

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



In the Matter of:

Strategic Development Corp, et al.,

Respondents.

ODS File No. 12-005

ORDER

On August 16, 2012, the Oklahoma Department of Securities (Department) issued a Subpoena Duces Tecum to Spirit Bank for the production of financial records relating to the bank accounts of Ameracorp Capital Group Corporation, Stephen Dean Holsey and Dalton E. Beck. On August 16, 2012, the Department also issued a Subpoena Duces Tecum to Arvest Bank for the production of financial records relating to the bank accounts of The Free Enterprise Foundation, Inc., Stephen Dean Holsey and Dalton E. Beck.

Ameracorp Capital Group Corporation, The Free Enterprise Foundation, Inc., Stephen Dean Holsey and Dalton E. Beck were provided notice of the subpoenas pursuant to the requirements of the Oklahoma Financial Privacy Act, Okla. Stat. tit. 6, §§ 2201 *et. seq.* (2011).

On September 12, 2012, Kent S. Ghahremani, attorney for Ameracorp Capital Group Corporation and The Free Enterprise Foundation, Inc., faxed to the Department a *Motion to Quash Subpoena Duces Tecum, Objection to Jurisdiction and Request for Hearing* (Motion to Quash).

The Enforcement Division of the Department filed *Oklahoma Department of Securities' Response to Motion to Quash Subpoenas Duces Tecum* on September 26, 2012.

The records requested by the subpoenas are relevant and material to the purpose of the Department's investigation into possible violations of the Oklahoma Uniform Securities Act of 2004 (Act), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (2011) by Strategic Development Corporation, Stephen Dean Holsey and Dalton E. Beck.

The Motion to Quash was not timely received by the Department.

IT IS HEREBY ORDERED that the Motion to Quash is denied.

Witness my Hand and the Official Seal of the Oklahoma Department of Securities this 27th day of September, 2012.

(SEAL)

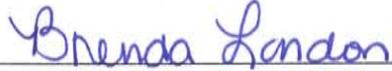
A handwritten signature in blue ink, appearing to read "Irving L. Faught".

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

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 27th day of September, 2012, a true and correct copy of the above and foregoing was mailed, with postage prepaid thereon, to:

Kent S. Ghahremani
207 N Oak St Ste One
Sallisaw, OK 74955



Brenda London, Paralegal