

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

Oklahoma Department of Securities,)
Ex rel. Irving L. Faught,)
Administrator,)
)
Plaintiff,)
)
v.)
)
Stacy Wayne Travis, an individual;)
HydroEnergy Revolution, LLC, an)
Oklahoma limited liability company; and)
Zydro Energy, LLC, an)
Oklahoma limited liability company)
)
Defendant.)

CJ-2018-3766

ANSWER

COME NOW Defendants Stacy Wayne Travis, an individual, HydroEnergy Revolution, LLC, an Oklahoma limited liability company, and Zydro Energy, LLC, an Oklahoma limited liability company for their Answers to Plaintiff's Petition for Permanent Injunction and Other Relief and state as follows:

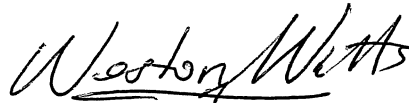
1. Defendants admit the allegations contained in Paragraph Nos. 2, 4-7, 13, 18, 23 and 29.
2. Defendants deny the allegations contained in Paragraph Nos. 1, 3, 8-12, 14-17, 20-22, 24-28, 30-40.
3. In response to Paragraph No. 19, Defendants admit that Jay Fribourg, a resident of Texas, and Michael Wanzel, a resident of Montana, shared information relating to Wayne Travis with their personal friends. Defendants deny the remaining allegations contained in Paragraph No. 19.

AFFIRMATIVE DEFENSES

Each and every other allegation not heretofore specifically answered is denied.

1. The Petition fails to state a claim upon which relief can be granted.
2. Defendants deny that there was a sale of securities, however, if it is determined that there has been a sale of securities these securities are exempt from registration pursuant to Okla. Stat. Tit. 71, §§ 1-201 through 1-202.
3. Defendants deny that they were unregistered agents, however, if it is determined that there has been a sale of securities, Defendants are exempt from registration pursuant to Okla. Stat. Tit. 71, §1-402.
4. The balance of equities does not favor the grant of injunctive relief.
5. Defendants reserve the right to assert additional defenses as discovery progresses in this case.

Respectfully Submitted,



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CERTIFICATE OF SERVICE

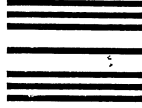
This is to certify on the 27th day of August, 2018, a true and correct copy of the above and foregoing Answer was mailed by first class mail, postage prepaid, to:

Robert Fagnant, OBA #30548
Oklahoma Department of Securities
204 N. Robinson Avenue, Suite 400
Oklahoma City, OK 73102

Wesley Watts

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