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UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES SECURITIES  
AND EXCHANGE COMMISSION,

Plaintiff(s)

Case No: 11-cv-00574-MJD-FLN

v.

JASON BO-ALAN BECKMAN, et al.,

**RESPONSE TO MOTION**

Defendant(s)

R.J. Zayed,

Receiver.

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**OPPOSITION TO RECEIVER'S MOTION TO APPROVE THE PAYMENT OF FEES**

**INCURRED BY THE RECEIVER**

The Defendant, Jason Bo-Alan Beckman, et al., respectfully moves this court, regarding the motion directing the receiver to make payments out of assets of the receivership for fees incurred by Receiver in or about March 2011 for services, to deny such motion and require the Receiver to file under separate receiverships.

1. Receiver, R.J. Zayed, has filed a Motion for receipt of payment for services rendered with made reference to the Courts March 8, 2011 order appointing a Receiver in the matter of the *SEC v. Beckman et al.*, 11-cv-574, pertaining to the estate of Jason Bo-Alan Beckman and relief defendant Hollie Beckman (collectively the "Receiver Estates") and *Order Appointing Receiver*, Docket No. 10, at 1-2 (March 3, 2011).

2. R.J Zayed states in his declaration that on 23 November 2009 he was appointed, by order, Receiver in the matters of *SEC v. Cook, et al.*, 09-cv-3333 and in the matters of *CFTC v. Cook et al.*, 09-cv-3332.

3. The Receiver has suggested in his *declaration in support of motion to approve the payment of fees incurred*, filed under heading CASE 0:11-cv-00574-MJD-FLN, *SEC v Beckman et al.*, document 72, filed 05/03/11, that the three receiverships are interrelated and supports his opinion stating that they involve the same Ponzi scheme, the same set of operative facts, a substantial overlap of victims, and the commingling of receivership funds and assets.

4. The Receiver is at best attempting to interrelate the receiverships based on allegations as the receiverships are not interrelated as they do not consists of the same operative facts, do not carry a substantial overlap of victims, and do not consist of commingling of receivership funds and assets.

5. It is respectfully requested that the Court deny the Receiver this request and require the Receiver to re-submit his request for payment of fees incurred under separate receiverships.

Executed on May 13, 2011

s/ Jason B. Beckman

Jason B. Beckman  
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