

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



In the Matter of:

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

Respondents.

File No. 09-141

**DEPARTMENT'S OBJECTION TO ISSUANCE OF THE REQUESTED SUBPOENA  
DUCES TECUM TO DAVID PAULUKAITIS**

The Oklahoma Department of Securities ("Department") respectfully objects to the issuance of the *Subpoena Duces Tecum* to David Paulukaitis as requested by Respondent Norman Frager ("Frager") on June 26, 2012 ("Requested Subpoena"). The Requested Subpoena is out of time pursuant to the *Final Amended Scheduling Order*, dated May 17, 2012, and the *Order Granting in part Department's Motion to Strike Witness List of Respondent Frager, Granting the Department's Motion in Limine to Exclude Testimony of Department's Counsel, and Amending the Scheduling Order*, dated June 1, 2012. The June 1<sup>st</sup> Order extended the deadline for taking Mr. Paulukaitis' deposition to July 31, 2012. The Department has agreed to voluntarily produce Mr. Paulukaitis for a deposition on July 16, 2012. The deadline for subpoenaing documents from Mr. Paulukaitis remained June 11, 2012.

For the foregoing reasons, the Department requests that the Hearing Officer deny Respondent Frager's application for issuance of the Requested Subpoena.

Respectfully,

A handwritten signature in black ink, appearing to read "Terra Shamas Bonnell". The signature is written in a cursive style and is positioned above a horizontal line.

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Melanie Hall, OBA #1209  
Terra Shamas Bonnell, OBA #20838  
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## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing objection was emailed and mailed, with postage prepaid, this 27<sup>th</sup> day of June, 2012, to:

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Terra Bonnell