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

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IN THE MATTER OF:	:	RESPONDENT'S PROPOSED ANSWER TO
	:	ORDER TO SHOW CAUSE
DAVID FRANKLIN HULL, JR. ,	:	
	:	Docket No. 06-0088
Respondent.	:	

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Comes now Respondent David Franklin Hull, Jr., and responds to the Division's Order To Show Cause as follows:

FIRST DEFENSE

The order to show cause fails to state a claim upon which relief can be granted.

SECOND DEFENSE

Respondent has no duty under the statute to make a refund when a purchaser requests a refund.

THIRD DEFENSE

D.A. is an accredited investor and a sophisticated investor.

FOURTH DEFENSE

The alleged misstatements were not made "in connection with the sale of a security".

FIFTH DEFENSE

The allegations of the Division's Order to Show Cause are premised on fraud and the

Order fails to comply with the pleading requirements of Rule 9(b) of the Utah Rules of Civil Procedure. For example, the complainant is identified only by initials.

#### SIXTH DEFENSE

The alleged misstatements are not fraudulent.

#### SEVENTH DEFENSE

Respondent now answers the numbered paragraphs of the Order to Show Cause as follows:

1. Admit.
2. Admit.
3. Deny.
4. Respondent is without sufficient information to admit or deny the allegations and therefor he denies the allegations. Respondent avers that in connection with the sale of the Tambora shares to D.A. and Respondent never provided any shareholders letters to D.A. and the quoted statement is taken out of context.
5. Deny.
6. Deny and aver that Respondent with permission used the church's credit card in 2005, not 2004.
7. Respondent is without sufficient information to admit or deny the allegations and therefor he denies the allegations.
8. Admit
9. Deny.
10. Deny and aver that the Tambora shares were issued in D.A.'s name.

11. Respondent is without sufficient information to determine the truthfulness of the allegations and therefor deny.

12. Deny and aver the document speaks for itself.

13. Respondent incorporates by reference his responses to paragraph 1 through 12.

14. Deny.

15. Deny and aver that Hull never told D.A. that “when Tambora went public, D. A.’s investment would triple in value.”

16. Deny and aver that the use of the credit card occurred in 2005, not 2004.

17. Deny.

Having fully answered the allegations Respondent requests that the Order to Show Cause be dismissed and that Respondent be awarded his costs and attorney’s fees and for such other relief as is proper and fit.

Dated this 30 day of March 2007.

Boyack Ashton LC

By   
Wallace T. Boyack  
Attorneys for Respondent

Certificate of Service

The undersigned hereby certifies that on this 30 day of March 2007 the foregoing **Respondent's Proposed Answer to Order to Show Cause** was deposited for service in the U.S. Mails, postage pre-paid, addressed to the following:

*hand-delivered*

Administrative Court Clerk  
c/o Pam Redinski  
Utah Division of Securities  
160 East 300 South, Second Floor  
Box 146760  
Salt Lake City, Utah 84114-6760  
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*William Boyack*