

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
FIRST NATIONAL CENTER
120 NORTH ROBINSON, SUITE 860
OKLAHOMA CITY, OKLAHOMA 73102



In the Matter of:

Richard W. Possett, Sr., d/b/a The Navigator Group,

Respondent.

ODS File No. 11-076

DEPARTMENT'S RESPONSE TO RESPONDENT'S MOTION TO COMPEL

The Oklahoma Department of Securities ("Department") submits the following response and objection to *Pro Se Respondent's* [sic], *Richard W. Possett, Sr., Motion to Compel Discovery*, filed on September 28, 2012 ("Motion to Compel").

In his Motion to Compel, Respondent seeks an order compelling the Department to produce the "complaint document(s) that specifically enumerates Complainant Blankenship [sic] complaint(s) against Respondent Possett." As the Department informed Respondent prior to his filing of the Motion to Compel, the Department has produced to Respondent all documents, including, but not limited to, correspondence, it has received from Gabriele Blankenship or her attorney in connection with the above-captioned proceeding. Such documents totaled over 800 pages. As the Department also informed Respondent prior to his filing of the Motion to Compel, the Department has not received a form entitled "Questionnaire" from, or on behalf of, Ms. Blankenship. The Department also has not received a form entitled "Complaint Questionnaire" from, or on behalf of, Ms. Blankenship.

An order compelling the Department to produce "the complaint(s) form(s), letter(s), communication(s), questionnaire(s), and/or document(s) disclosing the

particular complaint(s) filed against Respondent by Complainant Blankenship” would be futile because the Department has already produced those documents, to the extent that they exist, to Respondent. Accordingly, Respondent’s Motion to Compel should be denied.

Respectfully,



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 1st day of October, 2012, a true and correct copy of the above and foregoing DEPARTMENT'S RESPONSE TO RESPONDENT'S MOTION TO COMPEL was emailed and mailed by first-class mail with postage prepaid thereon, to the following:

Richard W. Possett, Sr.
1413 North Lakeside Drive
Andover, KS 67002-7415
rpossett@att.net



Terra Shamas Bonnell