

2. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 2 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

3. Keith Lamonda declines to admit, deny or otherwise answer the allegation regarding “illegal activity” in paragraph 3 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas, and is not required to admit or deny the remaining allegations of such paragraph.

4. Keith Lamonda is not required to admit or deny the legal statements concerning jurisdiction and venue in paragraph 4 of the Complaint. Keith Lamonda declines to admit, deny or otherwise answer the remaining allegations of paragraph 4 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

5. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 5 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

6. Keith Lamonda admits the allegations in paragraph 6 of the Complaint.

7. Keith Lamonda admits the allegations in paragraph 7 of the Complaint.

8. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 8 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

9. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 9 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

10. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 10 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

11. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 11 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

12. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 12 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

13. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 13 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

14. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 14 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

15. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 15 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 15, Article I of the Constitution of the State of Texas.

16. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 16 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

17. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 17 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

18. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 18 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

19. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 19 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

20. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 20 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

21. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 21 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

22. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 22 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

23. Keith Lamonda is not required to admit or deny what the alleged indictment referenced in paragraph 23 of the Complaint purportedly states, nor is he required to furnish a

response to the statements of law and procedure also contained in this paragraph. Keith Lamonda declines to admit, deny or otherwise answer the remaining allegations in paragraph 23 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

24. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 24 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

25. Keith Lamonda is not required to admit or deny what the alleged finding and orders referenced in paragraph 25 of the Complaint purportedly hold. Keith Lamonda declines to admit, deny or otherwise answer the remaining allegations in paragraph 25 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

26. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 26 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

27. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 27 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

28. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 28 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

29. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 29 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

30. Keith Lamonda is not required to admit or deny what the alleged order referenced in paragraph 30 of the Complaint purportedly states. Keith Lamonda declines to admit, deny or otherwise answer the remaining allegations in paragraph 30 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

31. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 31 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

32. Keith Lamonda reiterates all of his responses to each paragraph repeated and incorporated by the SEC in paragraph 32 of the Complaint.

33. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 33 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

34. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 34 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

35. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 35 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

36. Keith Lamonda reiterates all of his responses to each paragraph repeated and incorporated by the SEC in paragraph 36 of the Complaint.

37. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 37 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

38. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 38 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

39. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 39 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

40. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 40 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

41. Keith Lamonda reiterates all of his responses to each paragraph repeated and incorporated by the SEC in paragraph 41 of the Complaint.

42. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 42 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

43. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 43 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

44. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 44 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

45. Keith Lamonda declines to admit, deny or otherwise answer the allegations in paragraph 45 of the Complaint based on his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

46. Keith Lamonda reiterates all of his responses to each paragraph repeated and incorporated by the SEC in paragraph 46 of the Complaint.

47. Keith Lamonda reiterates all of his responses to each paragraph repeated and incorporated by the SEC in paragraph 47 of the Complaint his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

48. Keith Lamonda reiterates all of his responses to each paragraph repeated and incorporated by the SEC in paragraph 48 of the Complaint his rights under Amendment V to the Constitution of the United States of America and Section 10, Article I of the Constitution of the State of Texas.

49. Keith Lamonda is not required to answer the prayer made by the SEC in paragraphs 49 through 55 of the Complaint.

B. Affirmative Defenses

50. Keith Lamonda is not liable to the SEC because: (a) of estoppel; (b) of duress; (c) of illegality; (d) the SEC has failed to plead with the particularity required under Fed. R. Civ. P. 9(b); and (e) the SEC has failed to state a claim upon which relief may be granted.

C. Prayer

51. For these reasons, Keith Lamonda asks the court to enter judgment that the SEC take nothing, dismiss the SEC's suit with prejudice, assess costs against the SEC, and award Keith Lamonda all other relief to which he is entitled.

DATED: July 20, 2007.

Respectfully submitted,

KESSLER COLLINS, P.C.

/s/ Brad D'Amico

GARY S. KESSLER

State Bar No. 11358200

BRAD D'AMICO

State Bar No. 00783923

LISA C. TULK

State Bar No. 24047004

2100 Ross Avenue, Suite 750

Dallas, Texas 75201

(214) 379-0722

(214) 373-4714 (facsimile)

COUNSEL FOR C. KEITH LAMONDA

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above instrument has this day been sent by electronic means upon its filing to all parties pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5(a)(3)(A).

SIGNED on July 20, 2007.

/s/ Lisa C. Tulk

Lisa C. Tulk