

TRAVIS J. ILES  
SECURITIES COMMISSIONER



E. WALLY KINNEY  
CHAIR

CRISTI RAMÓN OCHOA  
DEPUTY SECURITIES COMMISSIONER

ROBERT BELT  
MEMBER

Mail: P.O. BOX 13167  
AUSTIN, TEXAS 78711-3167

## Texas State Securities Board

MELISSA TYROCH  
MEMBER

EJIKE E OKPA II  
MEMBER

Phone: (512) 305-8300  
Facsimile: (512) 305-8310

208 E. 10th Street, 5th Floor  
Austin, Texas 78701-2407  
www.ssb.texas.gov

DAVID B. MONTGOMERY  
MEMBER

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IN THE MATTER OF THE INVESTMENT  
ADVISER REGISTRATION OF  
CONNER MANAGEMENT GROUP, LLC  
AND THE INVESTMENT ADVISER  
REPRESENTATIVE REGISTRATION OF  
GEORGE MATHIS CONNER

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**Order No. IC-24-CDO-02**

TO: Conner Management Group, LLC  
3405 Walden Creek Ln  
Pearland, Texas 77581

George Mathis Conner (CRD No. 2881411)  
3405 Walden Creek Ln  
Pearland, Texas 77581

### DEFAULT ORDER

Be it remembered that this is your OFFICIAL NOTICE of the issuance by the Securities Commissioner of the State of Texas (“Securities Commissioner”) of a DEFAULT ORDER pursuant to Section 4007.102 of The Securities Act, Tex. Gov’t Code Ann. §§ 4007.001–4007.209 (“Texas Securities Act”) and §155.501(d)(1) of the Rules of Procedure for the State Office of Administrative Hearings, 1 Tex. Admin. Code Chapter 155 (“SOAH Rules of Procedure”).

### FINDINGS OF FACT

Legal Counsel for the Legal and Investigations Division of the Texas State Securities Board (“Counsel”) has presented evidence sufficient for the Securities Commissioner to find that:

1. On May 31, 2024, a Notice of Hearing, State Office of Administrative Hearings (“SOAH”) Docket No. 312-24-19087, SSB Docket No. IC-24-02 (the “Notice”),<sup>1</sup> was sent via certified mail to Conner Management Group, LLC (“Respondent CMG”) and George Mathis Conner (“Respondent Conner”) (collectively, “Respondents”). The notice was sent to Respondents’ last known address as shown by the records of Counsel.

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<sup>1</sup> Exhibit A to this Default Order

2. On June 11, 2024, Counsel received notice that the Notice was received personally by Respondent Conner on June 10, 2024 at a different address than Respondents' last known address.
3. Within the Notice, Counsel set forth certain matters related to Respondents' activities and requested that Respondent CMG and Respondent Conner cease and desist from acting as an investment adviser and investment adviser representative, respectively, in the State of Texas without first satisfying the registration requirements of the Texas Securities Act and Board Rules.
4. On June 17, Counsel filed its first request for a motion for continuance ("First Motion") with SOAH and on June 20, Counsel certified mailed a copy of the First Motion to the Respondents.<sup>2</sup>
5. The First Motion was granted, resetting the hearing date to July 17, 2024.<sup>3</sup>
6. The Notice also contained the following statement as required by the Board Rules:

**IF YOU DO NOT FILE A WRITTEN ANSWER OR OTHER WRITTEN RESPONSIVE PLEADING TO THIS NOTICE OF HEARING ON OR BEFORE THE 20TH DAY AFTER THE DATE ON WHICH THIS NOTICE WAS MAILED TO YOU OR PERSONALLY SERVED ON YOU, THE FACTUAL ALLEGATIONS IN THIS NOTICE COULD BE DEEMED ADMITTED, AND THE SECURITIES COMMISSIONER MAY DISPOSE OF THIS CASE WITHOUT A HEARING AND MAY GRANT THE RELIEF SOUGHT IN THIS NOTICE. THE RESPONSE MUST BE FILED IN AUSTIN, TEXAS, WITH THE SECURITIES COMMISSIONER AND THE STATE OFFICE OF ADMINISTRATIVE HEARINGS, AND ALSO SERVED ON THE STATE SECURITIES BOARD. IF YOU FAIL TO ATTEND THE HEARING, EVEN IF A WRITTEN ANSWER OR OTHER RESPONSIVE PLEADING HAS BEEN FILED AND SERVED, THE FACTUAL ALLEGATIONS IN THIS NOTICE COULD BE DEEMED ADMITTED, AND THE SECURITIES COMMISSIONER MAY DISPOSE OF THIS CASE WITHOUT A HEARING AND MAY GRANT THE RELIEF SOUGHT IN THIS NOTICE.**

7. Respondents did not file a written answer or other responsive pleading to the matters asserted in the Notice on or before the 20<sup>th</sup> day after the date the Notice was mailed to Respondents' last known address as shown by the records of Counsel.
8. On July 1, 2024, Counsel requested that the matter be dismissed ("Second Motion") from the SOAH docket for informal disposition pursuant to the Board Rules.<sup>4</sup>

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<sup>2</sup> Exhibit B to this Default Order

<sup>3</sup> Exhibit C to this Default Order

<sup>4</sup> The Motion to Dismiss was not ruled on by SOAH.

9. On July 17, 2024, Counsel appeared at the hearing on the merits, but Respondents failed to appear and were not represented at the hearing.
10. At the hearing, Counsel moved for a default dismissal from the SOAH docket, pursuant to §155.501(a) of the SOAH Rules of Procedure.<sup>5</sup>
11. On July 17, 2024, Administrative Law Judge Jessica Witte issued an Order granting Counsel's request for a default dismissal of the matter from the SOAH docket and deeming that the factual allegations detailed in the Notice and the documents incorporated within that Notice are admitted.<sup>6</sup>

### CONCLUSIONS OF LAW

1. Pursuant to §155.501(d)(1) of the SOAH Rules of Procedure, the matters set forth and alleged by Counsel in the Notice are deemed admitted as true with respect to the Respondents.
2. Pursuant to §155.501(d)(1) of the SOAH Rules of Procedure and Section 4007.102 of the Texas Securities Act, the relief requested in the Notice with respect to the Respondents is granted.

### ORDER

1. It is therefore ORDERED that the Conner Management Group, LLC and George Mathis Conner CEASE AND DESIST from acting as an investment adviser and investment adviser representative, respectively, in the State of Texas without first satisfying the registration requirements of the Texas Securities Act and Board Rules.

SIGNED AND ENTERED BY THE SECURITIES COMMISSIONER this 2nd day of August, 2024.



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TRAVIS J. ILES  
Securities Commissioner

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<sup>5</sup> §155.501(a) of the SOAH Rules of Procedure state that if a party fails to appear for the hearing, the opposing party may move to proceed in that party's absence on a default basis.

<sup>6</sup> Exhibit D to this Default Order

TRAVIS J. ILES  
SECURITIES COMMISSIONER



E. WALLY KINNEY  
CHAIR

ROBERT BELT  
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## Texas State Securities Board

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www.ssb.texas.gov

Phone: (512) 305-8300  
Facsimile: (512) 305-8310

SOAH DOCKET NO. 312-24-19087

TEXAS STATE SECURITIES BOARD  
Petitioner

v.

CONNER MANAGEMENT GROUP, LLC  
GEORGE MATHIS CONNER  
Respondents

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BEFORE THE STATE OFFICE OF

ADMINISTRATIVE HEARINGS

### NOTICE OF HEARING

This is your OFFICIAL NOTICE that a hearing will commence at **9:00 AM (CT) on JUNE 25TH, 2024**, before an Administrative Law Judge. The hearing is being held via videoconference for the purpose of determining whether to issue a proposal for decision for the issuance of an ORDER FOR Conner Management Group, LLC ("Respondent CMG") AND George Mathis Conner ("Respondent Conner"), (collectively, "Respondents") TO CEASE AND DESIST FROM ACTING AS AN INVESTMENT ADVISER AND INVESTMENT ADVISER REPRESENTATIVE, RESPECTIVELY, IN THE STATE OF TEXAS WITHOUT FIRST SATISFYING THE REGISTRATION REQUIREMENTS OF THE TEXAS SECURITIES ACT AND RULES AND REGULATIONS OF THE TEXAS STATE SECURITIES BOARD.

This hearing will be held pursuant to the Securities Act, Tex. Gov't Code §§ 4001.001-4008.105 (the "Securities Act"), the Rules and Regulations of the State Securities Board, 7 Tex. Admin. Code §§101.1-139.27 (2019) (Tex. State Sec. Bd.) (the "Board Rules"), the Administrative Procedure Act, Tex. Gov't Code Ann. §§2001.0012001.902 (the "Administrative Procedure Act"), and the Rules of Practice and Procedure of the State Office of Administrative Hearings, 1 Tex. Admin. Code Chapter 155 (2019) (State Ofc. of Admin. Hearings) (the "SOAH Rules").

## THE RESPONDENTS

1. Respondent CMG is a for profit domestic limited liability company<sup>1</sup> and Respondent Conner is a natural person and the sole owner and operator of Respondent CMG. Respondents' last known address is 4501 Lakefront Terrace Drive, Pearland, Texas 77584.
2. On or about January 27, 2014, Respondent CMG registered as an investment adviser with the Securities Commissioner. This registration is currently not effective.
3. On or about January 27, 2014, Respondent Conner registered as an investment adviser representative of Respondent CMG with the Securities Commissioner. This registration is currently not effective.

## SUMMARY OF RELEVANT FACTS

**Respondents were acting as an investment adviser and investment adviser representative, respectively, in the State of Texas without being properly registered with the Securities Commissioner.**

1. Respondent CMG failed to renew its registration during three (3) separate occasions from January 1, 2020 through April 25, 2024 (the "Relevant Period").
2. On December 31, 2019, Respondent CMG failed to renew its registration but paid renewal fees to the Securities Commissioner and was re-registered on January 12, 2021 pursuant to Section 4004.255(b) of the Securities Act<sup>2</sup>.
3. Then on December 31, 2021, Respondent CMG again failed to renew its registration but paid renewal fees to the Securities Commissioner and was re-registered on December 6, 2022 again pursuant to Section 4004.255(b) of the Securities Act.
4. On or about August 16, 2023, the Texas State Securities Board ("Staff") conducted a routine inspection ("Inspection") of Respondents pursuant to Section 4007.052(a) of the Securities Act.
5. And after the Inspection, on December 31, 2023, Respondent CMG again failed to renew its registration.
6. Respondent CMG is currently not registered as an investment adviser with the Securities Commissioner.

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<sup>1</sup> According to Texas Secretary of State records, on February 2, 2018, the Texas Secretary of State forfeited the charter, certificate and registration of Respondent CMG pursuant to Section 171.309 of the Texas Tax Code. Respondent CMG never revived its forfeited privileges.

<sup>2</sup> Section 4004.255(b) of the Securities Act allows renewal of an expired registration that has been expired for more than 90 days but less than two years to renew the registration by (1) filing a renewal application with the Commissioner; and (2) paying to the Board: (A) all unpaid renewal fees; and (B) a fee that is equal to the original registration application fee.

7. Respondent Conner was also unregistered as an investment adviser representative during the same periods that Respondent CMG was unregistered as an investment adviser.
8. Respondents continued to act as an investment adviser and investment adviser representative throughout the unregistered periods.

**Respondents collected advisory management fees during the unregistered periods.**

9. During the Relevant Period, Respondents were rendering investment advisory services to one client (the "Client").
10. Specifically, Respondents collected a total of \$28,022.74 in advisory management fees during the unregistered periods from the Client.
11. During the Relevant Period, Respondents did not place any trades in the Client's accounts<sup>3</sup>.
12. Currently, Respondents are still rendering investment advisory services to the Client.

**The Inspection of Respondent CMG also identified multiple deficiencies, including ones from previous examinations<sup>4</sup>.**

13. On or about August 16, 2023, the Staff initiated the Inspection of Respondents' business pursuant to Section 4007.052(a) and identified multiple books and records, including the following examples.
14. Respondent CMG failed to establish, maintain, and enforce a system to supervise the activities of its investment adviser representatives that is reasonably designed to achieve compliance with the Securities Act, Board Rules and all applicable securities laws and regulations. Failure to do so is a violation of § 116.10 of the Board Rules.
15. Respondent CMG failed to maintain a copy of the written agreement with the Client. Failure to maintain all written agreements entered into by the investment adviser with any client or otherwise relating to the business of such investment adviser is a violation of § 116.5(b)(2)(F) of the Board Rules.
16. Respondent CMG failed to prepare and maintain a current balance sheet, income statement and general and/or auxiliary ledgers (or other comparable records) reflecting asset, liability, reserve capital, income, and expense accounts. Failure to do so is a violation of § 116.5(a)(2) of the Board Rules.
17. The Staff reviewed eighteen (18) order memoranda from the Relevant Period and noted that it failed to include the terms and conditions of the order, the person connected with

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<sup>3</sup> The sell trades that appeared on the trade blotter provided by the custodian were made by the custodian to pay the automated management fees to the Respondents.

<sup>4</sup> Aside from the Respondents' unregistered activity as an investment adviser and investment adviser representative, the Staff identified at least thirteen (13) violations and deficiencies from the Inspection.

the investment adviser who recommended the transaction to the client, the person who placed the order, the account for which the order was entered, the date of entry, the bank, broker, or dealer by through whom executed and/or if the order was entered pursuant to the exercise of discretionary power. Failure to include such information on the Firm's order memoranda is a violation of § 116.5(a)(3) of the Board Rules.

18. Respondent CMG failed to maintain certain information in the Client's file, including client birth year, employment status, occupation, annual income, net worth, investment objective, and risk tolerance. Failure to maintain such information is a violation of § 116.5(a)(3) of the Board Rules.

**The staff of the Texas State Securities Board has been unable to get in contact with the Respondents.**

19. In or around January 2024, following the conclusion of the Inspection, the matter was referred to the Staff's Legal Division ("Legal Division").
20. After review of the Staff's findings, the Legal Division made multiple attempts to get in contact with the Respondents.
21. For example, the Legal Division attempted to reach out to Respondents via two different email addresses available to Staff on March 28, 2024 and April 1, 2024<sup>5</sup>.
22. The Legal Division also attempted to reach out to Respondents via two different phone numbers available to Staff on April 1, 2024<sup>6</sup>.
23. Finally, the Legal Division mailed a deficiency letter to Respondents' last known address via certified mail on April 25, 2024, requesting a response from the Respondents by May 13, 2024<sup>7</sup>.
24. The purpose of the Legal Division's attempts to reach out to Respondents were to resolve the unregistered activity and other deficiencies identified by the Staff through its Inspection.
25. As of the date of this filing, neither the Legal Division nor the Staff has received a response from Respondents. And Respondents continue to act as an investment adviser and investment adviser representative, respectively, despite not being registered in any capacity with the Securities Commissioner.

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<sup>5</sup> When Staff sent the e-mail messages to Respondents' e-mail addresses, Microsoft Outlook indicated the e-mails were undeliverable via an automated e-mail message to the Legal Division.

<sup>6</sup> One of the phone numbers was disconnected and the other phone number was an incorrect phone number that was instead for the dispatch department of a logistics company.

<sup>7</sup> Staff nor the Legal Division received a response from the Respondents.

## REMEDIES

1. Based on the foregoing allegations, the Agency is praying for a proposal for decision for entry of an order that Respondent CMG and Respondent Conner CEASE AND DESIST from acting as an investment adviser and investment adviser representative, respectively, in the State of Texas without first satisfying the registration requirements of the Texas Securities Act and Rules and Regulations of the Texas State Securities Board.
2. Although this Notice of Hearing is praying for a proposal for decision ordering Respondent CMG and Respondent Conner to cease and desist, nothing set forth herein shall preclude the Agency, consistent with applicable law and rule, from pursuing other enforcement remedies.

## THE HEARING

3. The hearing will be held before the State Office of Administrative Hearings. It will commence at 9:00 AM (CT) on JUNE 25TH, 2024.
4. The State Office of Administrative Hearings may conduct the hearing via Zoom. Zoom is a video conferencing platform for meetings held through the internet. The State Office of Administrative Hearings will provide instructions for accessing the hearing via Zoom.
5. At the hearing, the Agency will present testimony and other admissible evidence in support of its prayer for a proposal for decision for the entry of an order that Respondent CMG and Respondent Conner CEASE AND DESIST from acting as an investment adviser and investment adviser representative, respectively, in the State of Texas without first satisfying the registration requirements of the Texas Securities Act and Rules and Regulations of the Texas State Securities Board. Respondents will be afforded the right to present such testimony and other evidence related thereto.

## LEGAL NOTIFICATIONS

6. Legal authority and jurisdiction for this matter exist under Section 4007.102 of the Securities Act, Section 2003.021(b) of the Texas Government Code and Rule 155.51 of the SOAH Rules.
7. **IF YOU DO NOT FILE A WRITTEN ANSWER OR OTHER WRITTEN RESPONSIVE PLEADING TO THIS NOTICE OF HEARING ON OR BEFORE THE 20TH DAY AFTER THE DATE ON WHICH THIS NOTICE WAS MAILED TO YOU OR PERSONALLY SERVED ON YOU, THE FACTUAL ALLEGATIONS IN THIS NOTICE COULD BE DEEMED ADMITTED, AND THE SECURITIES COMMISSIONER MAY DISPOSE OF THIS CASE WITHOUT A HEARING AND MAY GRANT THE RELIEF SOUGHT IN THIS NOTICE. THE RESPONSE MUST BE FILED IN AUSTIN, TEXAS, WITH THE SECURITIES COMMISSIONER AND THE STATE OFFICE OF ADMINISTRATIVE HEARINGS, AND ALSO SERVED ON THE STAFF OF THE STATE SECURITIES BOARD. IF YOU FAIL TO ATTEND THE HEARING, EVEN IF A WRITTEN ANSWER OR OTHER RESPONSIVE PLEADING HAS BEEN FILED AND SERVED, THE FACTUAL**



**ALLEGATIONS IN THIS NOTICE COULD BE DEEMED ADMITTED, AND THE SECURITIES COMMISSIONER MAY DISPOSE OF THIS CASE WITHOUT A HEARING AND MAY GRANT THE RELIEF SOUGHT IN THIS NOTICE.**

8. **PARTIES THAT ARE NOT REPRESENTED BY AN ATTORNEY MAY OBTAIN INFORMATION REGARDING CONTESTED CASE HEARINGS ON THE PUBLIC WEBSITE OF THE STATE OFFICE OF ADMINISTRATIVE HEARINGS AT [WWW.SOAH.TEXAS.GOV](http://WWW.SOAH.TEXAS.GOV), OR IN PRINTED FORMAT UPON REQUEST TO THE STATE OF ADMINISTRATIVE HEARINGS.**
9. Respondents may access the Securities Act and the Board Rules through the website of the State Securities Board at [www.ssb.texas.gov](http://www.ssb.texas.gov). Respondent may also access the SOAH Rules through the website of the State Office of Administrative Hearings at [www.soah.texas.gov](http://www.soah.texas.gov) and the Administrative Procedure Act through Texas Legislature Online at [statutes.capitol.texas.gov](http://statutes.capitol.texas.gov).
10. The Securities Act authorizes the Texas State Securities Board to pursue administrative, civil, or criminal enforcement cases. The Securities Act and Board Rules also authorize the Texas State Securities Board to share information with and refer cases to other governmental agencies with administrative, civil, or criminal jurisdiction. These other governmental agencies include, without limitation, state and federal regulatory agencies, law enforcement agencies and prosecutors' offices. Therefore, any information provided, filed, or otherwise supplied by Respondent may be shared with these other government agencies and/or used in other cases. Whether the Texas State Securities Board makes its files available to other governmental agencies or refers cases to other government agencies is typically confidential pursuant to Section 4002.161 of the Texas Securities Act.
11. Pursuant to Board Rule 105.13, the Agency is now respectfully requesting and will continue to respectfully request the State Office of Administrative Hearings order all costs charged to the Texas Securities Board by any court reporting service be assessed against Respondents.
12. Persons with disabilities who need special accommodations at the hearing, whether held at the State Office of Administrative Hearings or through an audio or video conferencing platform, should contact the Docketing Department of the State Office of Administrative Hearings at 512-475-4993 at least one week prior to the hearing.

#### CONTACT AND FILING INFORMATION

13. The Agency is represented by Nadda Rungruangphol, Attorney, Registration Division. Ms. Rungruangphol's State Bar Card Number is 24126036, her work address is 208 E. 10th Street, 5th Floor, Austin, Texas 78701, her telephone number is 512-305-8300, her facsimile number is 512-305-8310, and her email address is [nrungruangphol@ssb.texas.gov](mailto:nrungruangphol@ssb.texas.gov).

14. The Docketing Office of the State Office of Administrative Hearings is located at 300 W. 15th Street, Austin, Texas 78701, and it may be contacted by telephone at 512-745-3445 and by facsimile at 512-475-4994.
15. The State Office of Administrative Hearings may conduct the hearing via audio or video conferencing. The audio and video conferencing platforms are secure, free meetings held telephonically or through the internet. The State Office of Administrative Hearings will provide instructions for all hearings held telephonically or through a video conferencing platform.
16. Persons with disabilities who need special accommodations at the hearing, whether held at the State Office of Administrative Hearings or through an audio or video conferencing platform, should contact the Docketing Department of the State Office of Administrative Hearings at 512-475-4993 at least one week prior to the hearing.
17. Pursuant to Board Rule 105.8, all documents filed by any party, other than business records and transcripts, must be contemporaneously served upon Cheryn Netz, General Counsel and Securities Commissioner's Representative. Ms. Netz's address is 208 E. 10th Street, 5th Floor, Austin, Texas 78701, her telephone number is 512-305-8300, her facsimile number is 512- 305-8336, and her email address is [cnetz@ssb.texas.gov](mailto:cnetz@ssb.texas.gov).

Respectfully submitted,

By: 

Nadda Rungruangphol  
State Bar No. 24126036  
Attorney  
Registration Division  
Texas State Securities Board  
208 E. 10th Street, 5th Floor  
Austin, Texas 78701  
T: (512) 305-8300  
F: (512) 305-8310  
[nrungruangphol@ssb.texas.gov](mailto:nrungruangphol@ssb.texas.gov)

CERTIFICATE OF SERVICE

I hereby certify that on this, the 30<sup>th</sup> day of May 2024, true and correct copies of this Notice of Hearing are being served via electronic filing and certified mail, return receipt requested, to the individual(s) listed below and to the Securities Commissioner's Representative by hand-delivery.

George Mathis Conner  
Respondent  
4501 Lakefront Terrace Drive  
Pearland, Texas 77584  
Telephone: (713) 818-0246  
gmconner14@gmail.com

VIA ELECTRONIC FILING AND CERTIFIED MAIL

Cheryn Netz  
General Counsel  
Securities Commissioner's Representative  
Texas State Securities Board  
208. E. 10th Street, Fifth Floor  
Austin, Texas 78701  
Telephone: (512) 305-8300  
Facsimile: (512) 305-8336  
cnetz@ssb.texas.gov

VIA ELECTRONIC FILING AND HAND DELIVERY

By:   
Nadda Rungruangphol  
State Bar No. 24126036  
Attorney  
Registration Division  
Texas State Securities Board  
208 E. 10th Street, 5th Floor  
Austin, Texas 78701  
T: (512) 305-8300  
F: (512) 305-8310  
nrunguangphol@ssb.texas.gov

TRAVIS J. ILES  
SECURITIES COMMISSIONER



E. WALLY KINNEY  
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## Texas State Securities Board

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www.ssb.state.tx.us

Phone: (512) 305-8300  
Facsimile: (512) 305-8310

### SOAH DOCKET NO. 312-24-19087 SSB DOCKET NO. IC24-01

TEXAS STATE SECURITIES BOARD,  
Petitioner

v.

CONNER MANAGEMENT GROUP, LLC  
GEORGE MATHIS CONNER  
Respondent

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BEFORE THE STATE OFFICE OF

ADMINISTRATIVE HEARINGS

### PETITIONER'S FIRST MOTION FOR CONTINUANCE

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

The Texas State Securities Board ("Petitioner"), by and through its attorney, Nadda Rungruangphol ("Counsel") files this First Motion for Continuance for the June 25, 2024 Hearing on the Merits (the "Hearing") pursuant to SOAH Rule §155.307, and would show the Court the following:

1. This is the Petitioner's first request for a motion for continuance.
2. On May 30, 2024, copies of the Notice of Hearing in this matter were electronically filed and served to Conner Management Group, LLC and George Mathis Conner (collectively, "Respondents").
3. And on May 31, 2024, copies of the Notice of Hearing in this matter were mailed to Respondents by certified mail to Respondents' last known address as shown by the records of the Texas State Securities Board pursuant to §105.6 of the Rules and Regulations of the Texas State Securities Board (the "Board Rules").
4. As stated in the Notice of Hearing, Petitioner has run into challenges when it attempted to contact Respondents on multiple occasions leading up to the Hearing, but on June 11, 2024, Petitioner received notice that the Notice of Hearing was received personally by Respondents at a different address than as shown by

the last known address as shown by the records of the Texas State Securities Board. *Exhibit 1*.

5. Pursuant to §105.7(a) of the Board Rules, if the notice of hearing was mailed to or personally served on a party at least 30 days prior to the hearing in a contested case, the respondent shall file with both the Securities Commissioner and SOAH, and also serve the Staff with, a written answer or other responsive pleading to the matters asserted in the notice of hearing no later than the 20th day after the date the notice was mailed to or personally served on the respondent.
6. And §105.10(a)(1) of the Board Rules allows for the Securities Commissioner to make an informal disposition of the contested case by default upon proof to the Commissioner that the notice was mailed to or personally served on a respondent in accordance with §105.6 of the Board Rules and that such respondent has failed to file a written response as provided in §105.7 of the Board Rules.
7. Currently, with the Hearing date set for June 25, 2024, it allows for very limited time for the Respondents to file a written answer or other responsive pleading to the matters asserted in the notice of hearing.
8. Further, the current Hearing date of June 25, 2024 does not permit §105.10(a)(1) of the Board Rules to be applicable for this matter.
9. Although Petitioner's First Motion for Continuance is being filed seven days before the date of the Hearing, good cause exists to grant this motion because it will allow more time for the Respondents to file an answer or if no answer is filed—allows for the Securities Commissioner to make an informal disposition of the contested case by default pursuant to §105.10(a)(1) of the Board Rules.
10. Petitioner respectfully proposes the dates of July 12, 2024, July 15, 2024, July 16, 2024, or July 17, 2024.

**WHEREFORE, PREMISES CONSIDERED,** Petitioner prays that this Court grant a continuance of the Hearing setting in the above cause.

Respectfully Submitted,

By: Nadda Rungruangphol  
Nadda B. Rungruangphol  
State Bar No. 24126036  
Texas State Securities Board  
208 East 10<sup>th</sup> Street, 5<sup>th</sup> Floor  
Austin, Texas 78701  
T: (512) 305-8300  
F: (512) 305-8310  
nrungruangphol@ssb.texas.gov

## CERTIFICATE OF CONFERENCE

The undersigned certifies that a reasonable effort has been made to resolve this dispute without the necessity of court intervention, and that effort failed.

Respectfully Submitted,

By: *Nadda Rungruangphol*  
Nadda B. Rungruangphol  
State Bar No. 24126036  
Texas State Securities Board  
208 East 10<sup>th</sup> Street, 5<sup>th</sup> Floor  
Austin, Texas 78701  
T: (512) 305-8300  
F: (512) 305-8310  
nrungruangphol@ssb.texas.gov

## CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been sent via electronic filing and certified mail, return receipt requested, to the Respondent, and to the Securities Commissioner's Representative by electronic filing and hand-delivery.

George Mathis Conner  
Respondent  
3405 Walden Creek Ln  
Pearland, Texas 77581  
Telephone: (713) 818-0246  
gmconner14@gmail.com

VIA ELECTRONIC FILING AND CERTIFIED MAIL

Cheryn Netz  
General Counsel  
Securities Commissioner's Representative  
Texas State Securities Board  
208. E. 10th Street, Fifth Floor  
Austin, Texas 78701  
Telephone: (512) 305-8300  
Facsimile: (512) 305-8336  
cnetz@ssb.texas.gov

VIA ELECTRONIC FILING AND HAND DELIVERY

*Nadda Rungruangphol*  
\_\_\_\_\_  
Nadda B. Rungruangphol  
State Bar No. 24126036  
Texas State Securities Board  
208 East 10<sup>th</sup> Street, 5<sup>th</sup> Floor  
Austin, Texas 78701  
T: (512) 305-8300  
F: (512) 305-8310  
nrungruangphol@ssb.texas.gov

FILED  
312-24-19087  
6/18/2024 10:09 AM  
STATE OFFICE OF  
ADMINISTRATIVE HEARINGS  
Julian Jaramillo, CLERK

ACCEPTED  
312-24-19087  
6/18/2024 10:10:19 am  
STATE OFFICE OF  
ADMINISTRATIVE HEARINGS  
Julian Jaramillo, CLERK

**SOAH Docket No. 312-24-19087**

**Suffix: SSB**

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**BEFORE THE  
STATE OFFICE OF ADMINISTRATIVE  
HEARINGS**

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**TEXAS STATE SECURITIES BOARD,  
PETITIONER**

**v.**

**CONNER MANAGEMENT GROUP, LLC AND  
CONNER GEORGE MATHIS,  
RESPONDENT**

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**ORDER NO. 2  
GRANTING MOTION FOR CONTINUANCE**

Having considered the motion for continuance filed on June 17, 2024, the motion is **GRANTED**. Accordingly, this case is reset and will convene via Zoom videoconference on **July 17, 2024 at 9:00 AM (CT)**.

To join by computer or smart device, go to <https://soah-texas.zoomgov.com> and enter:

Meeting ID: 160 528 4106

Video Passcode: SSB987



To join by telephone (audio only), call +1 669 254 5252, and enter:

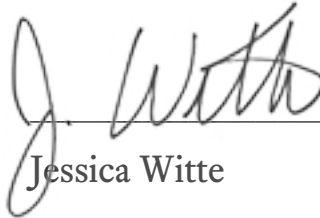
Meeting ID: 160 528 4106

Telephone Passcode: 621062

All other prehearing instructions in the prior Order Scheduling Hearing on the Merits remain in effect.

**Signed JUNE 18, 2024.**

ALJ Signature:

A handwritten signature in cursive script, appearing to read "J. Witte", is written over a horizontal line.

Jessica Witte

Presiding Administrative Law Judge

### Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 88912069

Filing Code Description: Order Granting Motion for Continuance

Filing Description: ORDER NO. 2 GRANTING MOTION FOR CONTINUANCE

Status as of 6/18/2024 10:11 AM CST

Associated Case Party: Texas State Securities Board

Name	BarNumber	Email	TimestampSubmitted	Status
Cristi RamonOchoa		cochoa@ssb.texas.gov	6/18/2024 10:09:04 AM	SENT
Travis Iles		tiles@ssb.texas.gov	6/18/2024 10:09:04 AM	SENT
Cheryn Netz		cnetz@ssb.texas.gov	6/18/2024 10:09:04 AM	SENT
Nadda Rungruangphol		nrungruangphol@ssb.texas.gov	6/18/2024 10:09:04 AM	SENT

Associated Case Party: GeorgeMathisConner

Name	BarNumber	Email	TimestampSubmitted	Status
George MathisConner		gmconner14@gmail.com	6/18/2024 10:09:04 AM	SENT
George MathisConner		mathis@connermg.com	6/18/2024 10:09:04 AM	SENT

Associated Case Party: Conner Management Group, LLC

Name	BarNumber	Email	TimestampSubmitted	Status
George MathisConner		gmconner14@gmail.com	6/18/2024 10:09:04 AM	SENT

ACCEPTED  
312-24-19087  
7/17/2024 9:29:18 am  
STATE OFFICE OF  
ADMINISTRATIVE HEARINGS  
Kevin Garza, CLERK

FILED  
312-24-19087  
7/17/2024 9:28 AM  
STATE OFFICE OF  
ADMINISTRATIVE HEARINGS  
Kevin Garza, CLERK

**SOAH Docket No. 312-24-19087**

**Suffix: SSB**

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**BEFORE THE  
STATE OFFICE OF ADMINISTRATIVE  
HEARINGS**

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**TEXAS STATE SECURITIES BOARD,  
PETITIONER**

**v.**

**CONNER MANAGEMENT GROUP, LLC AND  
CONNER GEORGE MATHIS,  
RESPONDENTS**

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**ORDER NO. 3  
DEFAULT DISMISSAL ORDER**

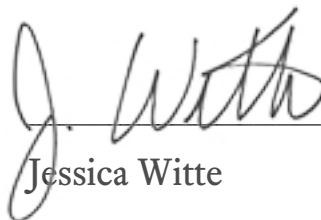
On July 17, 2024, the Administrative Law Judge (ALJ) convened a hearing on the merits in this matter via Zoom videoconference. Attorney Nadda Rungruangphol appeared on behalf of the staff (Staff) of the Texas State Securities Board. Neither Conner Management Group, LLC nor Conner George Mathis (Respondents) appeared and were not represented at the hearing. Staff Exhibits 10, 11, 12, and 13 were admitted, and the ALJ took official notice of SOAH's file in this case, including specifically Order No. 2 which set the hearing by Zoom videoconference and provided instructions for participating in the hearing.

Collectively, these exhibits and orders showed proof of adequate notice to Respondent.<sup>1</sup> Upon establishing adequate notice, Staff moved for a default dismissal. Staff's motion was **GRANTED**, and the factual allegations detailed in the Notice of Hearing and the documents incorporated within that notice are deemed admitted.<sup>2</sup>

**Respondent may file a motion to set aside the default within 15 days of the date of this order.**<sup>3</sup> The motion must show good cause for resetting a hearing or show that the interests of justice require setting aside the default. If Respondent does not file a timely motion, or if the ALJ finds that a filed motion should be denied, the contested case will be remanded to the Board for informal disposition on a default basis in accordance with the Administrative Procedure Act.<sup>4</sup>

**Signed JULY 17, 2024.**

ALJ Signature:

A handwritten signature in black ink, appearing to read "J. Witte", is written over a horizontal line.

Jessica Witte

Presiding Administrative Law Judge

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<sup>1</sup> 1 Tex. Admin. Code § 155.501(b).

<sup>2</sup> 1 Tex. Admin. Code § 155.501(d)(1).

<sup>3</sup> 1 Tex. Admin. Code § 155.501(e).

<sup>4</sup> Tex. Gov't Code §§ 2001.056, .058(d-1).

### Automated Certificate of eService

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Envelope ID: 89855878

Filing Code Description: Default Dismissal Order

Filing Description: ORDER NO. 3 DEFAULT DISMISSAL ORDER

Status as of 7/17/2024 9:30 AM CST

Associated Case Party: Texas State Securities Board

Name	BarNumber	Email	TimestampSubmitted	Status
Cristi RamonOchoa		cochoa@ssb.texas.gov	7/17/2024 9:28:15 AM	SENT
Travis Iles		tiles@ssb.texas.gov	7/17/2024 9:28:15 AM	SENT
Cheryn Netz		cnetz@ssb.texas.gov	7/17/2024 9:28:15 AM	SENT
Nadda Rungruangphol		nrungruangphol@ssb.texas.gov	7/17/2024 9:28:15 AM	SENT

Associated Case Party: GeorgeMathisConner

Name	BarNumber	Email	TimestampSubmitted	Status
George MathisConner		gmconner14@gmail.com	7/17/2024 9:28:15 AM	SENT
George MathisConner		mathis@connermg.com	7/17/2024 9:28:15 AM	SENT

Associated Case Party: Conner Management Group, LLC

Name	BarNumber	Email	TimestampSubmitted	Status
George MathisConner		gmconner14@gmail.com	7/17/2024 9:28:15 AM	SENT