

1 MICHAEL A. KAKUK  
2 Special Deputy Flathead County Attorney  
3 Special Assistant Montana Attorney General  
4 840 Helena Avenue  
5 Helena, MT 59601  
6 Telephone: (406) 444-2040  
7 Attorney for the State of Montana

CLERK OF DISTRICT COURT  
2014 MAY -8 PM 2:20  
FILED  
BY \_\_\_\_\_ *SS*  
DEPUTY

9 IN THE DISTRICT COURT OF THE ELEVENTH JUDICIAL DISTRICT OF  
10 THE STATE OF MONTANA, IN AND FOR THE COUNTY OF FLATHEAD

11 **STATE OF MONTANA,**

12 Plaintiff,

13 vs.

14 **JOE GLICKMAN, JR.,**

15 Defendant.

Cause No.: *DC-14-196C*

**INFORMATION**

**HEIDI J ULBRICHT**

17 =====  
18 The State of Montana, by and through the Flathead County  
19 Attorney's Office, having first obtained leave of the Court, files  
20 this information accusing the Defendant, JOE GLICKMAN, JR., of  
21 having committed the following offenses:

22 **COUNT ONE**

23 That on or about June 1, 2009, through December 28, 2011, in  
24 Flathead County and Lewis and Clark County, Montana, the Defendant  
25 committed the offense of Failure to Register as a Securities  
26 Salesperson, Common Scheme, a Felony, in violation of Mont. Code  
27

28 / / /

INFORMATION

1 Ann. § 30-10-201(1). The facts constituting this offense are as  
2 follows:

3 That at the times and places mentioned above, the Defendant  
4 wilfully transacted business in Montana as a securities salesperson  
5 without being registered as such with the State of Montana and  
6 without the benefit of a registration exemption.  
7

8 Specifically, the Defendant wilfully offered and sold limited  
9 partnership interests in the entity MWM Special Group, LP, in  
10 Montana to multiple investors, including the following Montana  
11 investors, while not registered as a securities salesperson and  
12 without the benefit of a registration exemption: Richard G. Bedrin,  
13 Rocky Lee Burtsfield, Michael P. Davis, Todd Featherly, Steve J.  
14 Kastella, Christopher J. Laidlaw Trust, James Laidlaw, Jeff Nelson,  
15 Greg Niles, LaDelle A. Reynolds, and Pauline Urban.  
16

17 Pursuant to § 30-10-306(1), the offense is punishable by a  
18 fine not to exceed \$5,000.00 or imprisonment in the state prison  
19 for a term not to exceed 10 years, or both.  
20

21 **COUNT TWO**

22 That on or about June 1, 2009, through December 28, 2011, in  
23 Flathead County and Lewis and Clark County, Montana, the Defendant  
24 committed the offense of Failure to Register a Security, Common  
25 Scheme, a Felony, in violation of § 30-10-202(1). The facts  
26 constituting this offense are as follows:  
27

28 / / /

1 That at the times and places mentioned above, the Defendant  
2 wilfully failed to register a security in Montana by notification,  
3 coordination, or qualification and without the benefit of a  
4 registration exemption before offering and selling the security in  
5 Montana.

6 Specifically, the Defendant wilfully offered and sold limited  
7 partnership interests in the entity MWM Special Group, LP, in  
8 Montana to multiple investors, including the following Montana  
9 investors, without registration by notification, coordination, or  
10 qualification and without the benefit of a registration exemption:  
11 Richard G. Bedrin, Rocky Lee Burtsfield, Michael P. Davis, Todd  
12 Featherly, Steve J. Kastella, Christopher J. Laidlaw Trust, James  
13 Laidlaw, Jeff Nelson, Greg Niles, LaDelle A. Reynolds, and Pauline  
14 Urban.  
15  
16

17 Pursuant to § 30-10-306(1), the offense is punishable by a  
18 fine not to exceed \$5,000.00, or imprisonment in the state prison  
19 for a term not to exceed 10 years, or both.  
20

21 **COUNT THREE**

22 That on or about June 1, 2009, through December 28, 2011, in  
23 Flathead County, Montana, the Defendant committed the offense of  
24 Fraudulent Practices, Common Scheme, a Felony, in violation of  
25 § 30-10-301(1)(c). The facts constituting this offense are as  
26 follows:  
27

28 / / /

1 That at the times and place mentioned above, in connection  
2 with the offer and sale of securities within the state of Montana,  
3 the Defendant wilfully engaged in a practice and course of business  
4 that acted as a fraud or deceit upon investors.

5 Specifically, Defendant wilfully solicited limited partnership  
6 interests in the entity MWM Special Group, LP, and obtained at  
7 least \$167,500 from investors without advising investors that: 1)  
8 he was not registered to sell securities in the state of Montana;  
9 and 2) that he would spend at least some of their invested money  
10 for his own, personal use. He sold these shares to multiple  
11 investors, including the following Montana investors: Richard G.  
12 Bedrin, Rocky Lee Burtsfield, Michael P. Davis, Todd Featherly,  
13 Steve J. Kastella, Christopher J. Laidlaw Trust, James Laidlaw,  
14 Jeff Nelson, Greg Niles, LaDelle A. Reynolds, and Pauline Urban.

15 Pursuant to § 30-10-306(1), the offense is punishable by  
16 a fine not to exceed \$5,000.00, or imprisonment in the state prison  
17 for a term not to exceed 10 years, or both.

18  
19  
20  
21 **COUNT FOUR**

22 That on or about June 1, 2009, through December 28, 2011, in  
23 Flathead County, Montana, the Defendant committed the offense of  
24 Theft, Common Scheme, a Felony, in violation of § 45-6-301(2)(b).  
25 The facts constituting this offense are as follows:  
26

27 That at the time and place mentioned above, the Defendant  
28 purposely or knowingly obtained by deception investors' property,

1 and purposely or knowingly used that property knowing that the use  
2 would deprive the investors of their property.

3 Specifically, the Defendant deceived multiple investors,  
4 including the following Montana investors, to invest at least  
5 \$167,500.00 into the entity MWM Special Group, LP: Richard G.  
6 Bedrin, Rocky Lee Burtsfield, Michael P. Davis, Todd Featherly,  
7 Steve J. Kastella, Christopher J. Laidlaw Trust, James Laidlaw,  
8 Jeff Nelson, Greg Niles, LaDelle A. Reynolds, and Pauline Urban.  
9 The Defendant then used at least \$13,000.00 for his own, personal  
10 expenses, and not for the benefit of MWM Special Group, LP.  
11

12 Pursuant to § 45-6-301(9), the property stolen in multiple  
13 thefts but in a single common scheme may be aggregated to determine  
14 the total value of the stolen property. Therefore, under § 45-6-  
15 301(8)(b)(i), the offense is punishable by a fine not to exceed  
16 \$50,000.00, or imprisonment in the state prison for a term not to  
17 exceed 10 years, or both.  
18

19 All known possible witnesses for the State are listed as  
20 follows:  
21

22 Mark Murray

23 Lynne Egan

24 Investors: Richard G. Bedrin, Charles Beall, Stephen Boyle,  
25 Bruenig Family Trust, Robert Burns, Rocky Lee Burtsfield, Stephen  
26 Cole, Jeffrey Cryer, Michael P. Davis, Doug Dean, Joseph Dillow,  
27 Bill Elkins, Dick Enlow, Milton Faber, Todd Featherly, Robert R.  
28

1 Glickman, Santos Gonzalez, Brenda Grey, Infinity Consult Group,  
2 Steve J. Kastella, Gregory Khoury, Ellen Krska, Christopher J.  
3 Laidlaw Trust, James Laidlaw, Ronda Matthews, Luther McCoy Jr.,  
4 Luther and Glenda McCoy, Jeff Nelson, New Aberdeen LLC, Gregg  
5 Niles, LaDelle A. Reynolds, Geary Rupp, Henry Smith,  
6 Raymond Snoddy, Marina Stewmon, Sara Ann Stewmon, Tom Stewmon,  
7 William Stewman, Sterling Trust Company, Lam Tran, Daniel Wallace,  
8 Robert Wilkin, and Pauline Urban.  
9

10 Any and all witnesses not listed here but which will be  
11 provided to this Court prior to trial.  
12

13 DATED this 5<sup>th</sup> day of May, 2014.



14  
15  
16 MICHAEL A. KAKUK  
17 Special Assistant Attorney General  
18 Special Deputy Flathead County Attorney  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28