

**IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA**

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

OCT 19 2010

PATRICIA PRESLEY, COURT CLERK
by _____
DEPUTY

Oklahoma Department of Securities)
ex rel. Irving L. Faught,)
Administrator,)
)
Plaintiff,)
)
v.)
)
Robert E. Tucker, and)
Keystone Equity Group, Inc.,)
)
Defendants.)

Case No. CJ-2010-2525

**PLAINTIFF'S MOTION, AND BRIEF IN SUPPORT, CHALLENGING SUFFICIENCY
OF DEFENDANTS' ANSWERS**

Plaintiff, Oklahoma Department of Securities *ex rel.* Irving L. Faught, Administrator, ("Department"), pursuant to 12 O.S. § 3236(A), challenges the sufficiency of Robert E. Tucker's and Keystone Equity Group's, Inc., (collectively, "Defendants"), answers to the Department's *Requests for Admissions No. 5, No. 9, No. 11, No. 18, No. 19 and No. 20* (collectively, the "Requests") in *Plaintiff's First Set of Requests for Admissions, Interrogatories and Document Requests to Defendants Robert E. Tucker and Keystone Equity Group, Inc.*, a copy of which is attached hereto as Exhibit 1 and incorporated herein by reference, and moves the Court for an order addressing the insufficient answers. The *Defendant's [sic] Response to Requests for Admissions Submitted by the Plaintiff* is attached hereto as Exhibit 2 and incorporated herein by reference.

The Department respectfully submits to the court a sufficiency challenge for the following Requests:

Plaintiff's Request No. 5: You represented to "Borrowers", and/or potential "Borrowers", that the funding sources for Commitment Letters would be pension, hedge funds and/or other such financial entities.

Defendant's Response to No. 5: Admitted and denied in part. Funding sources come from a variety of sources.

Reasons for Motion as to Request No. 5: The Defendants' answer leaves unclear what they are admitting or denying. It is impossible to know if the specific funding sources in the request are being admitted to or are being denied, or that "a variety of sources" includes pension and hedge funds. The partial denial appears as a means to interject possible misleading information and/or misdirection of what should instead be a fully admitted or denied response.

Plaintiff's Request No. 9: You purchased two (2) BMW vehicles with Fees paid by "Borrowers".

Defendants' Response to No. 9: Admitted and denied in part. I had these two vehicles at two different times. One was traded in for the other.

Reasons for Motion as to Request No. 9: The Defendants' answer leaves unclear what they are admitting or denying. The answer could be construed in at least two ways: as denying that "Borrowers'" funds were used to purchase the vehicles or that only one vehicle was purchased with these funds. Regardless of which interpretation is deemed appropriate, among a variety of possible interpretations, the answer is vague and left open ended for possible future plausible deniability.

Plaintiff's Request No. 11: You transferred Fees to your personal banking account from KEG's business banking account.

Defendants' Response to No. 11: Admitted in part and denied in part. I paid myself draws based on legitimate fees earned.

Reasons for Motion as to Request No. 11: The Defendants' answer leaves unclear what they are admitting or denying. Stating that Defendants paid themselves for legitimate fees is both conclusionary and irrelevant as to Request No. 11 and does not answer if Fees were transferred to Defendant's personal banking account. Again, the partial denial appears as a means to interject possible misleading information and/or misdirection of what should instead be a fully admitted or denied response.

Plaintiff's Request No. 18: You failed to inform "Borrowers" of your inability to provide funding in accordance with current and prior Commitment Letters during any stage of communications prior to, or contemporaneous with, Commitment Letter negotiations.

Defendants' Response to No. 18: Denied. I was in communication at all times with my clients.

Reasons for Motion as to Request No. 18: This request does not inquire about the communication frequency or habits of Defendants with "Borrowers", instead it specifically requests an admission that Defendants failed to inform "Borrowers" of the Defendants' inability to fund their Commitment Letters. Defendants appear to answer a request not submitted and therefore do not answer request No. 18 at all.

Plaintiff's Request No. 19: You failed to inform "Borrowers" of your criminal record prior to, or contemporaneous with, Commitment Letter negotiations.

Defendants' Response to No. 19: Admitted in part and denied in part.

Reasons for Motion as to Request No. 19: The Defendants' answer does not state which part of the request is admitted or denied. Because of the vagueness, the answer is in effect no answer at all and is contrary to the instructions of Exhibit 1, along with the underlying statutory requirements of the same.

Plaintiff's Request No. 20: KEG's due diligence of all "Borrowers" was satisfied in accordance, and in conformance with, Commitment Letters.

Defendants' Response to No. 20: Admitted in part and denied in Part. The funding is stalled due to the death of Terry Stacy.

Reasons for Motion as to Request No. 20: The Defendants' answer does not respond to the request. It is irrelevant, for purposes of this request, if in fact the funding is stalled for any reason. The request inquires if KEG's due diligence of "Borrowers" was or was not satisfied in the eyes of the Defendants. Because the Defendants failed to answer the request, this answer is, in effect, no answer at all.

BRIEF IN SUPPORT

In accordance with 12 O.S. § 3236(A), answers to admissions "shall specifically deny the matter or set forth in detail the reasons why the answering party cannot truthfully admit or deny the matter." A party "shall specify so much of it as is true and qualify or deny the remainder." Okla. Stat. Ann. tit. 12, § 3236(A) (West). Moreover, these requirements were highlighted in the "Instructions" portion of the Requests: "When an admission cannot be answered in full, they shall be answered as completely as possible." *Plaintiff's Motion, And Brief in Support, Challenging Sufficiency of Defendants' Answers*, Exhibit 1 at 2, ¶ 2 (Case No. CJ-2010-2525).

A party making the admission requests may move to determine the sufficiency of the answers. Okla. Stat. Ann. tit. 12, § 3236(A) (West). If the court determines an answer does not comply with the requirements of § 3236, the court may order either that the matter is admitted or that an amended answer be served. Okla. Stat. Ann. tit. 12, § 3236(A) (West).

WHEREFORE, the Department requests an order issued by the Court ordering the Requests be deemed admitted in accordance with 12 O.S. § 3236(A). In the alternative, the Department requests an order issued by the Court compelling Defendants to amend their answers to the Requests in accordance with 12 O.S. § 3236(A).

Respectfully submitted,



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Terra Shamas Bonnell, OBA # 20838
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TBonnell@securities.ok.gov
Attorneys for Plaintiffs

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616 S. Boston #403
Tulsa, OK 74119
Telephone (918) 622-0031
glovoi@aol.com
Attorney for Defendants

CERTIFICATE OF MAILING

The undersigned certifies that on the 19th day of October, 2010, a true and correct copy of the foregoing was mailed by certified mail addressed to:

Gerald J. Lovoi, Esq.
616 S. Boston #403
Tulsa, OK 74119
Attorney for Defendants



Terra Shamas Bonnell

**IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA**

OKLAHOMA DEPARTMENT OF)
SECURITIES, *ex. rel.* Irving L. Faught,)
Administrator,)

Plaintiff,)

vs.)

Robert E. Tucker, and)
Keystone Equity Group, Inc.,)

Defendants.)

Case No. CJ-2010-2525

**PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSIONS, INTERROGATORIES
AND DOCUMENT REQUESTS TO DEFENDANTS ROBERT E. TUCKER AND
KEYSTONE EQUITY GROUP, INC.**

TO: Robert E. Tucker
Keystone Equity Group, Inc.
c/o Gerald J. Lovoi
324 South Main #900
Tulsa, Oklahoma 74103

Please notice that, pursuant to 12 O.S. § 3233, 3234 and 3236 the Plaintiff, Oklahoma Department of Securities ("Department") *ex rel.* Irving L. Faught, Administrator, hereby submits the following requests for admissions ("Requests for Admissions"), interrogatories ("Interrogatories"), and requests for the production and/or inspection of documents ("Document Requests") to Defendants Robert E. Tucker ("Tucker") and Keystone Equity Group, Inc., ("KEG"). Tucker and KEG shall serve their answers to the Requests for Admissions and Interrogatories and produce Document Requests herein before the Administrator of the Oklahoma Department of Securities, or his designated representative, at 120 North Robinson, First National Center, Suite 860, Oklahoma City, County of Oklahoma, State of Oklahoma, **WITHIN THIRTY (30) DAYS** after the service of this discovery request.

EXHIBIT

1

INSTRUCTIONS

1. The discovery requested herein is directed toward all information known or available to Tucker and KEG (through its officers, directors, employees, agents, or attorneys) including information contained in the records and documents in its custody or control or available to it upon reasonable inquiry.
2. Where a request for admission, interrogatory or document cannot be answered in full, they shall be answered as completely as possible. Incomplete answers shall be accompanied by a specification of the reasons for the incompleteness of the answer and of whatever knowledge, information or belief is possessed with respect to each unanswered or incompletely answered discovery request. If defendants believe that other persons may be able to provide additional information responsive to the interrogatory or document request, the answer shall include an identification of each such person.
3. Unless otherwise specified (as, for example, by use of the word "ever" or the phrase "at any time" or "of any date"), and without regard to the tenses used, any Request for Admission, Document Request and/or Interrogatory shall cover the period from **January 2007 to the present**. To the extent that any answer varies with respect to any part of that period, a separate answer is required for each such part with the pertinent dates indicated.
4. Unless otherwise specified, any word used herein in the singular is also to be construed in the plural and vice versa and any use of the conjunctive is also to be construed in the disjunctive and vice versa. Any use of "any" is also to be construed as "all" and vice versa, and any use of "each" is also to be construed as "every" and vice versa.
5. These requests for interrogatories and documents shall be deemed continuing pursuant to 12 O.S. § 3226(E) requiring amended answers if you obtain information on the basis

of which you know that any response made was incorrect when made or, although correct when made, is no longer true.

6. As to every Request for Admissions, Document Request and/or Interrogatory which you fail to answer in whole or in part on the ground that the information sought involves a document or oral communication which you contend to be privileged, or otherwise protected from disclosure, state in detail:

- a. the portion of the request to which the response is claimed to be privileged;
- b. the identification of the document, as defined below;
- c. the general subject matter of the document or communication;
- d. the author and all recipients of any document, and the persons involved in any oral communication;
- e. the identity of any other persons having knowledge of the document or communication involved;
- f. the nature of the privilege claimed; and
- g. every fact on which you base the claim of privilege or that the information need not be disclosed.

7. Any reference to a corporate or business entity shall include references to any employee, principal, or agent of such business or entity.

8. If any document responsive to this request was, but is no longer in your possession, custody, control or in existence, state whether it (1) is missing or lost; (2) has been destroyed; (3) has been transferred voluntarily or involuntarily to others; or (4) has been

otherwise disposed of, and in each instance explain the circumstances surrounding the authorization of such disposition and state the date or approximate date thereof.

DEFINITIONS

1. "You" and "your" include Tucker and KEG and each of its subsidiaries, divisions, and affiliated entities, whether wholly owned or not, past and present, and their officers, directors, agents, employees, attorneys, investigators, or other representatives.
2. "Person(s)" shall refer to any natural person, association, partnership, limited liability company, corporation, business trust, estate, trust, joint venture, or other form of business entity, or any government or any agency, subdivision or instrumentality thereof.
3. "Document(s)" or "writing(s)" means any medium upon which intelligence or information can be recorded or retrieved, and includes, without limitation; any invoice, bill, order form, receipt, financial statement, account statement, accounting entry, diary, written material, book, file, note, pamphlet, periodical, letter, memorandum (including any memorandum or report of a meeting), calendar, telex, telegram, cable, report, record, contract, agreement, study, handwritten note, working paper, chart, print, laboratory record, drawing, sketch, graph, index, list, tape, photograph, microfilm, data sheet or data processing card, or any other written, recorded, transcribed, punched, taped, filmed, or graphic matter, however produced or reproduced. "Document(s)" or "writing" shall also mean all computer generated data including, but not limited to, spreadsheets, databases, graphics, charts and presentations, electronic mail messages, electronic facsimiles, scanned material, or all computer generated data stored on removable storage media, including, but not limited to, 3.5" and 5.25" floppy disks, rewritable optical disks, cd-recordable disks, flash memory, removable hard drives, backup and

archive tape cartridges, reels and cassettes, or fixed storage media, including, but not limited to, internal hard drives, external hard drives, and Local Area Network drives.

4. **"Identification," "identify," or "identity,"** when used in reference to (a) a natural individual, requires you to state his or her full name and residential and business addresses and telephone numbers; (b) a firm, association, partnership, limited liability company, corporation or other form of business entity, requires you to state its full name and any names under which it does business, its state of organization, the address of its principal place of business, and the addresses of all of its offices; (c) a business, requires you to state the full name or style under which the business is conducted, its business address or addresses, the types of businesses in which it is engaged, the geographic areas in which it conducts those businesses, and the identity of the person or persons who own, operate, control the business; (d) a communication, requires you, if any part of the communication was written, to identify the document(s) which refer to or evidence the communication, and, to the extent that the communication was non-written, to identify the persons participating in the communication and to state the date, manner, place, and substance of the communication.

5. **"Relation," "pertaining to," "relating to," "related to," or "related"** mean pertaining in any way to, referring to, reflecting, recording, memorializing, mentioning, constituting, describing, or concerning, directly or indirectly.

REQUEST FOR ADMISSIONS

The Department requests that you admit or deny the following:

Request for Admission No. 1: You are a resident of Tulsa, Oklahoma.

Request for Admission No. 2: You are the sole owner of KEG.

Request for Admission No. 3: You control KEG.

Request for Admission No. 4: You issued Commitment Letters to Fund (“Commitment Letters”) for loan amounts as large as \$550,000,000.

Request for Admission No. 5: You represented to “Borrowers”, and/or potential “Borrowers”, that the funding sources for Commitment Letters would be pension, hedge funds and/or other such financial entities.

Request for Admission No. 6: You received Commitment Fees (“Fees”) from “Borrowers” as consideration for Commitment Letters.

Request for Admission No. 7: The Commitment Letters are contractual obligations that contemplate a flow of funds in the future.

Request for Admission No. 8: You represented yourself to “Borrowers” as successful in the business and finance world with a track record of prior closings.

Request for Admission No. 9: You purchased two (2) BMW vehicles with Fees paid by “Borrowers”.

Request for Admission No. 10: The BMWs were purchased for personal use.

Request for Admission No. 11: You transferred Fees to your personal banking account from KEG’s business banking account.

Request for Admission No. 12: You did not use the Fees for any due diligence in connection with Commitment Letters.

Request for Admission No. 13: You offered and sold Commitment Letters in and/or from Oklahoma.

Request for Admission No. 14: You are not registered in any capacity under the Act.

Request for Admission No. 15: “Borrowers” have not received funding pursuant to, or in accordance with, the Commitment Letters.

Request for Admission No. 16: You failed to provide "Borrowers" evidence of your ability to perform in accordance with Commitment Letters.

Request for Admission No. 17: You have not refunded any Fees pursuant to refund requests made by "Borrowers".

Request for Admission No. 18: You failed to inform "Borrowers" of your inability to provide funding in accordance with current and prior Commitment Letters during any stage of communications prior to, or contemporaneous with, Commitment Letter negotiations.

Request for Admission No. 19: You failed to inform "Borrowers" of your criminal record prior to, or contemporaneous with, Commitment Letter negotiations.

Request for Admission No. 20: KEG's due diligence of all "Borrowers" was satisfied in accordance, and in conformance with, Commitment Letters.

INTERROGATORIES

Interrogatory No. 1: For each and every request for admission in which you provide anything other than an unqualified admission, state all facts upon which you base your response.

Interrogatory No. 2: How many Commitment Letters were issued by you, at any time, and to whom?

Interrogatory No. 3: Identify Carolyn Porritt.

Interrogatory No. 4: Identify Arthur and Rebecca Bogan.

Interrogatory No. 5: What was the nature of Carolyn Porritt's deposit, in the amount of \$5,000, into KEG's bank account on March 3, 2009?

Interrogatory No. 6: What was the nature of the outgoing wire transfer from KEG's bank account on December 18, 2008, to Arthur and Rebecca Bogan in the amount of \$2,400?

Interrogatory No. 7: Has Roger Clemmons been employed by KEG at any time; if so, when?

Interrogatory No. 8: Identify Marvin Gibbons and Ron Cremeny, in relation to the New Environmental Solutions Commitment Letter.

Interrogatory No. 9: Identify Mark O'Connor.

Interrogatory No. 10: Identify Terry Stacey's mother.

Interrogatory No. 11: Identify Terry Stacey's landlord at the time of his death.

Interrogatory No. 12: Identify Scott Balice, in relation to the Providence Energy Group Commitment Letter.

Interrogatory No. 13: Identify Mike Kolenburg, in relation to the Affinity Marketing Limited Commitment Letter.

DOCUMENTS REQUESTED

Document Request No. 1: All contracts, undertakings, memorandums of understanding and/or other agreements between, or among, you, Solice and/or Macro Group including, but not limited to, all agreements by Solice and/or Macro Group to acquire an ownership interest in KEG.

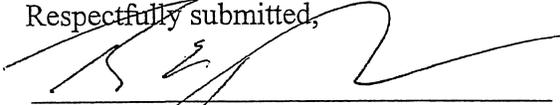
Document Request No. 2: All documents relating to an assignment of a Commitment Letter by KEG to any third party.

Document Request No. 3: All Commitment Letters which you received an actual Fee.

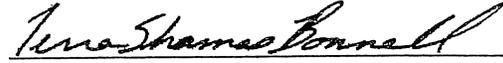
Document Request No. 4: All documents that relate to Commitment Letters in which you received Fees and that have not already been provided to the Department.

Respectfully submitted,

By:


Robert Fagnant
Licensed Legal Intern

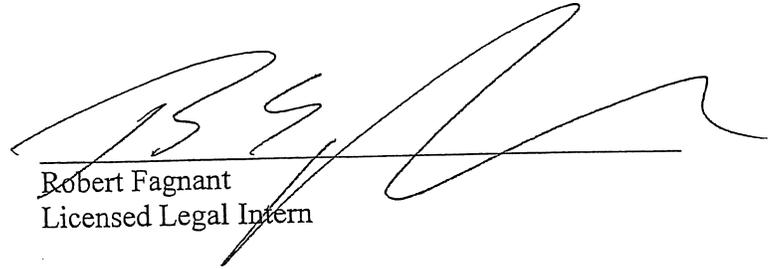
By:


Melanie Hall, OBA # 1209
Terra Shamas Bonnell, OBA # 20838
Oklahoma Department of Securities
120 North Robinson Avenue, Suite 860
Oklahoma City, Oklahoma 73102
Telephone: (405) 280-7700
Facsimile: (405) 280-7742

CERTIFICATE OF MAILING

The undersigned certifies that on the 29th day of June, 2010, a true and correct copy of the foregoing was mailed by first class mail, with postage prepaid thereon, addressed to:

Gerald J. Lovoi
324 S. Main #900
Tulsa, OK 74103



Robert Fagnant
Licensed Legal Intern

IN THE DISTRICT COURT IN AND FOR TULSA COUNTY
STATE OF OKLAHOMA

OKLAHOMA DEPARTMENT OF
SECURITIES, ex rel. Irving L. Faught,
Administrator,
Plaintiff,
Vs
Robert E. Tucker, and
Keystone Equity Group, Inc.
Defendants.

Case Number CJ-2010-2525

DEFENDANT'S RESPONSE TO
REQUESTS FOR ADMISSIONS
SUBMITTED BY THE PLAINTIFF

COMES NOW Robert E. Tucker and Keystone Equity Group, by
and through their attorney, Gerald J. Lovoi, and for Response to the
Requests for Admission would allege and state as follows to wit;

REQUEST FOR ADMISSION NUMBER 1

You are a resident of Tulsa, Oklahoma.

RESPONSE TO REQUEST FOR ADMISSION NUMBER 1

ADMITTED.

REQUEST FOR ADMISSION NUMBER 2

You are the sole owner of KEG.

RESPONSE TO REQUEST FOR ADMISSION NUMBER 2

ADMITTED IN PART AND DENIED IN PART. Terry Stacy/Solace

Group owned 49% of KEG. Macro Global acquired 50% of the

KEG. Robert Tucker had a 1% controlling interest.

REQUEST FOR ADMISSION NUMBER 3

You control KEG.

EXHIBIT

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RESPONSE TO REQUEST FOR ADMISSION NUMBER 3

ADMITTED IN PART AND DENIED IN PART. Terry Stacy/Solace Group owned 49% of KEG. Macro Global acquired 50% of the KEG. Robert Tucker had a 1% controlling interest.

REQUEST FOR ADMISSION NUMBER 4

You issued commitment Letters to Fund (Commitment Letters") for loan amounts as large as \$550,000,000.

RESPONSE TO REQUEST FOR ADMISSION NUMBER 4

ADMITTED.

REQUEST FOR ADMISSION NUMBER 5

You represented to "Borrowers", and/or potential "Borrowers", that the funding sources for commitment Letters would be pensions, hedge funds and/or other financial entities.

RESPONSE TO REQUEST FOR ADMISSION NUMBER 5

ADMITTED AND DENIED IN PART.

Funding sources come from a variety of sources.

REQUEST FOR ADMISSION NUMBER 6

You received commitment Fees ("Fees") from "borrowers" as consideration for Commitment Letters.

RESPONSE TO REQUEST FOR ADMISSION NUMBER 6

DENIED. I received fees for services rendered.

REQUEST FOR ADMISSION NUMBER 7

The Commitment Letters are contractual obligations that contemplate a flow of funds in the future.

RESPONSE TO REQUEST FOR ADMISSION NUMBER 7

DENIED. The commitment letters are conditional documents concerning a possible flow of funds in the future.

REQUEST FOR ADMISSION NUMBER 8

You represented yourself to "Borrowers" as successful in the business and finance world with a track record of prior closings.

RESPONSE TO REQUEST FOR ADMISSION NUMBER 8

ADMITTED.

REQUEST FOR ADMISSION NUMBER 9

You purchased two (2) BMW vehicles with Fees paid by "Borrowers."

RESPONSE TO REQUEST FOR ADMISSION NUMBER 9

ADMITTED AND DENIED IN PART.

I had these two vehicles at two different times. One was traded in for the other.

REQUEST FOR ADMISSION NUMBER 10

The BMWs were purchased for personal use.

RESPONSE TO REQUEST FOR ADMISSION NUMBER 10

ADMITTED IN PART AND DENIED IN PART. The vehicles were used for personal use and business use.

REQUEST FOR ADMISSION NUMBER 11

You transferred Fees to your personal banking account from KEGs business banking account.

RESPONSE TO REQUEST FOR ADMISSION NUMBER 11

ADMITTED IN PART AND DENIED IN PART. I paid myself draws based on legitimate fees earned.

REQUEST FOR ADMISSION NUMBER 12

You did not use the Fees for any due diligence in connection with commitment Letters.

RESPONSE TO REQUEST FOR ADMISSION NUMBER 12

DENIED.

REQUEST FOR ADMISSION NUMBER 13

You offered and sold commitment Letters in and/or from Oklahoma.

RESPONSE TO REQUEST FOR ADMISSION NUMBER 13

DENIED The commitment letters are conditional documents concerning a possible flow of funds in the future. The commitment fee is a fee for professional services rendered. I performed a portion of my work from Oklahoma.

REQUEST FOR ADMISSION NUMBER 14

You are not registered in any capacity under the Act.

RESPONSE TO REQUEST FOR ADMISSION NUMBER 14

ADMITTED.

REQUEST FOR ADMISSION NUMBER 15

"Borrowers" have not received funding pursuant to, or in accordance with the Commitment Letters.

RESPONSE TO REQUEST FOR ADMISSION NUMBER 15

ADMITTED IN PART AND DENIED IN PART. Funding is stalled based on the death of Terry Stacy. I have had successful funding in the past.

REQUEST FOR ADMISSION NUMBER 16

You failed to provide "Borrowers" evidence of your ability to perform in accordance with Commitment Letters.

RESPONSE TO REQUEST FOR ADMISSION NUMBER 16

DENIED.

REQUEST FOR ADMISSION NUMBER 17

You have not refunded any Fees pursuant to refund requests made by "Borrowers."

RESPONSE TO REQUEST FOR ADMISSION NUMBER 17

DENIED

REQUEST FOR ADMISSION NUMBER 18

You failed to inform "borrowers of your inability to provide funding in accordance with current prior commitment Letter during any stage of communications prior to, or contemporaneous with, Commitment Letter negotiations.

RESPONSE TO REQUEST FOR ADMISSION NUMBER 18

DENIED. I was in communication at all times with my clients.

REQUEST FOR ADMISSIONS NUMBER 19

You failed to inform "Borrowers" of your criminal record prior to, or contemporaneous with, Commitment Letter negotiations.

RESPONSE TO REQUEST FOR ADMISSION NUMBER 19

ADMITTED IN PART AND DENIED IN PART

REQUEST FOR ADMISSION NUMBER 20

KEGS due diligence of all "Borrowers" was satisfied in accordance, and in conformance with, Commitment Letters.

RESPONSE TO REQUEST FOR ADMISSION NUMBER 20

ADMITTED IN PART AND DENIED PART. The funding is stalled due to the death of Terry Stacy.

Respectfully Submitted

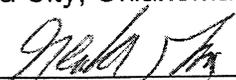


GERALD J. LOVOI
ATTORNEY AT LAW
616 South Boston #403
Tulsa, Oklahoma 74119
918-622-0031
OBA #12137

CERTIFICATE OF MAILING

The undersigned certifies that on the ^{27th}~~20~~ day of ^{JULY}~~June~~, 2010, a true and correct copy of the foregoing was mailed by first class mail, with postage prepaid thereon, addressed to:

Robert Fagnant
Malanie Hall
Terra Shamas Bonnell
Oklahoma Department of Securities
120 North Robinson Avenue, Suite 860
Oklahoma City, Oklahoma 73102



GERALD J. LOVOI

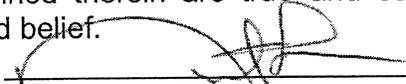
iii

VERIFICATION

TULSA COUNTY

STATE OF OKLAHOMA

I, ROBERT TUCKER, of lawful age and duly sworn upon oath depose and state as follows to wit: that I have read the above and foregoing document and the statements contained therein are true and correct to the best of my knowledge, information and belief.



ROBERT TUCKER

SUBSCRIBED AND SWORN TO BEFORE ME A NOTARY PUBLIC on this 27 day of July, 2010.



NOTARY PUBLIC

MY COMMISSION
EXPIRES:
9-10-2013

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