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,) Case No. 22 C 3978
MARK F. HAMLIN, SARAH L. THEISSEN,) Judge Jorge L. Alonso
CARLOS L. MARTINEZ, RONALD R. DEERING, CHERI BETH BOWEN, and)))
ALISHA R. SHEPPERD,))
Defendants.)

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

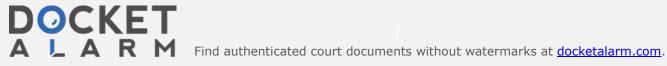


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