

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

OKLAHOMA DEPARTMENT OF)
SECURITIES EX REL. IRVING)
FAUGHT, ADMINISTRATOR,)
)
Plaintiff,)

SEP 18 2009

PATRICIA PRESLEY, COURT CLERK
by _____ DEPUTY

v.)

Case No. CJ-2009-2773
Judge: Gurich, Noma D.

GLOBAL WEST FUNDING, LTD.,)
Co., an Oklahoma limited liability)
company; GLOBAL WEST FINANCIAL)
LLC, an Oklahoma limited liability)
Company; SURE LOCK FINANCIAL,)
LLC, an Oklahoma limited liability)
Company; SURE LOCK LOANS LLC,)
Oklahoma limited liability company; THE)
WAVE-GOLDMADE, LTD., an)
unincorporated association; BRIAN)
MCKYE, an individual; JOE DON)
Johnson, an individual; JAMES)
FARNHAM, an individual,)

Defendants.)

and)

HERITAGE ESTATE SERVICE,)
LLC, an Oklahoma limited liability)
company,)

Relief Defendant.)

**SPECIAL MASTER’S MOTION FOR AN ORDER GRANTING SPECIFIC
AUTHORITY TO SELL TRAILER AND ESTABLISHING DEADLINE FOR
BRIAN MCKYE TO REMOVE PROPERTY FROM LEASED PREMISES**

Stephen J. Moriarty ("Special Master") the Court appointed Special Master for
GLOBAL WEST FUNDING, LTD., Co., an Oklahoma limited liability company; GLOBAL
WEST FINANCIAL LLC, an Oklahoma limited liability company; SURE LOCK FINANCIAL,

LLC, an Oklahoma limited liability company; SURE LOCK LOANS LLC, an Oklahoma limited liability company; THE WAVE-GOLDMADE, LTD., an unincorporated association; and BRIAN MCKYE, an individual (all collectively referred to as “McKye and the Companies”) moves the Court for the entry of an Order (a) granting specific authority to sell a certain trailer and (b) establishing a deadline for Brian McKye to remove property from the leased premises. In support of the Motion, the Special Master represents as follows:

Factual Background

1. On April 1, 2009, this Court entered its Order Appointing Special Master and Approving Waiver of Special Master's Bond. Pursuant to the Order, the Special Master was given full authority to “operate and manage all assets” of the Companies. Further, Special Master was given the authority to “take immediate custody, possession, and control of any and all assets” of the Companies.

2. On May 19, 2009, Special Master filed a Motion seeking authority to sell certain assets of McKye and the Companies; a copy of the Motion is attached as Exhibit “A” hereto.

3. On June 12, 2009, the Court entered an Order granting Special Master the authority to sell certain assets of McKye and the Companies; a copy of the Order is attached hereto as Exhibit “B”.

4. Special Master believes the Order of June 12, 2009 grants him the authority to sell a certain trailer located at 2000 N.W. 39th Street, Oklahoma City, Oklahoma. McKye believes the trailer to be his own separate property and demands possession of the trailer. Pictures of the trailer in question are attached hereto as Exhibit “C”.

5. On June 2, 2009, McKye filed a Motion to Retrieve Personal Effects and request Court to Direct Special Master to Return Personal Mail (the “McKye Motion to Retrieve

Personal Property”). Pursuant to the McKye Motion to Retrieve Personal Property, McKye requested that he be allowed to retrieve his personal effects, property, papers, software, bedding, linens, etc..”

6. On June 11, 2009, Special Master filed his Response to the McKye Motion to Retrieve Personal Property. Special Master did not object to the return of personal items of nominal value, but objected to the return of property of value as inconsistent with this Court’s Order of April 1, 2009.

7. On July 13, 2009, the Court held hearings on a number of pending Motions, including the McKye Motion to Retrieve Personal Property. The transcript of that hearing provides, in part, as follows:

THE COURT: And Mr. McKye, regarding personal effects, have you come up with any sort of list to tell the Special Master what it is that you want?

MR. MCKYE: Well, I said, beds, linens and clothing, and like a dresser, several dressers. All of my personal belongings at the corporate office. And I did maintain a cot at each of the stores, or a futon, I should say. So I have like a microwave, items at corporate far outnumber each of the stores. So all I’m asking for access to is my bedding in the stores and like my microwave and you know, towels and things like that. And then at corporate, it’s too numerous to mention.

THE COURT: Is there a possibility of setting up an appointment for Mr. McKye to come to corporate?

MR. MORIARTY: That would be fine, Your Honor.

THE COURT: All right. Why don’t I just leave it to the two of you then to work out a mutually agreeable time for you to appear and point out the items you wish to retrieve, and perhaps bring some kind of vehicle with you to take away things at that point if you can. And then, if there is anything left, you all can make arrangements to pick up. Would that work?

MR. MCKYE: If Your Honor sustains my motion, do you want me to put together an approved order for your signature?

THE COURT: That would be fine. And I’ll show your motion sustained. And I’ll let you draft something and perhaps provide it to the Special Master and you all

can work something out. I'm also suggesting that you go ahead at the quickest possible time to go arrange to meet with him at the office so you can retrieve whatever it is you want to retrieve. All right.

Transcript, page 16, line 20 through page 18, line 2.

8. On July 31, 2009, Special Master sent a letter to McKye stating McKye had failed to provide a list of his personal effects and failed to contact the Special Master to set up an appointment to identify his personal effects, as requested by the Court on July 13, 2009. McKye did not respond to the letter.

9. On August 5, 2009, in the middle of the closing of the sale to Your Credit, Inc., McKye showed up at the corporate office. He presented Special Master with a proposed Order regarding the McKye Motion to Retrieve Personal Property. Special Master told McKye he could agree to the proposed Order insofar as it directed the Special Master to forward personal mail and deliver identified personal items and papers, but could not agree to deliver certain trailers and tools not specifically requested in the Motion to Retrieve Personal Property, not described to the Court by McKye in the hearing on July 13, 2009 and not previously identified to the Special Master by McKye. At the same time, Special Master asked Mr. McKye to walk through the corporate office to identify items he claimed as personal property. McKye refused.

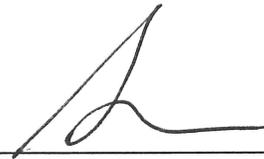
10. On September 3, 2009, Special Master, Nancy Shields (the landlord for the 39th Street property), Jim Buchanan (Mrs. Shield's broker) and Brian McKye met at 2000 N.W. 39th Street, Oklahoma City, Oklahoma for the express purpose of McKye identifying and removing his personal property. At that time, McKye did not remove any property.

11. Attached hereto as Exhibit "D" are pictures of the contents located at 2000 N.W. 39th Street, Oklahoma City, Oklahoma believed to be the property that McKye claims as his personal property. Special Master has no objection to the removal by McKye of the property

pictured in Exhibit "D". Landlord has no objection to the removal by McKye of the property pictured in Exhibit "D".

12. Landlord has requested that Special Master seek the establishment of a deadline by which McKye must remove any claimed personal property from 2000 N.W. 39th Street, Oklahoma City, Oklahoma so the property can be made ready to be re-leased.

WHEREFORE, the Special Master respectfully requests that the Court enter an order (a) granting specific authority to sell the trailer pictured at Exhibit "C" and (b) establishing a deadline for Brian McKye to remove from the leased premises the personal property pictured at Exhibit "D" and (c) for such other and further relief as this Court deems just and proper.



STEPHEN J. MORIARTY (OBA #6410)
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BAILEY & TIPPENS, P.C.
100 North Broadway, Suite 1700
Oklahoma City, OK 73102
Phone: 405-232-0621
Fax: 405-232-9659
E-mail: smoriarty@fellerssnider.com

SPECIAL MASTER

NOTICE OF HEARING

Please be advised that a hearing on the foregoing Motion has been set for 1:30
p.m. on the 30th day of September, 2009 before the Honorable Noma D. Gurich.

CERTIFICATE OF MAILING

This is to certify that on the 17th day of September, 2009, the foregoing was sent by U.S. Mail, first class, postage prepaid to:

Patricia A. Labarthe, Esq.
Jennifer Shaw, Esq.
Oklahoma Department of Securities
120 N. Robinson, Suite 860
Oklahoma City, OK 73102

R. Scott Adams, Esq.
Adams & Associates, P.C.
204 North Robinson
Twenty-Fifth Floor
Oklahoma City, OK 73102

Brian McKye
P.O. Box 957
Jay, OK 74346



Stephen J. Moriarty

499580.1

EXHIBIT "A"
SPECIAL MASTER'S MOTION FOR
AN ORDER TO ESTABLISH PROCEDURES
FOR THE SALE OF CERTAIN PROPERTY

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

MAY 19 2009

PATRICIA PRESLEY, COURT CLERK
by _____
DEPUTY

OKLAHOMA DEPARTMENT OF)
SECURITIES EX REL. IRVING)
FAUGHT, ADMINISTRATOR,)

Plaintiff,)

v.)

Case No. CJ-2009-2773
Judge: Gurich, Noma D.

GLOBAL WEST FUNDING, LTD.,)
Co., an Oklahoma limited liability)
company; GLOBAL WEST FINANCIAL)
LLC, an Oklahoma limited liability)
Company; SURE LOCK FINANCIAL,)
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Company; SURE LOCK LOANS LLC,)
Oklahoma limited liability company; THE)
WAVE-GOLDMADE, LTD., an)
unincorporated association; BRIAN)
MCKYE, an individual; JOE DON)
Johnson, an individual; JAMES)
FARNHAM, an individual,)

Defendants.)

and)

HERITAGE ESTATE SERVICE,)
LLC, an Oklahoma limited liability)
company,)

Relief Defendant.)

**SPECIAL MASTER'S MOTION FOR AN ORDER TO ESTABLISH PROCEDURES
FOR THE SALE OF CERTAIN PROPERTY**

Stephen J. Moriarty ("Special Master") the Court appointed Special Master for
GLOBAL WEST FUNDING, LTD., Co., an Oklahoma limited liability company; GLOBAL
WEST FINANCIAL LLC, an Oklahoma limited liability company; SURE LOCK FINANCIAL,

LLC, an Oklahoma limited liability company; SURE LOCK LOANS LLC, an Oklahoma limited liability company; THE WAVE-GOLDMADE, LTD., an unincorporated association; and BRIAN MCKYE, an individual (all collectively referred to as "Companies") moves the Court for the entry of an Order establishing procedures for the sale of certain property of the Companies. In support of the Motion, the Special Master represents as follows:

Factual Background

1. On April 1, 2009, this Court entered its Order Appointing Special Master and Approving Waiver of Special Master's Bond. Pursuant to the Order, the Special Master was given full authority to "operate and manage all assets" of the Companies. Further, Special Master was given the authority to "take immediate custody, possession, and control of any and all assets" of the Companies.

2. The major assets of the Companies consist of (a) the loan portfolio of Sure Lock Loans, LLC and the related assets associated with the operation of Sure Lock's lending offices located at (i) 2000 NW 39th Street, Oklahoma City, OK 73118, (ii) 1958 NW 10th Street, Oklahoma City, OK 73106, (iii) 108 S. Rockwell, Suite B, Oklahoma City, OK 73127, (iv) 2308 S. Air Depot Blvd., Midwest City, OK 73110, (v) 4844 S. Elwood Ave, Tulsa, OK 74126, (vi) 2110 Steve Owens Blvd, Miami, OK 74354, and (vii) 8916 Highway 59, Grove, OK 74344 (the "Sure Lock Assets") and (b) certain accounts purchased from Heritage Estate Service, LLC (the "Heritage Assets").

3. By motion, the Special Master has sought authority to sell (a) the Sure Lock Assets and (b) the Heritage Assets (collectively, the "Assets"). The Special Master has determined that a sale of the Sure Lock Assets and the Heritage Assets is in the best interests of the Companies and their creditors. A hearing on this motion is set for May 21, 2009.

4. At the request of Special Master, McKye furnished a Balance Sheet detailing the assets of the Companies; a copy of the Balance Sheet is attached hereto as Exhibit "A".

5. To the extent the assets identified on Exhibit "A" are owned by the Companies and are not included in the proposed sale of the Sure Lock Assets and the Heritage Assets (such assets being defined as the "Other Property"), Special Master seeks permission of this Court to conduct a public auction or auctions of the Other Property, on reasonable notice. Special Master asks that he be given discretion, after consultation with appropriate professionals, to determine appropriate notice and advertisement of such an auction or auctions.

6. Special Master will file a written report with the Court detailing all sales and any proceeds of such sales will be deposited by Special Master awaiting further Order of this Court.

WHEREFORE, the Special Master respectfully requests that the Court enter an order approving the process for sale of the Other Property on the terms and conditions set forth herein and for such other and further relief as this court deems just and proper.



STEPHEN J. MORIARTY (OBA #6410)
FELLERS, SNIDER, BLANKENSHIP,
BAILEY & TIPPENS, P.C.
100 North Broadway, Suite 1700
Oklahoma City, OK 73102
Phone: 405-232-0621
Fax: 405-232-9659
E-mail: smoriarty@fellerssnider.com

SPECIAL MASTER

NOTICE OF HEARING

Please be advised that a hearing on the foregoing Motion has been set for 10:00
A.m. on the 12th day of ~~May~~ June, 2009 before the Honorable Noma D. Gurich.

CERTIFICATE OF MAILING

This is to certify that on the 19th day of May, 2009, the foregoing
was sent by U.S. Mail, first class, postage prepaid to:

Patricia A. Labarthe, Esq.
Jennifer Shaw, Esq.
Oklahoma Department of Securities
120 N. Robinson, Suite 860
Oklahoma City, OK 73102

Clell I. Cunningham, III
Dunn, Swan & Cunningham, P.C.
2800 Oklahoma Tower
210 Park Avenue
Oklahoma City, OK 73102

Richard L. Rose
Mahaffey & Gore, P.C.
300 N.E. 1st Street
Oklahoma City, OK 73104

R. Scott Adams, Esq.
Adams & Associates, P.C.
204 North Robinson
Twenty-Fifth Floor
Oklahoma City, OK 73102

Robert G. McCampbell, Esq.
Kristin L. Huffaker, Esq.
Crowe & Dunlevy
20 North Broadway
Suite 1800
Oklahoma City, OK 73102

RECEIVED
OKLAHOMA DEPT.
OF SECURITIES
MAY 20 3:14

James Farnham
6308 N. Harvard Avenue
Oklahoma City, OK 73122



Stephen J. Moriarty

485050.1

EXHIBIT "A"

SPECIAL MASTER HAS RELIED ON THE COMPANIES EXISTING BOOKS AND RECORDS FOR SOME OF THE INFORMATION CONTAINED HEREIN. NOTHING CONTAINED HEREIN SHOULD BE CONSTRUED AS A REPRESENTATION BY SPECIAL MASTER. NOTHING HEREIN SHOULD BE CONSTRUED AS AN ADMISSION BY SPECIAL MASTER. AS SPECIAL MASTER'S INVESTIGATION IS ONGOING, ALL INFORMATION CONTAINED HEREIN IS PRELIMINARY AND SUBJECT TO REVISION.

Balance Sheet

03/23/2009

ASSETS:

Cash on hand: (as of 01/15/09)	210,000.00
ACH's on hand (30days Wire):	425,000.00
Sure Lock Loans Receivables:	540,400.00
Global West Funding Receivables:	483,600.00

Equity:

Stores Net Income (2yrs):	574,800.00
GWF Net Income (2yrs):	237,500.00

Intellectual Property:

104 Domains (Cost Basis):	2,088.00
4 ADT Licenses (Cost Basis):	4,800.00
2 Producing Web sites (2yrs):	15,000.00
1 Cutmy mortgage application (cost basis):	33,000.00
1 Processmart Choices Contract (cost basis):	38,000.00
28 Popular call 800 numbers (cost basis):	4,700.00

Licenses:

9 State Oklahoma Lending Licenses:	9,000.00
3 Money Gram Licenses:	1,900.00
3 FSS Software Licenses:	7,200.00

Personal Property:

1 1990 Bounder 40' (cost basis):	15,000.00
1 1996 Mini Winabago (Cost basis):	6,000.00
3 Trucks Fleet: (cost basis):	6,000.00
1 Caddy (cost basis):	1,800.00
1 Suburban (cost basis):	1,200.00

Real Estate:

2308 S Air Depot (cost basis):	138,000.00
54000 E 340 Rd (cost basis):	15,000.00

Aircraft:

1980 Grumman A1AB:	18,500.00
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Supplies:

Furniture & Fixtures (Store):	28,000.00
Furniture & Fixtures (Corporate):	41,900.00
9 "Credit cubble" Machines (cost basis):	36,000.00
3 Studio Trailers (Cost Basis):	27,000.00
1 Display Trailer (Cost Basis):	4,700.00
1 Car Hauler (Cost Basis):	2,700.00
5 "Breezy Money" Machines:	35,000.00
<u>Totals:</u>	2,764,780.00

EXHIBIT "B"
ORDER GRANTING
MOTION OF SPECIAL MASTER TO
ESTABLISH PROCEDURES FOR THE SALE
OR DISTRIBUTION OF CERTAIN PROPERTY

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

JUN 12 2009

PATRICIA PRESLEY, COURT CLERK
by _____
DEPUTY

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

OKLAHOMA DEPARTMENT OF)
SECURITIES *EX REL.* IRVING)
FAUGHT, ADMINISTRATOR,)

Plaintiff,)

v.)

Case No. CJ-2009-2773
Judge: Gurich, Noma D.

GLOBAL WEST FUNDING, LTD.,)
Co., an Oklahoma limited liability)
company; GLOBAL WEST FINANCIAL)
LLC, an Oklahoma limited liability)
Company; SURE LOCK FINANCIAL,)
LLC, an Oklahoma limited liability)
Company; SURE LOCK LOANS LLC,)
Oklahoma limited liability company; THE)
WAVE-GOLDMADE, LTD., an)
unincorporated association; BRIAN)
MCKYE, an individual; JOE DON)
Johnson, an individual; JAMES)
FARNHAM, an individual,)

Defendants.)

and)

HERITAGE ESTATE SERVICE,)
LLC, an Oklahoma limited liability)
company,)

Relief Defendant.)

**ORDER GRANTING MOTION OF SPECIAL MASTER TO ESTABLISH
PROCEDURES FOR THE SALE OR DISPOSITION OF CERTAIN PROPERTY**

Comes on for hearing on the Motion of Stephen J. Moriarty ("Special Master"), the Court appointed Special Master for Global West Funding, Ltd., Co., an Oklahoma limited liability company, Global West Financial LLC, an Oklahoma limited liability company, Sure Lock

Financial, LLC, an Oklahoma limited liability company, Sure Lock Loans, LLC, an Oklahoma limited liability company, The Wave-Goldmade, Ltd., an unincorporated association, and Brian McKye, an individual (all collectively referred to as "Companies") for an Order establishing procedures for the sale or disposition of certain property (the "Other Property") of the Companies and it appearing that the Motion was duly served, no written objections to the Motion have been filed, and that good cause exists for the granting of said Motion.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that Special Master is given discretion to determine whether a private sale or public auction of the Other Property is in the best interest of creditors and to hold such a sale or sales of the Other Property.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Special Master is hereby authorized to move the business records of the Companies to 100 North Broadway, Suite 1700, Oklahoma City, Oklahoma or such other place as Special Master deems appropriate.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Special Master is hereby given the authority to dispose of all items not sold that do not constitute business records of the Companies.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Special Master shall file a written report of any sale of property authorized by this Order within five (5) days of said sale.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that any proceeds of any sale authorized by this Order shall be placed by Special Master in a segregated bank account awaiting further Order of this Court.

Dated this 12 day of June, 2009.

Yoma W. Grew
DISTRICT JUDGE

APPROVED:



Stephen J. Moriarty, OBA # 6410
FELLERS, SNIDER, BLANKENSHIP,
BAILEY & TIPPENS, P.C.
100 North Broadway, Suite 1700
Oklahoma City, OK 73102
Phone: 405.232.0621
Fax: 405.232.9659
E-mail: smoriarty@fellerssnider.com

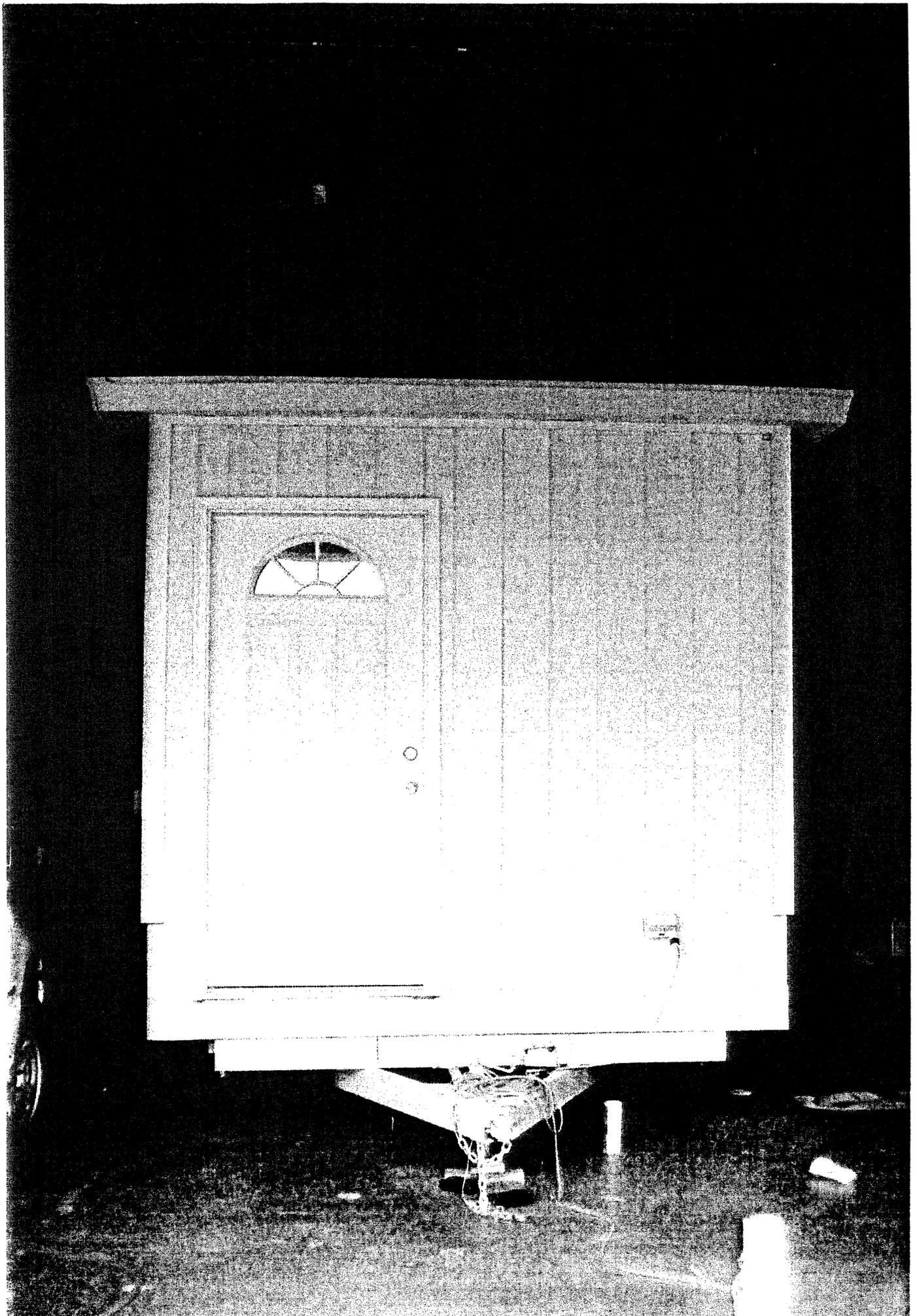
SPECIAL MASTER

487612
Jennifer Shaw

Jennifer Shaw, CBA 20839
Oklahoma Dept. of Sec.

I, Patricia Presley, Court Clerk for Oklahoma
County, Okla., do hereby certify that the foregoing is a
true, correct and complete copy of the instrument
herewith set out in _____ of record in the District
Court Clerk's Office at Oklahoma County, Okla.,
this 12 day of June, 2009
by Patricia Presley, Court Clerk
Deputy

EXHIBIT "C"
TWO PICTURES OF
TRAILER LOCATED AT 2000 N.W. 39TH



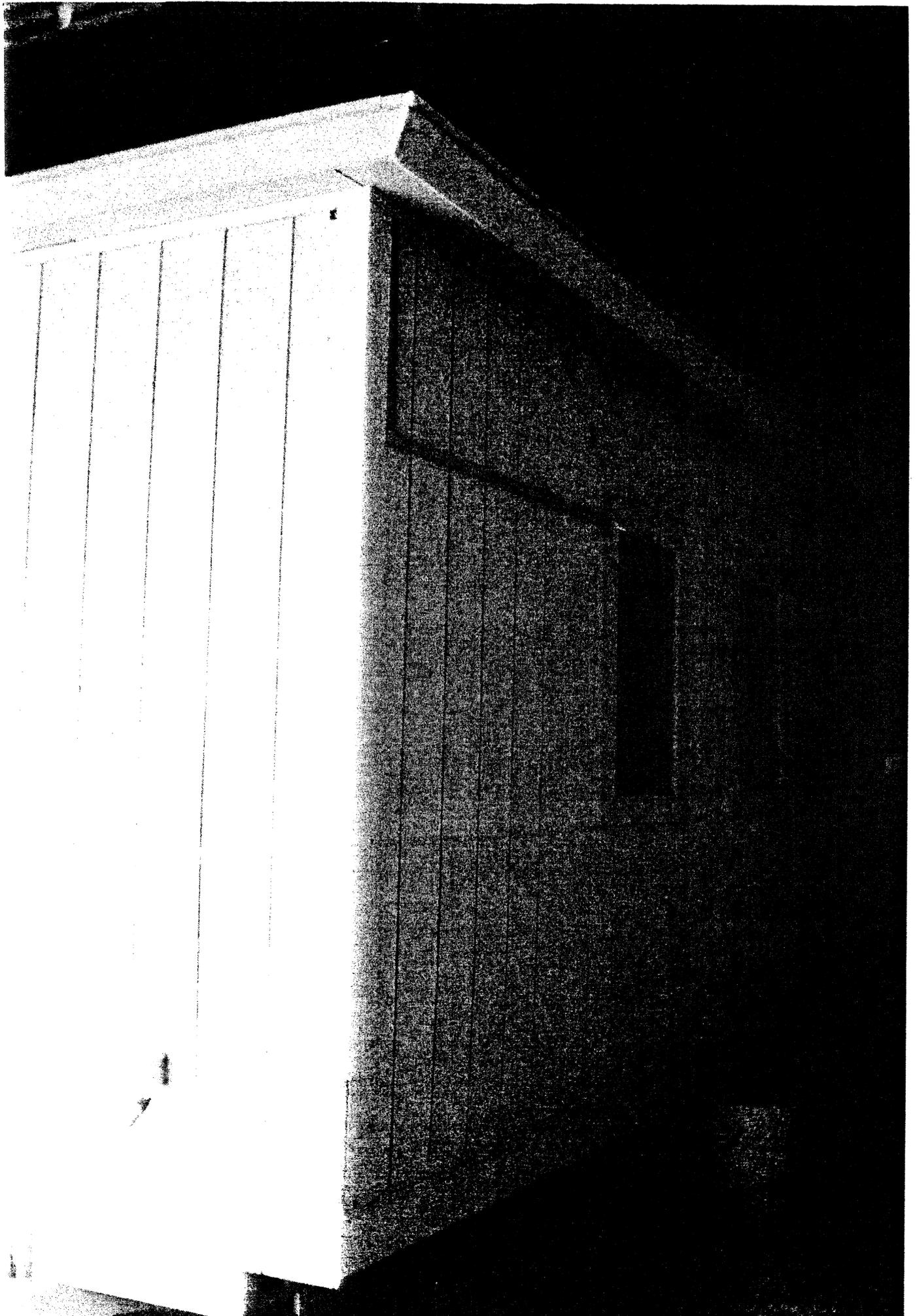
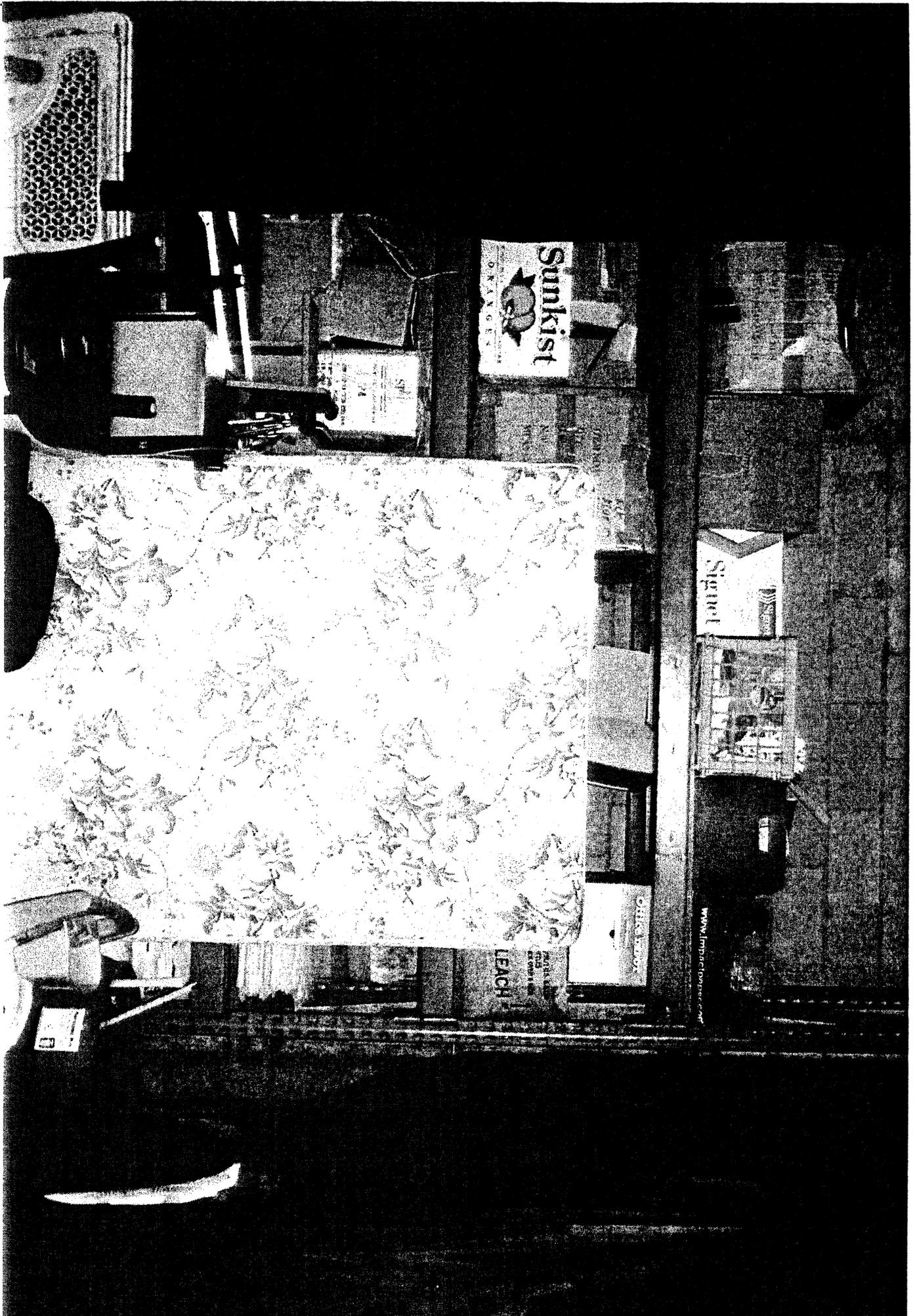


EXHIBIT "D"
SIX PICTURES OF
CONTENTS LOCATED AT 2000 N.W. 39TH
BELIEVED TO BE PROPERTY OF MCKYE



Sunkist
LEACH

Signal

CHIEF & WOOD

LEACH

www.ImpactPrinter.com



NR

U.S.A.
C/NO.: 26
MADE IN CHINA

3-98

LYS

Super Milk Pro

1097

machines

and
more

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