

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



In the Matter of:

Marsha K. Schubert, AXA Advisors, LLC,
and Wilbanks Securities, Inc.

ODS File No. 05-031

ORDER INITIATING INVESTIGATION

It has come to the attention of the Administrator of the Oklahoma Department of Securities (Department) that certain violations of the Oklahoma Securities Act (Act), Okla. Stat. tit. 71, §§ 1-413, 501, 701-703 (2001 and Supp. 2003), the Oklahoma Uniform Securities Act of 2004 (2004 Act), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (Supp. 2003), and/or the Rules of the Oklahoma Securities Commission and the Administrator of the Department of Securities (Rules) occurred in connection with transactions effected by Marsha K. Schubert, formerly registered as an agent of AXA Advisors, LLC and Wilbanks Securities, Inc.

Section 1-602 of the 2004 Act provides in part:

- A. The Administrator may:
1. Conduct public or private investigations within or outside of this state which the Administrator considers necessary or appropriate to determine whether a person has violated, is violating, or is about to violate this act or a rule adopted or order issued under this act, or to aid in the enforcement of this act or in the adoption of rules and forms under this act;
 2. Require or permit a person to testify, file a statement, or produce a record, under oath or otherwise as the Administrator determines, as to all the facts and circumstances concerning a matter to be investigated or about which an action or proceeding is to be instituted; and
 3. Publish a record concerning an action, proceeding, or an investigation under, or a violation of, this act or a rule adopted or order issued under this act if the Administrator determines it is necessary or appropriate in the public interest and for the protection of investors.

- B. For the purpose of an investigation or proceeding under this act, the Administrator or its designated officer may administer oaths and affirmations, subpoena witnesses, seek compulsion of attendance, take evidence, require the filing of statements, and require the production of any records that the Administrator considers relevant or material to the investigation or proceeding[.]

Based upon the information received, and in light of the provisions of the Act and the 2004 Act, the Administrator has determined it to be necessary and in the public interest to conduct an investigation to aid in the enforcement of the 2004 Act.

IT IS THEREFORE ORDERED that an investigation be commenced by the Department relating to the activities of Marsha K. Schubert while an agent of AXA Advisors, LLC, Wilbanks Securities, Inc., and/or any associated or affiliated entities or individuals, to aid in the enforcement of the 2004 Act.

If the Administrator determines that violations of the Act, the 2004 Act, and/or the Rules have occurred by AXA Advisors, LLC, Wilbanks Securities, Inc., and/or any associated or affiliated entities or individuals, the Administrator may pursue any of the courses of action authorized by law. If, however, the facts indicate that no corrective action by the Administrator is warranted, the investigation will be closed.

Witness my Hand and the Official Seal of the Oklahoma Department of Securities this 10th day of December, 2004.

(SEAL)



IRVING L. FAUGHT, ADMINISTRATOR OF THE
OKLAHOMA DEPARTMENT OF SECURITIES