

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

MAY 19 2009

PATRICIA PRESLEY, COURT CLERK
by _____
DEPUTY

OKLAHOMA DEPARTMENT OF)
SECURITIES EX REL. IRVING)
FAUGHT, ADMINISTRATOR,)

Plaintiff,)

v.)

Case No. CJ-2009-2773
Judge: Gurich, Noma D.

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,)
Oklahoma limited liability company; THE)
WAVE-GOLDMADE, LTD., an)
unincorporated association; BRIAN)
MCKYE, an individual; JOE DON)
Johnson, an individual; JAMES)
FARNHAM, an individual,)

Defendants.)

and)

HERITAGE ESTATE SERVICE,)
LLC, an Oklahoma limited liability)
company,)

Relief Defendant.)

**SPECIAL MASTER'S MOTION FOR AN ORDER TO ESTABLISH PROCEDURES
FOR THE SALE OF CERTAIN PROPERTY**

Stephen J. Moriarty ("Special Master") the Court appointed Special Master for
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; and BRIAN MCKYE, an individual (all collectively referred to as "Companies") moves the Court for the entry of an Order establishing procedures for the sale of certain property of the Companies. In support of the Motion, the Special Master represents as follows:

Factual Background

1. On April 1, 2009, this Court entered its Order Appointing Special Master and Approving Waiver of Special Master's Bond. Pursuant to the Order, the Special Master was given full authority to "operate and manage all assets" of the Companies. Further, Special Master was given the authority to "take immediate custody, possession, and control of any and all assets" of the Companies.

2. The major assets of the Companies consist of (a) the loan portfolio of Sure Lock Loans, LLC and the related assets associated with the operation of Sure Lock's lending offices located at (i) 2000 NW 39th Street, Oklahoma City, OK 73118, (ii) 1958 NW 10th Street, Oklahoma City, OK 73106, (iii) 108 S. Rockwell, Suite B, Oklahoma City, OK 73127, (iv) 2308 S. Air Depot Blvd., Midwest City, OK 73110, (v) 4844 S. Elwood Ave, Tulsa, OK 74126, (vi) 2110 Steve Owens Blvd, Miami, OK 74354, and (vii) 8916 Highway 59, Grove, OK 74344 (the "Sure Lock Assets") and (b) certain accounts purchased from Heritage Estate Service, LLC (the "Heritage Assets").

3. By motion, the Special Master has sought authority to sell (a) the Sure Lock Assets and (b) the Heritage Assets (collectively, the "Assets"). The Special Master has determined that a sale of the Sure Lock Assets and the Heritage Assets is in the best interests of the Companies and their creditors. A hearing on this motion is set for May 21, 2009.

4. At the request of Special Master, McKye furnished a Balance Sheet detailing the assets of the Companies; a copy of the Balance Sheet is attached hereto as Exhibit "A".

5. To the extent the assets identified on Exhibit "A" are owned by the Companies and are not included in the proposed sale of the Sure Lock Assets and the Heritage Assets (such assets being defined as the "Other Property"), Special Master seeks permission of this Court to conduct a public auction or auctions of the Other Property, on reasonable notice. Special Master asks that he be given discretion, after consultation with appropriate professionals, to determine appropriate notice and advertisement of such an auction or auctions.

6. Special Master will file a written report with the Court detailing all sales and any proceeds of such sales will be deposited by Special Master awaiting further Order of this Court.

WHEREFORE, the Special Master respectfully requests that the Court enter an order approving the process for sale of the Other Property on the terms and conditions set forth herein and for such other and further relief as this court deems just and proper.



STEPHEN J. MORIARTY (OBA #6410)
FELLERS, SNIDER, BLANKENSHIP,
BAILEY & TIPPENS, P.C.

100 North Broadway, Suite 1700

Oklahoma City, OK 73102

Phone: 405-232-0621

Fax: 405-232-9659

E-mail: smoriarty@fellerssnider.com

SPECIAL MASTER

NOTICE OF HEARING

Please be advised that a hearing on the foregoing Motion has been set for 10:00
A.m. on the 12th day of ~~August~~, 2009 before the Honorable Noma D. Gurich.
June

CERTIFICATE OF MAILING

This is to certify that on the 12th day of May, 2009, the foregoing
was sent by U.S. Mail, first class, postage prepaid to:

Patricia A. Labarthe, Esq.
Jennifer Shaw, Esq.
Oklahoma Department of Securities
120 N. Robinson, Suite 860
Oklahoma City, OK 73102

Clell I. Cunningham, III
Dunn, Swan & Cunningham, P.C.
2800 Oklahoma Tower
210 Park Avenue
Oklahoma City, OK 73102

Richard L. Rose
Mahaffey & Gore, P.C.
300 N.E. 1st Street
Oklahoma City, OK 73104

R. Scott Adams, Esq.
Adams & Associates, P.C.
204 North Robinson
Twenty-Fifth Floor
Oklahoma City, OK 73102

Robert G. McCampbell, Esq.
Kristin L. Huffaker, Esq.
Crowe & Dunlevy
20 North Broadway
Suite 1800
Oklahoma City, OK 73102

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OKLAHOMA DEPT
OF SECURITIES

James Farnham
6308 N. Harvard Avenue
Oklahoma City, OK 73122



Stephen J. Moriarty

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EXHIBIT "A"

SPECIAL MASTER HAS RELIED ON THE COMPANIES EXISTING BOOKS AND RECORDS FOR SOME OF THE INFORMATION CONTAINED HEREIN. NOTHING CONTAINED HEREIN SHOULD BE CONSTRUED AS A REPRESENTATION BY SPECIAL MASTER. NOTHING HEREIN SHOULD BE CONSTRUED AS AN ADMISSION BY SPECIAL MASTER. AS SPECIAL MASTER'S INVESTIGATION IS ONGOING, ALL INFORMATION CONTAINED HEREIN IS PRELIMINARY AND SUBJECT TO REVISION.

Balance Sheet

03/23/2009

ASSETS:

Cash on hand: (as of 01/15/09)	210,000.00
ACH's on hand (30days Wire):	425,000.00
Sure Lock Loans Receivables:	540,400.00
Global West Funding Receivables	483,600.00

Equity:

Stores Net Income (2yrs):	574,800.00
GWF Net Income (2yrs):	237,500.00

Intellectual Property:

104 Domains (Cost Basis):	2,050.00
4 ADT Licenses (Cost Basis):	4,800.00
2 Producing Web sites (2yrs):	15,000.00
1 Cutmymortgage application (cost basis):	33,000.00
1 Processmart Choice Contract (cost basis):	38,000.00
28 Popular call 800 numbers (cost basis):	4,700.00

Licenses:

9 State Oklahoma Lending Licenses:	9,000.00
3 Money Gram Licenses:	1,900.00
3 FSS Software Licenses:	7,200.00

Persona Property:

1 1990 Bounder 40' (cost basis):	15,000.00
1 1996 Mini Winabago (Cost basis):	6,000.00
3 Trucks Fleet: (cost basis):	6,000.00
1 Caddy (cost basis):	1,800.00
1 Suburban (cost basis):	1,200.00

Real Estate:

2308 S Air Depot (cost basis):	138,000.00
54000 E 340 Rd (cost basis):	15000.00

Aircraft:

1980 Grumann A1AB:	18,500.00
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Supplies:

Furniture & Fixtures (Store):	28,000.00
Furniture & Fixtures (Corporate):	41,900.00
9 "Credit cubble" Machines (cost basis):	36,000.00
3 Studio Trailers (Cost Basis):	27,000.00
1 Display Trailer (Cost Basis):	4,700.00
1 Car Hauler (Cost Basis):	2,700.00
5 "Breezy Money" Machines:	35,000.00
<u>Total:</u>	2,764,780.00