

**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,	)	Case No. 22 C 3978
SAMUEL D. ELLIS,	)	
MARK F. HAMLIN,	)	Judge Jorge L. Alonso
SARAH L. THEISSEN,	)	
CARLOS L. MARTINEZ,	)	
RONALD R. DEERING,	)	
CHERI BETH BOWEN, and	)	
ALISHA R. SHEPPERD,	)	
	)	
Defendants.	)	
	)	
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**PLAINTIFF'S MEMORANDUM OF LAW IN OPPOSITION TO  
DEFENDANT VLADIMIR OKHOTNIKOV'S MOTION TO DISMISS COMPLAINT**

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