

**IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA**

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

FILED
DISTRICT COURT
OKLAHOMA COUNTY, OKLAHOMA
May 8, 2025 4:58 PM
RICK WARREN, COURT CLERK
Case Number CJ-2022-5066

Case No. CJ-2022-5066
Judge Don Andrews

**RECEIVER AND ODS’S JOINT MOTION FOR CONTINUANCE
OF HEARING SET ON MAY 15, 2025, RELATING THE MOTION FOR AUTHORITY
TO PAY RICHARD D. DEAN A SALARY**

Eric L. Johnson (the “Receiver”), and the Oklahoma Department of Securities, *ex rel.* Melanie Hall, Administrator (“ODS” and together with Receiver, the “Movants”), hereby move for a continuance of the hearing on the Motion for Authority to Pay Defendant Richard D. Dean a Salary (the “Motion for Salary”). In support thereof, the Movants state as follows:

1. On October 14, 2022, the Court entered its Order Freezing Assets, Order Prohibit Disposition of Assets and Order Prohibiting Destruction for Disposition of Records (**Ex. A- “Asset Freeze Order”**).

2. On August 28, 2024, Defendant Richard Dale Dean (“Dean”) filed his Motion to Unfreeze and/or Release certain Accounts from the Order Freezing Assets (the “Motion to Unfreeze”), seeking to unfreeze Dean’s Credit Union of Texas account and to remove Settlements of Texas, Inc. (“SOT”), AAA Management & Benefit, LLC (“AAA”), Dickie Dean’s Insurance & Investment Agency, Inc.; and Wealth & Retirement Solutions, LLC from the asset freeze provided in the Asset Freeze Order.

3. On September 16, 2024, Plaintiff ODS filed Plaintiff's Combined Response in Opposition to Defendant Richard Dale Dean's Motion to Unfreeze and/or Release Certain Accounts from the Order Freezing Assets and Expedited Motion for Accounting and Order for the Return of Funds, requesting that Dean make an accounting of disbursements from the SOT account and show cause why such disbursements were not in violation of the Asset Freeze Orders.

4. On September 18, 2024, the Receiver also filed his Motion to Show Cause and for Accounting by Defendant Richard Dean (the "Show Cause Motion"), requesting among other things that Dean show cause why the disbursements from the SOT account are not a violation of the Asset Freeze Orders.

5. On October 28, 2024, the Show Cause Motions evidentiary hearing began but was continued and has been conducted on February 14, 2025, and on March 7, 2025, but has not been concluded.

6. The continued hearing on the Motion to Unfreeze and the Show Cause Motion is currently set for August 4, 2025.

7. On April 11, 2025, SOT filed the Motion for Salary, seeking authorization for SOT to pay an annual salary of \$50,000 to Dean.

8. On April 29, 2025, ODS filed its Response in Opposition to the Motion for Authority to Pay Defendant Richard D. Dean a Salary (the "ODS Opposition"). In the ODS Opposition, ODS argued, among other things, that to "adequately evaluate this new salary request, it is critical that Plaintiff and the Receiver's litigation over the violation of the asset freeze first conclude." ODS Opposition at 4.

9. Also on April 29, 2025, the Receiver filed its Response to Motion for Authority to Pay Defendant Richard D. Dean a Salary (the "Receiver Opposition"). In the Receiver Opposition,

the Receiver also noted the connection to the pending motions, explaining that Dean was seeking “authority for SOT to pay him a salary in excess of \$100,000, which he will use to offset his responsibility to pay back some of the [money subject to the Show Cause Motion] back to SOT.” Receivers Opposition at 1.

10. On May 6, 2025, Settlements of Texas filed a Notice of Hearing on the Motion for Salary, setting it for hearing on May 15, 2025.

11. Neither counsel for Receiver nor counsel for ODS was contacted regarding their availability on the date of the hearing and counsel for the Receiver has a prior commitment on May 15, is out of town and is not able to attend the hearing.

12. On May 7, 2025, Receiver filed a Notice of Receiver’s Determination Regarding Additional Receivership Entities designating SOT and AAA as Receivership Entities which somewhat makes Defendant Dean’s request moot.

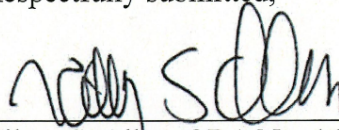
13. The request for payment of Dean of a salary is not an emergency. Dean’s use of the funds in the SOT and AAA accounts has been contemplated and is part of the Receiver and ODS’ Motion to Show Cause. Most importantly, Dean’s Motion for Salary goes to the very heart of the issue that this Court ordered the SOT and AAA’s accounts to be frozen as thus, neither should be a source of funds for Dean at this time, especially with Dean’s unauthorized withdrawal of approximately \$344,500 from the SOT account in 2024.

14. The Movants hereby request that the hearing on the Motion for Salary be continued to August 4, 2025, and decided in conjunction and contemporaneously with the Show Cause and Motion to Unfreeze proceeding.

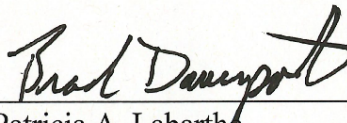
WHEREFORE, for the reasons stated, Movants request the Court continue the hearing on Dean's Motion for Salary until the hearing on the Show Cause Motion and the Motion to Unfreeze can be completed and the Court has all of the evidence it needs to decide said issues.

Date: May 8, 2025

Respectfully submitted,



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CERTIFICATE OF SERVICE

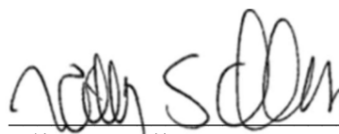
I hereby certify that on the 8th day of May 2025, a true and correct copy of the above and foregoing was sent electronically to all parties requesting electronic notice and mailed to the parties who have mailing addresses and have entered an appearance.

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Hilary S. Allen

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

OCT 14 2022
RICK WARREN
COURT CLERK

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA



Oklahoma Department of Securities
ex rel. Melanie Hall, Administrator,
Plaintiff,

v.

Premier Global Corporation, a Kansas corporation,
formerly known as Premier Construction Services,
Inc., and doing business as Premier Construction
Billing;
Premier Factoring, LLC, a Kansas limited
liability company;
PF-2, LLC, a Kansas limited liability company;
PF-3, LLC, a Kansas limited liability company;
PF-4, LLC, a Kansas limited liability company;
PF-5, LLC, a Kansas limited liability company;
PF-6, LLC, a Kansas limited liability company;
PF-7, LLC, a Kansas limited liability company;
DDI Advisory Group, LLC, a Kansas limited
liability company;
Steve Jonathan Parish, an individual;
Richard Dale Dean, an individual;
Premier Marketing Management,
a Kansas corporation;
Joshua Dane Owen, an individual;
J&H Holdings, LLC, a cancelled Oklahoma
limited liability company;
Kyle Blackburn, an individual;
Mitzimack, Inc., an Oklahoma corporation;
Erika Greggs, an individual;
Elkins & Associates Inc., an Oklahoma corporation;
Clyde Edward Elkins, an individual;
James Scott Stanley, an individual;
Brent Lee Worley, an individual;
Byron Kent Freeman, an individual; and
Karen Lynne Freeman, an individual;
Jay Michael Bogdahn, an individual,

Defendants.

Case No. CJ-2022-5066

**ORDER FREEZING ASSETS, ORDER PROHIBITING DISPOSITION OF ASSETS
AND ORDER PROHIBITING DESTRUCTION OR DISPOSITION OF RECORDS**

This matter came on for hearing this 14th day of Oct., 2022, before the undersigned Judge of the District Court in and for Oklahoma County, State of Oklahoma, upon Plaintiff's Petition for Permanent Injunction and Other Relief ("Petition") and the Plaintiff's *Application for Order Freezing Assets and Other Relief* ("Application") filed pursuant to Section 1-603 of the Oklahoma Uniform Securities Act of 2004 ("Act"), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (2022).

It appears to this Court from the facts alleged in Plaintiff's Petition and Application that Plaintiff is entitled to the relief requested in the Application. It further appears that the public will suffer irreparable damage and injury unless such relief is granted.

It also appears to the Court that if the issuance of this Order is further delayed there is a strong likelihood that investor funds may be lost to the detriment of those investors.

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. All banks or other depository or financial institutions or securities brokerage firms served with a copy of this Order shall cooperate with Plaintiff relating to implementation of this Order, including imposing a freeze on and prohibiting the disposition of any and all Assets, including accounts and funds, and producing records relating thereto. Facsimile or electronic transmission shall constitute service on the banks or other depository or financial institutions or securities brokerage firms.

IT IS FURTHER ORDERED that the Premier Defendants, their agents, servants, employees, assigns, and those persons, directly or indirectly, acting on their behalf, under their direction and control, and/or in active concert or participation with them who receive actual notice of the Order, by personal service, electronic submission, facsimile, or otherwise, and each of them from tampering with, mutilating, altering, erasing, concealing, removing, destroying or otherwise disposing of any and all books, records, documents, files, correspondence, electronically stored data, and information stored in computer maintained form, pertaining to or referring to the Premier Defendants and any of their subsidiaries or affiliates, and any financial transactions by the Premier Defendants or to which the Premier Defendants and/or investors were parties.

IT IS FURTHER ORDERED that the Premier Defendants, their agents, servants, employees, assigns and all those persons, directly or indirectly, acting on their behalf, under their direction and control, and/or in active concert or participation with them, who receive actual notice of the Order, by personal service, electronic transmission, facsimile or otherwise, and each of them from, directly or indirectly, transferring, withdrawing, concealing, removing, destroying, or otherwise disposing of any and all Assets of the Premier Defendants.

IT IS FURTHER ORDERED that the Premier Defendants allow representatives of the Oklahoma Department of Securities access to any and all documents relating to the sales of

securities and the business of the Premier Defendants, their subsidiaries, officers, directors, agents, servants, employees, assigns, attorneys, and all persons acting on their behalf, under their direction and control, and/or in active concert or participation with them, including, but not limited to, books, records, tapes, discs, accounting data, checks, correspondence, forms, advertisements, brochures, manuals, electronically stored data, bank records, customer and investor lists, customer and investor files, telephone records, ledgers, payroll records, to include such information stored in computer maintained form.

IT IS FURTHER ORDERED that the Premier Defendants shall provide notice of this Order to each of their affiliates, successors, directors, officers, and each of their employees, salespersons, representatives, and independent contractors.

THIS ORDER IS ENTERED this 14th day of Oct., 2022, at 2:20, P.m.

Cindy H. Turner
DISTRICT COURT JUDGE

Approved as to Form:

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