

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

R.J. ZAYED, In His Capacity As Court-Appointed Receiver For Oxford Global Partners, LLC, Universal Brokerage FX, and Other Receiver Entities,

Plaintiff,

Civil File No. 013-cv-1896 (DRN/SER)

v.

David and Dao Allen, Judith Averett, Patricia and Jasper Calandra, Rose Furner, Mark Hanby, **Adel (“A.K.”) Hilal**, Geraldine Jackman, Norma Johnson, Willis Wayne King, Don and Pamela Labbee, Andrew Lyon, Jeffrey Lyon, Jeffrey Maki, Steven Perkins, Richard Plantan, Douglas Reed, David Sherman, John Sterback, Mark Stoltenberg, Jane Wamsley as trustee for the Glen Van Lehn Living Trust, Michael (“Bruce”) Wu, Robert and Dianne Birk, Margaret Anderson, Mary Francoeur, George and Shirley Janssen, Joseph Koehnen, and Katherine Sobieck,

Defendants.

**DECLARATION OF DEFENDANT ADEL (A.K.) HILAL IN OPPOSITION TO
THE RECEIVER’S MOTION FOR SUMMARY JUDGMENT**

I, Adel (A.K.) Hilal, hereby declare:

1. I am a defendant in the above captioned civil action, and I submit this declaration in opposition the the receiver’s motion for summary judgment. This declarations is made on my personal knowledge and good faith belief, except as otherwise indicated herein;

2. I am 79 years old (DOB: 09/29/1934), retired and live on a fixed income. I reside at 6620 Plymouth Avenue North, Golden Valley, MN 55427;

3. In about 2005, I attended a retirement / wealth enhancement seminar / presentaion sponsored by Fidelity. There were about 25 people in attendance at the seminar; all individuals like me – either retired or very close to retirement.

4. A guest presenter / speaker at that seminar was Mr. Bo Beckman (“Beckman”). Beckman described and promoted himself as a “financial advisor,” who provided his clients an “individualized wealth enhancement program” *versus* mutual fund type programs. Beckman operated through a company he called Oxford Private Group (“Oxford”).

5. At some point after the seminar, Beckman became my finacial advisor. I had my retirment savings and IRA accounts with Bear Stearns Securities Corporation - Oberlin Financial was the office servicing my Bear Stearns account. It is my understanding that Bear Stearns / Oberlin was the custodian of my retirement account. Throughout times pertinent to these proceedings, the custodian of my account changed from Oberlin Financial and Bear Stearns to J.P. Morgan and Western International Securites Inc. However, my account number always remained the same – unchanged - and my holdings or investments remained essentially the same. While Beckman was my financial advisor he did not hold stocks or securites, but he had full authority to make orders. Beckman had full discretion and authority to place orders with the broker custodian for my account.

6. In about April 2007, Beckman contacted me about a new investment opportunity – “British Bank Bonds” - that would earn a guaranteed “12% annual return.”

7. After I considered the investment opportunity, I decided I would agree to transfer \$50,000.00 from my IRA account to purchase British Bank Bonds and hold the bonds for a period of two (2) years (2007-08 and 2008-09).

8. Under that agreement, Beckman's company, Oxford, would invest my \$50,000.00 in "yearly bonds" – British Bank Bonds - issued by the Royal Bank of Scotland. I agreed to pay Beckman / Oxford a fee of .8% on the total investment amount of \$50,000.00 - .2% each quarter - .8% per year on the \$50,000.00 investment. In accordance with the agreement, I paid Beckman / Oxford \$400.00 per year.

9. On about April 25, 2007, Oberlin Finacial / Bear Sterns by check made payable to Millenium Trust Co., LLC transferred the \$50,000.00. (See Exhibits 1 and 2 attached hereto – true and corrcet copies of finacial records).

10. It was my understanding based upon a representaion by Beckman that Oberlin Finacial / Bear Stearns – a brokerage house did not / does not hold foreign securites, so he (Beckman) needed to move or transfer my \$50,000.00 investment to Millenium Trust Co., LLC., which, in turn, would serve as the custodian for the British Bonds. In order to make the purchace, it is my understanding that Millenium would the \$50,000.00 to British Pounds and then actually purchased the British Bonds.

11. Millenium infomred me it needed to hold back \$1,000.00 in my account to pay for certain account fees, such as opening fee, brokerage fees, as well as miscelleaneous fees associated with managing or maintaining my account that would be incurred from time to time. So, \$49,000.00 of the \$50,000.00 investment was converted to British Pounds to purchase the British Bonds.

12. The British Bonds were renewable on 12 month increments. In accordance with the original agreement with Beckman / Oxford, I renewed one time – holding the bonds for a total of two years or 24 months.

13. At the end of the two years, I told Beckman to sell the British Bonds. It is my understanding and good faith belief UBS Diversified (whose name is the same, as well as known as Swiss Bank) actually sold the British Bonds and/or converted the British Pounds to U.S. Dollars, then transferred the proceeds from the sale to Millenium.

14. On about June 9, 2009, Millenium transferred \$56,734.98 to my IRA account at Western International Securities Inc. / J.P. Morgan – the same retirement account that I originally took the \$50,000.00 to purchase the British Bonds. I have attached a true and correct copy of the financial statement showing this transaction as Exhibit 3.

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

Dated: May 18, 2014

/s/ Adel (A.K.) Hilal

Adel (“A.K.”) Hilal