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 PRELIMINARY LIST OF WITNESSES AND EXHIBITS

The Oklahoma Department of Securities (Department) submits this preliminary list of witnesses and exhibits in the above-styled matter in compliance with the *Agreed Scheduling Order* issued on November 4, 2013. The Department expressly reserves the right to identify and list additional witnesses on its Final Witness List and to exchange additional documents and exhibits pursuant to the *Agreed Scheduling Order*.

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 the allegations contained in the Enforcement Division Recommendation filed in this matter.

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 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 the supervision of Rodney Larry Watkins.

4. Jeanette Roberts, 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 Enforcement Division Recommendation filed in this matter and the supervision of Rodney Larry Watkins.

5. 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 Respondents; 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.

6. 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.

7. 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.

8. Dr. Clifford Alprin, [redacted], is expected to testify about his business relationship and communications with Rodney Larry Watkins Jr. and Southeast Investments, N.C. Inc., to include transactions that occurred between February 1, 2012 and November 4, 2013.

9. Brenda Walker, [redacted], is expected to testify about her business relationship and communications with Rodney Larry Watkins Jr. and Southeast Investments, N.C. Inc., to include transactions that occurred between February 1, 2012 and November 4, 2013.

10. Troy Shawn Reed, [redacted], is expected to testify about his business relationship and communications with Rodney Larry Watkins Jr. and Southeast Investments, N.C. Inc., to include transactions that occurred between February 1, 2012 and November 4, 2013.

11. Lonnie Lewis, [redacted], is expected to testify about his business relationship and communications with Rodney Larry Watkins Jr. and Southeast Investments, N.C. Inc., to include transactions that occurred between February 1, 2012 and November 4, 2013.

12. Terry Payne, [redacted], is expected to testify about his business relationship and communications with Rodney Larry Watkins Jr. and Southeast Investments, N.C. Inc., to include transactions that occurred between February 1, 2012 and November 4, 2013.

13. Ronica Watkins, [redacted], is expected to testify about her relationship and communications with Rodney Larry Watkins Jr. and Southeast Investments, N.C. Inc., to include use by Rodney Larry Watkins Jr. of

her physical address as an office of Southeast and transactions that occurred between February 1, 2012 and November 4, 2013.

14. Carolyn Williams, [redacted] is expected to testify about her business relationship and communications with Rodney Larry Watkins Jr. and Southeast Investments, N.C. Inc., to include transactions that occurred between February 1, 2012 and November 4, 2013.

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

16. 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

1. All written correspondence between the Department and Respondents or representatives thereof.

2. Southeast Investments, N.C. Inc. records relating to any and all business matters involving Rodney Larry Watkins, Jr.

3. National Financial Services, LLC records relating to any and all business matters involving Rodney Larry Watkins, Jr.

4. All documents provided by Southeast Investments, N.C. Inc., or a representative thereof, to the Department in connection with the Department's investigation into the activities of Rodney Larry Watkins Jr., Frank H. Black, and Southeast Investments, N.C. Inc. and representatives thereof including, but not limited to, the following:

a. Written communications,
b. Emails and other electronic communications,
c. Trade blotters,
d. Checks received blotter(s),
e. Securities received blotter(s),
f. Commission and/or fee reports, and
g. Client account statements.

5. The registration and CRD records for Respondents.

6. The *Affidavit of Rodney Larry Watkins, Jr. (CRD #3091936)* dated December 27, 2012.

7. All documents received or provided by the Department in connection with the on-going discovery relating to this matter.

8. All pleadings filed in this matter.

9. The deposition transcript(s) of any witness who becomes unavailable.

10. Any evidence needed to impeach a witness including, but not limited to, deposition transcripts.

11. Any evidence needed to refresh a witness's memory.

12. All exhibits listed or offered by a Respondent to which the Department asserts no objection.

13. 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.

14. FINRA rules including, but not limited to, interpretive memorandums.

15. Demonstrative aids that have not yet been created.

16. Summaries of evidence that have not yet been created.

Dated this 11th day of December, 2013.

Jennifer Shaw, OBA No. 20839
Amanda Cornmesser, OBA No. 20044
Oklahoma Department of Securities
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Oklahoma City, OK 73102
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acornmesser@securities.ok.gov

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 11th day of December, 2013, 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 11th day of December, 2013, 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

Jennifer Shaw