

Defendant Beckman has agreed to a preliminary injunction, as well as a continuation of the Order Imposing Asset Freeze and Other Ancillary Relief and the Order Appointing Receiver (dated 3-8-11) (Dckt. No. 10). The Consent of Defendant Jason Bo-Alan Beckman is attached as Exhibit 1.

Relief Defendant Hollie Beckman has also agreed to a continuation of the Order Imposing Asset Freeze and Other Ancillary Relief and the Order Appointing Receiver. The Consent of Relief Defendant Hollie Beckman is attached as Exhibit 2.

In light of the two Consents, the SEC respectfully moves this Court to enter two Orders: (1) the Agreed Order of Preliminary Injunction, Asset Freeze, and Other Ancillary Relief as to Defendant Jason Bo-Alan Beckman; and (2) the Agreed Order of Asset Freeze and Other Ancillary Relief as to Relief Defendant Hollie Beckman. The SEC also moves this Court to strike the preliminary injunction hearing scheduled for March 15, 2011.

Respectfully submitted,

Dated: March 11, 2011

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