

9/18/13

State of Oklahoma  
Department of Securities  
First National Center, Ste 860  
120 North Robinson  
Oklahoma City, OK 73102



Attn: Irving Faught, Administrator

FILE: 13-079

Mr. Faught

I am sending this letter to you to confirm that we are in receipt of the notice you sent to us on 9/17/13 and will immediately comply with your order to cease and desist.

I would like to express my sincere apologies for the situation at hand and express our desire and willingness to immediately address all issues raised in your letter. I must apologize that many of the errors were listed on a website that we never intended to market and was merely a template made by a web-designer for consideration. I had no idea it was still up and active. That website is being shut down immediately and the issues related to our main website are being addressed as well.

We primarily offer insurance products such as life insurance and annuities as independent agents and only have been assisting people in Oklahoma for a short period of time. We were not aware that life settlements are considered securities in Oklahoma because they are not considered securities in the state of Texas at this time. We were not informed of this by anyone until now. Thank you for making us aware of this and again we apologize and will comply.

Our reputation means a lot to us and we have worked hard to serve people correctly. Again, please accept our apologies and know that we are addressing all issues and will only offer our services in Oklahoma after first contacting your department and being approved to do so.

Sincerely,

A handwritten signature in black ink, appearing to read "Brady Speers".

Brady Speers

A handwritten signature in black ink, appearing to read "Chris Novinger".

Chris Novinger