IN THE DISTRICT COURT IN AND FOR OKLAHOMA COUNTY
STATE OF OKLAHOMA

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

JUN 1 1 2009

PATRICIA PRESLEY, COURT CLERK
by _____
DEPUTY

Oklahoma Department of Securities *ex rel.* Irving L. Faught, Administrator,	)	
Plaintiff,	)	
v.	)	Case No. CJ-2009-2773
Global West Funding, Ltd., Co., an Oklahoma limited liability company; Global West Financial LLC, an Oklahoma limited liability company; Sure Lock Financial LLC, an Oklahoma limited liability company; Sure Lock Loans LLC, an Oklahoma limited liability company; The Wave-Goldmade, Ltd, an unincorporated association; Brian McKye, an individual; Joe Don Johnson, an individual; and James Farnham, an individual,	)	
Defendants,	)	
And	)	
Heritage Estate Service LLC, an Oklahoma limited liability company,	)	
Relief Defendant.	)	

DEFENDANT JOE DON JOHNSON'S RESPONSE TO SPECIAL MASTER'S MOTION FOR AN ORDER DIRECTING DEFENDANT JOE DON JOHNSON TO RETURN PROPERTY TRANSFERRED IN VIOLATION OF THIS COURT'S ORDER OF MARCH 24, 2009

Comes now the Defendant, Joe Don Johnson, and for his Response to Special Master's Motion for Order Directing Defendant Joe Don Johnson to Return Property

Transferred in Violation of this Court's Order of March 24, 2009, would allege and state as follows:

1. Defendant, Joe Don Johnson, admits that on March 24, 2009, this Court entered a Temporary Restraining Order, Order Freezing Assets and Order for Accounting in this case (the "TRO"), however, the Chase Bank account was not frozen. The bank account at the Bank of the West was frozen, however, Defendant, Joe Don Johnson, was no longer doing any business with Global West or Brian McKye. Defendant, Joe Don Johnson, was simply selling his trust instruments.

2. Please see Exhibit "1" attached hereto, specifically page 4, reflecting a balance of $768.45 in the Chase Bank account on March 24, 2009. This account was not frozen until the day the Special Master was appointed, April 23, 2009. The $4,000.00 from trust business was already withdrawn before the Special Master froze the account.

3. In response to the allegations that property was removed from the Heritage offices, attached hereto is Exhibit "2" reflecting a complete list of personal property removed from the office on March 24, 2009.

WHEREFORE, Defendants, Joe Don Johnson, respectfully requests that the Court enter an Order denying the Special Master's Motion for an Order Directing Defendant, Joe Don Johnson, to Return Property Transferred in Violation of this Court's Order of March 24, 2009 filed on May 12, 2009.

Respectfully submitted,

ADAMS & ASSOCIATES, P.C.

BY:_____

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CERTIFICATE OF SERVICE

This is to certify that on the 11 day of June, 2009, a true and correct copy of the above and foregoing document was mailed, with postage prepaid thereon, to:

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