
UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

U.S. COMMODITY FUTURES
TRADING COMMISSION,

Plaintiff(s)

Case No: 09-cv-3332 MJD/FLN

v.

TREVOR COOK d/b/a CROWN
FOREX, LLC, PATRICK KILEY d/b/a
CROWN FOREX, LLC, UNIVERSAL
BROKERAGE FX and UNIVERSAL
BROKERAGE FX DIVERSIFIED, OXFORD
GLOBAL PARTNERS, LLC, OXFORD
GLOBAL ADVISORS, LLC, UNIVERAL
BROKERAGE FX ADVISORS, LLC f/k/a
UBS DIVERSIFIED FX ADVISORS, LLC,
UNIVERSAL BROKERAGE FX
GROWTH, L.P. f/k/a UBS DIVERSIFIED FX
GROWTH L.P., UNIVERSAL BROKERAGE
FX MANAGEMENT, LLC f/k/a UBS
DIVERSIFIED FX MANAGEMENT, LLC
and UBS DIVERSIFIED GROWTH, LLC,

Defendant(s)

R.J. ZAYED,

Receiver.

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,

Case No: 09-cv-3333 MJD/FLN

Plaintiff(s)

v.

TREVOR G. COOK,
PATRICK J. KILEY,
UBS DIVERSIFIED GROWTH, LLC,
UNIVERSAL BROKERAGE FX
MANAGEMENT, LLC,
OXFORD GLOBAL ADVISORS, LLC,
and OXFORD GLOBAL PARTNERS, LLC,

Defendants

and

BASEL GROUP, LLC,
CROWN FOREX, LLC,
MARKET SHOT, LLC,
PFG COIN AND BULLION,
OXFORD DEVELOPERS, S.A.,
OXFORD FX GROWTH, L.P.,
OXFORD GLOBAL MANAGED
FUTURES FUND, L.P., UBS DIVERSIFIED
FX ADVISORS, LLC, UBS DIVERSIFIED
FX GROWTH, L.P., UBS DIVERSIFIED
FX MANAGEMENT, LLC, CLIFFORD
BERG, and ELLEN BERG,

Relief Defendants.

R.J. ZAYED,

Receiver.

**SUPPLEMENTAL DECLARATION OF JOSEPH M. KACZROWSKI IN
SUPPORT OF THE RECEIVER'S MOTION FOR AN ORDER ENTERING
RECOGNIZED CLAIM AMOUNTS FOR FIVE DISPUTED CLAIMS**

I, Joseph M. Kaczrowski, hereby declare:

1. I am an attorney working with the Receiver, R.J. Zayed, in the civil cases of *United States Securities and Exchange Commission v. Trevor Cook et al.*, Civil Action File No. 09-cv-3333 (D. Minn. 2009) and *United States Commodity Futures Trading Commission v. Trevor Cook et al.*, Civil Action File No. 09-cv-3332 (D. Minn. 2009). I submit this declaration in support of the Receiver's Motion for an Order entering the Recognized Claim Amounts for five disputed claims. This declaration is submitted on my personal knowledge except as otherwise indicated.

2. On April 27, 2011, Respondent David Cotten emailed me a copy of the documents he filed with the Clerk of Court in response to the Receiver's April 15, 2011 filing.

3. Mr. Cotten asserts the proof of his claimed additional deposit of \$40,000 can be found in Bo Beckman's client files.

4. On March 8, 2011, R.J. Zayed was appointed as Receiver for Jason Bo-Alan and Hollie Beckman and all entities under their control, including The Oxford Private Client Group LLC. *See Order Appointing Receiver*, 11-cv-00574, Docket No. 10, at 2 (Mar. 8, 2011). Also on March 8, 2011, this Court issued an Order freezing all assets of the Defendants and Relief-Defendant, including the real property located at 5140 Terraceview Lane North in Plymouth, Minnesota ("Plymouth Property"). *See Order*

Imposing Asset Freeze and Other Ancillary Relief and Setting Hearing on Motion for Preliminary Injunction, Beckman Docket No. 9, at 6 (Mar. 8, 2011).

5. On or around March 25, 2011, agents for the Receiver entered the Plymouth Property to seize and inventory personal property and documents found on the premises.

6. On March 29, 2011, the Receiver took possession of several boxes of investor files and other documents from Beckman's Plymouth Property. The Receiver's efforts to review all these documents are ongoing. However, the Receiver has identified two files in the seized Beckman materials for David Cotten.

7. Attached hereto as **Exhibit 38** is a true and correct (redacted) copy of the first client file for David Cotten found in the Beckman seized files.

8. Attached hereto as **Exhibit 39** is a true and correct (redacted) copy of the second client file for David Cotten found in the Beckman seized files.

9. The Receiver has reviewed these two client files but has not found any additional support for Mr. Cotten's claimed second deposit of \$40,000.

I state under penalty of perjury that the foregoing is true and correct.

Dated: April 28, 2011

s/ Joseph M. Kaczrowski
Joseph M. Kaczrowski