
UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

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

Petitioner,

Civil No. 11-cv-1042 SRN/FLN

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.

**DECLARATION OF ADAM S. HUHTA CONTAINING CONFIDENTIAL
DOCUMENTS IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT**

I, Adam S. Huhta, being first duly sworn upon oath, hereby declare:

1. I am an attorney in this case, representing Respondent Dot Anderson and am familiar with the facts and circumstances surrounding the subject matter of this litigation.

2. I submit this declaration in support of Mrs. Anderson's Motion for Summary Judgment. Each of these exhibits was produced as either "CONFIDENTIAL" OR "ATTORNEYS' EYES ONLY" under the Stipulated Protective Order in this case.

3. Attached as **Exhibit 10** is a true and correct copy of Anderson Deposition Exhibit 4.

4. Attached as **Exhibit 11** is a true and correct copy of Anderson Deposition Exhibit 1.
5. Attached as **Exhibit 12** is a true and correct copy of Anderson Deposition Exhibit 2.
6. Attached as **Exhibit 13** is a true and correct copies of Anderson Deposition Exhibit 3.
7. Attached as **Exhibit 14** is a true and correct copy of a Basel Withdrawal Form (Anderson Deposition Exhibit 8).
8. Attached as **Exhibit 15** is a true and correct copy of e-mails between Trevor Cook and Julia Smith relating to the wire transfers to Anderson.
9. Attached as **Exhibit 16** is a true and correct copy of the Basel Group, LLC records provided to Associated Bank, including the Depository Declaration, showing that Julia Smith was an authorized signer on Basel's account at Associated Bank.
10. Attached as **Exhibit 17** is a true and correct copy of Associated Bank Financial Statement of Accounts (IR012616-2629) produced by the Receiver in discovery.
11. Attached as **Exhibit 18** is a true and correct copy of excerpts of IR025816, which is a spread sheet produced by the Receiver in discovery, prepared by the SEC, illustrating deposits and withdrawals by investors.
12. Attached as **Exhibit 19** is a true and correct copy of IR030798 produced by the Receiver in discovery. It is an October 2009 letter from Steven L. Klawans, SEC Division of Enforcement to an investor in a Receivership Entity.

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

Dated: December 21, 2011

s/ Adam S. Huhta
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