

IN THE DISTRICT COURT WITHIN AND FOR OKLAHOMA COUNTY
STATE OF OKLAHOMA

OKLAHOMA DEPARTMENT OF)
SECURITIES ex rel. IRVIN L.)
FAUGHT, ADMINISTRATOR ,)
)
Plaintiff,)
)
v.)
)
DENNIS R ANDERSON,)
)
Defendant.)

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

JUN - 9 2004

PATRICIA PRESLEY, COURT CLERK
by _____
Deputy

Case No. CJ-2004-4234

**DEFENDANT'S RESPONSE TO APPLICATION FOR ORDER
ENFORCING ADMINISTRATIVE SUBPOENA DUCES TECUM**

COMES NOW the above-named Defendant, by counsel, and generally denies all allegations made except and specifically hereinafter admitted, and further respectfully makes the following response to the *Application for Order Enforcing Administrative Subpoena Duces Tecum*, filed herein by the Plaintiff, Oklahoma Department of Securities:

1. Paragraph one is admitted.
2. Paragraph two is admitted.
3. Paragraph three is a statement of law not requiring a response from the Defendant.
4. Paragraph four is admitted.
5. Paragraph five is admitted.
6. Paragraph six is admitted.
7. Paragraph seven is admitted.

8. Paragraph eight is denied. Defendant has responded and provided to the Plaintiff all documentation possessed by him or under his control pertinent to the request regarding Verma Mosier and/or "his personal life insurance program."
9. Paragraph nine is denied.
10. Paragraph ten is denied.

WHEREFORE, premises considered, the Defendant prays that the application for an order enforcing the subpoena duces tecum be denied, and that the Defendant have such other and further relief to which he may be entitled.

Respectfully submitted,



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CERTIFICATE OF SERVICE BY FIRST CLASS MAIL

The undersigned certifies that on the 9th Day of June 2004, a true and correct copy of the above and foregoing *Defendant's Response to Application for Order Enforcing Administrative Subpoena Duces Tecum* was served on REBECCA A. CRYER, ESQ. and AMANDA CORNMESSER, ESQ., Attorneys for Plaintiff, Oklahoma Department of Securities, 120 N. Robinson Suite 860, Oklahoma City OK 73102, by depositing the same in the United States Mail, first class and with sufficient postage prepaid thereon.

B. DAVID SISSON

