

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

JUN - 9 2004

PATRICIA PRESLEY, COURT CLERK
by _____
Deputy

Oklahoma Department of Securities)
ex rel. Irving L. Faught,)
Administrator,)

Plaintiff,)

v.)

Ananth S. Rajan, d/b/a)
The Investors Club,)

Defendant.)

Case No. CJ-03-2889
Judge Bryan C. Dixon

STIPULATION AND CONSENT

Defendant Ananth S. Rajan ("Defendant") hereby stipulates and consents to the following:

1. The Oklahoma Department of Securities ("Department"), pursuant to Section 406.1 of the Oklahoma Securities Act ("Act"), Okla. Stat. tit. 71, §§ 1-413, 501, 701-703 (2001 & Supp. 2002), is the proper party to bring this action seeking the relief requested in the Department's Petition for Permanent Injunction and Other Equitable Relief ("Petition");

2. Defendant is subject to the jurisdiction of this Court;

3. Defendant stipulates and admits to service upon him of summons and the Petition;

4. Defendant consents to the entry of the Order in the form attached hereto as Exhibit "A" and incorporated herein by reference ("Order") and waives any right he may have to appeal from the entry of the Order;

5. Defendant stipulates to the entry of the Dismissal attached hereto as Exhibit "B" and incorporated herein by reference;

6. Defendant agrees that this Stipulation and Consent ("Stipulation and Consent") is entered into voluntarily and that no threat or promise of immunity of any kind has been made by the Administrator or staff of the Department to coerce agreement with this Stipulation and Consent;

7. Defendant consents to the presentation of this Stipulation and Consent, the Order and the Dismissal to the Court to be entered without further notice; and

8. Defendant consents to the retention by the Court of jurisdiction of this matter for the purpose of enforcement of the Order and the Stipulation and Consent.

IN WITNESS WHEREOF, Defendant has executed this Stipulation and Consent as of the date and year set forth below.

Ananth S. Rajan:

Ananth S. Rajan

Date: June 9, 2004

SUBSCRIBED AND SWORN TO BEFORE ME on this 9 day of

June, 2004.

(Seal)

Brenda London Smith
Notary Public

My commission expires:

Aug 26 2005

My commission number:

01013792

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The Investors Club,)
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FINAL ORDER OF PERMANENT INJUNCTION

This matter comes before this Court on this _____ day of _____, 2004, before the undersigned Judge of the District Court in and for Oklahoma County, State of Oklahoma. Plaintiff appears by and through its attorney, Shaun Mullins. Defendant Ananth S. Rajan ("Defendant") appears *pro se*. The Court, having reviewed all of the evidence offered and the Court file, and being advised that the parties agree to the entry of this Order, finds as follows:

On the 4th day of April, 2003, the Department filed a Petition For Permanent Injunction and Other Equitable Relief pursuant to the Oklahoma Securities Act (the "Act"), Okla. Stat. tit. 71, §§ 1-413, 501, 701-703 (2001 & Supp. 2002).

Defendant has executed a Stipulation and Consent ("Stipulation and Consent"), filed herein, consenting to the entry of this Order. The Department has no objection to the terms of the Stipulation and Consent and agrees to the entry of this Order.

Therefore, based on the evidence reviewed and the execution of the Stipulation and Consent, the Court finds that the following order should be entered.

IT IS HEREBY ORDERED, ADJUDGED AND DECREED by the Court that the Stipulation and Consent filed herein be, and hereby is, incorporated in this Order of Permanent Injunction with the same force and effect as if set forth herein.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court that Defendant be, and hereby is, permanently enjoined and restrained from, directly or indirectly, offering and/or selling any security in and/or from the state of Oklahoma.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court that Defendant be, and hereby is, permanently enjoined and restrained from violating subsection (1) of Section 101 of the Act by, directly or indirectly, employing any device, scheme, or artifice to defraud in connection with the offer, sale, or purchase of any security in and/or from the state of Oklahoma.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court that Defendant be, and hereby is, permanently enjoined and restrained from violating subsection (2) of Section 101 of the Act by, directly or indirectly, making any untrue statement of a material fact or omitting to state material facts necessary in order to make statements made, in light of the circumstances under which they are made, not misleading, in connection with the offer, sale, or purchase of any security in and/or from the state of Oklahoma.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court that Defendant be, and hereby is, permanently enjoined and restrained from violating subsection (3) of Section 101 of the Act by, directly or indirectly,

engaging in any act, practice or course of business which operates or would operate as a fraud or deceit upon any person in connection with the offer, sale or purchase of any security in and/or from the state of Oklahoma.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that this Court will retain jurisdiction of this matter for the purpose of enforcement of this Order and the Stipulation and Consent.

IT IS SO ORDERED.

Dated this _____ day of _____, 2004.

JUDGE OF THE DISTRICT COURT

Approved as to form:

Oklahoma Department of Securities
Irving L. Faught, Administrator

Shaun M. Mullins, OBA #16869
Oklahoma Department of Securities
120 North Robinson, Suite 860
Oklahoma City, Oklahoma 73102
(405) 280-7700
(Attorney for Plaintiff)

Ananth S. Rajan
1315 Homeland Avenue
Norman, OK 73072
(Defendant)

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<u>ex rel.</u> Irving L. Faught,)	
Administrator,)	
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Plaintiff,)	
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v.)	Case No. CJ-03-2889
)	Judge Bryan C. Dixon
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The Investors Club,)	
)	
Defendant.)	

DISMISSAL

On the 4th day of April, 2003, the Department filed a Petition For Permanent Injunction and Other Equitable Relief pursuant to the Oklahoma Securities Act (the "Act"), Okla. Stat. tit. 71, §§ 1-413, 501, 701-703 (2001 & Supp. 2002).

On the 9th day of June, 2004, Defendant executed a Stipulation and Consent consenting to the entry of a final order of permanent injunction.

On the _____ day of _____, 2004, the Court ordered that Defendant be permanently enjoined and restrained from, directly or indirectly, offering and/or selling any security in and/or from the state of Oklahoma and violating Section 101 of the Act.

Accordingly, Plaintiff, Oklahoma Department of Securities ex rel. Irving L. Faught, hereby dismisses the above styled action.

Respectfully submitted,

Shaun M. Mullins (OBA# 16869)
Oklahoma Department of Securities
First National Center, Suite 860
120 North Robinson
Oklahoma City, OK 73102
(405) 280-7700
(Attorney for Plaintiff)