



2. Defendant Headington is a resident of Dallas, Texas.
3. Defendant Shelley is a resident of Canadian County, Oklahoma.
4. Defendant Braun is a resident of Canadian County, Oklahoma.
5. On September 22, 2010, an administrative proceeding was initiated by the Department against Geary Securities, Inc. *aka* Capital West Securities, Inc.; Keith D. Geary; Norman Frager and CEMP, L.L.C. (collectively the "Respondents") under the Oklahoma Uniform Securities Act of 2004 ("Act"), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (Supp. 2009) and 660:2-9-1 of the Rules of the Oklahoma Securities Commission and the Administrator of the Department of Securities (as amended July 7, 2007) (the "Rules"). On that same day the Administrator of the Department notified Respondents of their right to request a hearing.
6. On October 15, 2011, Respondents requested a hearing and on November 9, 2010, the request for a hearing was granted and a Hearing Officer (the "Hearing Officer") was appointed by the Administrator.
7. On February 14, 2011, and pursuant to Section 1-602(B) of the Act, the Subpoenas were issued to Defendants. The Subpoenas are attached hereto as Exhibit "A".
8. On February 22, 2011, the Subpoenas were served upon Defendants. See, Exhibit "B".
9. On March 3, 2011, Defendants filed a Motion to Quash and for Protective Order (the "Motion to Quash") with the Hearing Officer. On March 14, 2011, the Respondents filed an objection to the Motion to Quash.
10. On March 24, 2011, the Hearing Officer denied the Motion to Quash concluding that the Motion to Quash provided no justification under the Rules for an order quashing or otherwise limiting the scope of the Subpoenas.

11. On March 25, 2011, and pursuant to 660:2-9-4(e)(1) of the Rules, Respondents applied to the Administrator for enforcement of the Subpoenas.

12. To date, Defendants Bank of Union and Headington have failed and refused to produce any documents pursuant to the Subpoenas.

13. To date, Defendants Shelley, Braun and Headington have failed and refused to appear for depositions pursuant to the Subpoenas.

### AUTHORITY

14. Subsection (B) of Section 1-602 of the Act authorizes the Administrator or its designated officer to subpoena witnesses, compel their attendance, and require production of documents as follows:

"For the purpose of an investigation or proceeding under this act, the Administrator or its designated officer may administer oaths and affirmations, subpoena witnesses, seek compulsion of attendance, take evidence, require the filing of statements, and require the production of any records that the Administrator considers relevant or material to the investigation or proceeding."

15. 660:2-9-4 of the Rules relating to individual proceeding practices and procedures provides in pertinent part:

(e) Enforcement of subpoenas.

(1) If a person under subpoena fails to appear as required, or fails to produce the documents or tangible items set forth in the subpoena, a party may apply to the Administrator for enforcement of the subpoena.

(2) An application to the Administrator for enforcement of a subpoena shall be made immediately upon the failure to comply with the subpoena or within such other time period as the Administrator may establish.

(3) Upon a timely request by a party for enforcement of a subpoena, the Administrator may apply to the district court of Oklahoma County or the district court in any other county where service can be obtained to enforce the subpoena as authorized by the Securities Act.

16. Section 1-602 of the Act, grants the Court has the authority to enforce the Subpoenas. Subsection (C) of Section 1-602 provides as follows:

"If a person does not appear or refuses to testify, file a statement, produce records, or otherwise does not obey a subpoena as required by the Administrator under this act, the Administrator may apply to the district court of Oklahoma County or the district court in any other county where service can be obtained or a court of another state to enforce compliance."

17. In connection with both investigations and individual proceedings, the Act provides that the Administrator or a designated hearing officer may subpoena witnesses and require the production of documents. The Subpoenas were properly issued pursuant to Section 1-602 of the Act and validly served upon Defendants. Section 1-602 of the Act also provides that the mechanism for enforcement of properly issued subpoenas is to apply for enforcement with the Court. Enforcement of and compliance with properly issued subpoenas is essential for enforcement of the Act by the Administrator and vital to providing respondents in administrative proceedings with due process.

**WHEREFORE**, the Department requests that this Court issue an order enforcing the Subpoenas issued by the Hearing Officer on February 14, 2011, and granting such other relief as this Court deems appropriate.

Respectfully Submitted,

OKLAHOMA DEPARTMENT OF SECURITIES  
IRVING L. FAUGHT, ADMINISTRATOR

By:

A handwritten signature in cursive script, appearing to read "Shaun Mullins", written over a horizontal line.

Shaun Mullins, OBA #16869  
Oklahoma Department of Securities  
120 North Robinson, Suite 860  
Oklahoma City, Oklahoma 73102  
Telephone (405) 280-7700  
smullins@securities.ok.gov

STATE OF OKLAHOMA  
DEPARTMENT OF SECURITIES  
THE FIRST NATIONAL CENTER  
120 NORTH ROBINSON, SUITE 860  
OKLAHOMA CITY, OKLAHOMA 73102



In the Matter of:

Geary Securities, Inc. *aka* Capital West Securities, Inc.;  
Keith D. Geary; Norman Frager; and CEMP, LLC,

Respondents.

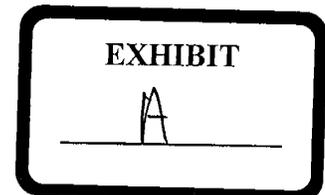
ODS File No. 09-141

**SUBPOENA DUCES TECUM**

TO: The Bank of Union  
Records Custodian  
PO Box 1010  
2000 South Country Club  
El Reno, OK 73036

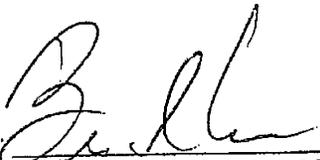
Pursuant to the Rules of the Oklahoma Securities Commission and the Administrator of the Department of Securities (as amended on July 1, 2007) (the "Rules"), and specifically Rule 660:2-9-4, you are hereby commanded to produce and permit inspection and copying of all documents and tangible items in your possession, custody or control, described on Exhibit A attached hereto. Said inspection and copying will take place at the offices of counsel for Geary Securities Inc., CORBYN HAMPTON, PLLC, 211 North Robinson, Suite 1910, Oklahoma City, Oklahoma 73102 on February 25, 2011 at 9 a.m.

In accordance with Rule 660:2-9-4, Geary Securities has submitted this Subpoena in writing to the Hearing Officer for approval of issuance, and the Hearing Officer has approved issuance of same. Respondent Geary Securities, Inc. may be contacted at the

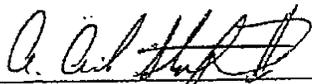


address and phone number listed below for its counsel of record, CORBYN HAMPTON,  
PLLC. Hereof fail not under penalty of law.

Issued this 11<sup>th</sup> day of February 2011.

By   
Bruce R. Kohl, Hearing Officer

Prepared by:

  
Joe M. Hampton, OBA No. 11851  
Amy J. Pierce, OBA No. 17980  
A. Ainslie Stanford II, OBA No. 18843  
**CORBYN HAMPTON PLLC**  
One Leadership Square  
211 North Robinson, Suite 1910  
Oklahoma City, Oklahoma 73102  
Telephone: (405) 239-7055  
Facsimile: (405) 702-4348  
Email: [jhampton@corbynhampton.com](mailto:jhampton@corbynhampton.com)  
[apierce@corbynhampton.com](mailto:apierce@corbynhampton.com)  
[astanford@corbynhampton.com](mailto:astanford@corbynhampton.com)  
**ATTORNEYS FOR RESPONDENTS**  
**GEARY SECURITIES, INC., KEITH D. GEARY,**  
**AND CEMP, LLC**

CERTIFICATE OF SERVICE

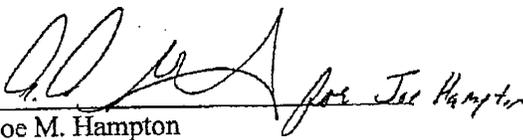
I hereby certify that on February 18, 2011, a copy of the foregoing document was served on the following by certified mail, return receipt requested, by restricted delivery:

The Bank of Union  
Records Custodian  
PO Box 1010  
2000 South Country Club  
El Reno, OK 73036

And a copy of the foregoing document was sent to the following via email:

Melanie Hall, Director of Enforcement  
Terra Shamas Bonnell, Enforcement Attorney  
Oklahoma Department of Securities  
120 North Robinson, Suite 860  
Oklahoma City, OK 73102;

Donald A. Pape, Esq.  
Donald A. Pape, P.C.  
401 West Main Street, Suite 440  
Norman, OK 73069

  
\_\_\_\_\_  
Joe M. Hampton

## EXHIBIT A

### DEFINITIONS:

The following definitions apply and govern the following requests:

“You” or “Your” means The Bank of Union and its representatives, agents, servants, and employees (including, but not limited to Mike Braun, John Shelley and Timothy Headington).

Whenever a noun appears, it shall be construed either to be singular or plural in order to bring within the scope of the following requests any information that may be otherwise construed to be outside their scope.

“And” as well as “or” shall be construed either disjunctively or conjunctively in order to bring within the scope of the following requests any information that might otherwise be construed to be outside their scope.

“Document” means a written, printed, typed or graphic matter, electronic facsimile, computer storage device, or any other media, of any kind or description, in its entirety, including records and other data compilations from which information can be obtained or translated (if necessary) through detection devices into usable form, and further including any addenda, supplements, amendments, revisions, exhibits and appendices thereto, in their original form (or copies thereof where originals are unavailable), together with any copies thereof bearing notations, memoranda or other written information not on the original. The term "document" means any tangible thing, recording, or reproduction made in any manner, any visual or auditory data in your possession, custody, or control including without limiting the generality of its meaning, correspondence, electronic mail (“e-mail”), instant messages, text messages, memoranda,

pleadings, briefs, transcripts, photographs, journals, diaries, calendars, stenographic or handwritten notes, studies, evaluations, analyses, reports, accounting records, reviews, working papers, books, charts, telegrams, pamphlets, pictures, video or audit tapes, voice recordings, computer tapes, printout or cards, microfilming, microfiche, and any papers on which words and numbers have been written, printed, typed, or otherwise affixed, and shall mean a copy where the original is not in your possession, custody, or control and shall mean every copy of every document where any such copy is not an identical copy of the original. Designated documents shall be taken to include all attachments and enclosures.

The term "Communication" when used in the following requests includes all forms of communication, discussion and discourse -- whether written, oral, electronic or otherwise.

"GSI" shall refer to Geary Securities, Inc., formerly known as Capital West Securities, Inc.

"Geary" shall refer to Keith D. Geary.

"CEMP" shall refer to CEMP, LLC.

"BOU" shall refer to the Bank of Union.

REQUESTS:

1. All documents that refer, relate to or in any way reference any form of communication between you and GSI, Geary or CEMP.
2. All documents that refer, relate to or in any way reference any form of communication by any officer, director, shareholder, employee or representative of BOU concerning GSI, Geary or CEMP.

3. All documents that refer, relate to or in any way reference any form of communication between any officer, director, shareholder, employee or representative of BOU and any representative, employee, investigator, or attorney for any regulatory or investigatory body or authority (including, but not limited to, the Federal Deposit Insurance Corporation, Oklahoma State Banking Department, Oklahoma State Department of Securities, or the Office of the Comptroller of the Currency) concerning GSI, Geary or CEMP.
4. All documents that refer, relate to or in any way reference any form of communication related to BOU's purchase or sale, or BOU's consideration of the potential purchase or sale, of any securities through GSI, Geary or CEMP.
5. All documents that refer, relate to or in any way reference any form of communication concerning Mortgage Resecuritization Notes, Series 2009-1, Class A-1 and/or Class A-2, issued by the CEMP Resecuritization Trust 2009-1.
6. All documents that refer, relate to or in any way reference the performance of any security BOU has purchased or sold through GSI, Geary, or CEMP.
7. All writings, communications, statements, reports or filings submitted by you to any regulatory or investigatory body or authority (including, but not limited to, the Federal Deposit Insurance Corporation, Oklahoma State Banking Department, Oklahoma State Department of Securities, or the Office of the Comptroller of the Currency) that refer, relate to, or reference any securities purchased or sold by BOU through GSI, Geary or CEMP.

8. All documents including, but not limited to, minutes, summaries, recordings, notes and agendas of BOU's Board of Directors that refer, relate to or in any way concern GSI, Geary, CEMP, or any security purchased or sold by BOU through GSI, Geary or CEMP (including, but not limited to, Mortgage Resecuritization Notes, Series 2009-1, Class A-1 and/or Class A-2, issued by the CEMP Resecuritization Trust 2009-1).
9. All documents including, but not limited to, minutes, summaries, recordings, notes and agendas of any BOU committee (including, but not limited to, executive, investment, loan, credit or risk committees) that refer, relate to or in any way concern GSI, Geary, CEMP, or any security purchased or sold by BOU through GSI, Geary or CEMP (including, but not limited to, Mortgage Resecuritization Notes, Series 2009-1, Class A-1 and/or Class A-2, issued by the CEMP Resecuritization Trust 2009-1).

STATE OF OKLAHOMA  
DEPARTMENT OF SECURITIES  
THE FIRST NATIONAL CENTER  
120 NORTH ROBINSON, SUITE 860  
OKLAHOMA CITY, OKLAHOMA 73102



In the Matter of:

Geary Securities, Inc. *aka* Capital West Securities, Inc.;  
Keith D. Geary; Norman Frager; and CEMP, LLC,

Respondents.

ODS File No. 09-141

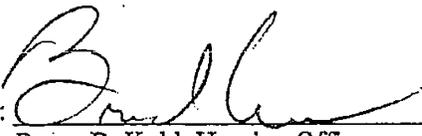
**SUBPOENA DUCES TECUM**

TO: Timothy Headington  
3515 Crescent Avenue  
Dallas, TX 75205

Pursuant to the Rules of the Oklahoma Securities Commission and the Administrator of the Department of Securities (as amended on July 1, 2007) (the "Rules"), and specifically Rule 660:2-9-4, you are hereby commanded to produce and permit inspection and copying of all documents and tangible items in your possession, custody or control, described on Exhibit A attached hereto. Said inspection and copying will take place at the offices of counsel for Geary Securities, Inc., CORBYN HAMPTON, PLLC, 211 North Robinson, Suite 1910, Oklahoma City, Oklahoma 73102 on February 25, 2011 at 9 a.m.

In accordance with Rule 660:2-9-4, Geary Securities has submitted this Subpoena in writing to the Hearing Officer for approval of issuance, and the Hearing Officer has approved issuance of same. Respondent Geary Securities, Inc. may be contacted at the address and phone number listed below for its counsel of record, CORBYN HAMPTON, PLLC. Hereof fail not under penalty of law.

Issued this 11<sup>th</sup> day of February 2011.

By:   
Bruce R. Kohl, Hearing Officer

Prepared by:

  
\_\_\_\_\_  
Joe M. Hampton, OBA No. 11851  
Amy J. Pierce, OBA No. 17980  
A. Ainslie Stanford II, OBA No. 18843  
**CORBYN HAMPTON PLLC**  
One Leadership Square  
211 North Robinson, Suite 1910  
Oklahoma City, Oklahoma 73102  
Telephone: (405) 239-7055  
Email: [jhampton@corbynhampton.com](mailto:jhampton@corbynhampton.com)  
[apierce@corbynhampton.com](mailto:apierce@corbynhampton.com)  
[astanford@corbynhampton.com](mailto:astanford@corbynhampton.com)

**ATTORNEYS FOR RESPONDENTS  
GEARY SECURITIES, INC., KEITH D. GEARY,  
AND CEMP, LLC**

**CERTIFICATE OF SERVICE**

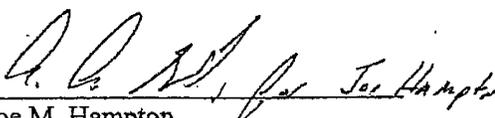
I hereby certify that on February 18, 2011, a copy of the foregoing document was served on the following by certified mail, return receipt requested, by restricted delivery:

Timothy Headington  
3515 Crescent Avenue  
Dallas, TX 75205

and a copy of the foregoing document was sent to the following via email:

Melanie Hall, Director of Enforcement  
Terra Shamas Bonnell, Enforcement Attorney  
Oklahoma Department of Securities  
120 North Robinson, Suite 860  
Oklahoma City, OK 73102;

Donald A. Pape, Esq.  
Donald A. Pape, P.C.  
401 West Main Street, Suite 440  
Norman, OK 73069

  
\_\_\_\_\_  
Joe M. Hampton

## EXHIBIT A

### DEFINITIONS:

The following definitions apply and govern the following requests:

“You” or “Your” means Timothy Headington and his representatives, agents, servants, and employees (including, but not limited to, Chris Martin).

Whenever a noun appears, it shall be construed either to be singular or plural in order to bring within the scope of the following requests any information that may be otherwise construed to be outside their scope.

“And” as well as “or” shall be construed either disjunctively or conjunctively in order to bring within the scope of the following requests any information that might otherwise be construed to be outside their scope.

“Document” means a written, printed, typed or graphic matter, electronic facsimile, computer storage device, or any other media, of any kind or description, in its entirety, including records and other data compilations from which information can be obtained or translated (if necessary) through detection devices into usable form, and further including any addenda, supplements, amendments, revisions, exhibits and appendices thereto, in their original form (or copies thereof where originals are unavailable), together with any copies thereof bearing notations, memoranda or other written information not on the original. The term "document" means any tangible thing, recording, or reproduction made in any manner, any visual or auditory data in your possession, custody, or control including without limiting the generality of its meaning, correspondence, electronic mail (“e-mail”), instant messages, text messages, memoranda, pleadings, briefs, transcripts, photographs, journals, diaries, calendars, stenographic or

handwritten notes, studies, evaluations, analyses, reports, accounting records, reviews, working papers, books, charts, telegrams, pamphlets, pictures, video or audit tapes, voice recordings, computer tapes, printout or cards, microfilming, microfiche, and any papers on which words and numbers have been written, printed, typed, or otherwise affixed, and shall mean a copy where the original is not in your possession, custody, or control and shall mean every copy of every document where any such copy is not an identical copy of the original. Designated documents shall be taken to include all attachments and enclosures.

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"Geary" shall refer to Keith D. Geary.

"CEMP" shall refer to CEMP, LLC.

REQUESTS:

1. All documents that refer, relate to or in any way reference any form of communication between you and GSI, Geary or CEMP.
2. All documents that refer, relate to or in any way reference any form of communication between you and any officer, director, shareholder, employee or representative of the Bank of Union concerning GSI, Geary or CEMP.
3. All documents that refer, relate to or in any way reference any form of communication between you and any representative, employee, investigator,

or attorney for the Oklahoma State Department of Securities, the Oklahoma State Banking Department, the Federal Deposit Insurance Corporation, or the Office of the Comptroller of the Currency concerning GSI, Geary or CEMP.

4. All documents that refer, relate to or in any way reference any form of communication related to your purchase or sale, or your consideration of the potential purchase or sale, of any securities through GSI, Geary or CEMP.
5. All documents that refer, relate to or in any way reference any form of communication concerning Mortgage Resecuritization Notes, Series 2009-1, Class A-1 and/or Class A-2, issued by the CEMP Resecuritization Trust 2009-1.
6. All documents that refer, relate to or in any way reference the performance of any security you have purchased or sold through GSI, Geary, or CEMP.

STATE OF OKLAHOMA  
DEPARTMENT OF SECURITIES  
THE FIRST NATIONAL CENTER  
120 NORTH ROBINSON, SUITE 860  
OKLAHOMA CITY, OKLAHOMA 73102



In the Matter of:

Geary Securities, Inc. *aka* Capital West Securities, Inc.;  
Keith D. Geary; Norman Frager; and CEMP, LLC,

Respondents.

ODS File No. 09-141

**DEPOSITION SUBPOENA**

TO: Timothy Headington  
3515 Crescent Avenue  
Dallas, TX 75205

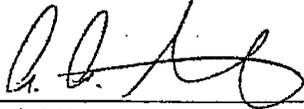
Pursuant to the Rules of the Oklahoma Securities Commission and the Administrator of the Department of Securities (as amended on July 1, 2007) (the "Rules"), and specifically Rules 660:2-9-3(b) and 660:2-9-4, you are hereby commanded to appear at the offices of Henjum Goucher Reporting at 2501 Oak Lawn Avenue #600, Dallas, Texas 75219 on **March 28, 2011 at 9 a.m.**, to testify as a witness in a deposition noticed by Geary Securities, Inc., in the above-referenced matter. The deposition may be recorded by audio/visual means.

In accordance with Rule 660:2-9-4, Geary Securities has submitted this Subpoena in writing to the Hearing Officer for approval of issuance, and the Hearing Officer has approved issuance of same. Respondent Geary Securities, Inc. may be contacted at the address and phone number listed below for its counsel of record, CORBYN HAMPTON, PLLC. Hereof fail not under penalty of law.

Issued this 11<sup>th</sup> day of February, 2011.

By:   
Bruce R. Kohl, Hearing Officer

Prepared by:



Joe M. Hampton, OBA No. 11851  
Amy J. Pierce, OBA No. 17980  
A. Ainslie Stanford II, OBA No. 18843  
**CORBYN HAMPTON PLLC**  
One Leadership Square  
211 North Robinson, Suite 1910  
Oklahoma City, Oklahoma 73102  
Telephone: (405) 239-7055  
Facsimile: (405) 702-4348  
Email: [jhampton@corbynhampton.com](mailto:jhampton@corbynhampton.com)  
[apierce@corbynhampton.com](mailto:apierce@corbynhampton.com)  
[astanford@corbynhampton.com](mailto:astanford@corbynhampton.com)  
**ATTORNEYS FOR RESPONDENTS**  
**GEARY SECURITIES, INC., KEITH D. GEARY,**  
**AND CEMP, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on February 18 2011, a copy of the foregoing document was served on the following by certified mail, return receipt requested, by restricted delivery:

Timothy Headington  
3515 Crescent Avenue  
Dallas, TX 75205

and a copy of the foregoing document was sent to the following via email:

Melanie Hall, Director of Enforcement  
Terra Shamas Bonnell, Enforcement Attorney  
Oklahoma Department of Securities  
120 North Robinson, Suite 860  
Oklahoma City, OK 73102;

Donald A. Pape, Esq.  
Donald A. Pape, P.C.  
401 West Main Street, Suite 440  
Norman, OK 73069



Joe M. Hampton

STATE OF OKLAHOMA  
DEPARTMENT OF SECURITIES  
THE FIRST NATIONAL CENTER  
120 NORTH ROBINSON, SUITE 860  
OKLAHOMA CITY, OKLAHOMA 73102



In the Matter of:

Geary Securities, Inc. *fka* Capital West Securities, Inc.;  
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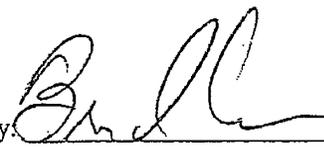
**DEPOSITION SUBPOENA**

TO: John Shelley  
2000 South Country Club Rd.  
El Reno, OK 73036

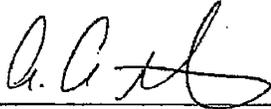
Pursuant to the Rules of the Oklahoma Securities Commission and the Administrator of the Department of Securities (as amended on July 1, 2007) (the "Rules"), and specifically Rules 660:2-9-3(b) and 660:2-9-4, you are hereby commanded to appear at the offices of counsel for Geary Securities, Inc., CORBYN HAMPTON, PLLC, 211 North Robinson, Suite 1910, Oklahoma City, Oklahoma 73102 on **March 30, 2011 at 9 a.m.**, to testify as a witness in a deposition noticed by Geary Securities, Inc., in the above-referenced matter. The deposition may be recorded by audio/visual means.

In accordance with Rule 660:2-9-4, Geary Securities has submitted this Subpoena in writing to the Hearing Officer for approval of issuance, and the Hearing Officer has approved issuance of same. Respondent Geary Securities, Inc. may be contacted at the address and phone number listed below for its counsel of record, CORBYN HAMPTON, PLLC. Hereof fail not under penalty of law.

Issued this 11<sup>th</sup> day of February, 2011.

By   
Bruce R. Kohl, Hearing Officer

Prepared by:



Joe M. Hampton, OBA No. 11851  
Amy J. Pierce, OBA No. 17980  
A. Ainslie Stanford II, OBA No. 18843  
**CORBYN HAMPTON PLLC**  
One Leadership Square  
211 North Robinson, Suite 1910  
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Telephone: (405) 239-7055  
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Email: [jhampton@corbynhampton.com](mailto:jhampton@corbynhampton.com)  
[apierce@corbynhampton.com](mailto:apierce@corbynhampton.com)  
[astanford@corbynhampton.com](mailto:astanford@corbynhampton.com)  
**ATTORNEYS FOR RESPONDENTS**  
**GEARY SECURITIES, INC., KEITH D. GEARY,**  
**AND CEMP, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on February 18, 2011, a copy of the foregoing document was served on the following by certified mail, return receipt requested, by restricted delivery:

John Shelley  
2000 South Country Club Rd.  
El Reno, OK 73036

and a copy of the foregoing document was sent to the following via email:

Melanie Hall, Director of Enforcement  
Terra Shamas Bonnell, Enforcement Attorney  
Oklahoma Department of Securities  
120 North Robinson, Suite 860  
Oklahoma City, OK 73102;

Donald A. Pape, Esq.  
Donald A. Pape, P.C.  
401 West Main Street, Suite 440  
Norman, OK 73069

  
Joe M. Hampton  
Joe M. Hampton

STATE OF OKLAHOMA  
DEPARTMENT OF SECURITIES  
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In the Matter of:

Geary Securities, Inc. *fka* Capital West Securities, Inc.;  
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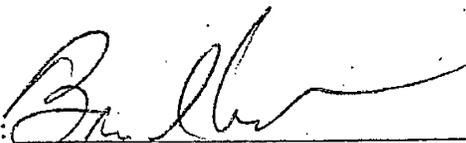
**DEPOSITION SUBPOENA**

TO: Mike Braun  
2000 South Country Club Rd.  
El Reno, OK 73036

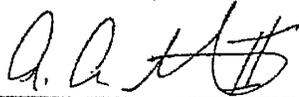
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Issued this 11<sup>th</sup> day of February, 2011.

By:   
Bruce R. Kohl, Hearing Officer

Prepared by:



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**ATTORNEYS FOR RESPONDENTS**

**GEARY SECURITIES, INC., KEITH D. GEARY,**

**AND CEMP, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on February 18, 2011, a copy of the foregoing document was served on the following by certified mail, return receipt requested, by restricted delivery:

Mike Braun  
2000 South Country Club Rd.  
El Reno, OK 73036

and a copy of the foregoing document was sent to the following via email:

Melanie Hall, Director of Enforcement  
Terra Shamas Bonnell, Enforcement Attorney  
Oklahoma Department of Securities  
120 North Robinson, Suite 860  
Oklahoma City, OK 73102;

Donald A. Pape, Esq.  
Donald A. Pape, P.C.  
401 West Main Street, Suite 440  
Norman, OK 73069



Joe M. Hampton

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**OFFICIAL USE**

Postage	\$ .44	Postmark Here
Certified Fee	2.80	
Receipt Fee (Required)	2.30	
Delivery Fee (Required)	4.50	
Postage & Fees	\$ 10.04	

Mike Braun  
 2000 South Country Club Rd.  
 El Reno, OK 73036

August 2006 See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

- Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mike Braun  
 2000 South Country Club Rd.  
 El Reno, OK 73036

2. Article Number  
 (Transfer from service label) 7010 0780 0002 1469 3086

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  
 X *Mike Braun*  Agent  Addressee

B. Received by (Printed Name) C. Date of Delivery  
 2-22

D. Is delivery address different from Item 1?  Yes  No  
 If YES, enter delivery address below:

3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1541

**It Provides:**

Receipt for your mailpiece  
 Delivery kept by the Postal Service for two years

**Restrictions:**  
 May ONLY be combined with First-Class Mail® or Priority Mail®.  
 Insurance is not available for any class of international mail.

INSURANCE COVERAGE IS PROVIDED with Certified Mail. For more information, see the Reverse of this Receipt.

For a Return Receipt, a Return Receipt may be requested to provide proof of delivery. If you request a Return Receipt, please complete and attach a Return Receipt (Form 3811) to the article and add applicable postage to cover the mailpiece "Return Receipt Requested". To receive a fee waiver for a Return Receipt, a USPS® postmark on your Certified Mail receipt is required.

International fee, delivery may be restricted to the addressee or authorized agent. Advise the clerk or mark the mailpiece with the "Restricted Delivery".

For a Return Receipt, on the Certified Mail receipt is desired, please present the article to the post office for postmarking. If a postmark on the Certified Mail receipt is needed, detach and affix label with postage and mail.

Keep this receipt and present it when making an inquiry.  
 August 2006 (Reverse) PSN 7530-02-000-9047

UNITED STATES POSTAL SERVICE



First-Class Mail  
 Postage & Fees Paid  
 USPS  
 Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

Nicole Rupp  
 CORBYN HAMPTON, PLLC  
 211 North Robinson, Suite 1910  
 Oklahoma City, Oklahoma 73102

*Depo subpoena*



**EXHIBIT**  
 B

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**OFFICIAL USE**

Postage	\$ 1.61
Certified Fee	2.80
Receipt Fee (if Required)	2.30
Delivery Fee (if Required)	4.50
Postage & Fees	\$ 10.21

Postmark Here

The Bank of Union  
 Records Custodian  
 PO Box 1010  
 2000 South Country Club  
 El Reno, OK 73036

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

**1. Article Addressed to:**

The Bank of Union  
 Records Custodian  
 PO Box 1010  
 2000 South Country Club  
 El Reno, OK 73036

**2. Article Number**  
 (Transfer from service label)

7010 0780 0002 1469 3079

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  
 x *Nicole Rupp*  Agent  Addressee  
 B. Received by (Printed Name) \_\_\_\_\_ C. Date of Delivery  
 2-22

D. Is delivery address different from item 1?  Yes  No  
 If YES, enter delivery address below: \_\_\_\_\_

3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

**Provides:**

Delivery for your mailpiece  
 is guaranteed to arrive on time.  
 Delivery is guaranteed by the Postal Service for two years.

**Restrictions:**  
 Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®.  
 Certified Mail is not available for any class of international mail.

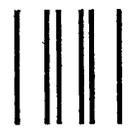
**Insurance:**  
 INSURANCE COVERAGE IS PROVIDED with Certified Mail. For more information, see the back of this receipt.  
 For insured mail, please consider Insured or Registered Mail.  
 For an additional fee, a Return Receipt may be requested to provide proof of delivery. For Return Receipt service, please complete and attach a Return Receipt (Form 3811) to the article and add applicable postage to cover the mailpiece "Return Receipt Requested". To receive a fee waiver for a Return Receipt, a USPS® postmark on your Certified Mail receipt is required.

For international delivery, delivery may be restricted to the addressee or an authorized agent. Advise the clerk or mark the mailpiece with the words "Restricted Delivery".

When the Certified Mail receipt is desired, please present the article to the post office for postmarking. If a postmark on the Certified Mail receipt is needed, detach and affix label with postage and mail.

Keep this receipt and present it when making an inquiry.  
 PSN 7530-02-000-9047

UNITED STATES POSTAL SERVICE

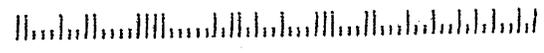


First-Class Mail  
 Postage & Fees Paid  
 USPS  
 Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

Nicole Rupp  
 CORBYN HAMPTON, PLLC  
 211 North Robinson, Suite 1910  
 Oklahoma City, Oklahoma 73102

*Subpoena Duces Tecum*



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**OFFICIAL USE**

Postage	\$ .44
Certified Fee	2.80
Receipt Fee (Required)	2.30
Delivery Fee (Required)	4.50
Postage & Fees	\$ 10.04

Postmark Here

To: John Shelley  
 2000 South Country Club Rd.  
 ZIP+4: El Reno, OK 73036

© August 2006 See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

John Shelley  
 2000 South Country Club Rd.  
 El Reno, OK 73036

2. Article Number

(Transfer from service label)

7010 0780 0002 1469 3093

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1541

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X *John Shelley*

- Agent  
 Addressee

B. Received by (Printed Name)

*John Shelley*

C. Date of Delivery

*2-22*

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type

- Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)

Yes

**Provides:**

At the time of mailing, the mailpiece is held for your mailpiece delivery by the Postal Service for two years.

**Restrictions:**

May ONLY be combined with First-Class Mail® or Priority Mail®. Not available for any class of international mail.

INSURANCE COVERAGE IS PROVIDED with Certified Mail. For other services consider Insured or Registered Mail.

When a fee is charged, a Return Receipt may be requested to provide proof of delivery. In Return Receipt service, please complete and attach a Return Receipt (Form 3811) to the article and add applicable postage to cover the mailpiece "Return Receipt Requested". To receive a fee waiver for Return Receipt, a USPS® postmark on your Certified Mail receipt is required.

When a fee is charged, delivery may be restricted to the addressee or authorized agent. Advise the clerk or mark the mailpiece with the "Restricted Delivery".

When a Return Receipt is desired, please present the article to the post office for postmarking. If a postmark on the Certified Mail receipt is desired, detach and affix label with postage and mail.

Keep this receipt and present it when making an inquiry.

Post Office (Reverse) PSN 7530-02-000-9047

UNITED STATES POSTAL SERVICE



First-Class Mail  
 Postage & Fees Paid  
 USPS  
 Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

Nicole Rupp  
 CORBYN HAMPTON, PLLC  
 211 North Robinson, Suite 1910  
 Oklahoma City, Oklahoma 73102

*Depo subpoena*



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**OFFICIAL USE**

Postage	\$ 1.61
Registered Mail Fee	2.80
Receipt Fee (required)	2.30
Delivery Fee (required)	4.50
Postage & Fees	\$ 10.21

Postmark Here

Timothy Headington  
 3515 Crescent Avenue  
 Dallas, TX 75205

August 2006 See Reverse for Instructions

**It Provides:**  
 Receipt for your mailpiece  
 Delivery kept by the Postal Service for two years

**Restrictions:**  
 May ONLY be combined with First-Class Mail® or Priority Mail®.  
 Is not available for any class of international mail.

**INSURANCE COVERAGE IS PROVIDED** with Certified Mail. For more information, see the Reverse of this receipt.

**Return Receipt:** For an additional fee, a Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (Form 3811) to the article and add applicable postage to cover the mailpiece. To receive a fee waiver for a Return Receipt, a USPS® postmark on your Certified Mail receipt is required.

**Restricted Delivery:** For an additional fee, delivery may be restricted to the addressee or authorized agent. Advise the clerk or mark the mailpiece with the "Restricted Delivery".

**Postmarking:** If a postmark on the Certified Mail receipt is desired, please present the article to the post office for postmarking. If a postmark on the Certified Mail receipt is needed, detach and affix label with postage and mail.

**Use this receipt and present it when making an inquiry.**  
 August 2006 (Reverse) PSN 7530-02-000-9047

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature <i>[Signature]</i> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) _____ C. Date of Delivery <i>2/22/11</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes                      If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p>Timothy Headington                      3515 Crescent Avenue                      Dallas, TX 75205</p>	<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input checked="" type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label)</p> <p>7010 0780 0002 1469 3062</p>	

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1541



First-Class Mail  
 Postage & Fees Paid  
 USPS  
 Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

Nicole Rupp  
 CORBYN HAMPTON, PLLC  
 211 North Robinson, Suite 1910  
 Oklahoma City, Oklahoma 73102

*Deposition subpoena and subpoena duces tecum*

