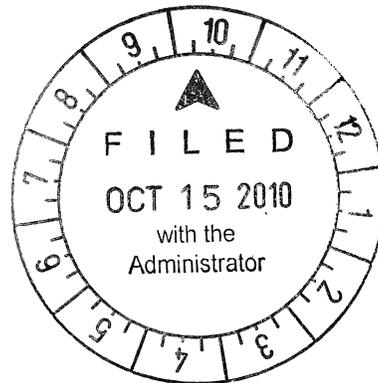


STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
THE FIRST NATIONAL CENTER
120 NORTH ROBINSON, SUITE 860
OKLAHOMA CITY, OKLAHOMA 73102



In the Matter of:

Geary Securities, Inc. *fka* Capital West Securities, Inc.;
Keith D. Geary; Norman Frager; and CEMP, LLC,

Respondents.

ODS File No. 09-141

**ANSWER BY RESPONDENTS GEARY SECURITIES, INC.,
KEITH D. GEARY, AND CEMP, LLC**

Pursuant to 660:2-9-1 of the Rules of the Oklahoma Securities Commission and the Administrator of the Department of Securities (the “Rules”), Respondents Geary Securities, Inc. (formerly known as Capital West Securities, Inc.) (“Geary Securities”), Keith D. Geary (“Geary”), and CEMP, LLC (“CEMP”) (at times collectively referred to as “Respondents”), submit the following as their Answer to the allegations contained in the Enforcement Division Recommendation dated September 22, 2010 (the “Recommendation”).

Response to Page 1 of Recommendation:

The first unnumbered paragraph of page 1 of the Recommendation merely consists of a general recitation of the investigation purportedly conducted by the Enforcement Division of the Oklahoma Department of Securities (“ODS”), but does not include any “allegation” of fact that requires a response from Respondents. The Rules only require Respondents to admit or deny “allegations” which, by practical definition and common understanding, consist of allegations of fact rather than conclusions or

statements of law. Notwithstanding the lack of a factual allegation and in the event it is determined a response is nevertheless required, Respondents lack sufficient information and knowledge and cannot obtain sufficient information to either admit or deny such allegations and, therefore, deny the same.

In response to the statements contained in the second unnumbered paragraph of page 1 of the Recommendation, Respondents state that the terms and provisions of the Rules, in their entirety, speak for themselves and all contrary, incomplete or inconsistent statements or inferences are denied. The factual allegations contained in the remainder of the second unnumbered paragraph of page 2 are denied.

In response to the statements contained in the third unnumbered paragraph of page 1 of the Recommendation, no response is required because no facts are alleged. However, in the event it is determined that a response is required, Respondents acknowledge that pages 2 through 22 of the Recommendation consist of Findings of Fact, Authorities, and Conclusions of Law, but deny their accuracy or appropriateness.

Response to Findings of Fact:

1. The allegations contained in paragraph 1 of the Recommendation's "Findings of Fact" are admitted.
2. The allegations contained in paragraph 2 of the Recommendation's "Findings of Fact" are admitted.
3. The allegations contained in paragraph 3 of the Recommendation's "Findings of Fact" are admitted.

4. The allegations contained in paragraph 4 of the Recommendation's "Findings of Fact" are admitted.
5. The allegations contained in the first sentence of paragraph 5 of the Recommendation's "Findings of Fact" are admitted. In response to the allegations in the second sentence, Respondents admit that CEMP was created as a special purpose entity, but denies the remainder of the second sentence. The allegations of the third sentence are admitted. In response to the allegations in the fourth sentence, Respondents admit that CEMP was not registered under the Act. Respondents are unable to admit or deny the remaining allegations in the fourth sentence because they are vague, ambiguous, confusing and potentially susceptible to differing and conflicting interpretations.
6. The allegations contained in paragraph 6 of the Recommendation's "Findings of Fact" are admitted.
7. The allegations contained in paragraph 7 of the Recommendation's "Findings of Fact" are admitted insofar as "the common ownership and control of The Geary Companies" is concerned; all remaining allegations are denied.
8. The allegations contained in Paragraph 8 of the Recommendation's "Findings of Fact" do not relate to Respondents; rather, the allegations concern an individual who is not a party to this proceeding and certain financial institutions that are not parties to this proceeding. Based on current information and belief, Respondents admit such allegations.

9. The allegations contained in paragraph 9 of the Recommendation's "Findings of Fact" are admitted insofar as "promoted" is interpreted to mean that Geary consulted with various financial institutions concerning leveraged investment programs; all contrary interpretations and inferences are denied.
10. The allegations contained in paragraph 10 of the Recommendation's "Findings of Fact" are admitted.
11. The allegations contained in paragraph 11 of the Recommendation's "Findings of Fact" concern interaction between two entities (the FDIC and Frontier State Bank) other than Respondents and Respondents were not parties to the referenced interactions and communications, such that Respondents lack sufficient information and knowledge and cannot obtain sufficient information to admit or deny the accuracy of such allegations and, therefore, deny the same.
12. The allegations contained in paragraph 12 of the Recommendation's "Findings of Fact" are admitted.
13. The allegations contained in paragraph 13 of the Recommendation's "Findings of Fact" concern interaction between two entities (the FDIC and Frontier State Bank) other than Respondents and Respondents were not parties to the referenced interactions and communications, such that Respondents lack sufficient information and knowledge and cannot obtain sufficient information to admit or deny the accuracy of such allegations and, therefore, deny the same.

14. In response to the allegations contained in paragraph 14 of the Recommendation's "Findings of Fact," Respondents state that the language, terms and provisions of the referenced Financial Institution Letter speak for themselves; all inconsistent or contrary allegations and inferences are denied.
15. The allegations contained in paragraph 15 of the Recommendation's "Findings of Fact" are admitted.
16. The allegations contained in the first sentence of paragraph 16 of the Recommendation's "Findings of Fact" are admitted. Respondents lack sufficient knowledge and information and cannot obtain sufficient information to admit or deny the remaining allegations and, therefore, deny the same.
17. The allegations contained in paragraph 17 of the Recommendation's "Findings of Fact" are admitted.
18. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in paragraph 18 of the Recommendation's "Findings of Fact" and, therefore, deny the same.
19. Respondents deny the allegations contained in paragraph 19 of the Recommendation's "Findings of Fact" are denied.
20. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in paragraph

20 of the Recommendation's "Findings of Fact" and, therefore, deny the same.

21. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in the first sentence of paragraph 21 of the Recommendation's "Findings of Fact" and, therefore, deny the same. The entirety of the email referenced and partially quoted by the second sentence of paragraph 21 speaks for itself and any contrary, inconsistent, or incomplete statement or inference is denied.

22. The allegations contained in paragraph 22 of the Recommendation's "Findings of Fact" are admitted, subject to the following exceptions which are denied. Respondents deny that Geary "Knew" that his proposed prices would, in fact, be higher than other bidders. Based on the specific use and purpose, Geary anticipated and expected that his proposed prices would be higher than other bidders that were expected to bid at deeply-discounted or "fire sale" price levels in an effort to take advantage of the market turmoil and confusion resulting from the Financial Institution Letter issued by the FDIC.

23. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in the first two sentences of paragraph 23 of the Recommendation's "Findings of Fact" and, therefore, deny the same. The remaining allegations in paragraph 23 are admitted.

24. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in the first two sentences of paragraph 24 of the Recommendation's "Findings of Fact" and, therefore, deny the same. The remaining allegations in paragraph 24 are admitted.
25. The allegations contained in paragraph 25 of the Recommendation's "Findings of Fact," while generally accurate, are materially incomplete in the context of the transaction that is the subject of paragraph 25, such that all resulting implications and inferences are denied.
26. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in paragraph 26 of the Recommendation's "Findings of Fact" and, therefore, deny the same.
27. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in paragraph 27 of the Recommendation's "Findings of Fact" and, therefore, deny the same.
28. The allegations contained in paragraph 28 of the Recommendation's "Findings of Fact" are admitted.
29. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in paragraph 29 of the Recommendation's "Findings of Fact" and, therefore, deny the same.

30. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in paragraph 29 of the Recommendation's "Findings of Fact" and, therefore, deny the same.
31. The allegations contained in paragraph 31 of the Recommendation's "Findings of Fact" are admitted.
32. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in paragraph 32 of the Recommendation's "Findings of Fact" and, therefore, deny the same.
33. The allegations contained in paragraph 25 of the Recommendation's "Findings of Fact" are admitted Insofar as the referenced administrative hearing commenced on June 1, 2009. Respondents lack sufficient information and knowledge and cannot obtain sufficient information to either admit or deny whether such commencement date was "as scheduled," or whether there had previously been scheduling modifications in connection with such hearing.
34. The allegations contained in the first and third sentences of paragraph 34 of the Recommendation's "Findings of Fact" are admitted. In response to the allegations contained in the second sentence, Respondents admit that Geary defended the leveraged investment program; however, Respondents currently lack sufficient information and knowledge and cannot obtain sufficient information to admit or deny whether Geary also defended

“Frontier’s management of its PL-CMO portfolio” and, therefore, denies the same.

35. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in the first sentence of paragraph 35 of the Recommendation’s “Findings of Fact” and, therefore, deny the same. The allegations contained in the second sentence are admitted.
36. In response to the allegations contained in paragraph 36 of the Recommendation’s “Findings of Fact,” Respondents state as follows. At the time the bids were submitted on the First Frontier Pool, Geary anticipated that, if Geary Securities was the successful bidder, the subject PL-CMOs would be held for a short period of time while the resecuritization and collateral enhancement processes were conducted and completed. Geary anticipated that financial institutions and accredited investors would be advised of the availability of the new securities based on their investment needs and objectives. All contrary allegations and inferences in paragraph 36 are denied.
37. The allegations contained in the first sentence of paragraph 37 of the Recommendation’s “Findings of Fact” are admitted. The allegations in the second sentence are denied because the phrase “due to capitalization issues that arose for the firm” is inaccurate and misleading. No “capitalization issues” “arose” for Geary Securities. The regulatory organization (“FINRA”) that monitors net capital levels for broker-dealers

such as Geary Securities first raised the question of a potential net capital issue related to the transactions involving the First Frontier Pool in approximately November 2009. After the subject trades were entered, Geary learned that Geary Securities' clearing firm ("Pershing") would not carry the subject securities pending completion of the resecuritization and collateral enhancement processes. All contrary and conflicting allegations and inferences are denied.

38. The allegations contained in paragraph 38 of the Recommendation's "Findings of Fact" are denied.
39. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in paragraph 39 of the Recommendation's "Findings of Fact" and, therefore, deny the same.
40. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in paragraph 40 of the Recommendation's "Findings of Fact" and, therefore, deny the same.
41. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in paragraph 41 of the Recommendation's "Findings of Fact" and, therefore, deny the same.
42. The allegations contained in paragraph 42 of the Recommendation's "Findings of Fact" are admitted.

43. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in paragraph 40 of the Recommendation's "Findings of Fact" and, therefore, deny the same.
44. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in paragraph 40 of the Recommendation's "Findings of Fact" and, therefore, deny the same.
45. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in paragraph 40 of the Recommendation's "Findings of Fact" and, therefore, deny the same.
46. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in paragraph 40 of the Recommendation's "Findings of Fact" and, therefore, deny the same.
47. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in paragraph 40 of the Recommendation's "Findings of Fact" and, therefore, deny the same.
48. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in paragraph

40 of the Recommendation's "Findings of Fact" and, therefore, deny the same.

49. In response to the allegations stated in paragraph 49 of the Recommendation's "Findings of Fact," Respondents state that CEMP, LLC was formed on or about July 16, 2009, to fulfill and perform the role stated in the documents related to the referenced offering including, but not limited to, the private placement memorandum.
50. The allegations contained in paragraph 50 of the Recommendation's "Findings of Fact" are admitted.
51. The allegations contained in paragraph 51 of the Recommendation's "Findings of Fact" are admitted.
52. The allegations contained in paragraph 52 of the Recommendation's "Findings of Fact" are admitted.
53. The allegations contained in paragraph 53 of the Recommendation's "Findings of Fact," while generally accurate, are materially incomplete in the context of the transaction that is the subject of paragraph 53 because of the omission of any reference to the fact that written purchase and sale agreements were utilized as part of such transaction. All implications and inferences resulting from such omission are denied.
54. The allegations contained in paragraph 54 of the Recommendation's "Findings of Fact," while generally accurate, are materially incomplete in the context of the transaction that is the subject of paragraph 54 because of the omission of any reference to the fact that written purchase and sale

agreements were utilized as part of such transaction. All implications and inferences resulting from such omission are denied.

55. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in paragraph 55 of the Recommendation's "Findings of Fact" and, therefore, deny the same.

56. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in paragraph 56 of the Recommendation's "Findings of Fact" and, therefore, deny the same.

57. The allegations contained in paragraph 57 of the Recommendation's "Findings of Fact," while generally accurate, are materially incomplete in the context of the transaction that is the subject of paragraph 57 because of the omission of any reference to the fact that written purchase and sale agreements were utilized as part of such transaction. All implications and inferences resulting from such omission are denied.

58. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in paragraph 58 of the Recommendation's "Findings of Fact" and, therefore, deny the same.

59. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in paragraph

59 of the Recommendation's "Findings of Fact" and, therefore, deny the same.

60. The allegations contained in paragraph 60 of the Recommendation's "Findings of Fact," while generally accurate, are materially incomplete in the context of the transaction that is the subject of paragraph 60 because of the omission of any reference to the fact that written purchase and sale agreements were utilized as part of such transaction. All implications and inferences resulting from such omission are denied.
61. The allegations contained in paragraph 61 of the Recommendation's "Findings of Fact" are vague and ambiguous due to the lack of any date reference and the phrase "Geary Securities would offer to buy" and, therefore, are denied.
62. The allegations contained in paragraph 62 of the Recommendation's "Findings of Fact" are denied.
63. The allegations contained in paragraph 63 of the Recommendation's "Findings of Fact" are denied.
64. The allegations contained in paragraph 64 of the Recommendation's "Findings of Fact" are denied.
65. The allegations contained in paragraph 65 of the Recommendation's "Findings of Fact" are admitted insofar as written Customer Agreements were executed, the terms and provisions of which speak for themselves. All inconsistent or contrary allegations and inferences are denied.

66. The allegations contained in paragraph 66 of the Recommendation's "Findings of Fact" are admitted insofar as written Securities Purchase Agreements were executed, the terms and provisions of which speak for themselves. All inconsistent or contrary allegations and inferences are denied.
67. The allegations contained in paragraph 67 of the Recommendation's "Findings of Fact" are admitted insofar as written Securities Purchase Agreements were executed, the terms and provisions of which speak for themselves. All inconsistent or contrary allegations and inferences are denied.
68. The allegations contained in paragraph 68 of the Recommendation's "Findings of Fact" are admitted insofar as written Customer Agreements were executed, the terms and provisions of which speak for themselves. All inconsistent or contrary allegations and inferences are denied.
69. The allegations contained in paragraph 69 of the Recommendation's "Findings of Fact" are admitted.
70. The allegations contained in paragraph 70 of the Recommendation's "Findings of Fact" are admitted.
71. The allegations contained in paragraph 71 of the Recommendation's "Findings of Fact" are denied.
72. The allegations contained in paragraph 72 of the Recommendation's "Findings of Fact" are admitted.

73. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in paragraph 73 of the Recommendation's "Findings of Fact" and, therefore, deny the same.
74. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in paragraph 74 of the Recommendation's "Findings of Fact" and, therefore, deny the same.
75. In response to the allegations contained in the first and second sentences of paragraph 75 of the Recommendation's "Findings of Fact," Respondents state as follows. The referenced purchase efforts were not consummated due to intervening developments beyond Respondents' control that prevented the anticipated closing from taking place. Geary promptly notified those involved. All inconsistent and contrary allegations and inferences are denied. The allegations in the third sentence are admitted.
76. The allegations contained in paragraph 76 of the Recommendation's "Findings of Fact" are denied.
77. The allegations contained in paragraph 77 of the Recommendation's "Findings of Fact" are denied.
78. The allegations contained in paragraph 78 of the Recommendation's "Findings of Fact" are denied.

79. The allegations contained in the first sentence of paragraph 79 of the Recommendation's "Findings of Fact" are admitted. The allegations in the second sentence are denied. The email exchange quoted in the third sentence speaks for itself; all inconsistent allegations and inferences are denied.
80. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in paragraph 80 of the Recommendation's "Findings of Fact" and, therefore, deny the same.
81. The allegations contained in paragraph 81 of the Recommendation's "Findings of Fact" are denied.
82. The allegations contained in paragraph 82 of the Recommendation's "Findings of Fact" are denied.
83. The allegations contained in paragraph 83 of the Recommendation's "Findings of Fact" are denied.
84. The allegations contained in paragraph 84 of the Recommendation's "Findings of Fact" are denied.
85. The allegations contained in paragraph 85 of the Recommendation's "Findings of Fact" are denied.
86. The allegations contained in paragraph 86 of the Recommendation's "Findings of Fact" are denied.
87. The allegations contained in paragraph 87 of the Recommendation's "Findings of Fact" are admitted.

88. The allegations contained in paragraph 88 of the Recommendation's "Findings of Fact," while generally accurate, are materially incomplete in the context of the referenced rating assignment that is the subject of paragraph 88, such that all resulting implications and inferences are denied.
89. The allegations contained in paragraph 89 of the Recommendation's "Findings of Fact" are admitted.
90. The allegations contained in paragraph 90 of the Recommendation's "Findings of Fact" are admitted.
91. The allegations contained in paragraph 91 of the Recommendation's "Findings of Fact" are admitted.
92. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in paragraph 92 of the Recommendation's "Findings of Fact" and, therefore, deny the same.
93. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in the first sentence of paragraph 94 of the Recommendation's "Findings of Fact" and, therefore, deny the same. The terms and provisions of the private placement memorandum referenced by the second sentence speak for themselves; all inconsistent or contrary allegations and inferences are denied.

94. Respondents lack sufficient knowledge and information and cannot obtain information to either admit or deny the allegations contained in paragraph 94 of the Recommendation's "Findings of Fact" and, therefore, deny the same.
95. The allegations contained in paragraph 95 of the Recommendation's "Findings of Fact" are admitted.
96. The allegations contained in paragraph 96 of the Recommendation's "Findings of Fact" are denied.
97. The allegations contained in paragraph 97 of the Recommendation's "Findings of Fact" are denied.
98. The allegations contained in paragraph 98 of the Recommendation's "Findings of Fact" are denied.
99. The allegations contained in paragraph 99 of the Recommendation's "Findings of Fact" are denied.
100. The allegations contained in paragraph 100 of the Recommendation's "Findings of Fact" are denied.
101. The allegations contained in the first and second sentences of paragraph 101 of the Recommendation's "Findings of Fact" are admitted. The entirety of the language of the email referenced and partially quoted in the third sentence speaks for itself; all contrary or inconsistent allegations and inferences are denied.
102. The allegations contained in paragraph 102 of the Recommendation's "Findings of Fact" are admitted.

103. The allegations contained in paragraph 103 of the Recommendation's "Findings of Fact" are admitted.
104. The allegations contained in paragraph 104 of the Recommendation's "Findings of Fact" are admitted.
105. The allegations contained in paragraph 105 of the Recommendation's "Findings of Fact" are admitted.
106. The allegations contained in paragraph 106 of the Recommendation's "Findings of Fact" are admitted.
107. The allegations contained in paragraph 107 of the Recommendation's "Findings of Fact" are denied.
108. The allegations contained in paragraph 108 of the Recommendation's "Findings of Fact" are denied.
109. The allegations contained in paragraph 109 of the Recommendation's "Findings of Fact" are denied.
110. The allegations contained in paragraph 110 of the Recommendation's "Findings of Fact" are admitted.
111. The allegations contained in paragraph 111 of the Recommendation's "Findings of Fact" are denied.
112. The allegations contained in paragraph 112 of the Recommendation's "Findings of Fact" are vague and ambiguous (including, but not limited to, the phrase "his offer to McKean") and are, therefore, denied.
113. The allegations contained in paragraph 113 of the Recommendation's "Findings of Fact" are denied.

114. The allegations contained in paragraph 114 of the Recommendation's "Findings of Fact" are admitted.
115. The allegations contained in paragraph 115 of the Recommendation's "Findings of Fact" are denied.
116. The allegations contained in paragraph 116 of the Recommendation's "Findings of Fact" are admitted.
117. The allegations contained in paragraph 117 of the Recommendation's "Findings of Fact" are denied.
118. The allegations contained in paragraph 118 of the Recommendation's "Findings of Fact" are denied.
119. The allegations contained in paragraph 119 of the Recommendation's "Findings of Fact" are denied.

Response to Authorities:

The Rules do not require Respondents to respond to the recitation of "Authorities" set forth at pages 17-19 of the Recommendation because such recitations do not constitute allegations of fact. Subject to and without waiving the foregoing statement, Respondents further state that the language, terms, and interpretations and applications of each of the "Authorities" recited in the Recommendation speak for themselves.

Response to Conclusions of Law:

The Rules do not require Respondents to respond to the "Conclusions of Law" set forth at pages 20-21 of the Recommendation because such recitations do not constitute allegations of fact. Subject to and without waiving the foregoing statement, in the event

it is later determined that the “Conclusions of Law” contain any allegations of fact that require a response, Respondents deny paragraphs 1 through 6 of the “Conclusions of Law” in their entirety.

Affirmative Defenses

1. The Recommendation fails to show cause why an order should be issued by the Administrator and against Respondents based on the Recommendation.
2. The Recommendation fails to state a viable claim for relief against Respondents.
3. The Recommendation’s purported Findings of Fact, Conclusions of Law, and requested or recommended action and relief are preempted, in whole or in part, for the reason that permitting state law liability for the net capital violations alleged by the Recommendation would be in conflict with the Securities Exchange Act of 1934 and its regulatory regime.
4. Subject to and without waiving or limiting Affirmative Defense number 3 above, the Administrator should decline to take any action on the Recommendation because its allegations are premature. The Department lacks the jurisdiction and authority to take independent action and impose state law liability concerning alleged net capital violations by a registered broker-dealer such as Geary Securities; rather, the Department’s jurisdiction and authority is limited to the declaration of a violation after the broker-dealer’s primary regulator has concluded that a violation occurred. To date, no such conclusion has been made by the United States Securities and

Exchange Commission or the Financial Industry Regulatory Authority, which comprise the regulators primarily responsible for the establishment, supervision, amendment, qualification, monitoring and calculation of statutory net capital levels for broker-dealers such as Geary Securities.

5. The Recommendations allegations of violations by Respondents are based, in whole or in part, on Rules 660:11-5-17 and 660:11-5-42, which contain unconstitutional violations of legislative authority and are, therefore, void and unenforceable.
6. Respondents reserve their right to amend, revise and supplement their affirmative answers as discovery is conducted pursuant to a scheduling order to be entered pursuant to the Rules.

Request for Hearing

Respondents' separately-filed Request for Hearing is hereby adopted and incorporated herein by reference.

WHEREFORE, Respondents Geary Securities, Inc. (formerly known as Capital West Securities, Inc.), Keith D. Geary, and CEMP, LLC, having fully answered and responded to the Recommendation. Respectfully request that the Administrator refrain from issuing an order based on the Recommendation and dismiss this proceeding with prejudice.

Respectfully submitted,



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**ATTORNEYS FOR RESPONDENTS
GEARY SECURITIES, INC., KEITH D.
GEARY, AND CEMP, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on October 15, 2010, a copy of the foregoing document was served on the following by hand delivery:

Irving L. Faight, Administrator of the Oklahoma Department of Securities
120 North Robinson, Suite 860
Oklahoma City, OK 73102; and

Melanie Hall, Director of Enforcement
Terra Shamas Bonnell, Enforcement Attorney
Oklahoma Department of Securities
120 North Robinson, Suite 860
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and by electronic delivery to:

Donald A. Pape, Esq.

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Joe M. Hampton