

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
(Palm Beach Division)**

**Case No. 9:19-CV-80633-ROSENBERG**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

NATURAL DIAMONDS INVESTMENT CO.,  
et al.,

Defendants,

H.S. MANAGEMENT GROUP LLC, et al.,

Relief Defendants.

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**RECEIVER'S NOTICE OF FILING PROPOSED  
AGREED ORDER CONCERNING THE TRANSFER  
OF JEWELRY TO COURT-APPOINTED RECEIVER**

Jeffrey C. Schneider, not individually, but solely in his capacity as the Court-appointed receiver (the "Receiver") for Argyle Coin, LLC ("Argyle"), files herewith the attached proposed Agreed Order Concerning the Transfer of Jewelry to Court-Appointed Receiver (the "Agreed Order"). The Agreed Order solely involves the Receiver and non-party Carmelo De Stefano, who have agreed to the form of the attached proposed Agreed Order. The Receiver respectfully requests that the Court enter the attached proposed Agreed Order.

Dated: June 11, 2019

Respectfully submitted,

**JEFFREY C. SCHNEIDER, P.A.**

*Court-Appointed Receiver for Argyle Coin, LLC and  
Corporate Monitor for Natural Diamonds  
Investment Co. and Eagle Financial Diamond  
Group, Inc. a/k/a Diamante Atelier*

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By: /s/ Jeffrey C. Schneider, P.A.

JEFFREY C. SCHNEIDER, P.A.  
Court-Appointed Receiver for Argyle Coin,  
LLC and Corporate Monitor for Natural  
Diamonds Investment Co. and Eagle  
Financial Diamond Group, Inc. a/k/a  
Diamante Atelier

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on June 11, 2019, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: /s/ Jeffrey C. Schneider, P.A.

JEFFREY C. SCHNEIDER, P.A.  
Court-Appointed Receiver for Argyle  
Coin, LLC and Corporate Monitor for  
Natural Diamonds Investment Co.  
and Eagle Financial Diamond Group,  
Inc. a/k/a Diamante Atelier

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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No. 9:19-CV-80633-ROSENBERG**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

NATURAL DIAMONDS INVESTMENT CO.,  
EAGLE FINANCIAL DIAMOND GROUP INC.  
a/k/a DIAMANTE ATELIER,  
ARGYLE COIN, LLC,  
JOSE ANGEL AMAN,  
HAROLD SEIGEL, &  
JONATHON H. SEIGEL,

Defendants,

H.S. MANAGEMENT GROUP LLC,  
GOLD 7 OF MIAMI, LLC,  
WINNERS CHURCH INTERNATIONAL INC.  
OF WEST PALM BEACH, FLORIDA,  
FREDERICK D. SHIPMAN, &  
WHITNEY SHIPMAN,

Relief Defendants.

**AGREED ORDER CONCERNING THE TRANSFER OF JEWELRY TO COURT-  
APPOINTED RECEIVER**

**WHEREAS**, on May 16, 2019, the Court appointed Jeffrey C. Schneider, Esq. as the Receiver of Argyle Coin, LLC (the "Order"). ECF No. 20.

**WHEREAS**, the Receiver has demanded that 38 pieces of jewelry in the custody, control or possession of non-party Carmelo De Stefano (the "Jewelry") be turned over to him in his capacity as Receiver. The Jewelry is discussed and listed in Mr. De Stefano's letter, including its exhibits, to the Receiver dated May 7, 2019.

**WHEREAS**, Mr. De Stefano takes the position that he has a perfected ownership interest in the Jewelry and that no order entered in this or any other proceeding requires him to turn over the Jewelry to the Receiver and reserves all rights and does not waive any defenses with respect to his ownership interest in the Jewelry and his right to retain custody, control and/or possession of the Jewelry.

**WHEREAS**, the Receiver reserves the right to dispute any of Mr. De Stefano's positions regarding the Jewelry.

**WHEREAS**, however, for purposes of promoting efficiency and judicial economy, Mr. De Stefano agrees to turn over custody of the Jewelry to the Receiver under the condition that an Agreed Order be entered by this Court providing that: (1) the Jewelry is transferred to the Receiver's possession solely for the purpose of appraisal and safekeeping; (2) the Jewelry will not be distributed, sold, or disposed of by the Receiver without a court order or stipulation of the parties; (3) the Jewelry must be maintained in a safe deposit box by the Receiver; and (4) if the Receiver and Mr. De Stefano cannot mutually agree on De Stefano's ownership interest and/or right to possess the Jewelry, such issues will be adjudicated by the Court, with there being no presumption against Mr. De Stefano or in favor of the Receiver by virtue of the fact that Mr. De Stefano transferred possession to the Receiver pursuant to this Agreed Order.

**WHEREAS**, the Court, being advised of the parties' agreement and being fully advised in the premises, orders that the Jewelry be transferred to the Receiver's possession pursuant to the terms herein within five (5) business days of entry of this Agreed Order.

**DONE AND ORDERED** in Chambers, West Palm Beach, Florida, this \_\_\_\_ day of \_\_\_\_\_, 2019.

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ROBIN L. ROSENBERG  
UNITED STATES DISTRICT JUDGE