

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



*In the Matter of:*

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

Pro se Respondent

ODS File No. 11-076

**RESPONDENT'S ANSWER TO THE ORDER GRANTING ISSUANCE OF  
THE SUBPOENA DUCES TECUM TO GABRIELE S. BLANKENSHIP  
REQUESTED BY RESPONDENT WITH MODIFICATIONS**

This matter has come before the Administrator on the objection of the Department to the issuance of a Requested Subpoena to Complainant Blankenship. In support of a modified Requested Subpoena, Respondent Possett states as follows:

1. On August 13, 2012, Respondent requested that the Department issue a *Subpoena Dues Tecum* ("Requested Subpoena") to Complainant.
2. On August 20, 2012, the Department filed an objection to the issuance of the Requested Subpoena.
3. On August 28, 2012, Respondent filed an answer to the Department's objection.
4. On August 29, 2012, the Department filed an Order Granting issuance of the *Subpoena Dues Tecum* to Complainant Gabriele S. Blankenship requested by Respondent Richard W. Possett, Sr. with modifications.

5. As requested in the Order by the Administrator, the Respondent provides the following justification for the relevance of the type and the scope of documents requested and avers as follows:

- a. The subject monies in question now before the Administrator represents \$357,931.00 in retirement funds ("Funds") from a Charles Schwab brokerage Account No. [REDACTED]0766 owned and controlled by Complainant [Exhibit A].
- b. The Funds were disbursed by Charles Schwab directly to Complainant on October 26, 2007 [Exhibit B].
- c. Upon receipt of the Funds, Complainant deposited them, in their entirety, into her personal checking account number [REDACTED]0695 at Oklahoma National Bank ("ONB") on October 29, 2007 [Exhibit C].
- d. On October 31, 2007, Complainant, on her own volition, personally wire transferred the Funds, along with personal savings in the amount of \$42,211.51, totaling \$400,142.51, to the escrow account of Carter Lock & Horrigan in Grande Prairie, Alberta, Canada [Exhibit D].
- e. It is Respondent's contention that, in this uninterrupted chain of actions, Complainant, at all times, had absolute control of and sole access to both the brokerage and bank accounts and any and all monies or funds related thereto.
- f. Respondent asserts that he never had any power to control or authority to access any of Complainant's funds at anytime. This complete lack of control and access to Complainant's funds rendered it impossible for Respondent to effectuate any transaction in securities related to Complainant at anytime.

Therefore, as to items number four (4) and five (5), Respondent proposes to reduce the scope to calendar year 2007.

Respondent again posits that the subject matter bank accounts are highly relevant to these proceedings and critical to Respondent's defense as expounded in paragraph seven (7) of Respondent's response to the Department's objections that was filed with the Department by Respondent on August 28, 2012.

Furthermore, as to item number six (6), Respondent offers to restrict the scope to calendar year 2007. Respondent postulates that the requested bank and brokerage account information is very relevant as expounded in paragraph seven (7) of Respondent's response to the Department's objections that was filed with the Department by Respondent on August 28, 2012.

In conclusion, Respondent prays that the Administrator will issue the Requested Subpoena, as modified, post haste.

Dated this 4<sup>th</sup> day of September, 2012.

Respectfully,



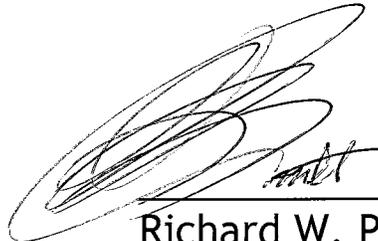
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Richard W. Possett, Sr.  
Pro se Respondent  
1413 North Lakeside Drive  
Andover, KS 67002-7415  
Fone: (316)-737-2993  
Email: [rpossett@att.net](mailto:rpossett@att.net)

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 4<sup>th</sup> of September, 2012, a true and correct copy of the above and foregoing objection response was mailed by first-class mail with postage prepaid thereon, to the following:

Mr. Irving L. Faught  
ODOS Administrator  
1<sup>st</sup> National Center, Suite 860  
120 North Robinson Ave  
Oklahoma City, OK 73102  
ATTENTION: Brenda London



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Pro se Respondent  
1413 North Lakeside Drive  
Andover, KS 67002-7415  
Fone: (316)-737-2993  
Email: [rpossett@att.net](mailto:rpossett@att.net)

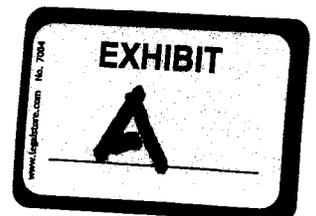
# ABSTRACT OF PLAINTIFF'S RESPONSE TO INTERROGATORIES'

SET ONE - PAGE 13

December 30, 2011

The Defendant (*Richard W. Possett, Sr.*) solicited a ninth loan from Plaintiff (*Gabriele S. Blankenship*) on October 31, 2007 in \$445,000 ("Forestry Property Purchase"). Defendant assured Plaintiff that this was an emergency "bridge" loan pending permanent financing. Plaintiff was very resistant to this loan, but Defendant insisted that if the closing did not occur that all investment would be lost. Defendant understood and was clear that this loan severely strained Plaintiff's available funds. Defendant promised that full repayment of this loan would occur in January of 2008.

The primary source of this loan was Plaintiff's Individual Retirement Account that is the subject of this lawsuit in the amount of \$357,931. Plaintiff obtained the balance of funds as follows: a) \$42,211.51 withdrawn from savings; and b) \$44,857 withdrawn from Plaintiff's savings. The amount of \$400,142.51 was wired directly to the closing attorney in Canada, and \$44,857.49 was paid by check to the Guenthers at the request of Defendant to be placed into Jenks Cochrane. Defendant assured Plaintiff that this entire loan would be repaid on or before January of 2008 after bank financing could be finalized.



ANNE MEYERS

181

date 10/29/07

34-1037/1031 08

Pay to the order of Pam Quentner

\$ 44,857.49

SpiritBank

2020 E. Main St. 910-224-0010  
Tulsa, Oklahoma 74122

Samie S Blank

⑆0004485749⑆

SPR

10-31-07 (34-005-10370) Acct # [redacted] 1828 Serial # 1 \$44,857.49

10382837  
111963701

043063825

615320074730

JPMORGAN CHASE BANK, N.A.

111000038 111963701 C WEIGHTED 392

10312607 10312607 97384893501 4/7/0

EXT-3415 TRC-3415 PK-01 EXT-3404 PK-3404 PK-16 00000000696659218 540044

0315713984 0410705267

Pamela Quentner

10-31-07 (34-005-10370) Acct # [redacted] 1828 Serial # 1 \$44,857.49

COPY OF ORIGINAL

Item Count: 1 Amount Total: \$44,857.49

COPY OF ORIGINAL

GSB Responses to Discovery No.: 000571

October 26, 2007

Account Number: [REDACTED] 0766

Questions:  
800-515-2157

Page 1 of 1

10/26-CL260002-001617-SML-74114310800-003281

Gabriele S Blankenship  
Charles Schwab & Co Inc Cust  
IRA Rollover



001617



**Notice of Third Party Disbursement(s)**

**What Has Occurred**

As of the date of this letter, Schwab has processed the following transaction(s) from your account listed above:

**Checks**

**Payee and Mail-to Address**

Amount: \$357,931.00

Gabriele S Blankenship  
[REDACTED]

Dollar value(s) cited are not intended for tax use. Schwab does not provide tax advice. Please consult your tax advisor.

If a disbursement was from a retirement account, and you requested tax withholding, the funds recipient was paid the net amount.

**Next Steps**

If you do not recognize this transaction or if you have any other questions regarding the transaction, please contact us immediately at the telephone number above.

0804-11182

15202

0000016170101



**CONFIDENTIAL**

074906 000002

THE ATTACHED CHECK IS IN PAYMENT OF ITEM DESCRIBED BELOW. IF NOT CORRECT PLEASE NOTIFY US IMMEDIATELY

10/26/07	<p style="text-align: right;">\$357,931.00</p> <p>PAID AS REGISTERED TO: GABRIELE S BLANKENSHIP</p> <p>[REDACTED]</p>	<p style="text-align: center;">ACCOUNT NUMBER</p> <p style="text-align: right;">[REDACTED]-0766-1</p>
IE04	CHECK NUMBER [REDACTED] 771	

Institutional Service Group P.O. Box 628290

REMOVE DOCUMENT BELOW THIS PERFORATION

WARNING: BACKGROUND OF CHECK IS BLUE INK WITH BLACK IMAGE

Institutional Service Group  
P.O. Box 628290

**Charles Schwab**

Bank One, NA  
Chicago, IL

70-78922

Check: **06 43771**

Date: OCTOBER 26, 2007

\$ \*\*\*\*\*357,931.00\*\*\*

PAY \*\*\*THREE HUNDRED FIFTY-SEVEN THOUSAND NINE HUNDRED THIRTY-ONE DOLLARS AND NO CENTS\*\*\*

TO THE ORDER OF GABRIELE S BLANKENSHIP

[REDACTED]

*Christina N. Doherty*  
*Christina N. Doherty*

CHECK VOID AFTER 180 DAYS  
Only one signature required for checks less than \$5,000

⑆0643771⑆ [REDACTED]

SEE REVERSE SIDE FOR OPENING INSTRUCTIONS

Institutional Service Group  
P.O. Box 628290  
Personal and Confidential

GABRIELE S BLANKENSHIP

[REDACTED]

GSB DISCOVERY RESPONSE NO.:


**W3 bank**  
 CHECKING DEPOSIT

ACCOUNT NO. [REDACTED] 0695

Date 10.29.07

Name Garnet Blankenship

Signature \_\_\_\_\_

CASH ON HAND  
 1110.00  
 357931.00  
 NET TOTAL  
 LESS CASH RECEIVED  
 \$ 359041.00

15760 [REDACTED] 0695

10/30/07

359,041.00



THE ATTACHED CHECK IS IN PAYMENT OF ITEM DESCRIBED BELOW. IF NOT CORRECT PLEASE NOTIFY US IMMEDIATELY

		ACCOUNT NUMBER
10/26/07	<p style="text-align: right;">\$357,931.00</p> <p>PAID AS REGISTERED TO:            GABRIELE S BLANKENSHIP            [REDACTED]            DELAWARE AVE</p>	[REDACTED] 0766-1
IE04	CHECK NUMBER 0643771	

Institutional Service Group P.O. Box 628290

REMOVE DOCUMENT BELOW THIS PERFORATION

CENTRAL BANCOMPANY

FUNDS TRANSFER NOTIFICATION

10-31-2007

CENTRAL BANCOMPANY  
OUTGOING WIRE TRANSFER  
ADVISE OF DEBIT

Date: 10/31/2007  
Customer Name: GABRIELE S BLANKENSHIP  
Account Debited: [REDACTED] 0695

Dollar Amount: \$400142.51  
3D IMAD Reference #: 20071031H6B7011C000039

WIRE TRANSFER INFORMATION:

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Receiving Bank: BK OF NYC  
Receiving Bank ABA: 021000018

Originator: GABRIELE S BLANKENSHIP  
Originator Account: [REDACTED] 0695  
Originator Info: POD ON FILE

[REDACTED]

Originating Bank: ONB BANK & TRUST  
Structuring Bank:

Beneficiary: CARTER LOCK & HORRIGAN  
Beneficiary Account: 1795-15  
Beneficiary Info: BARRISTERS & SOLICITORS  
200,9803-101 AVENUE GRAND PRARIE  
ALBERTA T8VOX6 CANADA

Intermediary Bank: CENTRAL BANK  
Beneficiary Bank: SCOTIABANK

Reference for BNF:  
Originator to BNF Information:  
Bank to Bank Information: {6500}INTERMEDIARY ABA: 026002532\*

GABRIELE S BLANKENSHIP  
POD ON FILE

[REDACTED]

