

JUN - 6 2011

IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA

PATRICIA ARBELY, COURT CLERK

Oklahoma Department of Securities )  
 ex rel. Irving L. Faught, )  
 Administrator, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 Robert E. Tucker, and )  
 Keystone Equity Group, Inc., )  
 )  
 Defendants. )

Case No. CJ-2010-2525

**PLAINTIFF'S APPLICATION FOR CITATION-INDIRECT CONTEMPT**

Plaintiff, Oklahoma Department of Securities *ex rel.* Irving L. Faught, Administrator, hereby charges and accuses Defendants Robert E. Tucker ("Tucker") and Keystone Equity Group, Inc. ("Keystone") (collectively, "Defendants"), of having knowingly, willfully and contemptuously disobeyed and violated a lawfully issued order of the District Court of Oklahoma County as follows:

1. Defendants executed a Stipulation and Consent to Final Order ("S&C"), attached hereto as "Exhibit A" and incorporated herein by reference, on March 28, 2011. Plaintiff, having no objection to the terms of the S&C, agreed to the entry of a Final Order, Judgment and Injunction ("Final Order"), attached hereto as "Exhibit B" and incorporated herein by reference, on March 30, 2011.
2. The Final Order required Defendants, jointly and severally, to pay a civil penalty in the amount of \$20,000 to Oklahoma's investor education program within forty-five (45) days of the entry of the Final Order.

3. The deadline for Defendants' payment of the civil penalty was May 14, 2011.
4. Plaintiff has not received Defendants' civil penalty payment.
5. Although Plaintiff contacted Defendants' counsel regarding the Defendants' failure to pay the civil penalty, Plaintiff has received no explanation for said failure.
6. The conduct described herein constitutes a violation of the Final Order and an instance of indirect contempt of court.

WHEREFORE, Plaintiff requests that Defendants Tucker and Keystone be adjudged guilty of indirect contempt for failure to remit \$20,000 and be punished by a fine, imprisonment, or both, and such other relief as the court deems appropriate to induce Defendants to obey the Final Order.

Respectfully submitted,



Melanie Hall, OBA # 1209  
Terra Shamas Bonnell, OBA # 20838  
Oklahoma Department of Securities  
120 North Robinson, Suite 860  
Oklahoma City, Oklahoma 73102  
Telephone (405) 280-7700  
Fax (405) 280-7742  
MHall@securities.ok.gov;  
TBonnell@securities.ok.gov  
*Attorneys for Plaintiff*

Gerald J. Lovoi, Esq.  
616 S. Boston, Ste. 403  
Tulsa, OK 74119  
Telephone (918) 622-0031  
glovoi@aol.com  
*Attorney for Defendants*

**CERTIFICATE OF MAILING**

The undersigned certifies that on the 6<sup>th</sup> day of June, 2011, a true and correct copy of the foregoing was mailed to:

Gerald J. Lovoi, Esq.  
616 S. Boston, Ste. 403  
Tulsa, OK 74119  
*Attorney for Defendants*

Robert E. Tucker  
2322 S. 87<sup>th</sup> E. Ave.  
Tulsa, OK 74129

Keystone Equity Group, Inc.  
c/o Robert E. Tucker  
2322 S. 87<sup>th</sup> E. Ave.  
Tulsa, OK 74129

  
Terra Shamas Bonnell

IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA

MAR 28 2011

CATHY DIA FREELIN, COURT CLERK  
BY \_\_\_\_\_ DEPUTY

Oklahoma Department of Securities	)
<i>ex rel.</i> Irving L. Faught,	)
Administrator,	)
	)
Plaintiff,	)
	)
v.	)
	)
Robert E. Tucker, and	)
Keystone Equity Group, Inc.,	)
	)
Defendants.	)

Case No. CJ-2010-2525

**STIPULATION AND CONSENT TO FINAL ORDER**

Defendants, Robert E. Tucker and Keystone Equity Group, Inc. (collectively, "Defendants"), hereby stipulate to the following:

1. Plaintiff, Oklahoma Department of Securities (the "Department"), is the proper party to bring this action seeking the relief requested in the *Petition for Permanent Injunction* ("Petition") filed in this matter.
2. Defendants are subject to the jurisdiction of this Court; this Court has subject matter jurisdiction of this action; and venue is proper in Oklahoma County.
3. Beginning in at least 2008, at least eight investors ("Investors"), including an Oklahoma resident, paid Defendants commitment fees ("Fees") totaling over \$160,000 pursuant to a contractual obligation set forth in "Commitment Letters to Fund" ("Commitment Letters") entered by the Investors in anticipation of Defendants funding loans of up to \$550,000,000 to the Investors. Investors sought the loans to fund various endeavors including, but not limited to, church renovations, construction projects and other investment opportunities.

4. The Commitment Letters are securities in the nature of evidences of indebtedness under Section 1-102 of the Oklahoma Uniform Securities Act of 2004 ("Act"), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (Supp. 2009).

5. Defendants enter this *Stipulation and Consent to Final Order* ("Stipulation and Consent") without admitting or denying any allegations in the Petition, except as stipulated above.

Defendants hereby undertake as follows:

1. Defendants consent to the entry of the Final Order, Judgment and Permanent Injunction against Defendants ("Final Order"), in the form attached hereto as "Exhibit A to Stipulation".

2. Defendants agree not to transact business in and/or from the state of Oklahoma as an agent, issuer, broker-dealer, investment adviser and/or investment adviser representative, as defined in the Act, or otherwise engage in the offer and/or sale of securities in and/or from the state of Oklahoma.

3. Defendants agree to, jointly and severally, pay a civil penalty in the amount of \$20,000, to Oklahoma's investor education program within thirty <sup>forty-five</sup> (30) days of the entry of the Final Order. The civil penalty shall be paid by money order or cashier's check payable to the "Oklahoma Department of Securities Investor Education Revolving Fund" and shall be mailed or hand-delivered to the Oklahoma Department of Securities, 120 North Robinson, Suite 860, Oklahoma City, Oklahoma 73102, on or before the date it is due.

4. Defendants state that this Stipulation and Consent is entered into voluntarily and that no threat or promise of immunity of any kind has been made by the Administrator of the

Department, any employee of the Department, or any member of the Oklahoma Securities Commission, to induce Defendants to enter into this Stipulation and Consent.

5. Defendants agree that the provisions of this Stipulation and Consent shall be incorporated by reference into the Final Order as though set forth in full therein.

6. Defendants waive any right to appeal the Final Order.

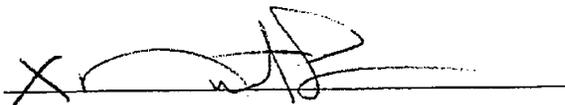
7. Defendants agree that this Court will retain jurisdiction over this matter for the purpose of enforcement of the Final Order and this Stipulation and Consent.

8. Defendants understand that Plaintiff will take action as authorized by law including, but not limited to, an enforcement action under the Act, for Defendants' failure to comply with the terms of the Final Order and this Stipulation and Consent in any material respect or for any future violation of the Act.

9. Defendants agree to the presentation of this Stipulation and Consent and the Final Order to the Court to be entered without further notice to Defendants.

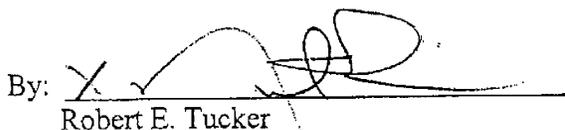
IN WITNESS WHEREOF, Defendants have executed this Stipulation and Consent as of the date and year set forth below the signature hereto.

**ROBERT E. TUCKER, INDIVIDUALLY**

X 

Date: 3-26 11

**KEYSTONE EQUITY GROUP, INC.**

By: X   
Robert E. Tucker

Date: 3-26 11

IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA

Oklahoma Department of Securities )  
*ex rel.* Irving L. Faught, )  
Administrator, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
Robert E. Tucker, and )  
Keystone Equity Group, Inc., )  
 )  
Defendants. )

Case No. CJ-2010-2525

**FINAL ORDER, JUDGMENT AND PERMANENT INJUNCTION**

On this \_\_\_\_ day of March, 2011, this matter came before the undersigned Judge of the District Court in and for Oklahoma County, State of Oklahoma, for entry by consent of this *Final Order, Judgment and Permanent Injunction* ("Final Order"). After a review of the pleadings and Defendants' *Stipulation and Consent to Final Order* ("Stipulation and Consent"), this Court finds:

On March 25, 2010, Plaintiff filed a petition alleging that Defendants engaged in violations of the Oklahoma Uniform Securities Act of 2004 ("Act"), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (Supp. 2009), in connection with the offer and/or sale of securities in and/or from Oklahoma. Defendants executed the Stipulation and Consent attached hereto as "Exhibit A to Order" and made a part hereof. Plaintiff has no objection to the terms of the Stipulation and Consent and agrees to the entry of this Final Order.

Based on the pleadings and execution of the Stipulation and Consent, this Final Order should be entered, and therefore:

EXHIBIT  
A  
To Stipulation

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Defendants are permanently enjoined from transacting business in and/or from the state of Oklahoma as an agent, issuer, broker-dealer, investment adviser and/or investment adviser representative, as defined in the Act, or otherwise engaging in the offer and/or sale of securities in and/or from the state of Oklahoma.

IT IS FURTHER ORDERED that Defendants, jointly and severally, pay a civil penalty in the amount of \$20,000, to Oklahoma's investor education program <sup>fourty five (45) days</sup> within ~~thirty (30)~~ days of the entry of the Final Order. The civil penalty shall be paid by money order or cashier's check payable to the "Oklahoma Department of Securities Investor Education Revolving Fund" and shall be mailed or hand-delivered to Oklahoma Department of Securities, 120 North Robinson, Suite 860, Oklahoma City, Oklahoma 73102, on or before the date it is due.

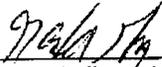
IT IS SO ORDERED.

Dated this \_\_\_\_ day of March, 2011.

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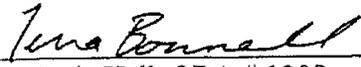
JUDGE OF THE DISTRICT COURT

Approved:



---

Gerald J. Lovoi, OBA # 12137  
616 S. Boston, Ste. 403  
Tulsa, OK 74119  
Telephone: (918) 622-0031  
glovoi@aol.com  
*Attorney for Defendants*



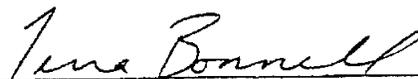
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Melanie Hall, OBA # 1209  
Terra Shamas Bonnell, OBA # 20838  
Oklahoma Department of Securities  
120 North Robinson, Suite 860  
Oklahoma City, Oklahoma 73102  
Telephone: (405) 280-7700  
Fax: (405) 280-7742  
mhall@securities.ok.gov  
tbonnell@securities.ok.gov  
*Attorneys for Plaintiffs*

### CERTIFICATE OF MAILING

The undersigned certifies that on the 28<sup>th</sup> day of March, 2011, a true and correct copy of the foregoing ~~Final Order, Judgment, and Permanent Injunction, with the Stipulation and Consent to Final Order attached,~~ was mailed to:

Gerald J. Lovoi, Esq.  
616 S. Boston, Ste. 403  
Tulsa, OK 74119  
*Attorney for Defendants*

  
\_\_\_\_\_  
Terra Shamas Bonnell

IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA

FILED IN THE DISTRICT COURT  
OKLAHOMA COUNTY, OKLA.

MAR 30 2011

PATRICIA PRESLEY, COURT CLERK

By HEPHY

Case No. CJ-2010-2525

Oklahoma Department of Securities )  
*ex rel.* Irving L. Faught, )  
Administrator, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
Robert E. Tucker, and )  
Keystone Equity Group, Inc., )  
 )  
Defendants. )

**FINAL ORDER, JUDGMENT AND PERMANENT INJUNCTION**

On this 30<sup>th</sup> day of March, 2011, this matter came before the undersigned Judge of the District Court in and for Oklahoma County, State of Oklahoma, for entry by consent of this *Final Order, Judgment and Permanent Injunction* ("Final Order"). After a review of the pleadings and Defendants' *Stipulation and Consent to Final Order* ("Stipulation and Consent"), this Court finds:

On March 25, 2010, Plaintiff filed a petition alleging that Defendants engaged in violations of the Oklahoma Uniform Securities Act of 2004 ("Act"), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (Supp. 2009), in connection with the offer and/or sale of securities in and/or from Oklahoma. Defendants executed the Stipulation and Consent attached hereto as "Exhibit A to Order" and made a part hereof. Plaintiff has no objection to the terms of the Stipulation and Consent and agrees to the entry of this Final Order.

Based on the pleadings and execution of the Stipulation and Consent, this Final Order should be entered, and therefore:

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Defendants are permanently enjoined from transacting business in and/or from the state of Oklahoma as an agent, issuer, broker-dealer, investment adviser and/or investment adviser representative, as defined in the Act, or otherwise engaging in the offer and/or sale of securities in and/or from the state of Oklahoma.

IT IS FURTHER ORDERED that Defendants, jointly and severally, pay a civil penalty in the amount of \$20,000, to Oklahoma's investor education program within ~~thirty (30)~~ <sup>forty five (45) days</sup> of the entry of the Final Order. The civil penalty shall be paid by money order or cashier's check payable to the "Oklahoma Department of Securities Investor Education Revolving Fund" and shall be mailed or hand-delivered to Oklahoma Department of Securities, 120 North Robinson, Suite 860, Oklahoma City, Oklahoma 73102, on or before the date it is due.

IT IS SO ORDERED.

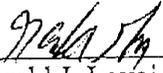
Dated this 30<sup>th</sup> day of March, 2011.

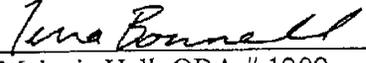
**TWYLA MASON GRAY**

JUDGE OF THE DISTRICT COURT

I, PATRICIA PRESLEY, Court Clerk for Oklahoma County, Okla., hereby certify that the foregoing is a true, correct and complete copy of the instrument herewith set out as appears of record in the District Court Clerk's Office of Oklahoma County, Okla., this 30<sup>th</sup> day of March, 2011.  
PATRICIA PRESLEY, Court Clerk  
Deputy

Approved:

  
\_\_\_\_\_  
Gerald J. Lovoi, OBA # 12137  
616 S. Boston, Ste. 403  
Tulsa, OK 74119  
Telephone: (918) 622-0031  
glovoi@aol.com  
*Attorney for Defendants*

  
\_\_\_\_\_  
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*Attorneys for Plaintiffs*

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*Attorney for Defendants*

  
\_\_\_\_\_  
Terra Shamas Bonnell

IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
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Defendants. )

Case No. CJ-2010-2525

**STIPULATION AND CONSENT TO FINAL ORDER**

Defendants, Robert E. Tucker and Keystone Equity Group, Inc. (collectively, "Defendants"), hereby stipulate to the following:

1. Plaintiff, Oklahoma Department of Securities (the "Department"), is the proper party to bring this action seeking the relief requested in the *Petition for Permanent Injunction* ("Petition") filed in this matter.
2. Defendants are subject to the jurisdiction of this Court; this Court has subject matter jurisdiction of this action; and venue is proper in Oklahoma County.
3. Beginning in at least 2008, at least eight investors ("Investors"), including an Oklahoma resident, paid Defendants commitment fees ("Fees") totaling over \$160,000 pursuant to a contractual obligation set forth in "Commitment Letters to Fund" ("Commitment Letters") entered by the Investors in anticipation of Defendants funding loans of up to \$550,000,000 to the Investors. Investors sought the loans to fund various endeavors including, but not limited to, church renovations, construction projects and other investment opportunities.

EXHIBIT  
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To Order

4. The Commitment Letters are securities in the nature of evidences of indebtedness under Section 1-102 of the Oklahoma Uniform Securities Act of 2004 ("Act"), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (Supp. 2009).

5. Defendants enter this *Stipulation and Consent to Final Order* ("Stipulation and Consent") without admitting or denying any allegations in the Petition, except as stipulated above.

Defendants hereby undertake as follows:

1. Defendants consent to the entry of the Final Order, Judgment and Permanent Injunction against Defendants ("Final Order"), in the form attached hereto as "Exhibit A to Stipulation".

2. Defendants agree not to transact business in and/or from the state of Oklahoma as an agent, issuer, broker-dealer, investment adviser and/or investment adviser representative, as defined in the Act, or otherwise engage in the offer and/or sale of securities in and/or from the state of Oklahoma.

3. Defendants agree to, jointly and severally, pay a civil penalty in the amount of \$20,000, to Oklahoma's investor education program <sup>forty-five (45) days</sup> within thirty (30) days of the entry of the Final Order. The civil penalty shall be paid by money order or cashier's check payable to the "Oklahoma Department of Securities Investor Education Revolving Fund" and shall be mailed or hand-delivered to the Oklahoma Department of Securities, 120 North Robinson, Suite 860, Oklahoma City, Oklahoma 73102, on or before the date it is due.

4. Defendants state that this Stipulation and Consent is entered into voluntarily and that no threat or promise of immunity of any kind has been made by the Administrator of the

Department, any employee of the Department, or any member of the Oklahoma Securities Commission, to induce Defendants to enter into this Stipulation and Consent.

5. Defendants agree that the provisions of this Stipulation and Consent shall be incorporated by reference into the Final Order as though set forth in full therein.

6. Defendants waive any right to appeal the Final Order.

7. Defendants agree that this Court will retain jurisdiction over this matter for the purpose of enforcement of the Final Order and this Stipulation and Consent.

8. Defendants understand that Plaintiff will take action as authorized by law including, but not limited to, an enforcement action under the Act, for Defendants' failure to comply with the terms of the Final Order and this Stipulation and Consent in any material respect or for any future violation of the Act.

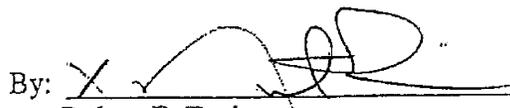
9. Defendants agree to the presentation of this Stipulation and Consent and the Final Order to the Court to be entered without further notice to Defendants.

IN WITNESS WHEREOF, Defendants have executed this Stipulation and Consent as of the date and year set forth below the signature hereto.

**ROBERT E. TUCKER, INDIVIDUALLY**

X   
Date: 3-26 11

**KEYSTONE EQUITY GROUP, INC.**

By: X   
Robert E. Tucker  
Date: 3-26 11