
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 and
THE OXFORD PRIVATE CLIENT
GROUP, LLC,

Defendant(s)

And

HOLLIE BECKMAN,

Relief Defendant.

**DECLARATION OF BRIAN HAYES IN SUPPORT OF
RECEIVER'S REPLY MEMORANDUM REGARDING MOTION TO
AUTHORIZE THE HIRING OF REAL ESTATE AGENTS AND TO
PUBLISH NOTICE OF OFFERS FOR SALE**

I, Brian Hayes, hereby declare:

1. I am an attorney with R.J. Zayed in the firm of Carlson, Caspers, Vandenburg and Lindquist ("CCVL"). I submit this declaration in support of the Receiver's reply memorandum regarding his motion to authorize the hiring of real estate agents and to publish notice of offers for sale. This declaration is submitted on my personal knowledge except as otherwise indicated.

2. Attached hereto as **Exhibit A** is a true and correct copy of the PACER Docket listing in the Southern District of Texas showing that a copy of the Complaint, Asset Freeze Order, and Order Appointing Receiver were filed in the Southern District of Texas on March 11, 2011.

3. Attached hereto as **Exhibit B** are true and correct copies of various research materials dated December 26, 2010 relating to the South Texas market found on seized and imaged Beckman computers.

4. During my March 2011 trip to the McAllen metropolitan area, I was told that Mexican nationals are buying houses on the Texas border due to safety concerns in Mexico, and that as a result the local market was much stronger than in the rest of the country.

5. Attached hereto as **Exhibit C** is a true and correct summary of expenses paid through May 31, 2011, by the Receiver relating to the several real properties of the Receiver Estates.

6. Attached hereto as **Exhibit D** is a true and correct (redacted) copy of the disconnection notice from Xcel Energy dated February 25, 2011 forwarded to the Receiver relating to the unpaid electricity service balance for the Plymouth property.

7. Attached hereto as **Exhibit E** is a true and correct copy of a listing agreement signed by Jason and Hollie Beckman instructing a Re/Max Elite Broker to begin listing the Paseo del Lago property for sale on February 1, 2011.

8. On March 18, 2011, the Receiver informed Mr. Beckman that the three vehicles – the 2011 Toyota Highlander, 2011 Jaguar XKR, and the 2008 Land Rover Range Rover – all have negative value and would be returned to the respective dealers. Attached hereto as **Exhibit F** is a true and correct copy of an email from me to Mr. Beckman’s attorney at the time, David Hashmall regarding the return of the vehicles.

9. On March 25, 2011, the Receiver caused the 2010 Jaguar and the 2008 Land Rover to be returned to agents for Chase Automotive Finance, the lease and loan holder for the vehicles.

10. Attached hereto as **Exhibit G** is a true and correct copy of the lease agreement for the 2010 Jaguar dated October 5, 2009.

11. Attached hereto as **Exhibit H** is a true and correct (redacted) copy of the February 2011 vehicle lease statement for the 2010 Jaguar.

12. Attached hereto as **Exhibit I** is a true and correct (redacted) copy of the purchase agreement for the 2008 Land Rover.

13. Attached hereto as **Exhibit J** is a true and correct (redacted) copy of the February 2011 vehicle loan statement for the 2008 Land Rover.

14. On March 18, 2011, the Receiver caused the 2011 Toyota Highlander to be returned to the dealer in Texas.

15. Attached hereto as **Exhibit K** is a true and correct copy of a November 2010 letter from the Toyota dealer in Texas to Beckman regarding the purchase of his new Toyota.

16. Attached hereto as **Exhibit L** is a true and correct (redacted) copy of the December bill for the leased Toyota, including correspondence to Beckman from Toyota Financial Services.

17. Attached hereto as **Exhibit M** is a true and correct (redacted) copy of the lease agreement for the 2011 Toyota dated November 26, 2010, including a February 13, 2011 cover letter from Toyota Financial Services stating they are providing the copy to Mr. Beckman at his request.

18. Attached hereto as **Exhibit N** is a true and correct (redacted) copy of the March 2011 bill for the leased Toyota.

19. Attached hereto as **Exhibit O** is a true and correct copy of an email from Bo Beckman to me regarding the balance still owed to Toyota for his vehicle loan in excess of the equity Toyota was able to recover from the vehicle.

20. Attached hereto as **Exhibit P** is a true and correct copy of an email exchange between Bo Beckman and me concerning the Notice of Appearance of Sam Lockner.

21. Attached hereto as **Exhibit Q** is a true and correct copy of an email exchange between Bo Beckman and me concerning his unpaid credit card debt.

22. The Receiver has also expended considerable time and energy reviewing and forwarding Beckman mail. Because the Receiver has several Beckman related properties and entities to manage, mail forwarding to the Receiver's office is in the best interests of the Receiver Estates. Nevertheless, the Receiver has respected the Beckman's personal privacy, particularly with health care related mail, and continues to forward any and all essential documents as quickly and efficiently as possible.

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

Dated: June 10, 2011

s/ Brian Hayes
Brian Hayes