does counsel for the Receiver have</p> <p>10 anything to add?</p> <p>11 MS. SALENGER: No, we do not.</p> <p>12 MR. REINSCH: All right. Let's go off</p> <p>13 the record at 11:13 a.m., And this concludes the</p> <p>14 attempted deposition of Mr. Goodspeed this morning.</p> <p>15 THE COURT REPORTER: Off the record.</p> <p>16</p> <p>17 (Time noted: 11:13 a.m.)</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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1 STATE OF TEXAS)ss.
2 CITY OF ARGYLE, COUNTY OF DENTON)
3 I, Karen L. D. Schoeve, CSR NO. 3354, a
4 Certified Shorthand Reporter of the State of Texas,
5 do hereby certify:

6 That the foregoing proceedings were taken
7 before me at the time and place herein set forth;
8 that a verbatim record of the proceedings was made
9 by me using machine shorthand which was thereafter
10 transcribed under my direction; further, that the
11 foregoing is an accurate transcription thereof.

12 I further certify that I am not
13 interested in the outcome of the said action, nor
14 connected with, nor related to any of the parties in
15 said action, nor to their respective counsel.


16 IN WITNESS WHEREOF, I have hereunto set
17 my hand and affixed my signature this 11th day of
18 December, 2017.

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23

Karen L. D. Schoeve, CSR No. 3354

24

State of Texas

25

Behmke Reporting and Video Services

Reinsch, Jason

From: Reinsch, Jason
Sent: Thursday, January 11, 2018 5:15 PM
To: 'mrtpagent@yahoo.com'
Cc: 'Evans, Timothy (EvansTim@SEC.GOV)'; Hudson, Timothy E.; 'Salenger, Mackenzie'; Wallace, Mackenzie; 'Trey Bryant'; 'Sonny B <sonny_103@hotmail.com>'; 'Toby M. Galloway'; 'Jimmy Ardoin'
Subject: SEC v. Bryant, et al. - Motion to Show Cause and for Sanctions

Mr. Goodspeed,

I want to reach out to you this one last time to request that you contact me immediately to discuss your unfulfilled discovery obligations including not showing up for your continued deposition and not producing documents as ordered by the Court. Please contact me immediately. If you have retained an attorney please ask them to contact me.

I am preparing a motion to show cause and for sanctions asking that you be held accountable for you violation of the Court's order. This is a very serious matter, and I would prefer not to go down this road if at all avoidable.

Regards,

Jason P. Reinsch

Attorney | Division of Enforcement

U.S. Securities and Exchange Commission

Fort Worth Regional Office

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Fort Worth, Texas 76102

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reinschj@sec.gov



**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

SECURITIES AND EXCHANGE COMMISSION :

Plaintiff, :

v. :

Civil Action No.: 4:17-cv-00336-ALM

THURMAN P. BRYANT, III, :
BRYANT UNITED CAPITAL FUNDING, INC., :
ARTHUR F. WAMMEL, :
WAMMEL GROUP, LLC, :
CARLOS GOODSPEED a/k/a SEAN PHILLIPS :
a/k/a GC d/b/a TOP AGENT ENTERTAINMENT :
d/b/a MR. TOP AGENT ENTERTAINMENT, :

Defendants, :

THURMAN P. BRYANT, JR., :

Relief Defendant. :

ORDER SETTING SHOW CAUSE HEARING

This matter comes before the Court on Plaintiff's Motion for Show Cause Order Against Defendant Carlos Goodspeed, and Brief in Support [Dkt. 172] (the "Motion"). After considering the Motion and any responsive pleadings, the Court GRANTS the Motion, in part.

IT IS HEREBY ORDERED that Defendant Carlos Goodspeed shall appear before the Court in person on _____, 2018 at ____ a.m./p.m. to show cause why he should not be held in contempt.

IT IS FURTHER ORDERED that if Defendant Carlos Goodspeed intends to file a written response to the Motion, he shall do so on or before _____, 2018 at ____ a.m./p.m.

FURTHER, the Court reserves its ruling on the remaining requests for relief set forth in the Motion until the conclusion of the afore-mentioned show cause hearing.