

EXHIBIT 1 TO
APPLICATION OF GENESIS ENERGY INTERNATIONAL, LLC
REGARDING FINANCIAL LICENSING REQUIREMENTS

REQUEST FOR PERMISSION TO POST CASH DEPOSIT IN LIEU OF BOND

Due to exigent circumstances, the Applicant respectfully requests permission to post a cash deposit, bank certificate of deposit or other suitable form of currently available funds in lieu of furnishing a bond.

This request is not the result of a lack of funds. On the contrary, the Applicant has more than ample funds. Rather the request is necessitated by a legal technicality imposed by bonding companies who require that ALL owners of an applicant sign the application for a bond. Because one of the owners of the Applicant is unwilling or unable to sign the required paperwork, the bonding companies will not issue a bond. This regrettable circumstance has forced the Applicant to file a lawsuit seeking to remove the subject owner from the company. The suit has been filed in the Circuit Court of the Eighteenth Judicial Circuit Court of DuPage County, Illinois in a case captioned Clayton Brust and Genesis Energy International LLC v Benton Payne, Case No. 2009 CH 005243. A file-stamped copy of the first page of the Complaint is attached hereto.

Unfortunately, it will take several months for the Court to reach a final decision in the matter. Therefore, unless the Commission consents to an alternative method of providing collateral, the Applicant will be unable to operate its business. Such development will jeopardize the future of the company and the many employees and their families who depend on the company for their support. In effect, the company could be forced out of business even though it can provide adequate resources to fulfill the intent of the statute.

In conclusion, the Applicant commits that it will vigorously pursue the above-mentioned lawsuit so that it will be able to secure a bond at the earliest possible date. In the meantime, permitting the Applicant to post currently available funds, in lieu of a bond, will guaranty that the intent of the statute--protecting the public by demonstrating financial responsibility—will definitely be served.

IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT
DUPAGE COUNTY, ILLINOIS

CLAYTON BRUST, individually and)
derivatively as 50% owner, member and)
manager of GENESIS ENERGY)
INTERNATIONAL L.L.C., an Illinois)
limited liability company,)

Plaintiff,)

v.)

BRENTON PAYNE and GENESIS)
ENERGY INTERNATIONAL L.L.C., an)
Illinois limited liability company,)

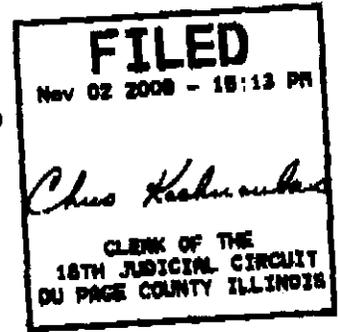
Defendants.)

2009CH005243

Status Date: 09/01/10

Assigned To: 2008

No.



VERIFIED COMPLAINT IN EQUITY

NOW COMES the Plaintiff, CLAYTON BRUST, individually and derivatively as 50%,
owner, member and manager of GENESIS ENERGY INTERNATIONAL LLC., an Illinois
Limited Liability Company, by and through their attorneys, Lawrence N. Stein and Marc
Pullman, for Verified Complaint, hereby state as follows:

COUNT I
(Breach of Fiduciary Duties)

1. At all times relevant hereto, Plaintiff Clayton Brust ("Brust") was a resident of Downers Grove, Illinois.
2. At all times relevant hereto, Defendant Brenton Payne ("Payne") was a resident of Frankfort, Illinois.
3. Defendant Genesis Energy International, LLC ("Genesis") is an Illinois limited liability company having its registered office is Lombard, Dupage County, Illinois, and its primary place of business is in Lombard, Illinois. Genesis is engaged in the business of energy consulting.
4. Brust and Payne were, previously to the organization of Genesis in Maryland, employees at an entity known as USFE, engaged in the business of energy consulting.