

FEB 28 2023

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

RICK WARREN
COURT CLERK

109 _____

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

Case No. CJ-2022-5066
Judge Don Andrews

**JOINT EMERGENCY MOTION TO PARTIALLY LIFT ASSET FREEZE
AS TO CERTAIN BANK ACCOUNTS AT KANZA BANK**

Plaintiff, Oklahoma Department of Securities, *ex rel.* Melanie Hall, Administrator (“Plaintiff”), and Defendants Richard Dale Dean and DDI Advisory Group LLC [collectively “the Parties”] move this Court for 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 certain bank accounts held at Kanza Bank in Kingman, Kansas. The Parties anticipate that a substantively identical motion will be filed in *Office of the Kansas Securities Commissioner, ex rel. Daniel J. Klucas, Securities Commissioner v. Premier Global Corp., et al.*, Case No. 2022-CV-002052-OT (Sedgwick County, Kansas). 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, based on the allegations in the *Petition*, 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*, which, in pertinent part, ordered the Assets of certain Defendants to be frozen as follows:

IT IS HEREBY ORDERED that the assets of the following Defendants: Premier Global Corporation; Premier Factoring, LLC; PF-2, LLC; PF-3, LLC; PF-4, LLC; PF-5, LLC; PF-6, LLC; PF-7, LLC; DDI Advisory Group, LLC; Steve Jonathan Parish; Richard Dale Dean; Premier Marketing Management; and Joshua Dane Owen (the "Premier Defendants") be, and hereby are, frozen ("Assets"). The freeze shall include, but not be limited to, funds, securities and properties, real and personal, tangible and intangible, of whatever kind and description, and wherever situated, held by or under the direct or indirect control of the Premier Defendants, whether held in the name of the Premier Defendants for the direct or indirect beneficial interest of any Premier Defendant, in whatever form such assets may presently exist; and those funds located in any bank or other depository or financial institution or securities brokerage firm. It shall also apply to accounts in the name of any individuals or entities controlled by the Premier Defendants or over which the Premier Defendants have signatory or other designated authority, if the funds are derived to any extent from the activities alleged in Plaintiff's Petition.

Order Freezing Assets at p. 2.

4. Under the *Order Freezing Assets*, numerous accounts at Kanza Bank are frozen. The frozen accounts include but are not limited to the following (hereinafter the "Life Settlement Accounts"):

Account Holder	Last 4 Digits Acct #	Account Balance
Adams Missouri, LLC	3476	\$3,758.61
Goldman Policy, LLC	4618	\$3,565.93
Goldman 1, LLC	4316	\$23,213.92
Harilall Policy, LLC	4847	\$62,488.09
H T Long, LLC	3670	\$9,805.92
Merritt Missouri, LLC	3468	\$45,579.70
NJ Stephen Three, LLC	3689	\$18,253.20

5. The Life Settlement Accounts are frozen under the *Order Freezing Assets* because Dean is an authorized signer on the accounts and the accounts are held by or under the direct or indirect control of Dean.

6. The Life Settlement Accounts and the funds on deposit therein relate to life settlement investments administered by Dean (“Life Settlement Investments”). Under these Life Settlement Investments, the above-listed limited liability companies (the “Life Settlement Issuers”), directly or indirectly, purchased existing life insurance policies from policy owners (the “Life Insurance Policies”), and are responsible for thereafter keeping the policies in force by paying policy premiums. To fund the purchase of the Life Insurance Policies, the Life Settlement Issuers sold membership units to investors. Upon the death of the insureds, the investors are entitled to a portion of the policy death benefits. In the meantime, the investors are responsible for making capital contributions to the Life Settlement Issuers to cover expenses of the ventures including, *inter alia*, payment of the policy premiums.

7. Plaintiff has been provided with information, including information provided by Dean’s counsel, that the premiums for certain Life Insurance are due and owing (or soon will be), and that failure to pay those premiums will cause those policies to lapse. Further, Dean is in possession of numerous checks from investors representing capital contributions to the Life Settlement Issuers to pay the policy premiums, which checks have not been deposited because the Life Settlement Accounts are frozen.

8. Plaintiff is in possession of bank records for the Life Settlement Accounts. Based on a preliminary review of those bank records, the funds in the Life Settlement Accounts appear to be related to the life settlement investment ventures of the Life Settlement Issuers, and do not appear to include funds related to Premier’s invoice factoring activities or the sale of securities and Ponzi scheme described in the *Petition*. However, Plaintiff has been informed that Premier Global Corp. or Steven Parish may have interests in several of the Life Settlement Issuers, and may owe substantial amounts of funds to fulfill pending or imminent capital calls.

The Receiver is currently gathering information regarding this purported interest in the Life Settlement Issuers, including information relevant to the existence of pending or imminent capital calls to Premier or Parish.

9. Based on the foregoing, Plaintiff believes that the asset freeze ordered in the *Order Freezing Assets* should be lifted as applied to the Life Settlement Accounts, subject to an order of the Court that, so long as Defendant Dean is the administrator of the life settlement investments described in Paragraphs 4 through 6, he must every 60 days: (a) file a report with the Court listing all transactions in the Life Settlement Accounts, with the first report due by April 13, 2023; and (b) provide copies of monthly bank statements for the Life Settlement Accounts to counsel for the Plaintiff and counsel for the Receiver, to the extent that such statements are available to him, with the first production due by April 13, 2023.

WHEREFORE, the Parties move the Court to enter an order: (1) lifting the asset freeze ordered in the *Order Freezing Assets* as applied to Life Settlement Accounts described above; (2) ordering Dean to deposit all funds in his possession payable to the Life Settlement Issuers, into the Life Settlement Accounts, and to expend funds from the Life Settlement Accounts only as is necessary to keep the Life Insurance Policies in force; (3) ordering Dean (so long as he is the administrator of the life settlement investments described in Paragraphs 4 through 6) to file a report with the Court every 60 days detailing all transactions in the Life Settlement Accounts, including a description of all transaction purposes, with the first report due by April 13, 2023; (4) ordering Dean (so long as he is the administrator of the life settlement investments described in Paragraphs 4 through 6) to provide copies of monthly bank statements for the Life Settlement Accounts to counsel for the Plaintiff and counsel for the Receiver every 60 days, to the extent that such statements are available to him, with the first production due by April 13,

2023; and (5) ordering Dean to produce to the Receiver by March 1, 2023 all information and/or documents he has regarding Premier's or Parish's interest in the Life Settlement Issuers, and regarding any pending or imminent capital calls by those entities to Premier or Parish.

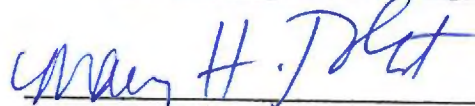
Respectfully submitted,

OKLAHOMA DEPARTMENT OF SECURITIES
Melanie Hall, Administrator

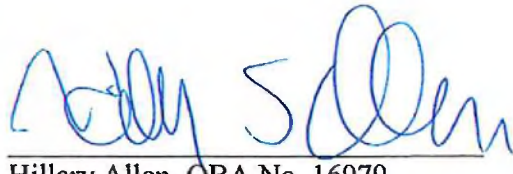
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A handwritten signature in blue ink, appearing to read "Hillary Allen".

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CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of February 2023, a true and correct copy of the above and foregoing instrument was delivered via email and 1st Class U.S. mail, with postage fully prepaid thereon, to:

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