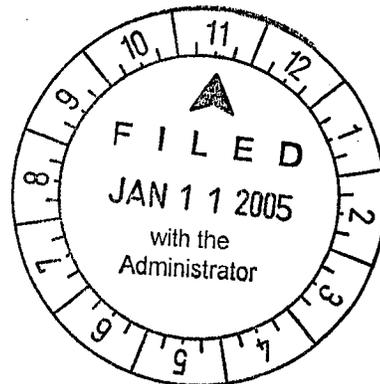


OKLAHOMA DEPARTMENT OF SECURITIES

In the Matter of:)
)
Benjamin Wei)
)
Respondent.)

ODS File No. 02-166



MOTION TO ASSOCIATE COUNSEL

Respondent Benjamin Wei, hereby moves the Court for an Order permitting Marc J. Ross to practice in the above styled and numbered cause pursuant to 5 O.S.1.1 et. seq. This motion is supported by the attached "Verified Application: (Exhibit A), "Certificate(s) of Good Standing (Exhibit B), and the "Statement of Compliance" (Exhibit C) from the Oklahoma Bar Association.

Respectfully submitted,
OGLE & WELCH, P.C.

A handwritten signature in black ink, appearing to be "J. David Ogle", written over a horizontal line.

J. DAVID OGLE, OBA NO. 17476
117 Park Avenue
Third Floor
Oklahoma City, Oklahoma 73102
(405) 232-9800 Telephone
(405) 232-1608 Facsimile
Attorney for Plaintiff

CERTIFICATE OF MAILING

The undersigned hereby certifies that on the 11th day of January, 2005, a true and correct copy of the above and foregoing instrument was mailed with postage prepaid thereon addressed to:

Rebecca Cryer, Enforcement Attorney
Oklahoma Department of Securities
120 North Robinson, Suite 860
Oklahoma City, Oklahoma 73102

A handwritten signature in black ink, appearing to be "Rebecca Cryer", written over a horizontal line.

EXHIBIT A

APPLICATION

 ORIGINAL



OUT OF STATE ATTORNEY REGISTRATION

Marc Jonathan Ross, Applicant, respectfully represents:
First Name Middle Name Last Name

1. Applicant resides at 99 Jane Street
New York NY Mailing Address NY 10014
City County State Zip Code
()
Telephone

2. Applicant is an attorney at law and a member of the law firm of Sichenzia Ross Friedman
Ference LLP

with its principal offices located at 1065 Avenue of the Americas, 21st Floor
New York NY Mailing Address NY 10018
City County State Zip Code
(212) 930-9700 () (212) 930-9725
Telephone (Firm) Telephone (Applicant's Direct Dial) Fax (Applicant)

mross@srff.com. If Applicant's office address is different from above,
E-mail Address (Applicant)

please provide the following: n/a
Mailing Address
City County State Zip Code

3. Applicant is admitted to practice and is a member in good standing
(statements attached) of the bar(s) of the highest court(s) of the following
state(s):

<u>State</u>	<u>Date of Admission</u>
New York	1988

4. Applicant is admitted to practice before the following United States District Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States, and/or other tribunals on the dates indicated for each, and is presently a member in good standing of the bars of said courts:

<u>Tribunal</u>	<u>Date of Admission</u>
U.S. District Court - Southern District of NY	April 1988
U.S. District Court - Eastern District of NY	April 1988

5. Applicant is not currently suspended or disbarred in any court except as hereinafter provided (Give particulars; e.g. court, jurisdiction, date): n/a

6. Applicant is not currently subject to any pending disciplinary proceedings by any organization with authority to discipline attorneys at law except as hereinafter provided (Give particulars; e.g. court, discipline authority, date, status): n/a

7. Applicant has never received public discipline including, but not limited to, suspension or disbarment, by any organization with authority to discipline attorneys at law except as hereinafter provided (Give particulars; e.g. court, discipline authority, type of discipline, date, status): n/a

8. Applicant has never had any certificate or privilege to appear and practice before any regulatory or administrative body suspended or revoked except as hereinafter provided (Give particulars; e.g. administrative body, date, status of suspension or reinstatement): n/a

9. Applicant, or any member of Applicant's firm with which Applicant is associated, has/have filed applications to appear as counsel in the state of Oklahoma during the past three (3) years in the following matters (including court cases, court annexed arbitrations, court annexed mediations, matters pending before an administrative agency or governmental body):

<u>Date of Application</u>	<u>Title of Court Administrative Body or Forum</u>	<u>Was Application Granted or Denied</u>
	n/a	

10. Applicant seeks admission to practice in the State of Oklahoma in the following matter (give particulars; e.g. caption of case, court or agency, type of matter, party to be represented): **Note - A separate application is to be submitted for each matter in which the applicant seeks admission!**

In the Matter of Benjamin Wei, ODS File No. 02-166,
 State of Oklahoma Department of Securities,
 Administrative Hearing, representing Respondent Benjamin Wei

11. The Oklahoma Bar Association member who is counsel of record for Applicant in this matter is:

J First Name	David Middle Name	Ogle Last Name	17476 O.B.A. Number
<u>117 Park Avenue, 3rd Flr</u> , <u>Oklahoma City</u> <u>OK</u> , <u>73102</u> ,			
Mailing Address		City State	Zip Code
(405) 232-9800 Telephone Number		(405) 232-1608 Fax Number	()dogle@oglewelchlaw.com E-mail Address

12. The following accurately represents the names of each party in this matter and the names and addresses of each counsel of record who appear for that party:

<u>Party Name</u>	<u>Counsel Name</u>	<u>Address of Counsel</u>
Benjamin Wei	Marc J. Ross	1065 Avenue of the Americas, 21st Fl New York, NY 10018
	Richard J. Babnick, Jr.	(same as above)
	J. David Ogle	117 Park Avenue, Oklahoma City, OK 73102
Department of Securities	Rebecca Cryer	Oklahoma Dept. of Securities First National Center, Suite 860, 120 North OK City, OK 73102

13. Applicant certifies that he/she shall be subject to the jurisdiction of the courts and disciplinary boards of this state with respect to the laws of this state governing the conduct of attorneys to the same extent as a member of the Oklahoma Bar Association.

14. Applicant understands and shall comply with the standards of professional conduct required of members of the Oklahoma Bar Association.

15. Applicant has disclosed in writing to the client that the Applicant is not admitted to practice in this jurisdiction and the client has consented to such representation.

I, Marc J Ross, do hereby swear/affirm under penalty of perjury that the assertions of this application are true:

I am the Applicant in the above referenced matter; I have read the foregoing and know the contents thereof; the same is true of my own knowledge except as to those matters therein stated on information and belief, and as to those matters I believe them to be true.

I further certify that I am subject to the jurisdiction of the Courts and disciplinary boards of this state with respect to the law of this state governing the conduct of attorneys to the same extent as a member of the Oklahoma Bar Association; I understand and shall comply with the standards of professional conduct required by members of the Oklahoma Bar Association; and that I am

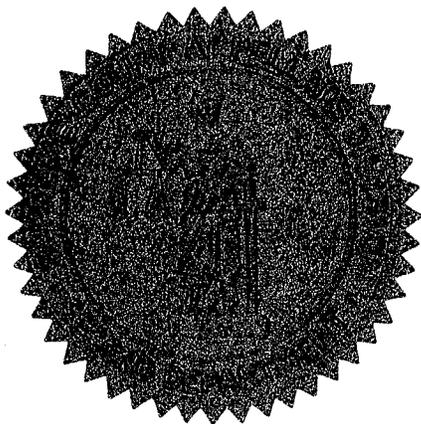
EXHIBIT B



Appellate Division of the Supreme Court
of the State of New York
Second Judicial Department

I, James Edward Pelzer, Clerk of the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department, do hereby certify that **Marc Jonathan Ross** was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of the State, according to the laws of the State and the court rules and orders, on the **13th** day of **April 1988** has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors at Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an attorney and counselor at law.

In Witness Whereof, I have hereunto set my hand and affixed
the seal of said Appellate Division on **December 20, 2004**



James Edward Pelzer

Clerk

EXHIBIT C

STATEMENT OF COMPLIANCE

Registration of Out-of-State Attorneys Act



The Oklahoma Bar Association, in response to the application of out-of-state attorney, submits the following statement pursuant to 5 O.S. 1.1 et.seq., :

1. There is no record of previous applications for appearance by applicant or other attorney members of the applicant's firm made within the last three (3) years.
2. Date of Application: **December 30, 2004**
3. Application Number: **2004-249**
4. Applying Attorney: **Marc Jonathan Ross**
Sichenzia Ross Friedman Ference LLP
1065 Avenue of the Americas 21st Fl
New York, NY 10018
5. The Application was: **GRANTED**

Dated this 30 day of December , 2004.

A handwritten signature in black ink, appearing to read "Gina L. Hendryx", is written over a horizontal line.

Gina L. Hendryx
Ethics Counsel
Oklahoma Bar Association
1901 N. Lincoln Blvd.
P.O. Box 53036
Oklahoma City, OK 73152-3036