
UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES SECURITIES
AND EXCHANGE COMMISSION, Case No: 11-cv-00574-MJD-FLN

Plaintiff(s)

v.

JASON BO-ALAN BECKMAN and
THE OXFORD PRIVATE CLIENT
GROUP, LLC,

Defendant(s)

And

HOLLIE BECKMAN,

Relief Defendant.

**RECEIVER'S MOTION TO CONFIRM RELEASE OF PALM CITY
PROPERTY FROM RECEIVERSHIP AND ASSET FREEZE ORDER**

R.J. Zayed, Receiver, respectfully moves the Court to exercise its discretion to confirm the release of the real property located at 752 SW Squire Johns Lane in Palm City, Florida, from the Receivership and the Court's Asset Freeze Order (Court File No. 9) thereby returning this property to the custody, control and possession of Jason Bo-Alan and Hollie Beckman.

This motion is based on (i) the Notice of Hearing submitted herewith; (ii) the Memorandum of Law submitted herewith; (iii) the Declaration of Brian Hayes, and the

exhibits thereto, submitted herewith; (iv) the Proposed Order submitted herewith; (v) the pleadings and papers on file in this action, and in the related cases of *SEC v. Cook, et al.* 09-cv-3333 (D. Minn. 2009) and *CFTC v. Cook et al.*, 09-cv-3332 (D. Minn. 2009); and (vi) such other evidence and argument as may be presented to the Court before or at the time of the hearing.

Dated: March 25, 2011

Respectfully submitted,

s/ Brian W. Hayes

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