

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)

**REPLY MEMORANDUM
IN SUPPORT OF RECEIVER'S
MOTION FOR ORDER
TO SHOW CAUSE**

The Receiver, RJ Zayed, appointed by the United States District Court for the District of Minnesota, Chief Judge Michael J. Davis presiding, over The Oxford Private Client Group, LLC, Jason Bo-Alan Beckman, Trevor Cook, and Oxford Global Advisors (“Receiver”), submits this Reply Memorandum pursuant to Minnesota Rule of General Practice 115.03(c) and 115.04(c).

Ms. Beckman’s response concedes that “there is no additional reason to proceed” if it is the Receiver’s position that the accounting prayed for in the Complaint was accomplished by the Securities and Exchange Commission civil enforcement actions, as codified in the Declarations of accountants Mr. Hlavacek and Ms. Aguilar. (Beckman Response at 3.) This position is indeed among those stated by the Receiver in support of the dismissal of this action. (Receiver Br. at 3-4.)

The other matters raised in Ms. Beckman’s response are not germane to the underlying case or the Receiver’s pending motion, and for that reason, the Receiver will not address them here unless requested to do so by the Court.

Because Ms. Beckman agrees that there is no reason to proceed with this action, the Receiver respectfully moves that the Court dismiss the case with prejudice.

Respectfully submitted,

Dated: April 3, 2014

/s/ Tara Norgard

Tara C. Norgard (MN Bar #307683)
Russell J. Rigby (MN Bar #323652)
Brenton A. Elswick (MN Bar #388816)
Carlson, Caspers, Vandenburg,
Lindquist & Schuman, P.A.
225 S. Sixth Street, Suite 4200
Minneapolis, MN 55402
Telephone: (612) 436-9600
Facsimile: (612) 436-9605
tnorgard@carlsoncaspers.com
rrigby@carlsoncaspers.com
belswick@carlsoncaspers.com

*Attorneys for R.J. Zayed, Court-appointed
Receiver for The Oxford Private Client Group,
LLC, Jason Bo-Alan Beckman, Trevor Cook, and
Oxford Global Partners, LLC.*

**By and on Behalf of The Oxford Private Client
Group, LLC, Jason Bo-Alan Beckman, Trevor
Cook, and Oxford Global Partners, LLC.**