

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,

Plaintiff,

Civ. No. 11-cv-574 (MJD/FLN)

v.

JASON BO-ALAN BECKMAN, et al.,

Defendants,

R.J. ZAYED,

Receiver.

U.S. COMMODITY FUTURES
TRADING COMMISSION,

Plaintiff,

Civ. No. 09-cv-3332 (MJD/JSM)

v.

TREVOR COOK, et al.,

Defendants.

R.J. ZAYED,

Receiver.

UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,

Plaintiff,

Civ. No. 09-cv-3333 (MJD/JSM)

v.

TREVOR G. COOK, et al.,

Defendants,

R.J. ZAYED,

Receiver.

**DECLARATION OF CHRISTOPHER A. GRGURICH
IN SUPPORT OF OPPOSITION TO RECEIVER'S MOTION
TO ENJOIN DISTRIBUTION OF SETTLEMENT PROCEEDS
TO THE FINRA CLAIMANTS**

Christopher A. Grgurich, being first duly sworn on oath, deposes and states as follows:

1. I am a partner in the law firm of Lindquist & Vennum PLLP, 4200 IDS Center, 80 South Eighth Street, Minneapolis, Minnesota 55402, and duly licensed to practice law in the State of Minnesota and before this Court.

2. That I am one of the attorneys representing the FINRA Claimants in the above-captioned matter.

3. That I submit this Declaration in support of the FINRA Claimants' Opposition to the Receiver's Motion to Enjoin Distribution of Settlement Proceeds to the FINRA Claimants.

4. Attached hereto as **Exhibit A** are true and correct copies of e-mails I sent to or received from Justin Delfino of the Division of Enforcement for the U.S. Securities and Exchange Commission.

5. Attached hereto as **Exhibit B** is a true and correct copy of an e-mail (without exhibits) that was forwarded to me by one of the FINRA Claimants from Ken Locklin, a defrauded investor, providing a "Weekend Update" to other defrauded investors.

6. Attached hereto as **Exhibit C** is a true and correct copy of the letter dated February 25, 2011 from the Receiver.

7. Attached hereto as **Exhibit D** is a true and correct copy of the unpublished decision *Liberte Capital Group, LLC v. Capwill*, 248 Fed.Appx. 650, 2007 WL 2733335 (6th Cir. 2007).

8. Attached hereto as **Exhibit E** is a true and correct copy of the unpublished decision *Seegert v. Monson Trucking, Inc.*, Civil No. 09-699, 2009 WL 2568591 (D. Minn. August 18, 2009).

9. Attached hereto as **Exhibit F** is a true and correct copy of the unpublished decision *Henderson v. Biltbest Products Inc.*, No. 4:10CV01503, 2010 WL 5392828 (E.D. Mo. Dec. 22, 2010)

10. Attached hereto as **Exhibit G** is a true and correct copy of the letter dated April 7, 2011 from the Receiver.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

/s/ Christopher A. Grgurich
Christopher A. Grgurich