

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
THE FIRST NATIONAL CENTER
120 N. ROBINSON, SUITE 860
OKLAHOMA CITY, OKLAHOMA 73102



In the Matter of:

Rodney Larry Watkins, Jr. (CRD #3091936);
Southeast Investments, N.C. Inc. (CRD #43035); and
Frank H. Black (CRD #22451);

Respondents.

ODS File No. 12-058

**DEPARTMENT'S FINAL LIST
OF WITNESSES AND EXHIBITS**

The Oklahoma Department of Securities (Department) submits this final list of witnesses and exhibits in the above-styled matter.

Witness List

1. Rodney Larry Watkins Jr., c/o Patrick O. Waddel, Esq., 1700 Williams Center Tower, One W. 3rd Street, Tulsa, OK 74103-3522, (918) 794-4942, is expected to testify regarding his affiliation with Southeast Investments, N.C. Inc. (Southeast) and Southeast's supervisory system.
2. Frank H. Black, c/o Patrick O. Waddel, Esq., 1700 Williams Center Tower, One W. 3rd Street, Tulsa, OK 74103-3522, (918) 794-4942, is expected to testify regarding the allegations contained in the Supplemental Enforcement Division Recommendation filed in this matter.
3. Lamar Guillory, c/o Patrick O. Waddel, Esq., 1700 Williams Center Tower, One W. 3rd Street, Tulsa, OK 74103-3522, (918) 794-4942, is expected to testify regarding his affiliation with Southeast and Southeast's supervisory system.
4. Carol Gruis, Director of Licensing and Examinations, Oklahoma Department of Securities, c/o Jennifer Shaw or Amanda Cornmesser, 120 North Robinson Avenue, Suite 860, Oklahoma City, OK 73102, (405) 280-7700, is expected to testify about the registrations and CRD records of relevant persons; the Department's requests for information from Respondents; documents Respondents provided to the Department; the Rules of the Financial Industry Regulatory Authority ("FINRA"); the Oklahoma Uniform Securities Act of 2004; and the Rules of the Oklahoma Securities Commission and the Administrator of the Department of Securities.

5. John Ulrey, Senior Investigator, Oklahoma Department of Securities, c/o Jennifer Shaw or Amanda Cornmesser, 120 North Robinson Avenue, Suite 860, Oklahoma City, OK 73102, (405) 280-7700, is expected to testify about the investigation conducted by the Department.

6. Brenda London, Paralegal, Oklahoma Department of Securities, c/o Jennifer Shaw or Amanda Cornmesser, 120 North Robinson Avenue, Suite 860, Oklahoma City, OK 73102, (405) 280-7700, is expected to testify in her capacity as the custodian of records of the Department.

7. Bonita Thompson, [REDACTED], is expected to testify about her business relationship and communications with Rodney Larry Watkins Jr., Lamar Guillory, and Southeast Investments, N.C. Inc., to include transactions that occurred between February 1, 2012 and April 30, 2014.

8. All witnesses needed to rebut the testimony of a witness or documentary evidence offered at hearing by Respondents.

9. All witnesses identified on Respondents' preliminary and/or final witness lists, or called at hearing by Respondents, and to whom the Department asserts no objection.

Document and Exhibit List

<u>Exhibit List</u>		
Tentative Exhibit Number	Description	Production Number
1	Watkins-Southeast Contract Documents	SE-00001 to SE-00025
2	Southeast Investments, N.C., Inc. Supervisory Procedures	SE-00026 to SE-00147
3	Watkins Email - Subject: Dist. Request for Thompson account	LG-00177
4	Guillory Email - subject: Dist. Request for Thompson account	LG-01080 to LG 01084
5	Watkins 2012 Bi-Annual Certification produced on 5/14/14	No production number
6	Watkins 2013 Bi-Annual Certification produced on 5/14/14	No production number
7	Guillory 2013 Bi-Annual Certification attached to Respondents' 6/19/14 Response	No production number
8	Guillory Email and Electronic Communications Acknowledgement Form dated 4/12/12	No production number
9	CRD Records for Southeast Investments, N.C., Inc.	No production number

10	CRD Records for Frank Black	No production number
11	CRD Records for Lamar Guillory	No production number
12	CRD Records for Rodney Larry Watkins, Jr.	No production number
13	Affidavit of Rodney Larry Watkins, Jr. (CRD #3091936) dated December 27, 2012	No production number
14	Affidavit of Dr. Clifford Alprin dated February 12, 2014	No production number
15	Frank Black's deposition transcript dated May 14, 2014	No production number
16	Lamar Guillory's deposition transcript dated April 16, 2014	No production number
17	Rodney Watkins' deposition transcripts dated April 21, 2014 and May 9, 2014	No production number
18	10/29/2012 Frank Black letter to Carol Gruis	No production number
19	11/4/2013 Department's First Request for Production of Documents	No production number
20	11/18/2013 Waddel Letter - re: responses of Watkins and Southeast to Department's documents requests served on 11/4/13	No production number
21	1/19/2013 Shaw Letter- re: Department's receipt of 11/18/13 letter from Respondents	No production number
22	11/26/2013 Jorgenson Letter- re: documents responsive to Department's two requests filed 11/4/13	No production number
23	12/2/2013 Jorgenson Letter - re: file stamped copy of Respondents' Motion for Summary Disposition and Respondents' First Request for Production of Documents to ODS	No production number
24	12/20/2013 Shaw Letter - re: ODS' extension of time to respond to Respondents' Motion for Summary Disposition, & ODS' issues w/the discovery responses provided by Respondents	No production number
25	1/16/2014 Waddel Letter - re: response to Department's discovery	No production number
26	1/28/2014 Shaw Letter - re: document production referred to in Waddel's letter dated 1/16/14	No production number
27	1/30/2014 Shaw Letter - re: receipt of hand delivered letter dated 1/28/14 referencing a letter dated 1/16/14, in which the Department did not receive	No production number
28	1/31/2014 Waddel Fax - re: response to Shaw's letter, dated 12/20/13, re: Department's documents requests of 11/4/13 to Watkins and Southeast	No production number

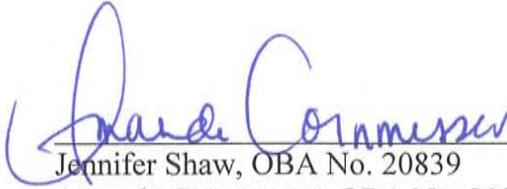
29	2/5/2014 Waddel Letter - re: document production containing new account forms of Watkins and order tickets placed with Southeast	No production number
30	4/7/2014 Waddel Email - re: Watkins business card	No production number
31	4/10/2014 Waddel Letter - re: document production pertaining to Guillory	No production number
32	4/15/2014 Jorgenson Letter - re: compliance with Administrator's Order Resolving Discovery Dispute dated 4/1/14 and in response to Department's Motion to Resolve Discovery Disputes dated 3/26/14	No production number
33	5/6/2014 Shaw Email - re: request Watkins business card	No production number
34	5/16/2014 Shaw Email - re: request documentation outlined after Black deposition and provide dates for Gruis deposition	No production number
35	5/20/2014 Shaw Email - re: Watkins U-4 Amendments	No production number
36	5/23/2014 Jorgenson and Shaw Emails - re: Gruis Deposition	No production number
37	5/28/2014 Jorgenson Email - re: Gruis Deposition	No production number
38	5/29/2014 Cornmesser Email - re: Gruis Deposition	No production number
39	6/18/2014 Shaw Email - re: evidentiary hearing	No production number
40	7/1/2014 Waddel Letter - re: asking ODS to provide certain information	No production number
41	7/5/2014 Shaw Letter - re: response to Waddel's letter dated 7/1/14	No production number

In addition to the Exhibits detailed above the Department will use the following documents and exhibits:

1. All pleadings filed in this matter.
2. Any evidence needed to impeach a witness including, but not limited to, deposition transcripts.
3. Any evidence needed to refresh a witness's memory.
4. All exhibits listed or offered by a Respondent to which the Department asserts no objection.
5. The Oklahoma Uniform Securities Act of 2004, Okla. Stat. tit. 71, §§ 1-101 through 1-701 (2011), and the Rules of the Oklahoma Securities Commission and the Administrator of the Department of Securities.
6. FINRA rules including, but not limited to, interpretive memorandums.

7. Demonstrative aids that have not yet been created.
8. Summaries of evidence that have not yet been created.

Dated this 4th day of August, 2014.



Jennifer Shaw, OBA No. 20839

Amanda Cornmesser, OBA No. 20044

Oklahoma Department of Securities

120 North Robinson, Suite 860

Oklahoma City, OK 73102

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 4th day of August, 2014, a true and correct copy of the above and foregoing Department's Preliminary List of Witnesses and Exhibits was hand delivered to the following:

Irving L. Faught
Oklahoma Department of Securities
120 N. Robinson Ave., Ste. 860
Oklahoma City, OK 73102
ifaught@securities.ok.gov

Hearing Officer

The undersigned hereby certifies that on the 4th day of August, 2014, a true and correct copy of the above and foregoing Department's Preliminary List of Witnesses and Exhibits was emailed and mailed by first-class mail with postage prepaid thereon, to the following:

Patrick O. Waddel, OBA No. 9254
1700 Williams Center Tower
One W. 3rd Street
Tulsa, OK 74103-3522
Telephone: (918) 794- 4942
Facsimile: (918) 588-1314
pwaddel@sneedlang.com

*Attorney for Respondents Rodney Larry Watkins, Jr.
Southeast Investments, N.C., Inc. and Frank H. Black*

Brenda London

Brenda London

From: Brenda London
Sent: Monday, August 04, 2014 4:14 PM
To: Irving Faight; pwaddel@sneedlang.com
Cc: Jennifer Shaw; Amanda Cornmesser
Subject: Rodney Watkins ODS 12-058
Attachments: 080414_ODS Final List of Wit and Exhs_12-058.pdf

Attached is the *Department's Final List of Witnesses and Exhibits*, filed with the Administrator.

Thank you,

Brenda London, Paralegal
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