

**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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