

offering or selling any security in and/or from this state;

transacting business in this state as a broker-dealer or agent unless appropriately registered under the Act;

directly or indirectly, making any untrue statements of material fact or omitting to state material facts necessary in order to make statements made, in light of the circumstances under which they are made, not misleading, in connection with the offer, sale, and/or purchase of securities in and/or from this state;

directly or indirectly, engaging in any act, practice, or course of business which operates or would operate as a fraud or deceit upon any person; and

unlawfully distributing sales literature in and/or from this state.

2. The Temporary Order provided that Huletty immediately transfer or deliver possession, custody, and control to the Receiver or to the Oklahoma County Sheriff of:

all assets of the Receivership Defendants;

all documents of the Receivership Defendants including, but not limited to books, records, tapes, discs, accounting data, checks, correspondence, forms, advertisements, brochures, manuals, electronically stored data, bank records, customer lists, customer files, telephone records, ledgers, payroll records, including information stored in computer maintained form;

all assets belonging to members of the public held by Defendants; and

all keys and codes necessary to gain or to secure access to any assets or documents of the Receivership Defendants including, but not limited to access to their business premises, means of communication, accounts, computer systems, or other property, wherever located.

3. The Temporary Order provided that Huletty refrain from interfering, directly or indirectly, with the Receiver taking custody, control or possession of Receivership Assets as defined in the Temporary Order.

4. On September 17, 2003, Huletty was personally served with a certified copy of the Temporary Order by an Oklahoma County Sheriff's Deputy.

5. Following this Court's issuance of the Temporary Order, and in complete contempt of that Temporary Order, Huletty delivered nothing to the Department.

6. On March 11, 2004, an Order Granting Motion to Compel Defendants to Produce Property ("Order Compelling Production of Property") was issued by this Court, by which Huletty was ordered to "immediately produce and surrender" a certain 2001 Dodge Durango to Receiver Win Holbrook, after this Court determined that the vehicle was an asset of Vision Services, Inc. and not a personal asset of Huletty.

7. Following this Court's issuance of the Order Compelling Production of Property, and in complete contempt of that order, Huletty has failed to deliver the vehicle to the Receiver.

8. In October , 2003, following this Court's issuance of the Temporary Order, and in complete contempt of that order, Huletty continued to offer and sell securities in the nature of promissory notes to investors ("Investors"). Huletty transacted business as a broker-dealer or agent by offering and selling securities in the nature of promissory notes to Investors. Huletty promised large returns to the Investors at the end of five (5) years. Huletty did not disclose that Investors would be assessed fees in connection with the purchase of the promissory notes from Huletty.

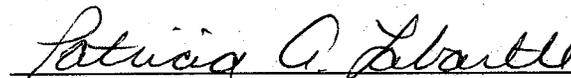
9. The conduct described herein constitutes violations of this Court's Temporary Order and Order Compelling Production of Property and constitutes indirect contempt of the Court.

Wherefore, the Department requests that this Court issue a citation directing Huletty to appear and show cause why he should not be held in contempt and, after a full and complete hearing, that Huletty be adjudged guilty of indirect contempt for failure to comply with the orders entered by this Court, and punished by the maximum fine or imprisonment, or both, and/or by and through such other relief as this Court deems appropriate. The Department requests that Huletty be required to post a cash bond if a jury trial is demanded.

Respectfully Submitted,

OKLAHOMA DEPARTMENT OF SECURITIES
IRVING L. FAUGHT, ADMINISTRATOR

By:



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 19th day of March, 2004, a true and correct copy of the foregoing was mailed by first class mail with postage prepaid thereon addressed to:

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