
UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

U.S. COMMODITY FUTURES
TRADING COMMISSION,

Plaintiff(s)

Case No: 09-cv-3332 MJD/JJK

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/JJK

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.

**RECEIVER’S MOTION TO SELL PROPERTY, AUTHORIZE THE
HIRING OF REAL ESTATE AGENT, AND TO
SEEK CANADIAN ORDER AUTHORIZING SALE**

R.J. Zayed, Receiver, respectfully moves the Court in accordance with 28 U.S.C. § 2001(b) to approve and authorize the private sale of the real estate property located at Parcel 4178 Rainy River, Island G 1251 containing 2.3 acres situated in Rainy Lake, West of Sand Point Island District of Rainy River (the “Rainy Lake Property”). The Rainy Lake Property is located in Fort Frances, Ontario, Canada. Specifically, the Receiver moves the Court to enter an Order permitting the Receiver to:

- (1) market and sell the Rainy Lake Property;
- (2) retain a real estate agent to assist with the marketing and sale of the Rainy Lake Property;¹ and
- (3) request the Ontario Superior Court of Justice to adopt the Order permitting the Receiver to market and sell the Rainy Lake Property.

¹ The Receiver respectfully suggests that it provide the Court with the names of three potential real estate agents capable of assisting with the marketing and sale of the Rainy Lake Property, namely, Alan Zucchiatti, Dan Cousineau and David Kircher. (*See* Lockner Decl. ¶ 4.) In order to conserve resources, the Receiver respectfully suggests the Court arrange telephonic conferences to interview and evaluate each candidate’s qualifications to market and sell the Rainy Lake Property. The Receiver further respectfully suggests that the Court then select which real estate agent should be hired to market and sell this Receivership asset. The Receiver will then proceed with a private sale of the properties under 28 U.S.C. § 2001(b) and any applicable requirements under Canadian law.

This motion is based on the Declaration of Samuel T. Lockner, arguments of counsel, and the files and proceedings herein.

Dated: May 11, 2010

Respectfully submitted,

/s/ R.J. Zayed

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