

COPY

IN THE DISTRICT COURT OF POTTAWATOMIE COUNTY
STATE OF OKLAHOMA

Oklahoma Department of Securities)
ex rel. Irving L. Faught,)
Administrator,)
)
Plaintiff,)
)
v.)
)
The Hickman Agency, Inc., et. al.)
)
Defendants.)

Case No C-03-1239

ANSWER

Sandra Friguletto, ("Sandra") for her answer to the First Amendment to the Petition for Permanent Injunction and Other Equitable Relief states:

INCOMPLETE PLEADINGS

1. Sandra has been served with a summons in this case and a copy of a document entitled First Amendment to the Petition for Permanent Injunction and Other Equitable Relief (the "Complaint"). Said complaint makes reference in its initial, unnumbered paragraph that it incorporates by reference Paragraphs 1 through 29 of the Petition for Permanent Injunction and Other Equitable Relief originally filed in this case (the "Original Complaint"). No copy of the Original Complaint has ever been served upon Sandra and to the best of Sandra's information and belief she is not named as a defendant in the Original Complaint. Accordingly, Sandra is incapable of answering the allegations contained in Paragraphs 1 through 29 of the Original Complaint.

OVERVIEW

2. Sandra is without sufficient information to admit or deny the allegations of Paragraph 1, of the Complaint, regarding the application of the Oklahoma Securities Act to the facts set forth in the Complaint for the reasons set forth in Paragraph 1, hereof, however, pleading further, Sandra denies any knowledge of, or participation in, any conduct or transaction of any kind which would or could be construed as a violation of the Oklahoma Securities Act or any other securities act of any other jurisdiction.

3. Sandra denies any knowledge of or participation in any conduct or transaction of any kind which could be construed as a "ponzi scheme" as alleged in paragraph 2, of the Complaint.

JURISDICTION

4. Sandra denies any knowledge of the receipt of any cash or property of any kind that could be construed as proceeds of the unlawful activities of the defendants in the Original Complaint (the "Investor Assets") as alleged in paragraph 3, of the Complaint.

RELIEF DEFENDANTS

5. The allegations of Paragraph 4, of the Complaint are not directed at Sandra and thus no answer to said allegations are required of Sandra.

6. The allegations of Paragraph 5, of the Complaint are not directed at Sandra and thus no answer to said

allegations are required of Sandra.

7. The allegations of Paragraph 6, of the Complaint are not directed at Sandra and thus no answer to said allegations are required of Sandra.

8. Sandra denies the allegations of Paragraph 7, of the Complaint.

9. The allegations of Paragraph 8, of the Complaint are not directed at Sandra and thus no answer to said allegations are required of Sandra.

NATURE OF THE CASE

10. Sandra denies the allegations of Paragraph 9, of the Complaint, insofar as said allegations are directed at Sandra.

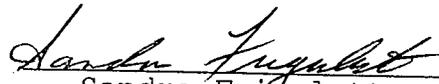
FIRST CAUSE OF ACTION AGAINST RELIEF DEFENDANTS

11. Sandra, for her answer to Paragraph 10 of the Complaint realleges and incorporates by reference her answers to Paragraphs 1 through 9 of the Complaint, which are set forth as Paragraphs 2 through 10 of this Answer. For her answer to Paragraphs 1 through 29 of the Original Complaint, which are realleged and incorporated into Paragraph 10, of the Complaint, Sandra realleges and incorporates the facts set forth at Paragraph 1, of this Answer.

12. Sandra denies the allegations of Paragraph 11, of the Complaint.

13. Sandra denies the allegations of Paragraph 12, of the Complaint.

WHEREFORE, Defendant Sandra Friguletto, prays this court for entry of its order granting judgment in favor of defendant and against plaintiff; granting judgment in favor of defendant and against plaintiff for defendant's costs of suit; and, granting such other and further relief as this court may deem proper and just


Sandra Friguletto

Sandra Friguletto
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STATE OF ILLINOIS)
) SS
DU PAGE COUNTY)

The undersigned, of lawful age, being first duly sworn deposes and says: that she is a named defendant in the foregoing pleading, that she has read the foregoing First Amendment to Petition for Permanent Injunction and Other Equitable Relief and knows the contents thereof, and that the matters and thing stated therein are true and correct to the best of her knowledge, information and belief.

Sandra Friguletto
Sandra Friguletto

Subscribed and sworn to
Before me this 17th day
of February, 2004.

Gloria Lewandowski
Notary Public

