

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

Oklahoma Department of Securities)
ex rel. Irving L. Faught,)
Administrator,)

Plaintiff,)

v.)

Bothwell Consulting, LLC, an Oklahoma)
LLC; Lawrence G. Bothwell, an individual;)
Christopher S. VonWerder, an individual;)
and Tommy L. Richardson, an individual,)

Defendants.)

and)

Amy J. Richardson, an individual,)

Defendant Solely For)
Purposes of Equitable Relief.)

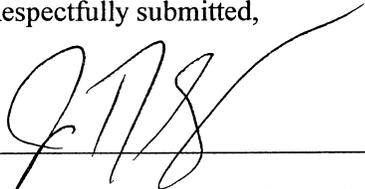
FEB 25 2010
PATRICIA PRESLEY, COURT CLERK
by _____
DEPUTY

Case No. CJ-2009-6989

SUPPLEMENT TO DEFENDANTS' MOTION FOR NEW TRIAL

The Defendants Bothwell Consulting, LLC and Lawrence G. Bothwell herewith file the affidavit of Stephen Bowe in support of their motion.

Respectfully submitted,



J. David Ogle, OBA #17476
100 Park Ave, Suite 500
Oklahoma City, OK 73102
(405) 605-6644
*Attorney for Bothwell Consulting,
LLC, and Lawrence G. Bothwell,
an individual.*

CERTIFICATE OF MAILING

I hereby certify that on the 25nd day of February, 2010, I mailed a true and correct copy of the above and foregoing, postage prepaid, to:

Amanda Cornmesser, Esq.
Jennifer Shaw, Esq.
Oklahoma Department of Securities
120 N. Robinson, Suite 860
Oklahoma City, OK 73102



J. David Ogle

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 Defendant Solely For)
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AFFIDAVIT OF STEPHEN BOWE, ESQUIRE

The undersigned , being duly sworn, avers and states as follows:

1. My name is Stephen Bowe. I am a private attorney licensed in the State of Missouri and serve as outside general counsel for Bothwell Consulting LLC, an Oklahoma LLC (Bothwell Consulting”) and Lawrence G. Bothwell, an individual (“Bothwell”). I make this affidavit based upon facts of which I have personal knowledge.
2. Bothwell Consulting is an Oklahoma limited liability company doing business in Oklahoma City, Oklahoma.
3. Bothwell did not conduct business as Bothwell Consulting. He did serve as an officer and director of the company. The company operated as an Oklahoma limited liability company.

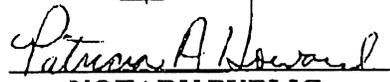
- 4. Neither Bothwell Consulting nor Bothwell accepted money from investors for "so-called debentures." Bothwell Consulting entered into various note transactions with individual lenders.
- 5. Bothwell Consulting did not promise any return on investments. Bothwell Consulting entered into various note transactions with individual lenders.
- 6. Bothwell Consulting never had "investors" which is a securities term of art. Bothwell Consulting promised no return on investments. Bothwell Consulting entered into various note transactions with individual lenders.
- 7. Bothwell did not accept "investor funds". Neither Bothwell Consulting nor Bothwell received any money from any investors. No "investor funds" were used to pay Bothwell's personal expenses. Bothwell Consulting entered into various note transactions with individual lenders.
- 8. Neither Bothwell Consulting nor Bothwell offered or sold any debentures.

Further affiant sayeth not.



 STEPHEN BOWE

SUBSCRIBED AND SWORN to before me this 24 day of February 2010.

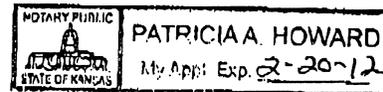


 NOTARY PUBLIC

County of Doniphan, State of Kansas

My Commission Expires: Feb 20, 2012

My Commission Number: _____



Approved and filed this _____ Day of _____ 2010.