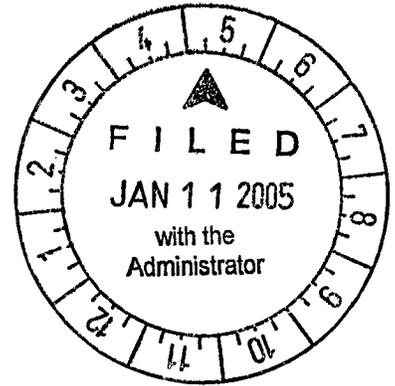


In the Matter of:)
)
Benjamin Wei,)
)
Respondent.)

ODS File No. 01-166



RESPONDENT'S FIRST DISCOVERY REQUEST

Respondent Benjamin Wei, by and through the undersigned counsel, requests that the State of Oklahoma Department of Securities produce the following documents to his counsel at the address indicated below on or before February 10, 2005.

Definitions and Rules of Construction

1. **Respondent.** The term "Respondent" means Benjamin Wei, individually, his agents, and all persons purporting to act on his behalf.
2. **Person.** The term "Person" is defined as any natural person or any business, legal of governmental entity or association.
3. **Division.** The term "Division" means the Enforcement Division of the State of Oklahoma Department of Securities and any employees or independent contractors thereof.
4. **Recommendation.** The term "Recommendation" means the Division's Recommendation filed November 1, 2004, which is the subject of this proceeding.
5. **Customers.** The term "Customers" means the individuals, either singularly or in concert, identified in the Recommendation as Customer A, Customer B and any other, identified or unidentified individual that the Division references in the Recommendation and attributes as a customer of Respondent, as well as any agents or attorneys for such individuals.

6. **Elite.** The term "Elite" means Elite Strong Growth Investment, Inc., all entities in which it had or has an ownership interest, all subsidiaries, affiliates, predecessors, successors, officers, directors, employees, agents, shareholders, general or limited partners, partnerships and all aliases used by them.

7. **Meyerson.** The term "Meyerson" means M.H. Meyerson & Company, Inc., all entities in which it had or has an ownership interest, all subsidiaries, affiliates, predecessors, successors, officers, directors, employees, agents, shareholders, general or limited partners, partnerships and all aliases used by them.

8. **Benchmark.** The term "Benchmark" means Benchmark Securities Group, Inc., all entities in which it had or has an ownership interest, all subsidiaries, affiliates, predecessors, successors, officers, directors, employees, agents, shareholders, general or limited partners, partnerships and all aliases used by them.

9. **Pharmaprint.** The term "Pharmaprint" means Pharmaprint, Inc.

10. **Micron.** The term "Micron" means Micron Electronics.

11. **Ashton.** The term "Ashton" means Ashton Technologies Group, Inc.

12. **Number.** The use of a singular form of any word included the plural and vice versa.

13. **Privilege.** If you claim that any document requested is privileged or constitutes attorney-client work product, then you are required to, on the time and date of production, provide a written statement for each document withheld sufficient to evaluate the claim of privilege or work product, including information that: (a) identifies the person who prepared or authored the document and all recipients or addressees, including recipients of copies; (b) specifies the date on which the document was prepared or transmitted; (c) describes the nature of

the document (e.g., letter, memorandum, notice, etc.); (d) identifies the subject matter of the document; (e) if the document refers or relates to a meeting or conversation, identifies all persons who were present at or parties to the meeting or conversation and describes who those persons are; and (f) sets forth the nature of and basis for the privilege asserted.

14. This discovery request is continuing in nature and requires the Division to supplement or amend their responses and/or production to include any information or document that satisfies any request herein comes into their possession, custody or control.

Document and Information Requests

1. Identify, by name, address and telephone number, the individual identified as "Customer A" in the Recommendation.
2. All documents concerning the brokerage account opened at Meyerson for Customer A including, but not limited to, opening account documents, suitability questionnaires, monthly statements, correspondence, and supervisory reviews.
3. All documents concerning the brokerage account opened at Elite for Customer A including, but not limited to, opening account documents, suitability questionnaires, monthly statements, correspondence, and supervisory reviews.
4. All documents concerning Customer A's investment experience, tax status, financial status, and investment objectives including, but not limited to, tax returns, account statements opening account documentations from all brokerage firms, and any financial statements.
5. All documents evidencing that Respondent "advised" or "recommended" Customer A to purchase shares of Pharmaprint.

6. All documents concerning Pharmaprint including, but not limited to, documents evidencing that it involved a high degree of risk.

7. All documents concerning Customer A's assets, including documents to support the allegation that the funds utilized in the transaction described in paragraph 7 of the Recommendation was Customer A's "life savings".

8. All documents referring or relating to any and all representations made by or attributed to Respondent in connection with Customer A's investment in Pharmaprint.

9. All documents evidencing that any representations made by Respondent to Customer A were false or untrue.

10. All documents referring or relating to the guarantee that Respondent allegedly made to Customer A in connection with her Pharmaprint investment.

11. All documents concerning and/or supporting the allegation in paragraph 12 of the Recommendation that Respondent, without Customer A's authorization or knowledge, purchased 46,000 shares of Pharmaprint for her account

12. All documents referring or relating to Customer A's communications to Respondent concerning the unauthorized purchase of Pharmaprint alleged in paragraph 13 of the Recommendation.

13. All documents referring or relating to any communications between Customer A and Respondent.

14. All documents concerning the purchase of any Pharmaprint's securities by Customer A.

15. All documents concerning the allegation set forth in paragraph 15 of the Recommendation that "at the time [Respondent] recommended [Customer A] buy Pharmaprint

stock, he was receiving compensation from Pharmaprint for consulting services" including, but not limited to, all consulting agreements between Respondent and Pharmaprint, all proof of payment of compensation from Pharmaprint to Respondent, and all documents evidence that such statement, if true, was not disclosed to Customer A.

16. Identify, by name, address and telephone number, the individual identified as "Customer B" in the Recommendation.

17. All documents concerning the brokerage account opened at Benchmark for Customer B including, but not limited to, opening account documents, suitability questionnaires, monthly statements, correspondence, and supervisory reviews.

18. All documents concerning Customer B's investment experience, tax status, financial status, and investment objectives including, but not limited to, tax returns, account statements opening account documentations from all brokerage firms, and any financial statements.

19. All documents evidencing that Respondent "advised" or "recommended" Customer B to purchase shares of Micron.

20. All documents concerning Micron including, but not limited to, the financial statements, and all analysis thereof that "clearly indicated a significant decline in revenue and unlikely prospects that Micron would be able to continue in the same business sector" as alleged in paragraph 17 of the Recommendation.

21. All documents evidencing that Respondent told Customer B that he was a consultant for Micron as alleged in paragraph 18 of the Recommendation.

22. All documents evidencing that Respondent told Customer B that she would earn a profit of 30% on an investment in Micron within three months as alleged in paragraph 18 of the Recommendation.

23. All documents concerning the purchase of Micron's securities by Customer B.

24. All documents concerning the historical trading price of Micron's securities.

25. All documents concerning and/or evidencing the allegation that Customer B "advised [Respondent] that she wanted to sell the Micron stock" as alleged in paragraph 21 of the Recommendation.

26. All documents referring or relating to each representations made by or attributed to Respondent in connection with Customer B's investment in Micron.

27. All documents evidencing that any representation made by Respondent to Customer B was false or untrue.

28. All documents referring or relating to the guarantee that Respondent allegedly made to Customer B in connection with her Micron investment.

29. All documents concerning and/or supporting the allegation in paragraph 25 of the Recommendation that Respondent, without Customer B's authorization or knowledge, purchased 200 shares of Ashton for her account

30. All documents referring or relating to Customer B's communications to Respondent concerning the unauthorized purchase of Ashton stock alleged in paragraph 25 of the Recommendation.

31. All documents evidencing that Respondent "advised" or "recommended" Customer B to purchase shares of Ashton.

32. All documents referring or relating to any communications between Customer B and Respondent.

33. All documents concerning the purchase of any Micron securities by Customer B.

34. All documents concerning the purchase of any Ashton securities by Customer B.

35. All documents concerning the allegation set forth in paragraph 28 of the Recommendation that "at the time [Respondent] recommended [Customer B] buy Ashton stock, he was selling Ashton stock from his personal holdings", including, but not limited to, all documents evidence that such statement, if true, was not disclosed to Customer A.

36. All documents referring or relating to Respondents' sale of Ashton stock.

37. All documents demonstrating that "at least 100,000" shares of Ashton stock sold by Respondent were shares of stock received as compensation for his services as a consultant to Ashton as alleged in paragraph 29 of the Recommendation including, but not limited to, all trading records reflecting such transactions and consulting agreements.

38. Identify, by name, address, and telephone number each of the brokerage customers referenced in paragraph 30 of the Recommendation.

39. All documents referring or relating to the allegation that Respondent "advised several of his brokerage customers to purchase Ashton stock".

40. All documents evidencing that Respondent purchased Ashton stock for a customer's account over which he exercised discretionary authority including, but not limited to, all documents evidencing that such transaction was executed on a discretionary basis.

41. Identify, by name, address, and telephone number each of the customers referenced in paragraph 31 of the Recommendation.

42. All documents evidencing that the customers referenced in paragraph 31 of the Recommendation "repeatedly directed [Respondent] to sell their Ashton stock."

43. All documents referring or relating to the allegation in paragraph 31 of the Recommendation that "[Respondent] promised the customers that they would make money on their investment and encourage them to hold onto the stock".

44. All documents supporting the allegation that Respondent was selling Ashton stock from his personal holdings while he was advising customers to buy Ashton stock as alleged in paragraph 32 of the Recommendation.

45. All documents concerning the purchase of any Ashton securities by any customer referenced in the Recommendation.

46. A copy of the transcript of the testimony provided by Kenneth Wilke during the Division's investigation of Respondent and Benchmark.

47. All statements made by Respondent.

48. All recorded conversations wherein Respondent is a party to the conversation.

49. All recorded conversations wherein any customer referenced in the Recommendation where such person is a party to the conversation.

50. All communications between the Division and each customer referenced in the Recommendation including, but not limited to, notes of conversations.

51. All documents provided to the Division by any customer referenced in the Recommendation.

52. All written statements, affidavits, declarations and/or sworn testimony provided by any customer referenced in the Recommendation.

53. All statements, affidavits, declarations and/or sworn testimony concerning any of the allegations set forth in the Recommendation.

54. All handwritten notes or notes of interviews conducted by the Division of any customer referenced in the Recommendation.

55. All documents concerning compensation that Respondent is alleged to have received from any transaction identified in the Recommendation.

56. All documents received by the Division in connection with the investigation that resulted in the filing of the Recommendation.

* * * * *

Respondent reserves his right to request additional documents and information after he has had an adequate time to review the Division's responses and documents produced in response to this discovery request.

Dated: January 11, 2005

SICHENZIA ROSS FRIEDMAN FERENCZ LLP

[Handwritten signature]
By: *[Handwritten signature]*

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- and -

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