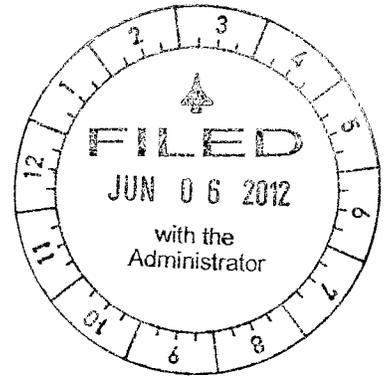


STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
THE FIRST NATIONAL CENTER
120 N. ROBINSON, SUITE 860
OKLAHOMA CITY, OKLAHOMA 73102



In the Matter of:

Anthony L. Cross (CRD #3155726), and
The O.N. Equity Sales Company (CRD #2936),

Respondents.

ODS File No. 11-017

ANTHONY CROSS MOTION FOR APPOINTMENT OF AN INDEPENDENT HEARING OFFICER

Respondent Anthony L. Cross ("Cross") respectfully submits this Motion for Appointment of an Independent Hearing Officer in the referenced matter. In support of this Motion, Cross alleges and states that:

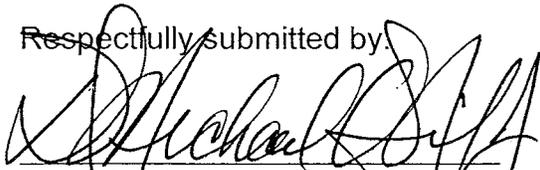
1. Oklahoma Administrative Code Title 660, Chapter 2, Section 2-9-2 provides that the Administrator of the Department of Securities may serve as Hearing Officer in this matter or appoint another Hearing Officer when deemed appropriate under the circumstances. This Section also provides that the Administrator or Hearing Officer may recuse himself upon the motion of a party based upon reasonable grounds, or upon his own motion.
2. The Administrator of the Department of Securities, or any of his staff, may have a conflict of interest if serving as the Hearing Examiner in the instant matter. This is because the Department makes policy decisions with respect to filing Enforcement Actions such as the instant matter, and a Department of Securities

employee / staff member serving as Hearing Examiner would be making rulings on motions, arguments, and findings proposed by co-employee staff members.

3. In the interests of justice, to avoid actual conflicts of interest, and to avoid even the appearance of a conflict of interest, and to maintain confidence in the Department of Securities, it would be appropriate for the Administrator to recuse himself as Hearing Officer and appoint an Independent Hearing Officer for the instant matter.

WHEREFORE, premises considered, Cross respectfully moves the Administrator of the Department of Securities to recuse himself as Hearing Officer and appoint an Independent Hearing Officer in the instant matter who is not previously or presently associated in any way with the Oklahoma Department of Securities.

Respectfully submitted by:



D. Michael O'Neil, Jr. (OBA #6784)
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**ATTORNEY FOR RESPONDENT
ANTHONY CROSS**

CERTIFICATE OF SERVICE

DMO
I hereby certify that a copy of this instrument was served on the following individuals and entities by Hand Delivery, depositing same in the U.S. Mail, first-class postage prepaid, and/or by other means as noted below, on June 6, 2012:

Irving L. Faught
Administrator, Okla. Dept. of Securities
120 North Robinson, Suite 860
Oklahoma City, OK 73102

U.S. Mail Fax E-mail

Terra S. Bonnell, Enforcement Attorney
Oklahoma Department of Securities
120 North Robinson, Suite 860
Oklahoma City, Oklahoma 73102

U.S. Mail Fax E-mail

Robert J. Carlson
GABLEGOTWALS
100 West Fifth Street
Suite 1100
Tulsa, Oklahoma
ATTORNEYS FOR ONESCO

U.S. Mail Fax E-mail



D. Michael O'Neil