

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



In the Matter of:

Jim J. Hammons,

Respondent.

ODS File 14-017

**DEPARTMENT'S FIRST REQUEST FOR PRODUCTION
OF DOCUMENTS FROM RESPONDENT**

TO: Jim J. Hammons
c/o Perry R. Tirrell, Esq.
Denton Law Firm
925 West State Highway 152
Mustang, OK 73064

The Oklahoma Department of Securities ("Department") requests, pursuant to 660:2-9-3(b)(1) of the Rules of the Oklahoma Securities Commission and the Administrator of the Department of Securities, that Respondent, Jim J. Hammons, produce the below-described documents that are in his possession, custody, or control, for inspection and copying at the offices of the Department, located at 120 North Robinson Avenue, Suite 860, Oklahoma City, Oklahoma, within fifteen (15) days of service of this request.

A. Definitions

1. "You" or "your" refers to Respondent, Jim J. Hammons, and any of his agents, employees, or representatives.

2. "The Center" refers to "The Center Mixed Martial Arts, LLC" and its predecessors and successors.

3. "Person" means an individual; corporation; business trust; estate; trust; partnership; limited liability company; association; joint venture; government, governmental subdivision, agency, or instrumentality; public corporation; or any other legal or commercial entity.

4. "Document" refers to any form of data compilation whether produced, reproduced, or stored on paper or electronically. A "document" includes, but is not limited to, writings, drawings, graphs, charts, photographs, tape and video recordings, records, computer files, emails, spreadsheets, and shall also include, but not be limited to, any draft or copy (with or without notes of changes thereon) of a writing or document.

5. A document "relating to" a given subject means any document constituting or comprising that subject, and any document identifying, referring to, dealing with, commenting upon, describing, summarizing, analyzing, explaining, detailing, outlining, defining, interpreting, or pertaining to that subject.

6. "Concerning" means "relating to" as that term is defined above.

7. "Communication" means any oral statement, dialogue, colloquy, discussion or conversation, and also means any transfer of thoughts or ideas between persons by means of documents, and includes any transfer of data from one location to another by electronic or similar means.

8. "Transaction" means a business deal; an occurrence in which goods, services, or money are passed from one person or account to another; the act or

process of doing business with another person; and the act or process of transacting business.

B. Instructions

1. Respondent shall serve a written response to this request for production of documents within fifteen (15) days after service of this request.

2. In responding to this request, you are required to furnish all documents that are available to you, or that you may obtain by reasonable inquiry, including documents in the possession of your attorneys, accountants, advisors, or other persons directly or indirectly employed by, or connected with, you or your attorneys, or anyone else otherwise subject to your control. If you object to production of any document or category of documents, or any part of a document or category of documents, you are required to furnish the documents or categories of documents, or parts of documents or categories of documents to which you do not object.

3. The documents produced should be organized and labeled to correspond with the categories in the request.

4. If you object to the production of any of the documents or parts of the documents described below, then, with respect to each document that you do not produce:

- a. State the date and nature of the document;
- b. State the name of the person who wrote the document and, if applicable, the person to whom it was addressed;
- c. State the name of all persons to whom copies of the document have been furnished;
- d. Describe the subject matter of the document;

- e. State the grounds of your objection; and
- f. State the name, business and residence addresses, and telephone number of each person who has possession, custody, or control of the document.

5. If any document responsive to this request was, but is no longer in your possession, custody, or control, or in existence, state whether it (a) is missing or lost; (b) has been destroyed; (c) has been transferred voluntarily or involuntarily to others; or (d) has been otherwise disposed of, and in each instance explain the circumstances surrounding the authorization of such disposition and state the date or approximate date thereof.

6. This request for production of documents is continuing. If you acquire possession, custody, or control of any of the documents described below at any time before the final hearing, you are requested to make them available to the Department for inspection and copying promptly.

7. Unless otherwise set forth in a specific document request, the documents requested include only documents created on or after January 1, 2012.

C. Documents Requested

REQUEST FOR PRODUCTION NO. 1. All documents relating to a transaction or potential transaction between or among you, Reaction Force, LLC, Executive Black Belt Training Centers, LLC, and/or The Center.

REQUEST FOR PRODUCTION NO. 2. All documents authorizing you, or relating to an authorization for you, to act on behalf of Executive Black Belt Training Centers, LLC.

REQUEST FOR PRODUCTION NO. 3. All documents authorizing you, or relating to an authorization for you, to act on behalf of Reaction Force, LLC.

REQUEST FOR PRODUCTION NO. 4. All documents relating to communications of any kind between you and Patricia Reynolds concerning Reaction Force, LLC, Executive Black Belt Training Centers, LLC, The Center, and/or the purchase of a martial arts school or franchise.

REQUEST FOR PRODUCTION NO. 5. All documents relating to communications of any kind between or among you, Mike Metzger, Cody Pepper, Frank Silverman, and/or any other representative of The Center concerning Reaction Force, LLC, Executive Black Belt Training Centers, LLC, The Center, and/or the purchase of a martial arts school or franchise.

REQUEST FOR PRODUCTION NO. 6. All documents relating to communications of any kind between you and Greg Cooper concerning Reaction Force, LLC, Executive Black Belt Training Centers, LLC, The Center, and/or the purchase of a martial arts school or franchise.

REQUEST FOR PRODUCTION NO. 7. All documents relating to communications of any kind between you and Thomas Jacobs concerning Reaction Force, LLC, Executive Black Belt Training Centers, LLC, The Center, and/or the purchase of a martial arts school or franchise.

REQUEST FOR PRODUCTION NO. 8. All documents that have not already been produced that relate to Reaction Force, LLC, Executive Black Belt Training Centers, LLC, and/or The Center.

Respectfully,



Terra Bonnell
Enforcement Attorney
Oklahoma Department of Securities
120 North Robinson, Suite 860
Oklahoma City, OK 73102
Telephone: (405) 280-7715
Email: tbonnell@securities.ok.gov

CERTIFICATE OF SERVICE

I certify that on September 17th, 2014, I sent a copy of the above and foregoing Request for Production of Documents by email to perry@dentonlawfirm.com and tiffany@dentonlawfirm.com and by first class mail to the following:

Mr. Perry Tirrell, Esq.
Denton Law Firm
925 West State Highway 152
Mustang, OK 73064

Counsel for Respondent



Terra Bonnell