

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



In the Matter of:

Geary Securities, Inc. *fka* Capital West Securities, Inc.;
Keith D. Geary; Norman Frager; and CEMP, LLC,

Respondents.

File No. 09-141

**DEPARTMENT'S RESPONSE TO RESPONDENTS' JOINT REQUEST FOR
HEARING ON PENDING MOTIONS**

The Oklahoma Department of Securities ("Department") submits the following response to *Respondents' Joint Request for Hearing on Pending Motions*, filed on January 10, 2012 (Request). The Department joins Respondents' request for a hearing on the pending motions outlined in their Request.¹ In addition, the Department respectfully requests that the Hearing Officer inform the parties, in advance of the hearing, whether oral argument will be necessary on any of the motions.²

A handwritten signature in black ink, appearing to read "Terra Bonnell". The signature is fluid and cursive.

Melanie Hall
Terra Shamas Bonnell
Oklahoma Department of Securities
120 North Robinson, Suite 860
Oklahoma City, OK 73102
Telephone: (405) 280-7700

¹ Although the Department joins Respondents' request for a hearing on the pending motions, the Department does not adopt or incorporate footnote 2 of Respondents' Request. For the reasons stated in the *Department's Objection to Respondent Frager's Motion for Sanctions*, filed on January 9, 2012, Respondent Frager's Motion for Sanctions is invalid, because it did not comply with the safe harbor provision of 12 O.S. § 2011(C)(1)(a), and should receive no further consideration.

² Rule 660:2-9-3(c)(3) of the Rules of the Oklahoma Securities Commission and the Administrator of the Department of Securities states: "The Administrator, or the Hearing Officer, may allow oral argument if it appears necessary to a fuller understanding of the issues presented."

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 11th day of January, 2012, a true and correct copy of the above and foregoing was emailed and mailed by first-class mail with postage prepaid thereon, to the following:

Mr. Bruce R. Kohl
201 Camino del Norte
Santa Fe, NM 87501
Bruce.kohl09@gmail.com

Hearing Officer

Joe M. Hampton, Esq.
Amy J. Pierce, Esq.
A. Ainslie Stanford II, Esq.
Corbyn Hampton, PLLC
211 North Robinson, Suite 1910
Oklahoma City, OK 73102
JHampton@Corbynhampton.com

*Attorney for Respondents Geary Securities, Inc., Keith D. Geary,
and CEMP, LLC*

Donald A. Pape, Esq.
Donald A. Pape, PC
401 W. Main, Suite 440
Norman, OK 73069
don@dapape.com

and

Susan E. Bryant
Bryant Law
P.O. Box 596
Camden, ME 04843
sbryant@bryantlawgroup.com

Attorneys for Respondent Norman Frager


Terra Shamas Bonnell