
UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

R.J. Zayad, in his Capacity as
Court-Appointed Receiver for Trevor G.
Cook et al.,

Petitioner,

Civil No. 1 (/)

v.

David Buysse, Steven and Pamela Cheney,
Walter Defiel, John Dzik, Terry Frahm,
Steven and Jenene Fredell, William Harris,
Michael Heise, Michael and Cynthia Hillesheim,
Larry Hopfenspirger, Steven Kautzman,
James McIntosh, George and Karen Morrisset,
Reynold Sundstrom, and Dot Anderson,

Respondents.

NOTICE OF TAKING 30 (b)(6) DEPOSITION OF RECEIVERSHIP ENTITIES.

TO: Peter Kohlhepp, Carlson, Caspers, Vandeburgh & Lindquist, 225 South Sixth
Street, Suite 3200, Minneapolis, Minnesota 55402

NOTICE IS HEREBY GIVEN that pursuant to Federal Rule of Civil Procedure Rule 30(b)(6), Respondent Dot Anderson's counsel will take the deposition upon oral examination of a Person or Persons designated by the Receivership Entities, on September 15, 2011, beginning at 9:30 a.m., and continuing by adjournment until completed, at the offices of Huhta Law Firm, PLLC, Minneapolis, MN 55402, before a qualified court reporter. Pursuant to the Federal Rule of Civil Procedure 30(b)(6), the Receivership Entities are obligated to designate and produce at the deposition one or more of their officers, directors, managing agents, employees or other persons who are

most qualified to testify as to the matters set forth below under the heading "CATEGORIES OF TESTIMONY."

DEFINITIONS AND INSTRUCTIONS

1. "You," "Your," and "Petitioner" shall mean the Receivership as well as any agent, employees, officers, directors, insurers, members, managers, governors, shareholders, organizers, consultants, independent contractors, successors and assigns or any and all persons purporting to act on behalf of any of them.

2. "Receivership Entities" means any entity on whose behalf the Receiver has been appointed to act in this matter, as well as any agent, employees, officers, directors, insurers, members, managers, governors, shareholders, organizers, consultants, independent contractors, successors and assigns or any and all persons purporting to act on behalf of any of them.

3. "Document" refers to the original and any non-identical copy or draft of any matter, including electronically stored information, within the scope of Rule 34 of the Federal Rules of Civil Procedure that is believed by you to exist or previously to have existed within your possession or control.

4. "Communication" shall mean all modes of conveying meaning or information, including but not limited to electronic transmission, email, telephone, telegraph, facsimile, and written or spoken language between two or more persons, in person, in writing, on the telephone, or by any other means.

5. As used herein, the words "and," "and/or," and "or" shall be construed either conjunctively or disjunctively as required by the context to bring within the scope

of these Categories of Testimony any information that might be deemed outside their scope by another construction.

6. "Person" means natural persons, corporations, partnerships, associations, governments (or agencies thereof), quasi-public entities, proprietorships, joint ventures, trusts, estates, and all other forms of entities.

7. The "Petition" means the "Petition for Return of Receivership Assets" filed by the Petitioner on July 23, 2010, and originally received the Court File Number of 09-cv-3332.

8. Unless otherwise indicated within the Categories of Testimony, the time frame for each category of testimony is January 2007 to the present.

CATEGORIES OF TESTIMONY

1. Each and every fact that supports the allegations contained in Paragraphs 31 and 31 (o) of the Petition, as it relates to your claims against Dot Anderson.

2. Each and every fact that supports the allegations contained in Paragraphs 32 and 32 (d) of the Petition, as it relates to your claims against Dot Anderson.

3. Each and every fact that supports the allegations contained in Paragraph 34 of the Petition that the transfers of funds to Dot Anderson was made in an effort to hinder, delay, or defraud creditors of any of the Receivership Entities.

4. Each and every fact that supports the allegations contained in Paragraphs 35 of the Petition, as it relates to your claims against Dot Anderson.

5. Each and every fact that supports the allegations contained in Paragraphs 39 and 40 of the Petition, as they relates to your claims against Dot Anderson.

6. Each and every fact that supports the allegations contained in Paragraph 42 of the Petition, as it relates to your claims against Dot Anderson.

7. Each and every fact that supports the allegations contained in Paragraphs 44, 45, and 46 of the Petition, as they relates to your claims against Dot Anderson.

8. Each and every fact that supports your claim that Dot Anderson did not receive any payments from the Receivership Entities in good faith.

9. Each and every fact that supports your contention that Anderson did not provide reasonably equivalent value in exchange for the funds identified in the Receiver's Petition that were returned to Mrs. Anderson.

10. Each and every fact that supports your contention that Dot Anderson did not complete paper work to request a withdrawal as alleged in paragraph 32 (o) of the Petition.

11. The circumstances involving the return to Dot Anderson of \$102,000 in July 2009, including, without limitation, the identification of each person involved and why the funds were returned to her.

12. How much money Dot Anderson provided to any Receivership Entity, and the terms under which Mrs. Anderson's money could be returned to her.

13. Each and every fact that supports your contention that Mrs. Anderson was not owed \$102,000 by a Receivership Entity.

14. Each and every fact that supports your contention that the Receivership Entities were not obligated to return to Mrs. Anderson the money she had invested.

15. The reasons why Basel International or any entity with “Basel” in its name was created.
16. The status of any Basel entity, including, without limitation:
 - a. whether any clients’ funds were provided to Basel for investment were actually invested;
 - b. What investors provided funds for any “Basel” entity;
 - c. Withdrawal requests from any “Basel” entity;
 - d. Basel’ bank accounts;
 - e. Any Receivership Entity’s efforts to return funds to Basel investors;
 - f. Any Basel entity’s role in the alleged Cook Ponzi scheme.

Dated: September 9, 2011

s/ Adam S. Huhta
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