

STATE OF MAINE
OFFICE OF SECURITIES
121 STATE HOUSE STATION
AUGUSTA, ME 04333

IN RE:

Mid-Continent Oil and Gas, Inc.,
Steven Lee White, Casey Ladymon and
Chad Willis

CONSENT ORDER
04-025 - CON

1. This Consent Order applies to respondents Casey Ladymon (“Ladymon”) and Chad Willis (“Willis”) only.
2. Ladymon is an individual who at all relevant times was a Senior Advisor of Mid-Continent Oil and Gas, Inc. (“MOGI”), and solicited individuals, including an investor from Lemoine, Maine (“the Maine investor”), to invest in MOGI’s oil and gas exploration projects.
3. Willis is an individual who at all relevant times was a Senior Advisor of MOGI and solicited individuals, including the Maine investor, to invest in MOGI’s oil and gas exploration projects.
4. Based upon these solicitations, the Maine investor (and later his widow) invested a total of \$31,000 in units of MOGI’s oil and gas exploration projects. Despite promises of repayment, neither the Maine investor nor his widow has received any monies back from respondents.
5. Pursuant to 32 M.R.S.A. §10401, a person may not offer or sell any security in Maine unless the security is registered under the Revised Maine Securities Act (“the Act”) or the securities or transaction is exempt from registration under the Act.
7. MOGI units were not registered for offer and sale in Maine. It is the position of the Maine Office of Securities that Ladymon and Willis violated 32 M.R.S.A. §10401 by offering and selling these units in Maine.
8. It is the position of the Maine Office of Securities that Ladymon and Willis are liable as control persons of MOGI pursuant to 32 M.R.S.A § 10605(3).

8. On January 29, 2004, the Securities Administrator issued a Notice of Intent to Issue a Cease and Desist Order against all respondents. Only Ladymon and Willis requested a hearing. Neither MOGI nor White requested a hearing.
9. On March 15, 2004, the Securities Administrator issued a Cease and Desist Order against Steven Lee White and MOGI.
10. Ladymon and Willis desire an expeditious resolution of this matter.
11. Without trial or adjudication of any issue of fact or law, and without admitting or denying that their conduct violated the Revised Maine Securities Act, Ladymon and Willis waive their right to a hearing and to judicial review of the entry of this order.

ORDER

NOW, THEREFORE it is ORDERED that Ladymon and Willis shall pay \$20,000 to the Maine investor's widow by a \$10,000 payment upon execution of this order and by a second \$10,000 payment within 30 days of said execution. Both payments shall be made by checks payable to the Maine Office of Securities and forwarded directly to the Maine Office of Securities for distribution to the Maine investor's widow. Ladymon and Willis are jointly and severally responsible for these payments. In consideration of such payment, the Maine investor's widow has indicated to the Maine Office of Securities that she intends to transfer to Respondents Ladymon and Willis all of her right, title and interest in and to the oil and gas properties purchased by the Maine Investor by an assignment with terms agreeable to the Maine Office of Securities, the Maine investor's widow, Ladymon and Willis.

It is further ORDERED that Ladymon and Willis permanently CEASE AND DESIST from violating any provisions of the Revised Maine Securities Act, including the prohibition in § 10401 against offering or selling any security in Maine unless the security is registered under the Act or the securities or transactions are exempt from registration under the Act.

Ladymon and Willis hereby waive their right to a hearing and to judicial review and consent to the entry of the order set forth above.

Date: 11/19/04

/s/ Chad Willis
Chad Willis

Date: 11/19/04

/s/ Casey Ladymon
Casey Ladymon

Ordered by:

Date: 12/22/04

/s/ Christine A. Bruenn
Christine A. Bruenn
Securities Administrator

Reviewed by:

Date: 12/22/04

/s/ Bonnie E. Russell
Bonnie E. Russell
Assistant Securities Administrator

Presented by:

Date: 12/22/04

/s/ Christian D. Van Dyck
Christian D. Van Dyck
Investigator/Examiner