

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



In the Matter of:

Jim J. Hammons,

Respondent.

ODS File 14-017

**ENFORCEMENT DIVISION'S AMENDED PRELIMINARY LISTS OF
WITNESSES, DOCUMENTS AND EXHIBITS**

The Enforcement Division of the Oklahoma Department of Securities ("Department") filed preliminary lists of witnesses, documents and exhibits in the above-styled matter on August 11, 2014. On August 14, 2014, the Enforcement Division discovered two additional witnesses and, on the same date, notified Respondent's counsel of the newly discovered witnesses and their contact information and anticipated testimony. Accordingly, the Enforcement Division files this amended preliminary witness list.

The Enforcement Division expressly reserves the right to identify and list additional witnesses on its final witness list and to exchange additional documents and exhibits pursuant to paragraph 5 of the Scheduling Order.

Amended Witness List

1. Jim Hammons, Respondent, is expected to testify regarding the Findings of Fact contained in the Enforcement Division Recommendation filed in this proceeding on April 29, 2013.

2. Thomas Jacobs, [REDACTED], is expected to testify regarding his communications, interactions, and transactions with Respondent and First Independent Advisory Services, Inc., and his investment in Reaction Force, LLC.

3. Greg Cooper, [REDACTED], is expected to testify regarding Reaction Force, LLC, and his communications, interactions and transactions with Respondent, The Center Mixed Martial Arts, LLC, Executive Black Belt Training Centers, LLC, Patricia Reynolds, and Thomas Jacobs.

4. Mike Metzger, [REDACTED]

[REDACTED] is expected to testify regarding his communications and interactions with Respondent, Thomas Jacobs, and Greg Cooper, and transactions between Reaction Force, LLC, and The Center Mixed Martial Arts, LLC.

5. Patricia Reynolds, [REDACTED]

[REDACTED] is expected to testify regarding Executive Black Belt Training Centers, LLC; the transactions among Executive Black Belt Training Centers, LLC, Reaction Force, LLC, and The Center Mixed Martial Arts, LLC; and her communications and interactions with Respondent, Thomas Jacobs and Greg Cooper.

6. Phillip Palmer, [REDACTED]

[REDACTED] is expected to testify regarding the relationships among First Independent Advisory Services, Inc., Respondent, and Thomas Jacob; documents relating to the investment advisory services provided to Thomas Jacobs; the internal investigation of Jim Hammons; and documentation submitted by First Independent Advisory Services, Inc. and/or First Independent Financial Services, Inc., to the Department in connection with its investigation into Respondent's activities.

7. Janet Tyler, [REDACTED]

[REDACTED] is expected to testify regarding her employment by Reaction Force, LLC, and Executive Black Belt Training Centers, LLC, d/b/a Martial Arts Advantage, and documentation relating to Reaction Force, LLC.

8. Cody Pepper, [REDACTED]

[REDACTED] is expected to testify regarding his interactions with Jim Hammons, Greg Cooper, and Tommy Jacobs, and business transactions between The Center Mixed Martial Arts, LLC, and Reaction Force, LLC.

9. All witnesses necessary to rebut the testimony of any witness or a document or exhibit identified on Respondent's preliminary or final witness lists or exhibit lists or offered by Respondent at hearing.

10. All witnesses identified in the Respondent's preliminary and/or final list of witnesses or called at hearing by Respondent, to the extent such witnesses' testimony is relevant, admissible, and not objected to by the Department.

Document and Exhibit List

1. All contracts, agreements and communications among Respondent, Executive Black Belt Training Centers, LLC, Patricia Reynolds, Reaction Force, LLC, Greg Cooper, Thomas Jacobs, MAES, LLC, and The Center Mixed Martial Arts, LLC.

2. All documents relating to the investment made by Thomas Jacob, through MAES, LLC, in Reaction Force, LLC.

3. Corporate registration records for Executive Black Belt Training Centers, LLC, and Reaction Force, LLC, including, but not limited to, articles of organization and operating agreements.

4. Agreed Journal Entry of Judgment entered on August 8, 2013, in *Cooper v. Hammons*, CJ-2013-01768, in the District Court of Tulsa County.

5. "Jim Hammons Internal Investigation Interview" transcript for interviews by Phillip Palmer on December 18, 2013, and January 20, 2014.

6. The Advisory Services Contract, dated March 2, 2012, among Respondent, First Independent Advisory Services, Inc., and Thomas Jacobs, and all documents relating to said contract including, but not limited to, the Account Agreement dated March 2, 2012.

7. All documents relating to Thomas Jacob's IRA at Trust Company of America.

8. Letter from Respondent to the Department dated November 26, 2013.

9. All documents submitted by Respondent to the Department on June 30, 2014, in support of his answer to the Enforcement Division Recommendation, to the extent such documents are relevant, admissible, and not objected to by the Department.

10. All documents and exhibits identified in Respondent's preliminary list of documents and exhibits to the extent such documents and exhibits are relevant, admissible, and not objected to by the Department.

11. All documents and exhibits received by the Department pursuant to paragraph 5 of the Scheduling Order dated August 6, 2014, to the extent such documents and exhibits are relevant, admissible, and not objected to by the Department.

12. All items received by the Department in connection with on-going discovery relating to this matter to the extent such documents are relevant, admissible, and not objected to by the Department.

13. All documents filed in this matter to the extent such documents are relevant, admissible, and not objected to by the Department.

14. The deposition transcript(s) of any witness who becomes unavailable.

15. Any evidence needed to impeach a witness.

16. Any document needed to refresh a witness's memory.
17. Demonstrative aids and summaries of evidence that have not yet been created.

Dated this 19th day of August, 2014.



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 19th day of August, 2014, a true and correct copy of the above and foregoing document was emailed to Respondent's counsel at perry@dentonlawfirm.com and mailed with postage prepaid thereon, addressed to:

Mr. Perry R. Tirrell, Esq.
Denton Law Firm
925 West State Highway 152
Mustang, OK 73064
Counsel for Respondent



Terra Bonnell