

IN THE DISTRICT COURT OF OKLAHOMA COUNTY

STATE OF OKLAHOMA

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

v.)

Randall D. Jeffers and)
Renaissance U.S.A., Inc.)
Defendants.)

Case No. CJ 98-373-62

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

JUL 14 1999

PATRICIA PRESLEY, COURT CLERK

BY

PRE-TRIAL CONFERENCE ORDER

1. Appearances:

Mark Edmondson for the Plaintiff, Oklahoma Department of Securities *ex rel.* Irving L. Faught, Administrator.

No appearance for the Defendant Randall D. Jeffers ("Jeffers"). Jeffers was represented by Henry A. Meyer III until Mr. Meyer withdrew from the representation over the objection of the Plaintiff. Since that time, Plaintiff has been unable to contact Jeffers. In addition, Jeffers has not entered an appearance in this case nor has he contacted Plaintiff. All information described herein is that known to the Plaintiff and does not include any information of Jeffers.

2. General Statement of Facts:

a. What: On January 16, 1998, the District Court entered an order temporarily restraining Jeffers from offering any business opportunity in the state of Oklahoma unless such business opportunity was registered with the Department and temporarily restraining Jeffers from providing any information relating to the business opportunity known as Renaissance U.S.A., Inc., unless such information contained appropriate and full disclosure of facts relating to the business opportunity, including disclosure of prior actions taken against related companies and principals of Renaissance U.S.A., Inc. On that same date, Jeffers was served with the Petition, Temporary Restraining Order, and other pleading by a process server properly appointed by the Court for service of these papers. After service of the Temporary Restraining Order and other pleadings upon Jeffers, he conducted a seminar in Oklahoma City before numerous

people. At that seminar Jeffers promoted and offered the business opportunity known as Renaissance U.S.A., Inc. and failed to disclose material facts in connection with the offer of the business opportunity so as to make his statements and presentation not misleading. The business opportunity offered by Jeffers was not registered with the Department.

- b. Where: Oklahoma County, Oklahoma.
- c. When: January, 1998.
- d. Who: Defendant Randall D. Jeffers

3. Plaintiff's Contentions:

Grounds for Recovery

Applicable Statute

On the 16th day of January, 1998, the District Court entered a temporary restraining order against Jeffers.

21 O.S. §565

On that same date, Jeffers was served with the Petition, Temporary Restraining Order, and other pleading by a process server properly appointed by the Court for service of these papers. After service of the Temporary Restraining Order and other pleadings upon Jeffers, he conducted a seminar in Oklahoma City before numerous people, activity prohibited by the Temporary Restraining Order and in indirect contempt of the Court.

Relief Sought

That Jeffers be adjudged guilty of indirect contempt for failure to comply with the Temporary Restraining Order entered by the Court and be punished by a fine, imprisonment, or both and such other relief as the Court deems appropriate.

- 4. Defenses: None asserted.
- 5. Cross Petition (or Counterclaim or Set-Off): None Asserted.
- 6. Reply: None filed.
- 7. Miscellaneous:
 - a. Jury waived: Yes
 - b. Objection to jurisdiction of court: No
 - c. Are parties proper and correctly named or identified: Yes

Patricia A. Labarthe
Oklahoma Department of Securities
120 North Robinson, Suite 860
Oklahoma City, Oklahoma 73102

Will testify about the Oklahoma City meetings of Renaissance and the presentations of Jeffers. Will identify documents distributed at the meetings. Will also testify about the involvement of Jeffers in Destiny and orders issued against that entity and Jeffers by Oklahoma and other states. Will testify as to the application of the Oklahoma Business Opportunity Sales Act and the registration status of Renaissance with the Oklahoma Department of Securities. Will testify about an affidavit prepared and the service on Jeffers of a Temporary Restraining Order and Petition.

Sandra Brittain
12901 Nicholson Road, Suite 200
Farmers Branch, Texas 75234

Will testify about the service on Jeffers of a Temporary Restraining Order and Petition and the Renaissance meeting in Oklahoma City.

Randall D. Jeffers
14902 Preston Road, Number 374
Dallas, Texas

Will testify about the service of a Temporary Restraining Order and Petition and the Renaissance meeting in Oklahoma City.

13. Defendant's Witnesses: Unknown

14. Estimated Trial Time: One day

15. Stipulations: None at this time as Plaintiff has been unable to contact Jeffers. No stipulations were discussed with previous counsel.

16. Settlement: Not likely at this time.

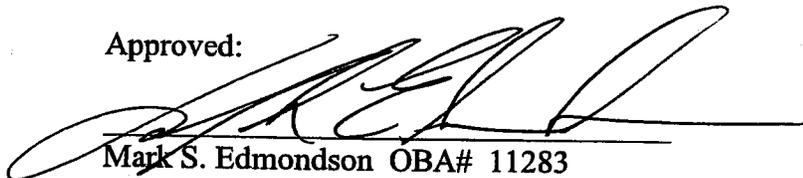
17. Other Matters: Action for permanent injunction filed by Plaintiff is also pending against Jeffers in this Court.

18: **TRIAL DATE SET:** On the 27 day of July, 1999 at 11:00
A.m.

19. Dated this 14th day of July, 1999.


District Court Judge

Approved:



Mark S. Edmondson OBA# 11283
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Attorney for Plaintiff