

offering or selling any security in and/or from this state;

transacting business in this state as a broker-dealer or agent unless appropriately registered under the Act;

directly or indirectly, making any untrue statements of material fact or omitting to state material facts necessary in order to make statements made, in light of the circumstances under which they are made, not misleading, in connection with the offer, sale, and/or purchase of securities in and/or from this state;

directly or indirectly, engaging in any act, practice, or course of business which operates or would operate as a fraud or deceit upon any person; and

unlawfully distributing sales literature in and/or from this state.

2. On September 17, 2003, Wood was personally served with a certified copy of the Temporary Order by an Oklahoma County Sheriff's Deputy.

3. In October, 2003, following this Court's issuance of the Temporary Order, and in complete contempt of that order, Wood continued to offer and sell securities in the nature of promissory notes to investors ("Investors"). Wood transacted business as a broker-dealer or agent by offering and selling securities in the nature of promissory notes to Investors. Wood promised large returns to the Investors at the end of five (5) years. Wood did not disclose that Investors would be assessed fees in connection with the purchase of the promissory notes from Wood.

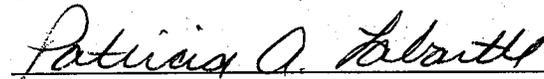
4. The conduct described herein constitutes violations of this Court's Temporary Order and constitutes indirect contempt of the Court.

Wherefore, the Department requests that this Court issue a citation directing Wood to appear and show cause why he should not be held in contempt and, after a full and complete hearing, that Wood be adjudged guilty of indirect contempt for failure to comply with the order entered by this Court, and punished by the maximum fine or imprisonment, or both, and/or by and through such other relief as this Court deems appropriate. The Department requests that Wood be required to post a cash bond if a jury trial is demanded.

Respectfully Submitted,

OKLAHOMA DEPARTMENT OF SECURITIES
IRVING L. FAUGHT, ADMINISTRATOR

By:



Patricia A. Labarthe, OBA# 10391
Oklahoma Department of Securities
120 North Robinson, Suite 860
Oklahoma City, Oklahoma 73102
Telephone (405) 280-7700

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 19th day of March, 2004, a true and correct copy of the foregoing was mailed by first class mail with postage prepaid thereon addressed to:

Donald J. Wood
4128 NW 61st Terrace
Oklahoma City, OK 73112

P. David Newsome, Jr.
Conner & Winters, P.C.
3700 First Place Tower
15 East Fifth Street
Tulsa, OK 74103

Terry D. Kordeliski, II
Riggs, Abney, Neal, Turpen, Orbison & Lewis
5801 Broadway Extension
The Paragon Building, Suite 101
Oklahoma City, OK 73118

Mark S. Edmondson
Miller Dollarhide
100 Park Avenue, Second Floor
Oklahoma City, OK 73102

M. Michael Arnett
L. Justin Lowe
Arnett Law Firm
3133 NW 63rd Street
Oklahoma City, OK 73116

Win Holbrook
Holbrook & Toffoli
120 North Robinson, Suite 2200
Oklahoma City, OK 73102

