

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

R.J. ZAYED, IN HIS CAPACITY AS
COURT- APPOINTED RECEIVER FOR
TREVOR G. COOK, ET AL.,
Petitioner,

Case No. 11-CV-01042 SRN/FLN

vs.

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 MORISSET,
AND REYNOLD SUNDSTROM, AND
DOT ANDERSON,

Respondents.

**DECLARATION OF CRAIG LE VESSEUR IN SUPPORT OF LENDER
RESPONDENTS' MOTION FOR SUMMARY JUDGMENT**

I, Craig Le Vesseur, hereby declare:

1. I have been a P2 Financial Advisor with Ameriprise Financial Services, Inc. since 1984 and have been a Financial Advisor for respondent Walter Defiel since 1994.

2. Sometime in 2007 Mr. Defiel approached me and asked me to evaluate an investment opportunity related to currency trading which he said he was told paid an interest rate of approximately 10-12% annually.

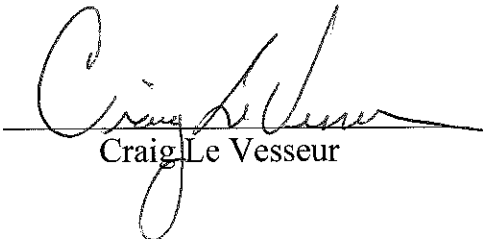
3. My expertise in financial planning and investments does not extend to currency trading and I told Walter that I could not evaluate the currency trading investment opportunity he described. During the course of that conversation I do recall telling him that I believed that 10-12% was a high rate of return at the time considering what was then transpiring in the equity markets (and I encouraged him to investigate the investment carefully because I believed that an investment which paid such a high rate of return would have entailed more risk than he described. To the best of my present recollection, this was the full extent of our conversation and we had no further discussions on this topic.

4. In our conversation, I did not characterize the currency trading investment that Mr. Delfiel described to me as "illegal," "a ponzi scheme," or as an "illigitmate investment." I was not provided with sufficient information to make any evaluation or determination of the proposed investment opportunity.

5. I do not consider Mr. Delfiel to be a "sophisticated investor" as that term is used in the financial services industry.

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

Dated: January 11, 2012.


Craig Le Vesueur