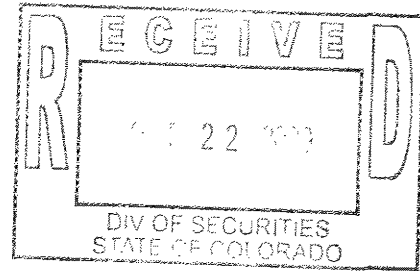




DAUNTLESS FINANCIAL LLC  
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SCOTT G. KING, Manager  
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October 21, 2009

Gerald R. Rome  
Deputy Securities Commissioner  
State of Colorado, Dept. of Regulatory Agencies  
Division of Securities  
1560 Broadway; Suite 900  
Denver, CO 80202

Re: Request for Order of Exemption for Investment Adviser

Dear Mr. Rome:

Please allow this letter to serve as a request of an Order of Exemption from Investment Adviser Licensing Requirements as set forth in Section 11-51-401(1.5), C.R.S. related to Dauntless Financial LLC ("DF"), a Colorado Limited Liability Company.

In support of such request we respectfully submit the following information:

1. DF is a Colorado Limited Liability Company, established under date of 09.23.2009, which is owned fifty (50%) per cent by Scott G. King, twenty-five (25%) by Julie Shultz King, and twenty-five (25%) by Steven C. Shultz. Scott G. King is the sole Manager of DF.
2. DF has been established as a family office to provide investment and wealth management advice for the sole benefit of one (1) family unit (the "Family"), which for purposes hereunder, includes the following "Members": Charles E. Shultz and wife, Alicia Louanne Shultz; their two (2) children, Julie Shultz King and Steven C. Shultz; their children's spouses, Scott G. King and Stephanie A. Shultz; and their six (6) grandchildren. There are numerous trusts that have been established for the benefit of the various Family Members that are referred to herein as "Family Trusts." DF's sole clients are, and will continue to be these same Family Members and Family Trusts.
3. DF is subject to no statutory disqualification from registration as an investment adviser under the Investment Advisers Act of 1940 or from investment adviser licensing under the Colorado Securities Act.
4. DF employs only one (1) person, that being Scott G. King, the Manager, and he is not subject to any statutory disqualification from licensing in Colorado as an investment adviser representative or otherwise. As the Manager of DF,

Scott G. King will provide leadership and direct oversight of all of the DF operations; will be responsible for proposing and identifying, managing, governing and exiting alternative investment opportunities; provide on-going analysis of such investments; and, manage and assist in structuring such investments.

5. DF provides various accounting, administrative and other services, including advisory services, to the Family Members and Family Trusts.
6. Provided this Request for Exemption is granted, DF will enter into a written Management Agreement with each of the Family Members and Family Trusts in which the relationship will be confirmed in writing. Under the terms of such Management Agreement, DF will be paid a reasonable fee for managing and performing its obligations, which will be limited to the Family Members and Family Trusts exclusively. DF does not advertise in any way, does not hold itself out as providing investment advice to any person other than the Family Members and the Family Trusts, does not attend investment-related conferences as a vendor and does not conduct any marketing activities. DF is not listed in any directory as an investment adviser.

Based upon the foregoing, we believe that requiring DF to license under the Colorado Securities Act as an investment adviser would not advance the public interest and that issuing an exemption would be consistent with the protection of investors and the purposes of the Colorado Securities Act.

We respectfully submit herewith a proposed Order of Exemption from Investment Adviser Licensing ("Order") and request that you grant such exemption.

We appreciate your consideration of this matter and should you desire additional information or have questions, please feel free to contact us at the address/numbers shown above.

Sincerely Yours,



Scott G. King, Manager  
Dauntless Financial LLC

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