

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

Oklahoma Department of Securities)
ex rel. Irving L. Faught, Administrator)
)
Plaintiff,)
)
vs.)
)
Bruce J. Scambler,)
)
Defendant.)

Case No.: CJ-2014-1346

**FILED IN DISTRICT COURT
OKLAHOMA COUNTY**

APR 15 2014

**TIM RHODES
COURT CLERK**

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ANSWER

COMES NOW, the Defendant, Bruce J. Scambler ("Scambler"), and for his Answer to Plaintiff's Petition does allege and state the following:

1. The Defendant admits the allegations contained in paragraph one (1) of Plaintiff's Petition.
2. The Defendant admits the allegations contained in paragraph two (2) of Plaintiff's Petition.
3. The Defendant admits the allegations contained in paragraph three (3) of Plaintiff's Petition.
4. The Defendant admits the allegations contained in paragraph four (4) of Plaintiff's Petition.
5. The Defendant admits that he entered an Administrative Order in June of 2009.
6. This specific paragraph of Plaintiff's Petition does not require the Defendant to answer.
7. This paragraph does not require an answer from the Defendant.
8. The Defendant denies the allegations contained in paragraph eight (8) of Plaintiff's Petition.

9. The Defendant denies the allegations contained in paragraph nine (9) of Plaintiff's Petition.

10. The Defendant denies the allegations contained in paragraph ten (10) of Plaintiff's Petition.

11. The Defendant denies the allegations contained in paragraph eleven (11) of Plaintiff's Petition.

12. The Defendant denies the allegations contained in paragraph twelve (12) of Plaintiff's Petition.

13. The Defendant denies the allegations contained in paragraph thirteen (13) of Plaintiff's Petition.

14. The Defendant denies the allegations contained in paragraph fourteen (14) of Plaintiff's Petition.

15. The Defendant denies the allegations contained in paragraph fifteen (15) of Plaintiff's Petition.

AFFIRMATIVE DEFENSES

The Defendant, Bruce J. Scambler, does hereby state the following affirmative defenses:

1. The allegations contained in Plaintiff's Petition fail to give rise to a claim upon which relief can be granted.

2. The Defendant has not violated any Administrative Order.

3. The Defendant did not have control of all Directors of the company who it is believed, acted on their own without the Defendant's knowledge or consent.

4. The Defendant asserts that actions of third parties, who are not parties to any Administrative Order, are the cause of any sell or transfer of shares of the referenced company.

5. As discovery has yet to be completed, the Defendant reserves the right to add additional affirmative defenses as they become revealed.



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CERTIFICATE OF MAILING

This is to certify that on the 15th day of April, 2014 a true and correct copy of the foregoing Answer was mailed with sufficient postage, prepaid thereon, to: Amanda Cornmesser & Terra Shamas Bonnell, First National Center, 120 N. Robinson Ave., #860, Oklahoma City, OK 73102, Attorneys for Plaintiff.



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