

**IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA**

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

NOV - 4 2008

PATRICIA PRESLEY, COURT CLERK
by _____
DEPUTY

Oklahoma Department of Securities)
ex rel. Irving L. Faught,)
 Administrator,)
)
 Plaintiff,)
)
 v.)
)
 American Liberty Insurance & Financial)
 Services, an unincorporated entity;)
 LightHouse Marketing Incorporated, an)
 Oklahoma corporation; and Travis Ray)
 Winnett, an individual,)
)
 Defendants.)

Case No. CJ-2007-5605

APPLICATION FOR CITATION OF INDIRECT CONTEMPT
AGAINST TRAVIS RAY WINNETT

Plaintiff, Oklahoma Department of Securities (“Department”) *ex rel.* Irving L. Faught, Administrator, hereby charges and accuses Defendant Travis Ray Winnett (“Winnett”) of having knowingly, willfully and contemptuously disobeyed and violated this Court’s lawfully issued *Order of Repayment to Investors by Defendants.*

Background

1. On June 28, 2007, the Department filed a *Petition for Permanent Injunction and Other Equitable Relief* pursuant to Section 1-603 of the Oklahoma Uniform Securities Act of 2004 (Act), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (Supp. 2003).

2. On August 30, 2007, this Court issued an *Order of Permanent Injunction* against Winnett and ordered Winnett to pay restitution to approved claimants. A true and correct copy of the *Order of Permanent Injunction* is attached hereto as Exhibit “A.”

3. On August 30, 2007, Winnett executed a stipulation and consent (“Stipulation”), in which Winnett agreed to return all funds to participants in the Premium Funding Plans in such amounts and on such dates as subsequently determined by this Court (Repayment Schedule). A true and correct copy of the Stipulation is attached hereto as Exhibit “B”.

4. On February 20, 2008, this Court ordered Winnett to make payments according to the *Order of Repayment to Investors by Defendants* into the RCB account in the sum of One Hundred Eighteen Thousand Two Hundred Ninety-Eight Dollars and Twenty-Four Cents (\$118,298.24), a true and correct copy of which is attached hereto as Exhibit “C.” Defendants were required to pay a sum of Five Thousand Dollars (\$5,000.00) per month, to be paid no later than the first of each month beginning on April 1, 2008, and continuing to and including February 1, 2010, and a final payment of Three Thousand Two Hundred and Ninety-Eight Dollars and Twenty-Four Cents (\$3,298.24), by March 1, 2010.

5. In compliance with the *Order of Repayment to Investors by Defendants*, Winnett has deposited Twenty-Five Thousand Dollars (\$25,000) into the RCB account since March of 2008.

6. On September 11, 2008, the Parties agreed that Winnett would provide proof of his September payment to the RCB account by September 15, 2008. *See* copies of email correspondence attached hereto as Exhibit “D”.

7. On September 22, 2008, the Parties agreed that Winnett would pay the full amount owed in the *Order of Repayment to Investors by Defendants* by October 15, 2008. *See* copy of letter from Winnett attached hereto as Exhibit “E”.

Violation of Order of Permanent Injunction

8. As of October 31, 2008, Winnett has failed to pay the Five Thousand Dollars (\$5,000.00) due on September 1, 2008, the Five Thousand Dollars (\$5,000) due on October 1, 2008, and the Five Thousand Dollars (\$5,000) due on November 1, 2008, to RCB Bank in violation of the *Order of Repayment to Investors by Defendants* and in violation of the Stipulation entered into on August 30, 2007.

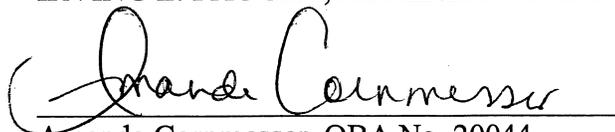
9. The conduct described herein constitutes a violation of this Court's *Order of Repayment to Investors by Defendants* and is an instance of indirect contempt of the Court.

Wherefore, the Department requests that this Court issue a citation directing Winnett to appear and show cause why he should not be held in contempt, and, after a full and complete hearing, that Winnett be adjudged guilty of indirect contempt for failure to comply with the *Order of Permanent Injunction* entered by this Court, and punished by fine, imprisonment, or both, and/or by and through such other relief as this Court deems appropriate.

Respectfully Submitted,

OKLAHOMA DEPARTMENT OF SECURITIES
IRVING L. FAUGHT, ADMINISTRATOR

By:



Amanda Cornmesser, OBA No. 20044
Oklahoma Department of Securities
120 North Robinson, Suite 860
Oklahoma City, Oklahoma 73102
Telephone (405) 280-7700

CERTIFICATE OF MAILING

The undersigned certifies that on the 4th day of November, 2008, a true and correct copy of the foregoing *Application for Citation of Indirect Contempt against Travis Ray Winnett* was mailed by first class mail, with postage prepaid thereon, to the following:

James O. Goodwin
PO Box 3267
Tulsa, OK 74101-3267
(918) 582-9181

*Attorney for American Liberty Insurance & Financial Services, LightHouse Marketing, Inc. and
Travis Ray Winnett*


Amanda Cornmesser

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
 STATE OF OKLAHOMA

FILED IN THE DISTRICT COURT
 OKLAHOMA COUNTY, OKLA.

AUG 30 2007

PATRICIA PRESLEY, COURT CLERK
 by _____ Deputy

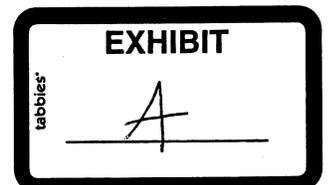
Oklahoma Department of Securities)
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 LightHouse Marketing Incorporated, an)
 Oklahoma corporation; and Travis Ray)
 Winnett, an individual,)
)
 Defendants.)

Case No. CJ-2007-5605

FINAL ORDER, JUDGMENT AND PERMANENT INJUNCTION

This matter came on for hearing this 24th day of August, 2007, before the undersigned Judge of the District Court in and for Oklahoma County, State of Oklahoma, upon Plaintiff's *Petition for Permanent Injunction and Other Equitable Relief* (Petition). The Petition was filed pursuant to Section 1-603 of the Oklahoma Uniform Securities Act of 2004 (Act), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (Supp. 2003). After a review of the pleadings and evidence, this Court finds:

On June 28, 2007, Plaintiff filed the Petition alleging that Defendants engaged, directly and/or indirectly, in the offer and sale of insurance premium funding plans through which participants were promised returns of 8% per year for five years or 10% per year for six years (Premium Funding Plans).



Defendants have executed the *Stipulation and Consent to Final Order* (Stipulation and Consent) attached hereto as Exhibit "A" and made a part hereof. Plaintiff has no objection to the terms of the Stipulation and Consent and agrees to the entry of this *Final Order, Judgment and Permanent Injunction* (Final Order).

Based on the pleadings, evidence, and the execution of the Stipulation and Consent, this Court finds that this Final Order should be entered, and therefore:

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that a permanent injunction be and is hereby entered, forever enjoining and restraining Defendants, their agents, servants, employees, assigns and all those natural persons, corporations or other business entities, directly or indirectly, acting on their behalf, under their direction and control, and/or in active concert or participation with them, who receive actual notice of this order, by personal service, facsimile or otherwise, including, but not limited to, American Liberty Funding, from offering and/or selling any security in and/or from this state for a period of five (5) years.

IT IS HEREBY FURTHER ORDERED, ADJUDGED AND DECREED that Defendants shall return all funds to participants in the Premium Funding Plans in such amounts and on such dates as subsequently determined by this Court (Repayment Schedule).

IT IS HEREBY FURTHER ORDERED, ADJUDGED AND DECREED that pending this Court's determination regarding the Repayment Schedule, the assets of Defendants remain frozen, as specified in the *Temporary Restraining Order, Order Freezing Assets and Order for Accounting* filed in this matter on June 29, 2007.

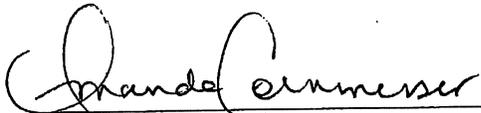
IT IS FURTHER ORDERED that this Court will retain jurisdiction of this matter for the purpose of enforcement of this Final Order and the Stipulation and Consent.

IT IS SO ORDERED.

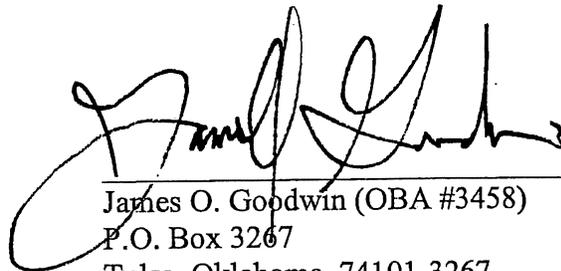
Dated this 24th day of August, 2007.

PATRICIA G. PARRISH
Patricia G. Parrish, District Judge

Approved as to form and substance:



Amanda Cornmesser (OBA #20044)
Oklahoma Department of Securities
120 North Robinson, Suite 860
Oklahoma City, Oklahoma 73102
(405) 280-7700



James O. Goodwin (OBA #3458)
P.O. Box 3267
Tulsa, Oklahoma 74101-3267
(918) 582-9181

I, PATRICIA PRESLEY, Court Clerk for Oklahoma County, Okla., hereby certify that the foregoing is a true, correct and complete copy of the instrument herewith set out as appears of record in the District Court Clerk's Office of Oklahoma County, Okla., this 30 day of August, 2007.

By  PATRICIA PRESLEY, Court Clerk
Deputy

**IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA**

Oklahoma Department of Securities)
<i>ex rel.</i> Irving L. Faught,)
Administrator,)
)
Plaintiff,)
)
v.)
)
American Liberty Insurance & Financial)
Services, an unincorporated entity;)
LightHouse Marketing Incorporated, an)
Oklahoma corporation; and Travis Ray)
Winnett, an individual,)
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Defendants.)

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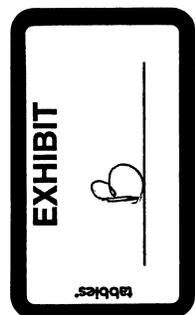
PATRICIA PRESLEY, COURT CLERK
by _____ Deputy

Case No. CJ-2007-5605

DEFENDANTS' STIPULATION AND CONSENT TO FINAL ORDER

Defendants American Liberty Insurance & Financial Services, LightHouse Marketing Incorporated, and Travis Ray Winnett (collectively, the "Defendants") hereby stipulate to the following:

1. The Oklahoma Department of Securities (Plaintiff) is the proper party to bring this action seeking the relief requested in the *Petition for Permanent Injunction and Other Equitable Relief* (Petition) filed in this matter.
2. Defendants are subject to the jurisdiction of this Court by receipt of proper service of a summons and the Petition and their appearance in this matter.
3. Defendants engaged, directly and/or indirectly, in the offer and sale of insurance premium funding plans through which participants were promised returns of 8% per year for five years or 10% per year for six years (Premium Funding Plans). The Premium Funding Plans are securities as defined by Section 1-102 of the Oklahoma



Uniform Securities Act of 2004 (Act), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (Supp. 2003).

4. Defendants acknowledge that certain participants executed agreements in connection with their participation in the Premium Funding Plans with an entity identified as "American Liberty Funding LLC" (American Liberty Funding), an entity that is not organized as a limited liability company under Oklahoma law.

5. Plaintiff has alleged that Defendants engaged in violations of the Act in connection with the offer and/or sale of securities, in and/or from the state of Oklahoma. Specifically, Plaintiff has alleged that Defendants offered and sold unregistered securities, failed to register as an agent, employed at least one unregistered agent, and/or perpetrated a fraud in connection with the offer, sale or purchase of a security.

6. Defendants, without admitting or denying the allegations in the Petition, acknowledge that they do not contest the application of the Act to the issuance, offer and/or sale of the Premium Funding Plans.

7. Defendants agree not to take any action or to make or permit to be made any public statement denying, directly or indirectly, any allegation in the Petition or creating the impression that the Petition is without factual basis. Nothing in this provision affects Defendants: (a) testimonial obligations in any matter; or (b) right to take legal or factual positions in litigation in which Plaintiff is not a party.

Defendants hereby undertake as follows:

1. Defendants consent to the entry of the *Final Order, Judgment and Permanent Injunction* (Final Order), in the form attached as Exhibit "A" hereto.

2. Defendants agree that the terms of the Final Order and this Stipulation and Consent shall apply to American Liberty Funding.

3. Defendants state that this Stipulation and Consent is entered into voluntarily and that no threat or promise of immunity of any kind has been made by Plaintiff, the Administrator of the Oklahoma Department of Securities, or any employee of the Oklahoma Department of Securities, to induce Defendants to enter this Stipulation and Consent.

4. Defendants waive any right to appeal from the Final Order.

5. Defendants agree that the provisions of this Stipulation and Consent shall be incorporated by reference into the Final Order as though set forth in full therein.

6. Defendants agree to return all funds to participants in the Premium Funding Plans in such amounts and on such dates as subsequently determined by this Court (Repayment Schedule).

7. Defendants agree that pending this Court's determination regarding the Repayment Schedule, the assets of Defendants will continue to be frozen, as specified in the *Temporary Restraining Order, Order Freezing Assets and Order for Accounting* filed in this matter on June 29, 2007.

8. Defendants agree that this Court will retain jurisdiction of this matter for the purpose of enforcement of the Final Order and this Stipulation and Consent.

9. Defendants understand that Plaintiff will take action as authorized by law including, but not limited to, an enforcement action under the Act, for Defendants' failure to comply with the terms of the Final Order and this Stipulation and Consent in any material respect or for any future violation of the Act.

10. Defendants agree to the presentation of this Stipulation and Consent and the Final Order, to the Court to be entered without further notice to them.

IN WITNESS WHEREOF, Defendants have executed this Stipulation and Consent as of the date and year set forth below their signatures hereto.

American Liberty Insurance & Financial Services

By: 
Travis R. Winnett

Date: 8-16-07

LightHouse Marketing Incorporated


Travis R. Winnett, President

Date: 8-16-07

Travis R. Winnett, individually


Travis R. Winnett

Date: 8-16-07

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IN THE DISTRICT COURT OF OKLAHOMA COUNTY FEB 20 2008
STATE OF OKLAHOMA

PATRICIA PRESLEY, COURT CLERK
by BBPW

Oklahoma Department of Securities)
ex rel. Irving L. Faught,)
Administrator,)

Plaintiff,)

v.)

Case No. CJ-2007-5605

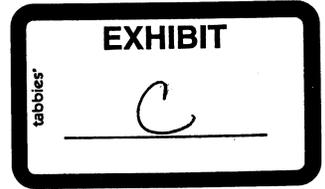
American Liberty Insurance & Financial)
Services, an unincorporated entity;)
LightHouse Marketing Incorporated, an)
Oklahoma corporation; and Travis Ray)
Winnett, an individual,)

Defendants.)

ORDER OF REPAYMENT TO INVESTORS BY DEFENDANTS

This matter came on for hearing this 20 day of Feb, 2008, for an order establishing the terms of the repayment ordered by this Court against Defendants American Liberty Insurance & Financial Services, LightHouse Marketing Incorporated, and Travis Ray Winnett (collectively, the "Defendants") on August 30, 2007. The Court, having reviewed all of the evidence offered and the Court file, and being advised that all parties agree to the entry of this Order, finds as follows:

1. On June 28, 2007, Plaintiff filed the Petition alleging that Defendants engaged, directly and/or indirectly, in the offer and sale of insurance premium funding plans through which participants (Investors) were promised returns of 8% per year for five years or 10% per year for six years (Premium Funding Plans).



2. On August 30, 2007, Defendants agreed to a *Stipulation and Consent to Final Order* (Stipulation and Consent) and the entry of a *Final Order, Judgment and Permanent Injunction* (Final Order).

3. On August 30, 2007, this Court ordered that Defendants return Investor funds in a sum to be determined.

4. The total amount of claims submitted by Investors known to Plaintiff total \$704,000. The Defendants' current RCB bank balances are \$585,701.76. This money will be distributed to Investors pursuant to an order by this Court.

5. The difference owed to Investors is One Hundred Eighteen Thousand Two Hundred and Ninety-Eight Dollars and Twenty-Four Cents (\$118,298.24) which Defendants agree to pay over a two (2) year period as follows:

a) a sum of Five Thousand Dollars (\$5,000.00) per month, to be paid no later than the first of each month beginning on the 1st day of April, 2008, and continuing to and including February 1, 2010; and

b) a final payment of Three Thousand Two Hundred and Ninety-Eight Dollars and Twenty-Four Cents (\$3,298.24), by the 1st day of March, 2010.

6. Defendants agree to make payments directly to Account #110002070 at RCB Bank. Defendants agree to provide documentation to the Department evidencing the payments made by mailing a copy to the Oklahoma Department of Securities, 120 N. Robinson, Ste. 860, Oklahoma City, OK 73102, within 5 days of each deposit to the RCB Bank account.

7. In the event that the Defendants are unable to make a payment on or before the 1st of any month, they will have ten (10) calendar days to make the payment without penalty.

8. 8. Defendants agree that failure to make a required payment pursuant to the terms of this Order will be a violation of this Order and constitute contempt of court.

Therefore, based on the evidence reviewed, the Court orders the following:

IT IS HEREBY FURTHER ORDERED, ADJUDGED AND DECREED that Defendants shall return \$118,298.24 to Investors by payments of Five Thousand Dollars (\$5,000.00) per month, to be paid beginning on the 1st day of April, 2008, and continuing to and including February 1, 2010; and a final payment of Three Thousand Two Hundred and Ninety-Eight Dollars and Twenty-Four Cents (\$3,298.24), by the 1st day of March, 2010.

IT IS HEREBY FURTHER ORDERED, ADJUDGED AND DECREED Defendants make payments directly to Account #110002070 at RCB Bank. Defendants agree to provide documentation to the Department evidencing the payments made by mailing a copy to the Oklahoma Department of Securities, 120 N. Robinson, Ste. 860, Oklahoma City, OK 73102, within 5 days of each deposit to the referenced RCB Bank account.

IT IS HEREBY FURTHER ORDERED, ADJUDGED AND DECREED that in the event that Defendants are unable to make a payment on or before the 1st of any month, they will have ten (10) calendar days to make the payment without penalty.

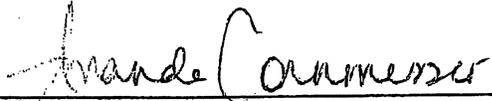
IT IS FURTHER ORDERED, ADJUDGED AND DECREED that failure to make a required payment pursuant to the terms of this Order will be a violation of this Order and constitute contempt of court.

THIS ORDER IS ENTERED this 10 day of Feb, 2008.

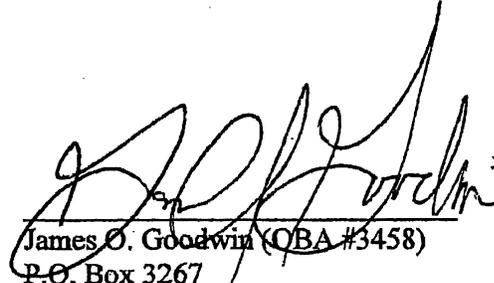
PATRICIA G. PARRISH

DISTRICT COURT JUDGE

Approved as to form and substance:



Amanda Cornmesser (OBA #20044)
Oklahoma Department of Securities
120 North Robinson, Suite 860
Oklahoma City, Oklahoma 73102
(405) 280-7700
Attorney for Plaintiff



James O. Goodwin (OBA #3458)
P.O. Box 3267
Tulsa, Oklahoma 74101-3267
(918) 582-9181
Attorney for Defendants

Amanda Cornmesser

From: Amanda Cornmesser
Sent: Monday, September 15, 2008 2:46 PM
To: 'Jim Goodwin'
Subject: RE: Bank records

Jim, As a courtesy, I have given Mr. Winnett some additional time to provide proof of his payment. Please send the proof of payment by the end of the day. Thank you, Amanda Cornmesser

From: Jim Goodwin [mailto:jgoodwin@theoklahomaeagle.net]
Sent: Thursday, September 11, 2008 4:25 PM
To: Amanda Cornmesser
Subject: Re: Bank records

Amanda: Sorry I did not get back to you yesterday. Mr. Winnett said he had to contact the bank yesterday and was told it would take approximately two days for him to get the records. He said he thought he had the records but after an exhaustive search he had to contact the bank.

As far as the payment is concerned he is expecting to pay it immediately. He was awaiting payment himself on a receivable. I ask that you delay action at least until Monday .

On 9/11/08 2:00 PM, "Amanda Cornmesser" <acornmesser@securities.ok.gov> wrote:

Jim, It is now September 11th and I still have not received the requested bank records nor proof of the September payment from Mr. Winnett. If I don't receive proof of the September payment by the end of the day tomorrow, I will have to file a motion with the court. This is the second month in a row that Mr. Winnett has not provided timely proof. I understand that he is ill this week, but I did not receive the payment last week when it was due.

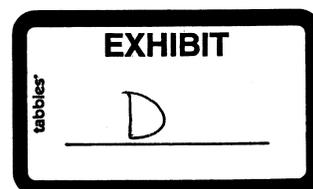
Amanda

From: Jim Goodwin [mailto:jgoodwin@theoklahomaeagle.net]
Sent: Tuesday, September 09, 2008 3:13 PM
To: Amanda Cornmesser
Subject: Re: Bank records

Amanda: I've been unable to get the information today. Mr. Winnett is ill with high temperature ,confined to bed last communication I had with him. Will try to respond tomorrow to your request

On 9/8/08 2:24 PM, "Amanda Cornmesser" <acornmesser@securities.ok.gov> wrote:
Jim, Please also provide proof of Mr. Winnett's September 1st payment. This is the second month in a row that the Department has not received a timely notice of payment. Thank you, Amanda

From: Jim Goodwin [mailto:jgoodwin@theoklahomaeagle.net] <mailto:jgoodwin@theoklahomaeagle.net%5d>
Sent: Tuesday, September 02, 2008 3:54 PM
To: Amanda Cornmesser
Subject: FW: Bank records



I will forward the other info you requested tomorrow when I receive it from Mr. Winnett

----- Forwarded Message

From: Jim Goodwin <jgoodwin@theoklahomaeagle.net>
Date: Wed, 27 Aug 2008 15:15:18 -0500
To: Amanda Cornmesser <acornmesser@securities.ok.gov>
Conversation: Bank records
Subject: Bank records

I trust this transmission is sufficient. Please advise if not.

----- Forwarded Message

From: Travis Winnett <Travis@safeharborfinancial.net>
Date: Wed, 27 Aug 2008 14:36:19 -0500
To: "jgoodwin@theoklahomaeagle.net" <jgoodwin@theoklahomaeagle.net>
Conversation: Bank Records
Subject: FW: Bank Records

Jim,

I have attached the XL doc with explanation of all unexplained transactions concerning Safe Harbor. I also have attached it to this forwarded email from 3/26/2008 containing the so called missing November docs.

Respectfully,

Travis R. Winnett
Safe Harbor Financial Group Inc.
214 South Neosho Blvd, Suite B,
Neosho, Missouri 64850
417-451-0800 Office
918-407-3686 Cell

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From: Travis Winnett
Sent: Wednesday, March 26, 2008 3:30 PM
To: jseay@theoklahomaeagle.net
Subject: Bank Records

Bank Records,

Respectfully,

10/30/2008

Travis R. Winnett
Safe Harbor Financial Group Inc.
214 South Neosho Blvd, Suite B,
Neosho, Missouri 64850
417-451-0800 Office
918-407-3686 Cell

----- End of Forwarded Message

----- End of Forwarded Message

September 22, 2008

Dear Ms. Cornmesser,

Please accept this formal request to retire the debt by October 15, 2008. Thank you for your efforts and grace in this matter. I look forward to your response regarding this matter.



Travis R. Winnett

