

2. On that same date, Jeffers was served with the Petition, Temporary Restraining Order, and other pleading by a process server properly appointed by the Court for service of these papers.

3. After service of the Temporary Restraining Order and other pleadings upon Jeffers, he conducted a seminar in Oklahoma City before numerous people. At that seminar Jeffers promoted and offered the business opportunity known as Renaissance U.S.A., Inc. and failed to disclose material facts in connection with the offer of the business opportunity so as to make his statements and presentation not misleading.

4. The business opportunity offered by Jeffers was not registered with the Department.

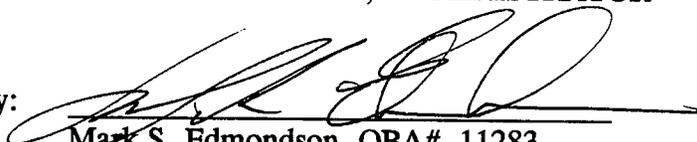
5. The conduct described above constitutes a violation of this Court's Temporary Restraining Order and is an instance of indirect contempt of the Court.

Wherefore, the Department requests that Defendant, Jeffers, be adjudged guilty of indirect contempt for failure to comply with the Temporary Restraining Order entered by the Court and to be punished by a fine, imprisonment, or both and such other relief as the Court deems appropriate.

Respectfully Submitted,

OKLAHOMA DEPARTMENT OF SECURITIES
IRVING L. FAUGHT, ADMINISTRATOR

By:



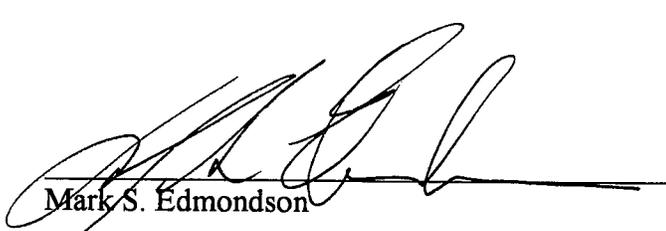
Mark S. Edmondson OBA# 11283
Oklahoma Department of Securities
120 North Robinson, Suite 860
Oklahoma City, Oklahoma 73102
Telephone (405) 280-7700

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 23rd day of January, 1998, a true and correct copy of the above was mailed with postage prepaid thereon addressed to:

Randall J. Jeffers
6200 N. Robinson
Oklahoma City, OK 73118

Timothy J. Bomhoff
Conner & Winters
One Leadership Square
211 North Robinson, Suite 1700
Oklahoma City, Oklahoma 73102



Mark S. Edmondson