IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

Oklahoma Department of Securities *ex rel.* Irving L. Faught, Administrator,	)	
Plaintiff,	)	
v.	)	Case No. CJ-2009-6989
Bothwell Consulting, LLC, an Oklahoma LLC; Lawrence G. Bothwell, an individual; Christopher S. VonWerder, an individual; and Tommy L. Richardson, an individual,	)	
Defendants,	)	
and	)	
Amy J. Richardson, an individual,	)	
Defendant Solely For Purposes of Equitable Relief.	)	

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

AUG 26 2009

PATRICIA PRESLEY, COURT CLERK
by _____ DEPUTY

MOTION FOR DEFAULT JUDGMENT
AGAINST DEFENDANT TOMMY L. RICHARDSON
AND RELIEF DEFENDANT AMY J. RICHARDSON

Plaintiff moves this Court to enter judgment by default in its favor and against Defendant Tommy L. Richardson and Relief Defendant Amy J. Richardson 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 Tommy L. Richardson as a Defendant and against Amy J. Richardson as a Relief Defendant.

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 29, 2009, Tommy L. Richardson and Amy J. Richardson were served with the Petition, Summons and Order by personal service.

4. On August 20, 2009, Defendant Tommy L. Richardson and Relief Defendant consented to the entry of a temporary injunction but did not appear at a hearing before the Court.

5. Defendant Tommy L. Richardson and Relief Defendant have failed to answer or otherwise plead to the Petition, and their time for doing so has expired.

6. Plaintiff requests that Defendant Tommy L. Richardson be enjoined from offering and/or selling securities in any capacity in and/or from this state.

7. Plaintiff further requests that Defendant Tommy L. Richardson be ordered to pay restitution to any and all investors who purchased securities in the nature of a 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.

8. Plaintiff further requests that Defendant Tommy L. Richardson and Relief Defendant 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 Tommy L. Richardson and Amy J. Richardson at their last known addresses of record.

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

I.

That Defendant Tommy L. Richardson be permanently enjoined from offering and/or selling securities in any capacity in and/or from this state.

II.

That judgment by default be entered in its favor and against Defendant Tommy L. Richardson for 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;

III.

That Defendant Richardson and Relief Defendant 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 Cornmesser, 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 26th day of August, 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:

Tommy L. Richardson
1511 Tahoe Lane
Yukon, OK 73099

Amy J. Richardson
1511 Tahoe Lane
Yukon, OK 73099

I hereby certify that a true and correct copy of the, was mailed this 26th day of August, 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

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