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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH
CENTRAL DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

Art Intellect, Inc., a Utah corporation, d/b/a
Mason Hill and VirtualMG, Patrick Merrill
Brody, Laura A. Roser, and Gregory D. Wood

Defendants.

CIVIL NO: 2:11 CV 00357

**MOTION FOR SUMMARY JUDGMENT
AGAINST DEFENDANTS PATRICK M.
BRODY AND LAURA A. ROSER**

Judge Tena Campbell

Plaintiff, Securities and Exchange Commission (the "Commission"), by and through its counsel of record, hereby moves the Court for the entry of an Order of Summary Judgment as to Defendants Patrick M. Brody ("Brody") and Laura A. Roser ("Roser") (collectively, the "Defendants"). As set forth in the accompanying Memorandum, the undisputed facts prove that Brody and Roser violated the registration, antifraud provisions and the broker registration

requirements of the federal securities laws and that the Commission is entitled to a judgment as a matter of law.

Since at least 2009, Brody and Roser misappropriated investor funds and securities by way of misrepresentations and omissions made to investors. Contrary to the representation they made to investors, Brody and Roser used investor funds to pay for (1) their personal expenses and extravagant lifestyle and (2) the operating expenses and obligations of Art Intellect, Inc., d/b/a Mason Hill (“Mason Hill”) and Art Intellect, Inc., d/b/a VirtualMG (“VirtualMG”) (collectively, “Mason Hill”), businesses through which Brody and Roser conducted their scheme. The scheme required new investors to pay a \$20,000 reservation deposit to Mason Hill in exchange for a promise to eventually sell investors fully functioning rental properties in highly desirable areas with occupying tenants, paying monthly rent. However, the properties Mason Hill delivered were not as described to investors. Further, Mason Hill operated as a Ponzi scheme through which Brody and Roser used new investor money to purchase and refurbish properties for current investors. Brody and Roser also used new investor funds to pay Mason Hill’s operating expenses and “profits” to Mason Hill’s earlier investors. Brody’s and Roser’s scheme ultimately defrauded at least 75 investors and raised approximately \$1,367,250.

For the reasons set forth in the accompanying Memorandum and Exhibits thereto, the Commission respectfully requests this Court to grant its Motion for Summary Judgment on all claims it asserts against Brody and Roser.

Respectfully submitted this 13th day of April 2012.

/s/ Thomas M. Melton

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