

Matt Solomon, CPL
Senior Staff Landman
Galvanic Energy
7701 S. Western Ave., Ste. 201
Oklahoma City, OK 73139

Jason T. Maloy, CPL
Ethics Committee Chairman
American Association of Professional Landmen
800 Fournier Street
Ft. Worth, TX 76102

Dear Chairman Maloy and Ethics Committee Members:

My name is Matt Solomon and I am an Active AAPL member in good standing with a CPL designation. My membership number is 76997. I file this complaint on behalf of my employer, Galvanic Energy and in accordance with my responsibility as an AAPL Member. The complaint is against Bert Sturrock, CPL. Mr. Sturrock works for a land services broker named Top Dog Land and Minerals, LLC, which has been leasing brine mineral rights in East Texas for Texas Lonestar Brine, LLC, as subsidiary of Standard Lithium, Ltd.

On the night of Thursday, December 12th, 2024, Mr. Sturrock violated the following sections of the Code of Ethics:

Article XVI - Section 1

It shall be the duty of the Land Professional at all times to promote and, in a fair and honest manner, represent the industry to the public at large with the view of establishing and maintaining goodwill between the industry and the public and among industry parties.

The Land Professional, in his dealings with landowners, industry parties and others outside the industry, shall conduct himself in a manner consistent with fairness and honesty, such as to maintain the respect of the public.

Article XVI - Section 2

Competition among those engaged in the mineral and energy industries shall be kept at a high level with careful adherence to established rules of honesty and courtesy.

On Thursday night, December 12th, Bright Star Exploration (an affiliate of Galvanic Energy) held a private, invitation only meeting with prospective lessors in the conference room of Clarion Pointe Hotel in Sulphur Springs, Texas.

One week earlier, Standard Lithium held a meeting, led by Sturrock, with many of the same landowners. We learned of this meeting from one of the landowners we have been competing to sign. Bright Star invited some of these landowners to a separate meeting one week later to make a similar pitch. Naturally, we did NOT invite Bert Sturrock (or any other competition) to our meeting at the Clarion.

Somehow, Mr. Sturrock learned of our meeting and tried to surreptitiously attend. We submit the following facts about Mr. Sturrock's behavior which several other Active AAPL members are willing to confirm.

1. Mr. Sturrock Purposely Avoided Engagement With Other Attendees
 - a. Several of our lease buying agents stood in the lobby to greet the arriving landowners they'd been courting for months. Mr. Sturrock was not recognized by any of these lease buyers. On multiple occasions, our lease buying agents attempted to welcome him, but upon seeing an attempt at engagement, Mr. Sturrock would walk away, giving the appearance of having just answered a phone call or writing a text message.
 - b. When he entered the conference room, Mr. Sturrock took a seat in the very back corner of the room, sat by himself, continued to mostly engage with his phone, and did not help himself to the catered food that was clearly visible at the front of the room. Simply put, his conduct was odd among all other people at the meeting.

2. Mr. Sturrock Intentionally Misled About His Identity When Confronted
 - a. After learning that a leasing agent from a direct competitor was present, Galvanic principals and employees then approached Mr. Sturrock. When asked his name, Mr. Sturrock introduced himself not as "Bert", but as "Thomas." We later learned Thomas is his middle name. However, we confirmed a number of lessors had met Mr. Sturrock previously and only knew him as Bert. Further, his professional letters seem to always be signed "Bert Sturrock."
 - b. The Galvanic representatives then asked Mr. Sturrock if he works for Standard Lithium, which he affirmed. He was told this was a private meeting and was asked to leave. Mr. Sturrock did leave without further incident, but it was clear to all those present in the room he was being escorted out of the meeting. Additionally, as he exited, he made a passing comment that he assumed our meeting was open to the competition because that is how Standard operates their meetings with landowners. This seems illogical, given long-established industry custom and in consideration of Mr. Sturrock's experience and professional certification.

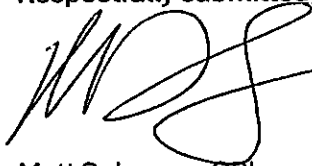
I am filing this complaint not only because of the public nature of Mr. Sturrock's actions, but also in recognition of my duty as a Land Professional with "... *direct knowledge of apparent unethical misconduct of another member, [I] shall place all pertinent facts before the proper authority of the American Association of Professional Landmen.*" In the course of the events described above, it seems clear that Mr. Sturrock violated the following Standards of Practice as defined by the AAPL:

- A. Fair and honest dealing with landowners, industry associates and the general public so as to preserve the integrity of the profession (Article XVI, Section 1); and**
- E. Adherence to any provision of the Bylaws, Code of Ethics, or any rule, regulation or order adopted pursuant thereto (Article V, Section 9); and**

G. Avoiding any act or conduct which causes disrespect for or lack of confidence in the member to act professionally as a land professional (Article V, Section 9).

As a professional trade organization, the AAPL expressly aims to uphold the highest of ethical conduct. Therefore, I hope the Ethics Committee will consider appropriate disciplinary action against Mr. Sturrock for his behavior on December 12.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'MS', with a long horizontal stroke extending to the right.

DATED 12/17/24

Matt Solomon, CPL



November 13, 2023

Dr. Lamar Ingulli
493 Lucerne Ave
Tampa, Florida 33606
(682)225-3056

RE: Offer for a Brine Lease (Titus County, Texas)

Dear Brine Owner:

Top Dog Land and Minerals, LLC working on behalf of Texas Lonestar Brine, LLC ("TLB"), is pleased to submit this offer to acquire from you a Brine Lease ("Lease") on the following tract of land:

998.684-acres out of the R. E. Beaty Survey (A-49), the John H. Keith Survey (A-321), the Benjamin Tolbert Survey (A-574), the Joel Holbert Survey (A-262), the J. M. Burford Survey (A-703) and the G. W. Hollingsworth Survey (A-719)

As to the material terms of the Lease, TLB offers the following based on your estimated acreage:

- Estimated net acres: 332.8946 net acres
- Bonus: \$19,973.68 (5 years at \$60/net acre)
- Royalty: \$13,315.79 (\$40/net acre/year during Brine Extraction/Injection)
- Term: 5 Years with the option to extend.
- **THE BONUS & ROYALTY AMOUNT IS ESTIMATED BASED ON PRELIMINARY NET ACRES**

This offer is limited in duration and will remain open for acceptance until December 13, 2023, at 4:00 PM CST as, after which time it automatically expires. If you find the terms of the Brine Lease described approve to be agreeable, please complete the following steps:

1. Sign your name, as it is printed on the Lease & Memorandum before a Notary Public and have it notarized.
2. Complete the Included W-9 with your correct Tax Information.
3. Mail the properly executed Lease & Memorandum and W-9 back to me in the enclosed, prepaid envelope.
4. Keep the documents marked COPY for your file.

The obligations of TLB to execute a Lease are conditioned upon 1) receipt of the executed and notarized Lease and Memorandum by Grantor, and 2) TLB's due diligence and confirmation of Grantor's clear title to the aforementioned property(ies). TLB shall make a good faith effort to complete due diligence and title reviews within thirty (30) business days of the date of the receipt of Grantor's properly executed forms. Upon completion of said due diligence and title reviews, TLB shall make a good faith effort to pay the bonus within five (5) business days.

Thank you for the opportunity of allowing us to present this offer. Please advise me of any questions or if additional information is required in connection with the above. If you have any questions or concerns, please contact me at bert@topdoglandandminerals.com or the phone number listed below. Thank you for your time and consideration in this matter. I look forward to working with you soon.

Sincerely,

Bert Sturrock, CPL
Leasing Agent for Texas Lonestar Brine, LLC
P: (903) 238-6255

