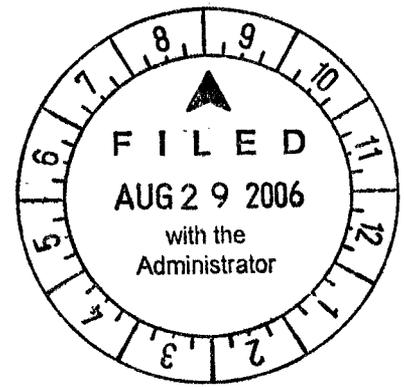


**STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
FIRST NATIONAL CENTER, SUITE 860
120 NORTH ROBINSON
OKLAHOMA CITY, OKLAHOMA 73102**



IN THE MATTER OF:

**WILBANKS SECURITIES, INC., CRD No. 40673,
RANDALL LEE WILBANKS, CRD NO. 2675482, AND
AARON BRONELLE WILBANKS, CRD NO. 1983697,**

RESPONDENTS.

FILE NO. ODS 05-029

**MOTION TO QUASH AND OBJECTION TO JURISDICTION
BY RESPONDENTS, AND, PLEADING IN THE ALTERNATIVE,
ANSWER, AND, PLEADING IN THE ALTERNATIVE,
REQUEST FOR HEARING**

COMES now the Respondents by and through their attorney of record Bill V. Wilkinson of Wilkinson Law Firm and respectfully allege and state as follows:

1. The Oklahoma Department of Securities caused to be served on Respondents a "Notice of Opportunity For Hearing" and "Enforcement Division Recommendation", copies of which are filed herein.
2. Oklahoma law requires the Oklahoma Department of Securities to file and serve an appropriate notice on Respondents.
3. The notice filed and served on Respondents is improper, incorrect, defective, and insufficient and should be quashed because it does not comply with and is inconsistent with the organization and procedural rules governing the Oklahoma Department of Securities, specifically 660:2-9-1.

4. Respondents appear specially and for purposes of this motion only urging that the Oklahoma Department of Securities lacks jurisdiction over Respondents because the notice is defective and should be quashed.

WHEREFORE, Respondents pray that the purported notice filed and served on them be quashed and that it be determined that the Oklahoma Department of Securities lacks jurisdiction over Respondents.

**PLEADING IN THE ALTERNATIVE
WITHOUT WAIVING JURISDICTION OBJECTIONS
RESPONDENTS REQUEST A HEARING**

5. Respondents, appearing specially and without waiving their objection to jurisdiction, plead in the alternative as follows: Respondents request a hearing in accordance with 660:2-9-1

**PLEADING IN THE ALTERNATIVE
WITHOUT WAIVING JURISDICTION OBJECTIONS
RESPONDENTS' ANSWER**

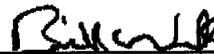
6. Respondents, appearing specially and without waiving their objections to jurisdiction, plead in the alternative as follows: Respondents submit their answer.
7. In accordance with 660:2-9-2(a), Respondents specifically deny the following allegations in the enforcement division recommendations: Paragraphs 9, 10, 11, 16, 17, 19, 20, 21, 22, 23, 27, 28, 29, 30, 32, 34, 36, 37, 40, 41, 44, 45, 46, 47, 48, 49, and 50. Paragraphs 42 and 43 are admitted only to the extent that such persons were considered for heightened supervision, but the remaining charges or accusations against Respondents are denied.

8. All paragraph numbers from 1 to 50 not enumerated in Paragraph 7 above are admitted.
9. Sections of the Enforcement Division Recommendation entitled "Authorities" and "Conclusions of Law" do not require a response; but to the extent that such arguments differ with the defenses relied on by the Respondents, they are denied.
10. The Notice and Enforcement Division Recommendations do not comply with 71 O.S. § 1-411 and/or such asserted claims are barred under Oklahoma law.

WHEREFORE, the Respondents pray that the charges and allegations thus be dismissed.

Respectfully submitted,

WILKINSON LAW FIRM

By: 

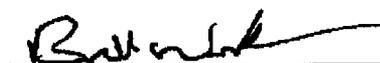
Bill V. Wilkinson, OBA No. 9621
7625 East 51st Street, Suite 400
Tulsa, Oklahoma 74145-7857
Tel: 918/663-2252; Fax: 918/663-2254

ATTORNEY FOR RESPONDENTS

CERTIFICATE OF SERVICE

I DO HEREBY CERTIFY that on the 29th day of August, 2006, I caused a true and correct copy of the foregoing to be mailed with proper postage fully prepaid thereon, to:

**TERRA SHAMAS, ATTORNEY
STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
FIRST NATIONAL CENTER, SUITE 860
120 NORTH ROBINSON
OKLAHOMA CITY, OKLAHOMA 73102**



Bill V. Wilkinson