

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SECURITIES AND EXCHANGE COMMISSION)
)
Plaintiff,)
)
v.)
)
VLADIMIR OKHOTNIKOV,)
JANE DOE a/k/a LOLA FERRARI,)
MIKAIL SERGEEV,)
SERGEY MASLAKOV,)
SAMUEL D. ELLIS,)
MARK F. HAMLIN,)
SARAH L. THEISSEN,)
CARLOS L. MARTINEZ,)
RONALD R. DEERING,)
CHERI BETH BOWEN, and)
ALISHA R. SHEPPERD,)
)
Defendants.)
_____)

Case No. 22 C 3978

Judge Jorge L. Alonso

**PLAINTIFF'S MEMORANDUM OF LAW IN OPPOSITION TO
DEFENDANT VLADIMIR OKHOTNIKOV'S MOTION TO DISMISS COMPLAINT**

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