

II.

- 10-11. Defendant admits the allegations stated in Paragraph's 10 and 11 of Plaintiff's Complaint.
12. Defendant admits the allegations stated in Paragraph 12 of Plaintiff's Complaint.
- 13-14. Defendant has insufficient information to either confirm or deny the allegations stated in Paragraphs 13-14 of Plaintiff's Complaint.
15. Defendant admits that he is a resident of Bellingham, Washington and that he has never been registered with the Commission, nor does he qualify for exemption from registration. Defendant denies the remainder of the allegations stated in Paragraph 15 of Plaintiff's Complaint.
- 16-17. Defendant has insufficient information to either confirm or deny the allegations stated in Paragraph 16 and 17 of Plaintiff's Complaint.
18. Defendant has insufficient information to either confirm or deny the allegations stated in Paragraph 18 of Plaintiff's Complaint.
- 19-31. Defendant admits the allegations stated in Paragraph 19-31 of Plaintiff's Complaint.
32. Defendant denies the allegations stated in Paragraph 32 of Plaintiff's Complaint as same apply to him. Defendant has insufficient information to either confirm or deny the remainder of the allegations.
- 33-34. Defendant has insufficient information to either confirm or deny the allegations stated in Paragraph 33-34 of Plaintiff's Complaint.
35. Defendant denies the allegations stated in Paragraph 35 of Plaintiff's Complaint as same apply to him. Defendant has insufficient information to either confirm or deny the remainder of the allegations.

36. Defendant generally admits the allegations stated in Paragraph 36 of Plaintiff's Complaint, but has insufficient information to either confirm or deny the exact mechanism of the payment structure.
37. Defendant denies the allegations stated in Paragraph 37 of Plaintiff's Complaint as same apply to him. Defendant has insufficient information to either confirm or deny the remainder of the allegations.
- 38-40. Defendant has insufficient information to either confirm or deny the allegations stated in Paragraph 38-40 of Plaintiff's Complaint.
41. Defendant admits that he was a client service representative, but otherwise denies the allegations stated in Paragraph 41 of Plaintiff's Complaint.
- 42-44. Defendant has insufficient information to either confirm or deny the allegations stated in Paragraph 42-44 of Plaintiff's Complaint.
- 45-46. Defendant denies the allegations stated in Paragraph 45-46 of Plaintiff's Complaint as same apply to him. Defendant has insufficient information to either confirm or deny the remainder of the allegations.
47. Defendant admits the allegations stated in Paragraph 47 of Plaintiff's Complaint as same apply to him. Defendant has insufficient information to either confirm or deny the remainder of the allegations.
- 48-52. Defendant denies the allegations stated in Paragraph 48-52 of Plaintiff's Complaint as same apply to him. Defendant has insufficient information to either confirm or deny the remainder of the allegations.

III.

53. See Defendant's above-stated responses to the allegations stated in Paragraph 1-52 of Plaintiff's Complaint.
- 54-57. Defendant denies the allegations stated in Paragraph 54-57 of Plaintiff's Complaint as same apply to him. Defendant has insufficient information to either confirm or deny the remainder of the allegations.
58. See Defendant's above stated responses to Paragraphs 1-57 of Plaintiff's Complaint.
- 59-60. Defendant has insufficient information to either confirm or deny the allegations stated in Paragraphs 59-60 of Plaintiff's Complaint.
- 61-62. Defendant denies the allegations stated in Paragraph 61-62 of Plaintiff's Complaint as same apply to him. Defendant has insufficient information to either confirm or deny the remainder of the allegations.
63. Defendant has insufficient information to either confirm or deny the allegations stated in Paragraph 63 of Plaintiff's Complaint.
64. See Defendant's above stated responses to Paragraphs 1-63. Defendant denies the allegations stated in Paragraph 64 of Plaintiff's Complaint as same apply to him. Defendant has insufficient information to either confirm or deny the remainder of the allegations.
- 65-66. Defendant admits that the allegations stated in Paragraphs 65 and 66 of Plaintiff's Complaint that he was not registered with the Commission, but he denies the remainder of the allegations in Paragraphs 65 and 66 of Plaintiff's Complaint as same apply to him. Defendant has insufficient information to either confirm or deny the remainder of the allegations.

67. See Defendant's above stated responses to Paragraphs 1-66. Of Plaintiff's Complaint.

68-71. Defendant has insufficient information to either confirm or deny the allegations stated in Paragraphs 68-71 of Plaintiff's Complaint.

72. See Defendant's above stated responses to Paragraphs 1-71 of Plaintiff's Complaint.

73-75. Defendant has insufficient information to either confirm or deny the allegations stated in Paragraphs 73-75 of Plaintiff's Complaint.

76. See Defendant's above stated responses to Paragraphs 1-75 of Plaintiff's Complaint.

77. Defendant admits the allegations stated in Paragraph 77 of Plaintiff's Complaint.

78-80. Defendant has insufficient information to either confirm or deny the allegations stated in Paragraphs 78-80 of Plaintiff's Complaint.

Finally, Defendant generally denies that the relief requested in Plaintiff's Complaint is applicable to him and prays that the Plaintiff take nothing by its claims against him.

WHEREFORE, PREMISES CONSIDERED, Defendant Friant prays that Plaintiff take nothing against him, that all relief requested by Plaintiff against Defendant be denied, that he go hence with his costs without day, and Defendant prays for all such other relief to which he may be entitled, both at law and in equity.

Respectfully Submitted,

Date: October 10, 2012

/s/ James W. George

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**ATTORNEY FOR DEFENDANT
JOEL FRIANT**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **DEFENDANT JOEL FRIANT'S ORIGINAL ANSWER TO PLAINTIFF'S COMPLAINT** has been served upon the parties of record by the Court's CM/ECF service on this 10th day of October, 2012:

/s/ James W. George

JAMES W. GEORGE