

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

APR - 7 2025

RICK WARREN
COURT CLERK

114 _____

Oklahoma Department of Securities)
<i>ex rel.</i> Melanie Hall, Administrator,)
)
Plaintiff,)
v.)
)
Premier Global Corporation, <i>et al.</i>)
)
Defendants.)

Case No. CJ-2022-5066
Judge Don Andrews

**APPLICATION FOR ORDER PARTIALLY LIFTING ASSET FREEZE
AS TO GENERATIONS TO COME, LLC ACCOUNT AT BANK OF AMERICA, N.A.**

Plaintiff, Oklahoma Department of Securities, *ex rel.* Melanie Hall, Administrator (“Plaintiff”) requests this Court issue an order partially lifting the asset freeze ordered in the *Order Freezing Assets, Order Prohibiting Disposition of Assets and Order Prohibiting Destruction or Disposition of Records* issued on October 14, 2022 (“*Order Freezing Assets*”), as to the non-party bank account in the name Generations to Come, LLC, held at Bank of America, N.A. (“Transferee Accounts”). In support thereof, the Parties submit the following

1. Plaintiff initiated this case on October 13, 2022, by filing its *Petition for Permanent Injunction and Other Relief* (“*Petition*”).
2. On October 14, 2022, Plaintiff filed an *Application for Emergency Order Freezing Assets and Other Relief* (“*Application for Asset Freeze*”).
3. On October 14, 2022, the Court granted the *Application for Asset Freeze*, and issued the *Order Freezing Assets*.
4. Under the *Order Freezing Assets*, certain accounts established at Bank of America NA, described herein as the “Transferee Accounts” were frozen. The Transferee Accounts were established pursuant to the terms of certain “Transferee Agreements” executed by and between Premier Global Corporation and each named “Transferee.” Each Transferee Account was held in

the name of the Transferee but with a designated representative of Premier added as a signatory to the Transferee Account in accordance with the terms of each Transferee Agreement.

5. Bank of America has advised that an account in the name Generations to Come, LLC is included in the frozen Transferee Accounts, account number ending in 4367, with a balance of \$139,926.21.

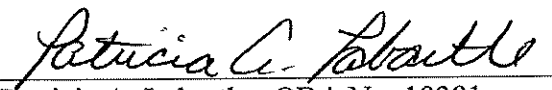
6. Based on the foregoing, it is Plaintiff's position that the interests of Generations to Come, LLC would best be served by releasing such remaining funds to Generations to Come, LLC and that no further public interest exists in such accounts remaining frozen.

7. This application has been circulated and agreed to by the parties indicated by their signatures on the order. Counsel for Defendants DDI Advisory, LLC and Richard Dale Dean neither agree nor object to this application as described in the email attached as *Exhibit A*.

8. Therefore, the Parties move the Court to enter an order lifting the *Order Freezing Assets* as it applies to the account in the name Generations to Come, LLC, account number ending in 4367, with a balance of \$139,926.21.

Respectfully submitted,

OKLAHOMA DEPARTMENT OF SECURITIES
Melanie Hall, Administrator

By: 
Patricia A. Labarthe, OBA No. 10391
Shaun Mullins, OBA No. 16869
Brad Davenport, OBA No. 18687
Oklahoma Department of Securities
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Email: plabarthe@securities.ok.gov
smullins@securities.ok.gov
bdavenport@securities.ok.gov

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of April 2025, a true and correct copy of the above and foregoing instrument was delivered via First Class U.S. mail, with postage fully prepaid thereon, to:

Rollin Nash, Jr.
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Bryan C. Dixon
NASH COHENOUR & GIESSMAN, P.C.
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*Attorneys for Defendants Elkins & Assoc., Inc.
and Clyde Edward Elkins*

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*Attorney for Defendants Joshua Dane Owen
and Premier Marketing Management*

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Attorney for Receiver, Eric Johnson

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*Attorneys for Defendants DDI Advisory
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Life Investors Management Company, LLC*

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*Attorneys for Defendants DDI Advisory
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jon@christensenlawgroup.com
brock@christensenlawgroup.com

*Attorneys for Defendants J & H Holdings, LLC, Kyle Blackburn, Mitzimack, Inc., Erika Greggs,
James Scott Stanley, Edmond Brokerage, Inc., Brent Lee Worley, Byron Kent Freeman, and
Karen Lynne Freeman*



Michelle L. Statham

Patty Labarthe

From: Tara A. LaClair <TLaClair@bressler.com>
Sent: Friday, April 4, 2025 5:00 PM
To: Patty Labarthe; Lodoen, Jim; ejohnson; Jennifer Lamirand; Allen, Hilary; clay@christensenlawgroup.com; jon@christensenlawgroup.com; brock@christensenlawgroup.com; justin williams; rnash@nashfirm.com; dboxeur@nashfirm.com
Cc: Shaun Mullins; Brad Davenport; Chase, Andrea
Subject: [EXTERNAL] RE: Generations to Come LLC BOA Account for Release from Asset Freeze

Hi Patty,

We do not know anything about this entity or any of the transferees and do not feel like we are in position to agree or object. Accordingly, we take no position on the motion.

Tara A. LaClair

Principal



Bressler Amery & Ross, P.C.

6608 N Western Avenue | 1213|Oklahoma City, OK 73116



From: Patty Labarthe <PLabarthe@securities.ok.gov>

Sent: Thursday, April 3, 2025 2:36 PM

To: Lodoen, Jim <jlodoen@spencerfane.com>; ejohnson <ejohnson@spencerfane.com>; Jennifer Lamirand <Jennifer.Lamirand@Steptoe-Johnson.com>; Allen, Hilary <hallen@spencerfane.com>; clay@christensenlawgroup.com; jon@christensenlawgroup.com; brock@christensenlawgroup.com; justin williams <justinwilliams@overmanlegal.com>; rnash@nashfirm.com; dboxeur@nashfirm.com; Tara A. LaClair <TLaClair@bressler.com>

Cc: Shaun Mullins <SMullins@securities.ok.gov>; Brad Davenport <BDavenport@securities.ok.gov>; Chase, Andrea <achase@spencerfane.com>

Subject: RE: Generations to Come LLC BOA Account for Release from Asset Freeze

Good afternoon all:

The Department has not received all signatures on this proposed order. Noone has expressed an objection. Please sign the order and return it to me by the close of business tomorrow.

Thank you,

Patty Labarthe

Patty Labarthe | Director of Enforcement

Oklahoma Department of Securities

204 North Robinson, Suite 400

Oklahoma City, OK 73102

EXHIBIT

A

Office: (405) 280-7735 | Fax: (405) 280-7742

securities.ok.gov | investedok.org



OKLAHOMA

From: Lodoen, Jim <jlodoen@spencerfane.com>

Sent: Thursday, March 13, 2025 2:26 PM

To: Tara LaClair <Tara.LaClair@Steptoe-Johnson.com>; ejohnson <ejohnson@spencerfane.com>; Patty Labarthe <PLabarthe@securities.ok.gov>; Jennifer Lamirand <Jennifer.Lamirand@Steptoe-Johnson.com>; Allen, Hilary <hallen@spencerfane.com>; clay@christensenlawgroup.com; jon@christensenlawgroup.com; brock@christensenlawgroup.com; justin williams <justinwilliams@overmanlegal.com>; rnash@nashfirm.com; dboxeur@nashfirm.com

Cc: Shaun Mullins <SMullins@securities.ok.gov>; Brad Davenport <BDavenport@securities.ok.gov>; Chase, Andrea <achase@spencerfane.com>

Subject: [EXTERNAL] RE: Generations to Come LLC BOA Account for Release from Asset Freeze

Tara,

They were a net loser—and as such we did not pursue them.

Jim

James A. Lodoen Partner
Spencer Fane LLP

100 South Fifth Street, Suite 2500 | Minneapolis, MN 55402

O 612.268.7039

jlodoen@spencerfane.com | spencerfane.com | [Bio](#)

From: Tara LaClair <Tara.LaClair@Steptoe-Johnson.com>

Sent: Thursday, March 13, 2025 1:56 PM

To: Johnson, Eric <ejohnson@spencerfane.com>; Patty Labarthe <PLabarthe@securities.ok.gov>; Jennifer Lamirand <Jennifer.Lamirand@Steptoe-Johnson.com>; Allen, Hilary <hallen@spencerfane.com>; clay@christensenlawgroup.com; jon@christensenlawgroup.com; brock@christensenlawgroup.com; justin williams <justinwilliams@overmanlegal.com>; rnash@nashfirm.com; dboxeur@nashfirm.com

Cc: Shaun Mullins <SMullins@securities.ok.gov>; Brad Davenport <BDavenport@securities.ok.gov>; Lodoen, Jim <jlodoen@spencerfane.com>; Chase, Andrea <achase@spencerfane.com>

Subject: [EXTERNAL] RE: Generations to Come LLC BOA Account for Release from Asset Freeze

[Warning] This E-mail came from an External sender. Please do not open links or attachments unless you are sure it is trusted.

Hi Eric,

Our inquiry was is this entity subject to a claw back action and if not, why. Thank you, Tara

Please note our new address below.

Tara A. LaClair, LL.M.

Member / Head of Securities & Financial Services Litigation

Step toe & Johnson PLLC
210 Park Avenue, Suite 2300
Oklahoma City, OK 73102
O: 405-930-5153 C: 405-204-2809

Licensed: Oklahoma, California & Michigan



www.step toe-johnson.com

From: Johnson, Eric <ejohnson@spencerfane.com>

Sent: Thursday, March 13, 2025 1:31 PM

To: Patty Labarthe <PLabarthe@securities.ok.gov>; Tara LaClair <Tara.LaClair@Step toe-Johnson.com>; Jennifer Lamirand <Jennifer.Lamirand@Step toe-Johnson.com>; Allen, Hilary <hallen@spencerfane.com>; clay@christensenlawgroup.com; jon@christensenlawgroup.com; brock@christensenlawgroup.com; [justin williams@overmanlegal.com](mailto:justinwilliams@overmanlegal.com); rnash@nashfirm.com; dboxeur@nashfirm.com

Cc: Shaun Mullins <SMullins@securities.ok.gov>; Brad Davenport <BDavenport@securities.ok.gov>; Lodoen, Jim <jlodoen@spencerfane.com>; Chase, Andrea <achase@spencerfane.com>

Subject: RE: Generations to Come LLC BOA Account for Release from Asset Freeze

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you trust ejohnson@spencerfane.com.

Patty – We ran this to ground on our end and I do not have an objection to lifting the freeze.

Eric

Eric L. Johnson

Receiver

—
1000 Walnut, Suite 1400 | Kansas City, MO 64106
816.292.8267
ejohnson@spencerfane.com

From: Patty Labarthe <PLabarthe@securities.ok.gov>

Sent: Tuesday, March 11, 2025 2:31 PM

To: Tara LaClair <Tara.LaClair@Step toe-Johnson.com>; Jennifer Lamirand <Jennifer.Lamirand@Step toe-Johnson.com>; Allen, Hilary <hallen@spencerfane.com>; clay@christensenlawgroup.com; jon@christensenlawgroup.com; brock@christensenlawgroup.com; [justin williams@overmanlegal.com](mailto:justinwilliams@overmanlegal.com); rnash@nashfirm.com; dboxeur@nashfirm.com

Cc: Shaun Mullins <SMullins@securities.ok.gov>; Brad Davenport <BDavenport@securities.ok.gov>; Johnson, Eric <ejohnson@spencerfane.com>

Subject: [EXTERNAL] RE: Generations to Come LLC BOA Account for Release from Asset Freeze

[Warning] This E-mail came from an External sender. Please do not open links or attachments unless you are sure it is trusted.

Hi Tara:

Generations to Come LLC is a transferee investor that opened an account at BOA with Joshua Owen. In that account, they funded the purchase of Premier invoices. The individuals associated with the account are David and Angela Mazzara from Wichita, KS. The Receiver is checking on the clawback issue but this transferee investor was not identified as a possible clawback defendant. I can report back when Eric confirms this.

Thank you,

Patty Labarthe

Patty Labarthe | Director of Enforcement

Oklahoma Department of Securities
204 North Robinson, Suite 400
Oklahoma City, OK 73102
Office: (405) 280-7735 | Fax: (405) 280-7742
securities.ok.gov | investedok.org



OKLAHOMA

From: Tara LaClair <Tara.LaClair@Step toe-Johnson.com>

Sent: Tuesday, March 11, 2025 10:39 AM

To: Patty Labarthe <PLabarthe@securities.ok.gov>; Jennifer Lamirand <Jennifer.Lamirand@Step toe-Johnson.com>; Allen, Hilary <hallen@spencerfane.com>; clay@christensenlawgroup.com; jon@christensenlawgroup.com; brock@christensenlawgroup.com; justin williams <justinwilliams@overmanlegal.com>; rnash@nashfirm.com; dboxeur@nashfirm.com

Cc: Shaun Mullins <SMullins@securities.ok.gov>; Brad Davenport <BDavenport@securities.ok.gov>; ejohnson <ejohnson@spencerfane.com>

Subject: [EXTERNAL] RE: Generations to Come LLC BOA Account for Release from Asset Freeze

Hi Patty,

Thank you for sending this along. We are not familiar with this entity - who is associated with it? Is Generations to Come a transferee or was the account included in error? Also, if they are a transferee investor and have funds in the account, are they also subject to a claw back action by the Receiver?

Apologies for all the questions – just want to make sure we have enough information to make an informed decision.

Thank you! Tara

Please note our new address below.

Tara A. LaClair, LL.M.

Member / Head of Securities & Financial Services Litigation

Step toe & Johnson PLLC
210 Park Avenue, Suite 2300
Oklahoma City, OK 73102
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Licensed: Oklahoma, California & Michigan



www.step-toe-johnson.com

From: Patty Labarthe <PLabarthe@securities.ok.gov>
Sent: Tuesday, March 11, 2025 10:20 AM
To: Tara LaClair <Tara.LaClair@Step-toe-Johnson.com>; Jennifer Lamirand <Jennifer.Lamirand@Step-toe-Johnson.com>; Allen, Hilary <hallen@spencerfane.com>; clay@christensenlawgroup.com; jon@christensenlawgroup.com; brock@christensenlawgroup.com; justin williams <justinwilliams@overmanlegal.com>; rnash@nashfirm.com; dboxeur@nashfirm.com
Cc: Shaun Mullins <SMullins@securities.ok.gov>; Brad Davenport <BDavenport@securities.ok.gov>; ejohnson <ejohnson@spencerfane.com>
Subject: Generations to Come LLC BOA Account for Release from Asset Freeze

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you trust plabarthe@securities.ok.gov.

Good morning:

Under the Order Freezing Assets, a group of accounts at Bank of America in the names of transferee investors have been restricted. We are working with the bank to propose an order to release these accounts from the asset freeze. The attached account is the largest transferee investor account holder. The Department would like to return the funds in this account to the investor.

Please review the application and, if agreeable, please return the signed order. If you have any questions, feel free to contact me.

Thank you,

Patty Labarthe

Patty Labarthe | Director of Enforcement

Oklahoma Department of Securities
 204 North Robinson, Suite 400
 Oklahoma City, OK 73102
 Office: (405) 280-7735 | Fax: (405) 280-7742
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Eric Johnson, Receiver
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1000 Walnut, Ste. 1400
Kansas City, MO 64106



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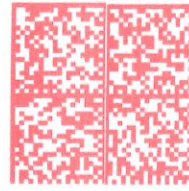
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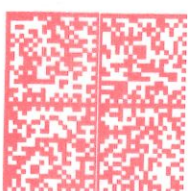
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