

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

IN THE DISTRICT COURT OF OKLAHOMA COUNTY NOV - 7 2012
STATE OF OKLAHOMA

PATRICIA PRESLEY, COURT CLERK
~~DEPUTY~~

Oklahoma Department of Securities,)
ex rel. Irving L. Faught, Administrator,)
)
 Plaintiff,)
)
 v.)
)
)
 2001 Trinity Fund, L.L.C. and)
 Robert Arrowood,)
)
 Defendants.)

Case No. CJ-2012-6164

**ANSWER OF DEFENDANTS 2001 TRINITY FUND, L.L.C. AND
ROBERT ARROWOOD**

Defendants 2001 Trinity Fund, L.L.C. and Robert Arrowood, for their Answer to Plaintiff's Petition for Permanent Injunction and/or Other Equitable Relief, allege and state as follows:

1. Defendants admit that the Administrator has the authority to bring this action as stated in paragraph 1 of the Petition.
2. Defendants admit that jurisdiction is proper in this Court. Defendants deny the remaining allegations of paragraph 2 of the Petition.
3. Defendants admit that venue is proper in this Court.
4. Defendants admit the allegations of paragraph 4 of the Petition.
5. Defendants admit that Defendant Robert Arrowood ("Arrowood") is an Oklahoma resident who controls Defendant 2001 Trinity Fund, L.L.C. (the "Fund"). Defendants admit that Arrowood is not registered pursuant to the Oklahoma Uniform Securities Act of 2004

(the "Act"), but deny that he is required to do so. Defendants deny the remaining allegations of paragraph 5 of the Petition.

6. Defendants deny the allegations of paragraph 6 of the Petition.

7. Defendants deny the allegations of paragraph 7 of the Petition.

8. Defendants admit that the Notes at issue in this case were offered primarily through referrals from Defendant Arrowood's personal contacts as stated, and that there are Note holders in the enumerated states. Defendants deny the remaining allegations of paragraph 8 of the Petition.

9. Defendants deny the allegations of paragraph 9 of the Petition.

10. Defendants deny the allegations of paragraph 10 of the Petition.

11. Defendants deny the allegations of paragraph 11 of the Petition.

12. Defendants deny the allegations of paragraph 12 of the Petition.

13. Defendants deny the allegations of paragraph 13 of the Petition.

14. Defendants deny the allegations of paragraph 14 of the Petition.

15. Defendants deny the allegations of paragraph 15 of the Petition.

16. Defendants deny the allegations of paragraph 16 of the Petition.

17. Defendants deny the allegations of paragraph 17 of the Petition.

18. Defendants admit that the Fund filed for bankruptcy as stated in paragraph 18 of the Petition.

19. No response is required to paragraph 19 of the Petition.

20. Defendants deny the allegations of paragraph 20 of the Petition.

21. Defendants deny the allegations of paragraph 21 of the Petition.

22. Defendants admit that the Notes are not registered under the Act, nor were such Notes entered into pursuant to an exemption from registration, but deny that any such registration or exemption was required. Defendants deny the remaining allegations of paragraph 22 of the Petition.

23. Defendants deny the allegations of paragraph 23 of the Petition.

24. No response is required to paragraph 24 of the Petition.

25. Defendants deny the allegations of paragraph 25 of the Petition.

26. Defendants admit that Defendant Arrowood is not registered as an agent as stated in paragraph 26, but deny that such registration is required.

27. Defendants deny the allegations of paragraph 27 of the Petition.

28. No response is required to paragraph 28 of the Petition.

29. Defendants deny the allegations of paragraph 29 of the Petition.

30. Defendants deny the allegations of paragraph 30 of the Petition.

Affirmative Defenses

1. Plaintiff's Petition fails to state a claim upon which relief can be granted.

WHEREFORE, premises considered, Defendants 2001 Trinity Fund, L.L.C. and Robert Arrowood pray that Plaintiff Oklahoma Department of Securities take nothing by virtue of its Petition and that the Defendants be awarded any relief deemed necessary by this Court, including the costs and fees incurred in responding to the Plaintiff's Petition.

Respectfully Submitted,

S/ BILLY BOCK

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 9th, 2012, a true and correct copy of the foregoing Answer of Defendants 2001 Trinity Fund, L.L.C. and Robert Arrowood was mailed by first-class mail, postage prepaid, to:

Shaun Mullins
Gerri Kavanaugh
Oklahoma Department of Securities
120 North Robinson, Suite 860
Oklahoma City, OK 73102

S/ BILLY BOCK

William H. Bock