

STATE OF MINNESOTA
COUNTY OF HENNEPIN

DISTRICT COURT
FOURTH JUDICIAL DISTRICT
Case Type: Other Civil

The Oxford Private Client Group, LLC, Jason
Bo-Alan Beckman and Hollie Beckman,

Plaintiffs,

v.

Trevor Cook and Oxford Global Partners,
LLC,

Defendants.

Case No. 27-cv-09-21722
(Hon. Janet N. Poston)

**AFFIDAVIT OF
TARA C. NORGARD
IN SUPPORT OF ORDER
TO SHOW CAUSE**

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

I, Tara C. Norgard, being first duly sworn upon oath, state and allege as follows:

1. I am a partner with the law firm of Carlson, Caspers, Vandenburg, Lindquist & Schuman, P.A. I make this affidavit as counsel for R.J. Zayed in his capacity as the Receiver appointed by Chief Judge Michael J. Davis of the United States District Court for the District of Minnesota over the parties in the above-referenced action (the "Receiver"). I make this Affidavit in support of an order to show cause why the above-captioned matter should not be dismissed.

Except as otherwise indicated, I make this Affidavit of my own personal knowledge.

2. Attached hereto as **Exhibit A** is a true and correct copy of the *Second Amended Order Appointing Receiver in United States Securities and Exchange Commission v. Trevor Cook et al.*, Civil Action File No. 09-cv-3333 (D. Minn.) ("*SEC v. Cook*").

3. Attached hereto as **Exhibit B** is a true and correct copy of the *Order Continuing Appointment of Temporary Receiver in United States Commodity Futures Trading Commission v. Trevor Cook et al.*, Civil Action File No. 09-cv-3332 (D. Minn.) ("*CFTC v. Cook*").

4. Attached hereto as **Exhibit C** is a true and correct copy of the *Order Appointing Receiver in United States Securities and Exchange Commission v. Jason Bo-Alan Beckman et al.*, Civil Action File No. 11-cv-574 (“*SEC v. Beckman*”).

5. Attached hereto as **Exhibit D** is a true and correct copy of a letter from Kathryn Hibbard to this Court dated December 14, 2009.

6. Attached hereto as **Exhibit E** is a true and correct copy of a letter from this Court to all parties dated November 18, 2013.

7. Attached hereto as **Exhibit F** is a true and correct copy of a letter from Receiver attorney Brenton A. Elswick to this Court dated November 25, 2013.

8. Attached hereto as **Exhibit G** is a true and correct copy of a letter from Brenton A. Elswick to Hollie Beckman dated December 6, 2013, and containing a true and correct copy of a draft Stipulation for Dismissal with Prejudice.

9. Attached hereto as **Exhibit H** is a true and correct copy of a letter from Brenton A. Elswick to Hollie Beckman dated December 23, 2013, and forwarding copies of the pleadings in the instant action.

10. Attached hereto as **Exhibit I** is a true and correct copy of a letter from Brenton A. Elswick to Hollie Beckman dated January 14, 2014, and containing a true and correct copy of a draft Stipulation for Dismissal with Prejudice.

11. Attached hereto as **Exhibit J** is a true and correct copy of a letter from Hollie Beckman to this Court dated January 23, 2014.

12. Attached hereto as **Exhibit K** is a true and correct copy of the *Declaration of Scott J. Hlavacek* (excluding exhibits) in the *SEC v. Cook* case.

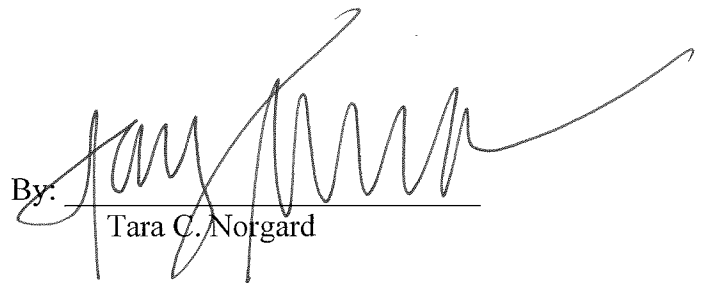
13. Attached hereto as **Exhibit L** is a true and correct copy of the *Declaration of Luz M. Aguilar* (excluding exhibits) in the *SEC v. Beckman* case.

14. Attached hereto as **Exhibit M** are true and correct copies of newspaper articles published in July 2009.

15. Attached hereto as **Exhibit N** is a true and correct copy of the unpublished case: *Payne v. Wyeth Pharms., Inc.*, No. 08-cv-119, 2008 U.S. Dist. LEXIS 91849 (E.D. Va. Nov. 12, 2008).

FURTHER YOUR AFFIANT SAYETH NOT.

Dated: March 10, 2014

By: 
Tara C. Norgard

Subscribed and sworn to before me
this 10th day of March, 2014.


Notary Public

