

IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA

AUG 25 2014

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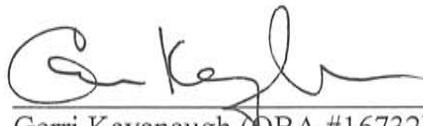
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Oklahoma Department of Securities	)
<i>ex rel.</i> Irving L. Faught,	)
Administrator,	)
	)
Plaintiff,	)
	)
v.	)
	)
2001 Trinity Fund, L.L.C. and	)
Robert Arrowood,	)
Defendants.	)

Case No. CJ-2012-6164  
Judge Roger H. Stuart

**EXHIBIT A**  
**TO DEPARTMENT'S MOTION TO STRIKE THIRD PARTY PETITION**  
**FILED ON AUGUST 21, 2014**

The Oklahoma Department of Securities *ex rel.* Irving L. Faught, Administrator, (Department) filed its Motion to Strike Third-Party Petition on August 21, 2014 (Motion), and neglected to attach a referenced exhibit. Exhibit A to the Motion is attached hereto and incorporated by reference into the Department's Motion.



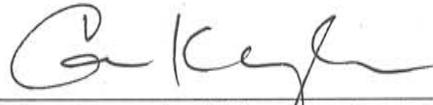
Gerri Kavanaugh (OBA #16732)  
Shaun Mullins (OBA #16869)  
Oklahoma Department of Securities  
120 North Robinson, Suite 860  
Oklahoma City, Oklahoma 73102  
Telephone: (405) 280-7700  
Fax: (405) 280-7742  
Email: smullins@securities.ok.gov  
Email: gkavanaugh@securities.ok.gov  
Email: smullins@securities.ok.gov  
*Attorneys for Plaintiff*

## CERTIFICATE OF MAILING

The undersigned certifies that on the \_\_\_\_ of August, 2014, a true and correct copy of the foregoing was emailed and mailed by first class mail, with postage prepaid thereon, addressed to:

William H. Bock  
Michelle L. Greene  
William H. Bock, Inc.  
6402 N. Santa Fe Ave., Ste. A  
Oklahoma City, OK 73116  
[billybock@wbocklaw.com](mailto:billybock@wbocklaw.com)  
*Attorney for Defendant Robert Arrowood*

L. Win Holbrook  
Andrews Davis, P.C.  
100 North Broadway, Suite 3300  
Oklahoma City, OK 73102  
[wholbrook@andrewsdavis.com](mailto:wholbrook@andrewsdavis.com)  
*Bankruptcy Trustee for 2001Trinity Fund, L.L.C.*



---

Gerri Kavanaugh

Michelle R. Day  
Administrator  
Division of Capital Assets Management



Preston L. Doerflinger  
Director and Secretary of  
Finance, Administration, and  
Information Technology

State of Oklahoma  
Office of Management and Enterprise Services

December 9, 2013

William H. Bock  
William H. Bock, Inc.  
6402 N. Santa Fe Ave., Suite A  
Oklahoma City, OK 73116-9118

RE: Tort Claim of: Robert Arrowood  
Risk Management No: 1420012543

Dear Mr. Bock:

The Office of the Oklahoma Attorney General has completed the process of evaluating the above-referenced tort claim. After careful consideration of the facts, your client's claim is hereby denied. The basis for the denial of your client's claim includes, but is not limited to: 51 O. S. § 155 (3, 5 and 30).

The state or a political subdivision shall not be liable if a loss or claim results from:

3. Execution or enforcement of the lawful orders of any court.
5. Performance of or the failure to exercise or perform any act or service which is in the discretion of the state or political subdivision or its employees.
30. Acts or omissions done in conformance with then current recognized standards.

Further, a determination has been made that the State of Oklahoma was not negligence in this matter.

Your client's claim is denied as of December 9, 2013. No action for any cause arising under the Act shall be maintained unless valid notice has been given and the action is commenced within one hundred eighty (180) days after denial of the claim. Please be advised that this letter does not extend the statutory time limits prescribed by the Governmental Tort Claims Act.

You have the right, under Oklahoma law, to differ with the decision to deny your client's tort claim. The right to seek compensation by suit in District Court may be restricted by the limitations period prescribed by law.

Sincerely;

A handwritten signature in black ink that reads "Adriano Coronel".

Adriano Coronel  
MMSEA Specialist & Liability Advisor  
Oklahoma Risk Management Department

EXHIBIT

A

WILLIAM H. BOCK, INC.  
ATTORNEYS AT LAW  
*A Professional Corporation*

BILLY BOCK  
MICHELLE L. GREENE



September 23, 2013  
OFC. (405) 848-5400  
FAX (405) 848-5479

Office of the Risk Management Administrator  
Office of Management and Enterprise Services  
State Capitol  
2300 N. Lincoln Blvd.  
Room 122  
Oklahoma City, OK 73105

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SEP 30 2013

DCAM RISK MANAGEMENT

Re: *Oklahoma Department of Securities ex rel. Irving L. Faught, Administrator v. 2001 Trinity Fund, L.L.C. and Robert Arrowood*, Case No. CJ-2012-6164, District Court of Oklahoma County

Dear Sir:

The undersigned submits this letter as notification, pursuant to 51 Okla. Stat. § 156, of his intent to request leave to file a counter-claim in the above captioned action on behalf of Defendant Robert Arrowood, against Irving L. Faught as Administrator of the Oklahoma Department of Securities. The counter-claim will assert causes of action in tort, including intentional infliction of emotional distress. In brief, Defendant Arrowood asserts that the Administrator has wrongfully disparaged him in the media with regard to the above case, and has intentionally misrepresented the allegations in the Petition. The Administrator's actions have severely damaged Mr. Arrowood's business relationships and personal reputation without cause or justification. Defendant Arrowood intends to seek the full amount of damages authorized by 51 Okla. Stat. § 154.

Mr. Arrowood can be contacted at Trinity Resources, Inc., P.O. Box 722158, 701 Wall Street, Norman, Oklahoma, 73070. The telephone number is 405-321-8740.

The Petition was filed by the Oklahoma Department of Securities on September 28, 2012, and the first negative news report was aired at the direction of the Plaintiff on October 2, 2012. This claim is thus timely filed pursuant to 51 Okla. Stat. § 156 (B).

Sincerely,

A handwritten signature in cursive script, appearing to read "Bill Bock".

William H. Bock  
WILLIAM H. BOCK, INC.  
6402 N. Santa Fe Ave., Suite A  
Oklahoma City, OK 73116

Telephone: (405) 848-5400

Facsimile: (405) 848-5479

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WILLIAM H. BOCK, INC.  
ATTORNEYS AT LAW  
*A Professional Corporation*  
6402 N. SANTA FE AVENUE  
SUITE A  
OKLAHOMA CITY, OK 73116-9111

**CERTIFIED MAIL™**



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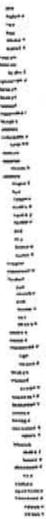
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OFFICE OF THE RISK MANAGEMENT AND ENTERPRISE SERVICES

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Office of the Risk Management Administrator  
Office of Management and Enterprise Services  
State Capitol  
2300 N. Lincoln Blvd.  
Room 122  
Oklahoma City, OK 73105

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