

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

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

AUG 20 2009

PATRICIA PRESLEY, COURT CLERK
by _____
DEPUTY

Oklahoma Department of Securities)
ex rel. Irving L. Faught,)
 Administrator,)
)
 Plaintiff,)
)
 v.)
)
 Bothwell Consulting, LLC, an Oklahoma)
 LLC; Lawrence G. Bothwell, an individual;)
 Christopher S. VonWerder, an individual;)
 and Tommy L. Richardson, an individual,)
)
 Defendants,)
)
 and)
)
 Amy J. Richardson, an individual,)
)
 Defendant Solely For)
 Purposes of Equitable Relief.)

Case No. CJ-2009-6989

**TEMPORARY INJUNCTION AGAINST BOTHWELL CONSULTING, LLC
AND LAWRENCE G. BOTHWELL BY CONSENT**

This matter came on for hearing this 20th day of August, 2009, before the undersigned Judge of the District Court in and for Oklahoma County, State of Oklahoma, upon the verified *Petition for Permanent Injunction and Other Equitable Relief* of the Plaintiff ("Petition"), pursuant to the Oklahoma Uniform Securities Act of 2004 (the "Act"), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (Supp. 2004).

It appears to this Court from the facts alleged in the Petition that Plaintiff is entitled to the temporary injunction requested as to Defendants Bothwell Consulting, LLC (Bothwell Consulting) and Lawrence G. Bothwell (Bothwell) (collectively, "Relevant Defendants"); it

further appears that the public will suffer irreparable damage and injury unless the Relevant Defendants, their officers, directors, agents, and other individuals acting on their behalf and under their direction and control, are enjoined.

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the Relevant Defendants, their agents, servants, employees, assigns, and those persons 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, be and hereby are, and until further notice of this Court, enjoined from offering or selling any security in and/or from the state of Oklahoma including, but not limited to, debentures.

IT IS FURTHER ORDERED that the Relevant Defendants, their agents, servants, employees, assigns and all those persons, directly and/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, be and hereby are, and until further notice of this Court, enjoined from tampering with, mutilating, altering, fabricating, erasing, concealing, removing, destroying or otherwise disposing of any and all books, records, documents, files, correspondence, computer disks, tapes or other data recordings of any type, pertaining to or referring to Defendants or any transactions by Defendants or to which Defendants were parties.

IT IS FURTHER ORDERED that the assets of the Relevant Defendants be, and hereby remain, frozen ("Assets"). The freeze shall include, but not be limited to, any funds located in any bank, depository institution, brokerage firm, or internet securities or other financial institution account in the names of the Relevant Defendants, in accounts in the name of any individuals or entities controlled by the Relevant Defendants or accounts over which the

Relevant Defendants have signatory or other designated authority. All banks, depository institutions, internet service providers, securities firms, or other institutions or persons served with a copy of this Order shall cooperate with the Oklahoma Department of Securities ("Department") relating to implementation of this Order, including imposing a freeze on all Assets, including accounts and funds, and producing records relating thereto. Facsimile transmission shall constitute service on the banks, depository institutions, internet service providers, securities firms, or other institutions or persons.

IT IS FURTHER ORDERED that Bothwell Consulting may make a one time disbursement in the amount of Five Thousand Dollars (\$5,000.00) from its bank account at City National Bank in Lawton, Oklahoma, for the sole purpose of payment of the initial costs of its defense in this action.

IT IS FURTHER ORDERED that the Relevant Defendants, their subsidiaries, affiliates, officers, directors, agents, servants, employees, attorneys, and all persons acting on their behalf, under their direction and control, and/or in active concert or participation with them, including any banks, depository or financial institutions, wherever chartered or located, securities firms or companies, loan providers, life insurance companies, internet service providers or companies, federal and state agencies, or other institutions or persons who receive actual notice of this Order, by personal service, facsimile transmission or otherwise, shall deliver and surrender to the Department no later than September 9, 2009:

1. all records relating to all Oklahoma investors including, but not limited to, books; records; tapes; discs; accounting data; checks; correspondence; forms; advertisements; brochures; manuals; electronically stored data and records; bank records; customer and investor lists to include the total

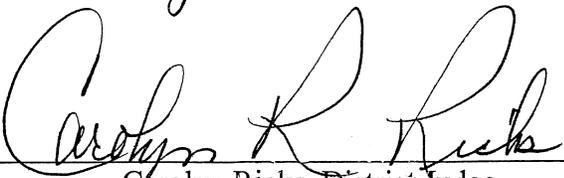
amount received from Oklahoma investors, the name and address of each investor, the amount invested, and the date each such investment was made; customer and investor files to include any agreements, contracts or notes; telephone records; ledgers; and payroll records; and

2. all keys and codes necessary to gain or to secure access to any Assets or documents of the Relevant Defendants.

IT IS FURTHER ORDERED that, except by leave of Court during the pendency of this action, all creditors and other persons seeking money, damages or other relief from the Relevant Defendants, and all others acting on behalf of any such creditor or other persons, including sheriffs, marshals, and other officers and their deputies, and their respective attorneys, servants, agents, and employees, continue to be stayed and restrained from doing any act or thing whatsoever to interfere in any manner during the pendency of this proceeding with the exclusive jurisdiction of this Court over the Relevant Defendants. This Order shall not stay or restrain any pending or future action whatsoever by any government agency or any representative on behalf of any government.

IT IS FURTHER ORDERED that the Relevant Defendants shall provide notice of this Order to each of its affiliates, successors, directors, officers, and each of its employees, salespersons, representatives and independent contractors.

THIS ORDER IS ENTERED this 20 day of August, 2009, at 10 : 15, A.m.



Carolyn Ricks, District Judge

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 20 day of Aug, 2009.

By  Deputy
PATRICIA PRESLEY, Court Clerk

APPROVED: AS TO FORM AND CONTENT OVER OBJECTION:



Amanda Commesser, OBA #20044
Jennifer Shaw, OBA # 20839
Oklahoma Department of Securities
120 North Robinson, Suite 860
Oklahoma City, OK 73102
(405) 280-7700



J. David Ogle, OBA #17476
100 Park Ave, Suite 500
Oklahoma City, OK 73102
(405) 605-6644
*Attorney for Bothwell Consulting, LLC
and Lawrence G. Bothwell*

Certificate of Mailing

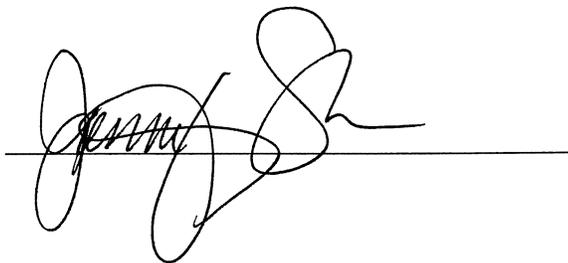
I hereby certify that a true and correct copy of the, was mailed this 20 day of August, 2009, by depositing it in the U.S. Mails, postage prepaid, to the following:

J. David Ogle, OBA #17476
100 Park Ave, Suite 500
Oklahoma City, OK 73102
(405) 605-6644

Tommy L. Richardson
1511 Tahoe Lane
Yukon, OK 73099

Amy J. Richardson
1511 Tahoe Lane
Yukon, OK 73099

Chris VonWerder
6014 N. 42nd St.
Enid, OK 73701-9467

A handwritten signature in black ink, appearing to read "Chris VonWerder", is written over a horizontal line. The signature is stylized and cursive.