

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



In the Matter of:

Richard W. Possett, Sr., d/b/a The Navigator Group,

Pro se Respondent

ODS File No. 11-076

**PRO SE RESPONDENT'S, RICHARD W. POSSETT, SR., RESPONSE
TO DEPARTMENT'S OBJECTION TO INCLUSION OF
DEPARTMENT ATTORNEY ON WITNESS LIST OF RESPONDENT
AND MOTION IN LIMINE TO EXCLUDE TESTIMONY OF
DEPARTMENT ATTORNEY**

TO: Mr. Irving L. Faught, Administrator
Oklahoma Department of Securities
120 North Robinson Ave, Suite 860
Oklahoma City, OK 73102
ATTENTION: Ms. Brenda London

Comes now, Respondent to answer Department's objection and motion to exclude, to wit:

1. ODOS has accused Respondent of transacting business in the State of Oklahoma as an unregistered broker-dealer and has issued a Cease and Desist Order ("Order").
2. ODOS is a direct party to the subject investigation and adjudication proceedings and Complainant is deemed a non-party witness.

3. ODOS is a non-person institution represented by people such as the Administrator and all his staff, to include Ms. Terra Shamas Bonnell, an investigation and enforcement employee.
4. For the true application of justice and equity, the Respondent should have the right to confront his accuser and because Ms. Bonnell is the investigative and enforcement employee for ODOS, she should be made available for testimony as a witness at Hearing and through oral deposition in discovery.
5. Furthermore, the ODOS Order cites certain findings of fact and conclusions in law. It is Respondent's responsibility, if not his right, to examine the evidence related to the facts and conclusions directly with the author, presumably Ms. Bonnell, an employee of ODOS.
6. Finally, the fact that Ms. Bonnell may be an attorney is incidental and irrelevant to the proceedings. As the investigating and law enforcement employee, her intimate insights and knowledge of the facts and circumstances are material and probative to all of the issues in this matter now before the Administrator.

Therefore, for the reasons stated above, and as a matter of justice and equity, the Administrator must overrule the objection and deny the Motion in Limine to Exclude Testimony.

Respectfully Submitted

Dated this 26th day of September, 2012

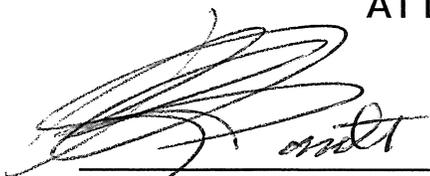


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CERTIFICATE OF SERVICE

I hereby certify that I served, on this 22nd day of September, 2012, a true and correct copy of Pro se Respondent's, Richard W. Possett, Sr., Response to Department's Objection to Inclusion of Department Attorney on Witness List of Respondent and Motion in Limine to Exclude Testimony of Department Attorney on the Administrator of the ODOS, by mailing it, first class mail, sufficient postage attached thereon to:

Mr. Irving L. Fought, Administrator
Oklahoma Department of Securities
120 North Robinson Ave, Suite 860
Oklahoma City, OK 73102
ATTENTION: Ms. Brenda London



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