

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,)

OCT 18 2009

PATRICIA PRESLEY, COURT CLERK
by _____
DEPUTY

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

Case No. CJ-2009-6989

and)

HEARING SET FOR
NOVEMBER 23, 2009 @ 9:00 A.M.

Amy J. Richardson, an individual,)
)
Defendant Solely For)
Purposes of Equitable Relief.)

MOTION FOR DEFAULT JUDGMENT
AGAINST DEFENDANT CHRISTOPHER S. VONWERDER

Plaintiff moves this Court to enter judgment by default in its favor and against Defendant Christopher S. VonWerder for the relief prayed for in the *Petition for Permanent Injunction and Other Equitable Relief* filed by Plaintiff in this matter. In support of this motion, Plaintiff states as follows:

1. On July 24, 2009, a *Petition for Permanent Injunction and Other Equitable Relief* (Petition) was filed against Defendants including Defendant Christopher S. VonWerder.

2. On July 24, 2009, a *Temporary Restraining Order, Order Freezing Assets and Order for Accounting* (Order) was issued by this Court against the Defendants and Relief Defendant.
3. On July 30, 2009, Christopher S. VonWerder was served with the Petition, Summons and Order by personal service.
4. On August 20, 2009, the Court postponed the hearing on the Temporary Injunction to September 3, 2009, in order to provide Defendant Christopher S. VonWerder the opportunity to retain counsel.
5. On September 9, 2009, Defendant Christopher S. VonWerder consented to the entry of a temporary injunction with Stephen Parker appearing before the Court on his behalf.
6. Defendant Christopher S. VonWerder has failed to answer or otherwise plead to the Petition, and his time for doing so has expired.
7. Plaintiff requests that Defendant Christopher S. VonWerder be permanently enjoined from offering and/or selling securities in any capacity in and/or from this state.
8. Plaintiff further requests that Defendant Christopher S. VonWerder be ordered to pay restitution to any and all investors who purchased a so-called debenture (Debenture) from the Defendants or who transferred money to the Defendants for the purpose of purchasing the Debentures or otherwise making investments on their behalf.
9. Plaintiff further requests that Defendant Christopher S. VonWerder disgorge all ill-gotten gains achieved through the sale or potential sale of the Debentures or other investment vehicle.

A copy of this motion has been sent by certified mail to Christopher S. VonWerder at his last known address of record and to the law office of Stephen Parker.

WHEREFORE, premises considered, Plaintiff prays for the Court to grant the following relief:

I.

That Defendant Christopher S. VonWerder be permanently enjoined from offering and/or selling securities in any capacity in and/or from this state;

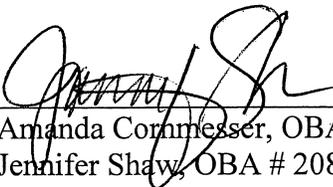
II.

That Defendant Christopher S. VonWerder be ordered to pay restitution to all investors who purchased Debentures from the Defendants or who transferred money to the Defendants for the purpose of purchasing the Debentures or otherwise making investments on their behalf; and

III.

That Defendant Christopher S. VonWerder be ordered to disgorge all ill-gotten gains achieved through the sale or potential sale of the Debentures or other investment vehicle.

Respectfully submitted,



Amanda Commesser, OBA #20044
Jennifer Shaw, OBA # 20839
Oklahoma Department of Securities
120 North Robinson, Suite 860
Oklahoma City, OK 73102
(405) 280-7700

CERTIFICATE OF MAILING

The undersigned hereby certifies that on the 13th day of October, 2009, a true and correct copy of the above and foregoing was mailed by certified mail, return receipt requested, with postage prepaid thereon, addressed to:

Chris VonWerder
6014 N. 42nd St.
Enid, OK 73701-9467

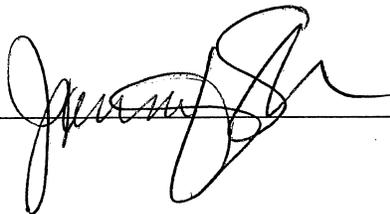
Stephen Parker
416 SW 79th St # 100
Oklahoma City, OK 73139-8121

I hereby certify that a true and correct copy of the, was mailed this 13th day of October, 2009, by depositing it in the U.S. Mails, postage prepaid, to the following:

J. David Ogle
100 Park Ave, Suite 500
Oklahoma City, OK 73102
(405) 605-6644

Tommy L. Richardson
1511 Tahoe Lane
Yukon, OK 73099

Amy J. Richardson
1511 Tahoe Lane
Yukon, OK 73099



A handwritten signature in black ink, appearing to read "J. David Ogle", is written over a horizontal line.