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Department of Commerce  
Division of Securities

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Attorneys for Richard W. Mack

**BEFORE THE DIVISION OF SECURITIES  
OF THE DEPARTMENT OF COMMERCE  
OF THE STATE OF UTAH**

**IN THE MATTER OF:**

**vs.**

**WALNUT STREET SECURITIES, INC.,  
CRD#15840;  
RICHARD W. MACK CRD#2400825;  
CAROLE TURNER, CRD #274397,**

**Respondents**

**MOTION TO STAY**

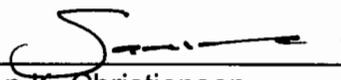
**Docket No. SD-06-0040  
Docket No. SD-06-0041  
Docket No. SD-06-0043**

Respondent Richard W. Mack, through counsel and pursuant to Department of Commerce Administrative Procedures Act Rule R151-46b-7(6)(a), hereby moves the Division of Securities (Division) for an order staying the instant proceeding pending the outcome of the injunction hearing scheduled for October 24, 2006. The October 24, 2006 hearing in the Third District Court of and for Salt Lake County, Utah before the Honorable Joseph C. Fratto, Jr. Case No. 060916268, has the potential to resolve the instant administrative proceeding in its entirety by declaring the proceeding to be barred. Because the motion to be argued at the upcoming hearing has the potential to resolve the instant administrative proceeding in its entirety, the Division should stay the proceeding

pending the outcome of the October 24, 2006 hearing. If the Third District Court ultimately rules against Mr. Mack, Mr. Mack would know to move forward and would respond to the Division's Petition for Order Revoking Licenses, Barring Licensees, and Imposing a Fine at that time.

DATED this 16<sup>th</sup> day of October, 2006.

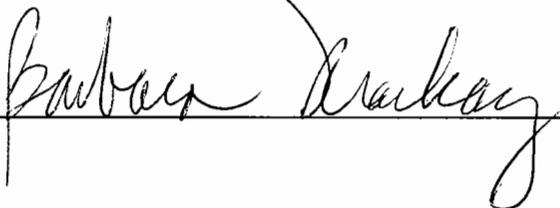
VAN COTT, BAGLEY, CORNWALL & MCCARTHY

By:   
\_\_\_\_\_  
Stephen K. Christiansen  
Clark K. Taylor  
Sam Meziani  
Attorneys for Richard W. Mack

**CERTIFICATE OF SERVICE**

I hereby certify that on this 16<sup>th</sup> day of October, 2006, I caused a true and correct copy of the foregoing MOTION TO STAY to be sent by U.S. Mail postage prepaid to the following:

Laurie L. Noda  
Assistant Attorney General  
Utah Attorney General's Office  
Commercial Enforcement Division  
160 East 300 South, 5<sup>th</sup> Floor  
Salt Lake City, Utah 84114-0872



Barbara Arakay