

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

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

**SECURITIES AND EXCHANGE COMMISSION,**

**Plaintiff,**

**v.**

**NATURAL DIAMONDS INVESTMENT CO.,  
EAGLE FINANCIAL DIAMOND GROUP INC.  
AKA DIAMANTE ATELIER,  
ARGYLE COIN, LLC,  
JOSE ANGEL AMAN,  
HAROLD SEIGEL, AND  
JONATHAN H. SEIGEL,**

**Defendants,**

**and**

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

**Relief Defendants.**

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**ANSWER, AFFIRMATIVE DEFENSES AND AVOIDANCES OF RELIEF  
DEFENDANTS WINNERS CHURCH INTERNATIONAL, INC. OF WEST PALM  
BEACH, FLORIDA, BISHOP FREDERICK D. SHIPMAN, AND PASTOR WHITNEY  
SHIPMAN**

Pursuant to Fed. R. Civ. P. 8(b)-(c), Relief Defendants Winners Church International, Inc. of West Palm Beach Florida (“Winners Church”), Bishop Frederick D. Shipman (“Bishop Shipman”), and Pastor Whitney Shipman (“Pastor Shipman”) (collectively, the “Winners Church Relief Defendants”), by and through their undersigned counsel, hereby submit their Answer,

Affirmative Defenses, and Avoidances to the Complaint [ECF 1] and state as follows:

1. The Winners Church Relief Defendants admit that the SEC has brought this action seeking injunctive relief but they are without sufficient knowledge to admit or deny that the Defendants have defrauded “investors through the sale of securities in violation of the anti-fraud and registration provisions of the federal securities laws” and therefore, this averment shall have the same procedural effect as if they had denied the same.

2. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 2 and therefore, this averment shall have the same procedural effect as if they had denied the same.

3. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 3 and therefore, this averment shall have the same procedural effect as if they had denied the same.

4. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 4 and therefore, this averment shall have the same procedural effect as if they had denied the same.

5. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 5 and therefore, this averment shall have the same procedural effect as if they had denied the same.

6. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 6 and therefore, this averment shall have the same procedural effect as if they had denied the same.

7. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 7 and therefore, this averment shall have the same procedural effect as if they had denied the same.

8. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 8 and therefore, this averment shall have the same procedural effect as if they had denied the same.

9. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 9 and therefore, this averment shall have the same procedural effect as if they had denied the same.

10. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 10 and therefore, this averment shall have the same procedural effect as if they had denied the same.

11. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 11 and therefore, this averment shall have the same procedural effect as if they had denied the same.

12. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 12 and therefore, this averment shall have the same procedural effect as if they had denied the same.

13. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 13 and therefore, this averment shall have the same procedural effect as if they had denied the same.

14. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 14 and therefore, this averment shall have the same procedural effect as if they had denied the same.

15. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 15 and therefore, this averment shall have the same procedural effect as if they had denied the same.

16. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 16 and therefore, this averment shall have the same procedural effect as if they had denied the same.

## **II. DEFENDANTS AND RELIEF DEFENDANTS**

### **A. Defendants**

17. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 17 and therefore, this averment shall have the same procedural effect as if they had denied the same.

18. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 18 and therefore, this averment shall have the same procedural effect as if they had denied the same.

19. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 19 and therefore, this averment shall have the same procedural effect as if they had denied the same.

20. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 20 and therefore, this averment shall have the same

procedural effect as if they had denied the same.

21. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 21 and therefore, this averment shall have the same procedural effect as if they had denied the same.

22. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 22 and therefore, this averment shall have the same procedural effect as if they had denied the same.

**B. Relief Defendants**

23. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 23 and therefore, this averment shall have the same procedural effect as if they had denied the same.

24. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 24 and therefore, this averment shall have the same procedural effect as if they had denied the same.

25. The Winners Church Relief Defendants admit that Winners Church is an active Florida not-for-profit corporation incorporated in November 1985 with its principal place of business in West Palm Beach, Florida, admit that Bishop Shipman is its President, and admit that Pastor Shipman is a Director. The Winners Church Relief Defendants deny that Aman is a director at present. The Winners Church Relief Defendants admit that from May 2014 until December 2018, they received at least \$1 million in donations and tithes from Aman-related entities but deny that said donations and tithes were received without any legitimate basis. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the remainder of the allegations

contained in Paragraph 25 and therefore, those averments shall have the same procedural effect as if they had denied the same.

26. The Winners Church Relief Defendants admit that Bishop Frederick D. Shipman is the President of Winners Church and father of Pastor Whitney Shipman. The Winners Church Relief Defendants admit that Aman-related entities donated at least \$700,000 to Bishop Shipman between August 2014 and August 2018, but deny that said donations were without any legitimate basis. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the remainder of the allegations contained in Paragraph 26 and therefore, those averments shall have the same procedural effect as if they had denied the same.

27. The Winners Church Relief Defendants admit that Pastor Shipman is a Director of Winners Church, and admit that Eagle donated at least \$40,000 between January 2015 and April 2018 to Pastor Shipman but deny that said donations were without any legitimate basis. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the remainder of the allegations contained in Paragraph 27 and therefore, this averment shall have the same procedural effect as if they had denied the same.

### **III. JURISDICTION AND VENUE**

28. The Winners Church Relief Defendants admit that this Court has jurisdiction over this action under the cited provisions of the federal securities laws but deny that this Court has proper jurisdiction over them in this action as they deny that they are proper “relief defendants.” The Winners Church Relief Defendants had no knowledge of the alleged misconduct of Aman and the other defendants and they each had a legitimate property interest in the religious donations they received in good faith. Therefore, this Court is without proper subject matter jurisdiction over the

Winners Church Relief Defendants.

29. The Winners Church Relief Defendants set forth no response to the legal conclusion contained in Paragraph 29 as to the other Defendants, and are without sufficient knowledge to admit or deny the factual allegations contained in Paragraph 29 as they pertain to other Defendants such that this averment shall have the same procedural effect as if they had denied the same. The Winners Church Relief Defendants admit that they are all located in the Southern District of Florida.

30. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 30 and therefore, this averment shall have the same procedural effect as if they had denied the same.

#### **IV. THE NATURAL DIAMONDS SECURITIES FRAUD**

##### **A. The Natural Diamonds Offering**

31. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 31 and therefore, this averment shall have the same procedural effect as if they had denied the same.

32. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 32 and therefore, this averment shall have the same procedural effect as if they had denied the same.

33. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 33 and therefore, this averment shall have the same procedural effect as if they had denied the same.

34. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 34 and therefore, this averment shall have the same

procedural effect as if they had denied the same.

35. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 35 and therefore, this averment shall have the same procedural effect as if they had denied the same.

36. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 36 and therefore, this averment shall have the same procedural effect as if they had denied the same.

37. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 37 and therefore, this averment shall have the same procedural effect as if they had denied the same.

38. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 38 and therefore, this averment shall have the same procedural effect as if they had denied the same.

39. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 39 and therefore, this averment shall have the same procedural effect as if they had denied the same.

**B. Solicitation of Natural Diamonds Investors**

40. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 40 and therefore, this averment shall have the same procedural effect as if they had denied the same.

41. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 41 and therefore, this averment shall have the same



procedural effect as if they had denied the same.

42. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 42 and therefore, this averment shall have the same procedural effect as if they had denied the same.

43. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 43 and therefore, this averment shall have the same procedural effect as if they had denied the same.

44. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 44 and therefore, this averment shall have the same procedural effect as if they had denied the same.

45. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 45 and therefore, this averment shall have the same procedural effect as if they had denied the same.

46. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 46 and therefore, this averment shall have the same procedural effect as if they had denied the same.

47. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 47 and therefore, this averment shall have the same procedural effect as if they had denied the same.

48. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 48 and therefore, this averment shall have the same procedural effect as if they had denied the same.

49. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 49 and therefore, this averment shall have the same procedural effect as if they had denied the same.

50. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 50 and therefore, this averment shall have the same procedural effect as if they had denied the same.

51. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 51 and therefore, this averment shall have the same procedural effect as if they had denied the same.

52. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 52 and therefore, this averment shall have the same procedural effect as if they had denied the same.

53. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 53 and therefore, this averment shall have the same procedural effect as if they had denied the same.

54. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 54 and therefore, this averment shall have the same procedural effect as if they had denied the same.

55. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 55 and therefore, this averment shall have the same procedural effect as if they had denied the same.

56. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 56 and therefore, this averment shall have the same procedural effect as if they had denied the same.

57. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 57 and therefore, this averment shall have the same procedural effect as if they had denied the same.

58. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 58 and therefore, this averment shall have the same procedural effect as if they had denied the same.

59. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 59 and therefore, this averment shall have the same procedural effect as if they had denied the same.

60. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 60 and therefore, this averment shall have the same procedural effect as if they had denied the same.

61. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 61 and therefore, this averment shall have the same procedural effect as if they had denied the same.

62. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 62 and therefore, this averment shall have the same procedural effect as if they had denied the same.

**C. Fraudulent Conduct in the Natural Diamonds Offering**

63. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 63 and therefore, this averment shall have the same procedural effect as if they had denied the same.

64. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 64 and therefore, this averment shall have the same procedural effect as if they had denied the same.

65. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 65 and therefore, this averment shall have the same procedural effect as if they had denied the same.

66. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 66 and therefore, this averment shall have the same procedural effect as if they had denied the same.

67. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 67 and therefore, this averment shall have the same procedural effect as if they had denied the same.

68. The Winners Church Relief Defendants deny the allegations contained in Paragraph 68 although they each admit that they did receive religious donations from Aman through certain of his entities.

69. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 69 and therefore, this averment shall have the same procedural effect as if they had denied the same.

70. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 70 and therefore, this averment shall have the same procedural effect as if they had denied the same.

71. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 71 and therefore, this averment shall have the same procedural effect as if they had denied the same.

72. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 72 and therefore, this averment shall have the same procedural effect as if they had denied the same.

73. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 73 and therefore, this averment shall have the same procedural effect as if they had denied the same.

#### **IV. THE EAGLE SECURITIES FRAUD**

##### **A. The Eagle Offering**

74. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 74 and therefore, this averment shall have the same procedural effect as if they had denied the same.

75. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 75 and therefore, this averment shall have the same procedural effect as if they had denied the same.

76. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 76 and therefore, this averment shall have the same

procedural effect as if they had denied the same.

77. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 77 and therefore, this averment shall have the same procedural effect as if they had denied the same.

78. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 78 and therefore, this averment shall have the same procedural effect as if they had denied the same.

79. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 79 and therefore, this averment shall have the same procedural effect as if they had denied the same.

80. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 80 and therefore, this averment shall have the same procedural effect as if they had denied the same.

**B. Solicitation of Eagle Investors**

81. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 81 and therefore, this averment shall have the same procedural effect as if they had denied the same.

82. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 82 and therefore, this averment shall have the same procedural effect as if they had denied the same.

83. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 83 and therefore, this averment shall have the same

procedural effect as if they had denied the same.

84. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 84 and therefore, this averment shall have the same procedural effect as if they had denied the same.

85. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 85 and therefore, this averment shall have the same procedural effect as if they had denied the same.

86. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 86 and therefore, this averment shall have the same procedural effect as if they had denied the same.

87. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 87 and therefore, this averment shall have the same procedural effect as if they had denied the same.

88. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 88 and therefore, this averment shall have the same procedural effect as if they had denied the same.

89. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 89 and therefore, this averment shall have the same procedural effect as if they had denied the same.

90. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 90 and therefore, this averment shall have the same procedural effect as if they had denied the same.

**C. Fraudulent Conduct in the Eagle Offering**

91. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 91 and therefore, this averment shall have the same procedural effect as if they had denied the same.

92. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 92 and therefore, this averment shall have the same procedural effect as if they had denied the same.

93. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 93 and therefore, this averment shall have the same procedural effect as if they had denied the same.

94. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 94 and therefore, this averment shall have the same procedural effect as if they had denied the same.

95. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 95 and therefore, this averment shall have the same procedural effect as if they had denied the same.

96. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 96 and therefore, this averment shall have the same procedural effect as if they had denied the same.

97. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 97 and therefore, this averment shall have the same procedural effect as if they had denied the same.



98. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 98 and therefore, this averment shall have the same procedural effect as if they had denied the same.

99. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 99 and therefore, this averment shall have the same procedural effect as if they had denied the same.

100. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 100 and therefore, this averment shall have the same procedural effect as if they had denied the same.

101. The Winners Church Relief Defendants deny the allegations contained in Paragraph 101, although they each admit that they did receive religious donations from Aman through certain of his entities. As set forth in Bishop Shipman's sworn accounting, between December 2, 2014 and August 16, 2018, he received \$739,125.00 in religious donations. Denied that the donations made to Bishop Shipman were "without any legitimate purpose" since religious belief — and donations and tithes made in conformance with the practice of religious belief — is a legitimate purpose. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the remaining allegations contained in Paragraph 101, particularly the allegation that the donations made by Aman "included investor funds," and therefore, those averments shall have the same procedural effect as if they had denied the same.

102. The Winners Church Relief Defendants admit that between about May 2014 and December 2018, Aman-related entities donated about \$1,224,410.11 to the Winners Church. Denied that the donations made to the Winners Church were "without any legitimate purpose" since

religious belief— and donations and tithes made in conformance with the practice of religious belief — is a legitimate purpose. The Winners Church Relief Defendants admit that on or about July 18, 2016, Winners Church received a check signed by Aman for certain funds bearing the notation “Donation,” that on or about August 10, 2016, Winners Church received a check signed by Aman for \$30,000.00 bearing the notation “My Kids,” and that on or about October 2, 2016, Winners Church received a check signed by Aman for \$50,000.00, also bearing the notation “My Kids.” The Winners Church Relief Defendants admit that Aman made certain notations on some checks, including notations such as “tithing” and “trip to Israel.” The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the remainder of the allegations contained in Paragraph 102, particularly the allegation that the donations made by Aman “included investor funds,” and therefore, those averments shall have the same procedural effect as if they had denied the same.

103. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 103 and therefore, this averment shall have the same procedural effect as if they had denied the same.

104. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 104 and therefore, this averment shall have the same procedural effect as if they had denied the same.

105. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 105 and therefore, this averment shall have the same procedural effect as if they had denied the same.

**V. THE ARGYLE COIN FRAUD**

**A. The Argyle Coin Offering**

106. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 106 and therefore, this averment shall have the same procedural effect as if they had denied the same.

107. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 107 and therefore, this averment shall have the same procedural effect as if they had denied the same.

108. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 108 and therefore, this averment shall have the same procedural effect as if they had denied the same.

109. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 109 and therefore, this averment shall have the same procedural effect as if they had denied the same.

110. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 110 and therefore, this averment shall have the same procedural effect as if they had denied the same.

111. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 111 and therefore, this averment shall have the same procedural effect as if they had denied the same.

112. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 112 and therefore, this averment shall have the same

procedural effect as if they had denied the same.

**B. Solicitation of Argyle Coin Investors**

113. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 113 and therefore, this averment shall have the same procedural effect as if they had denied the same.

114. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 114 and therefore, this averment shall have the same procedural effect as if they had denied the same.

115. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 115 and therefore, this averment shall have the same procedural effect as if they had denied the same.

116. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 116 and therefore, this averment shall have the same procedural effect as if they had denied the same.

117. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 117 and therefore, this averment shall have the same procedural effect as if they had denied the same.

118. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 118 and therefore, this averment shall have the same procedural effect as if they had denied the same.

119. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 119 and therefore, this averment shall have the same

procedural effect as if they had denied the same.

120. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 120 and therefore, this averment shall have the same procedural effect as if they had denied the same.

121. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 121 and therefore, this averment shall have the same procedural effect as if they had denied the same.

122. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 122 and therefore, this averment shall have the same procedural effect as if they had denied the same.

123. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 123 and therefore, this averment shall have the same procedural effect as if they had denied the same.

124. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 124 and therefore, this averment shall have the same procedural effect as if they had denied the same.

125. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 125 and therefore, this averment shall have the same procedural effect as if they had denied the same.

126. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 126 and therefore, this averment shall have the same procedural effect as if they had denied the same.

127. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 127 and therefore, this averment shall have the same procedural effect as if they had denied the same.

**C. Misrepresentations and Omissions in the Argyle Coin Offering**

128. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 128 and therefore, this averment shall have the same procedural effect as if they had denied the same.

129. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 129 and therefore, this averment shall have the same procedural effect as if they had denied the same.

130. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 130 and therefore, this averment shall have the same procedural effect as if they had denied the same.

131. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 131 and therefore, this averment shall have the same procedural effect as if they had denied the same.

132. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 132 and therefore, this averment shall have the same procedural effect as if they had denied the same.

133. The Winners Church Relief Defendants admit that between about August 20, 2018 and December 18, 2018, Aman donated monies to Bishop Shipman and that between about November 13, 2018 and December 4, 2018, Aman also donated monies to Winners Church.

Admitted also that Aman made these donations through certain of his entities, including Eagle and/or Argyle Coin. Denied that the donations made to Bishop Shipman and Winners Church were “without any legitimate purpose” since religious belief — and donations and tithes made in conformance with the practice of religious belief — is a legitimate purpose. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the remainder of the allegations contained in Paragraph 133 and therefore, those averments shall have the same procedural effect as if they had denied the same.

134. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 134 and therefore, this averment shall have the same procedural effect as if they had denied the same.

135. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 135 and therefore, this averment shall have the same procedural effect as if they had denied the same.

136. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 136 and therefore, this averment shall have the same procedural effect as if they had denied the same.

137. The Winners Church Relief Defendants are without sufficient knowledge to admit or deny the allegations contained in Paragraph 137 and therefore, this averment shall have the same procedural effect as if they had denied the same.

### **COUNT I**

#### **Fraud in Violation of Section 10(b) and Rule 10(b-5(a) of the Exchange Act Against Natural Diamonds, Eagle, Argyle Coin and Aman**

138. The Winners Church Relief Defendants repeat each of the responses they have set forth above in paragraphs 1 through 137 of the Complaint, however, this Count of the Complaint is not directed to any of the Winners Church Relief Defendants and as a result, they are not obligated to provide any response to the allegations contained therein.

139. This Count of the Complaint is not directed to any of the Winners Church Relief Defendants and as a result, they are not obligated to provide any response to the allegations contained in this paragraph.

140. This Count of the Complaint is not directed to any of the Winners Church Relief Defendants and as a result, they are not obligated to provide any response to the allegations contained in this paragraph.

**COUNT II**  
**Fraud in Violation of Section 10(b) and Rule 10(b-5(a) of the Exchange Act**  
**Against Aman**

141. The Winners Church Relief Defendants repeat each of the responses they have set forth above in paragraphs 1 through 137 of the Complaint, however, this Count of the Complaint is not directed to any of the Winners Church Relief Defendants and as a result, they are not obligated to provide any response to the allegations contained therein.

142. This Count of the Complaint is not directed to any of the Winners Church Relief Defendants and as a result, they are not obligated to provide any response to the allegations contained in this paragraph.

143. This Count of the Complaint is not directed to any of the Winners Church Relief Defendants and as a result, they are not obligated to provide any response to the allegations contained in this paragraph.



**COUNT III**

**Fraud in Violation of Section 10(b) and Rule 10(b-5(a) of the Exchange Act  
Against Natural Diamonds, Eagle, Argyle Coin and Aman**

144. The Winners Church Relief Defendants repeat each of the responses they have set forth above in paragraphs 1 through 137 of the Complaint, however, this Count of the Complaint is not directed to any of the Winners Church Relief Defendants and as a result, they are not obligated to provide any response to the allegations contained therein.

145. This Count of the Complaint is not directed to any of the Winners Church Relief Defendants and as a result, they are not obligated to provide any response to the allegations contained in this paragraph.

146. This Count of the Complaint is not directed to any of the Winners Church Relief Defendants and as a result, they are not obligated to provide any response to the allegations contained in this paragraph.

**COUNT IV**

**Fraud in the Offer or Sale of Securities in  
Violation of Section 17(a)(1) of the Securities Act  
Against Natural Diamonds, Eagle, Argyle Coin and Aman**

147. The Winners Church Relief Defendants repeat each of the responses they have set forth above in paragraphs 1 through 137 of the Complaint, however, this Count of the Complaint is not directed to any of the Winners Church Relief Defendants and as a result, they are not obligated to provide any response to the allegations contained therein.

148. This Count of the Complaint is not directed to any of the Winners Church Relief Defendants and as a result, they are not obligated to provide any response to the allegations contained in this paragraph.

149. This Count of the Complaint is not directed to any of the Winners Church Relief Defendants and as a result, they are not obligated to provide any response to the allegations contained in this paragraph.

**COUNT V**

**Fraud in the Offer or Sale of Securities in  
Violation of Section 17(a)(2) of the Securities Act  
Against Aman**

150. The Winners Church Relief Defendants repeat each of the responses they have set forth above in paragraphs 1 through 137 of the Complaint, however, this Count of the Complaint is not directed to any of the Winners Church Relief Defendants and as a result, they are not obligated to provide any response to the allegations contained therein.

151. This Count of the Complaint is not directed to any of the Winners Church Relief Defendants and as a result, they are not obligated to provide any response to the allegations contained in this paragraph.

152. This Count of the Complaint is not directed to any of the Winners Church Relief Defendants and as a result, they are not obligated to provide any response to the allegations contained in this paragraph.

**COUNT VI**

**Fraud in the Offer or Sale of Securities in  
Violation of Section 17(a)(3) of the Securities Act  
Against Natural Diamonds, Eagle, Argyle Coin and Aman**

153. The Winners Church Relief Defendants repeat each of the responses they have set forth above in paragraphs 1 through 137 of the Complaint, however, this Count of the Complaint is not directed to any of the Winners Church Relief Defendants and as a result, they are not obligated

to provide any response to the allegations contained therein.

154. This Count of the Complaint is not directed to any of the Winners Church Relief Defendants and as a result, they are not obligated to provide any response to the allegations contained in this paragraph.

155. This Count of the Complaint is not directed to any of the Winners Church Relief Defendants and as a result, they are not obligated to provide any response to the allegations contained in this paragraph.

### **COUNT VII**

#### **Sale of Unregistered Securities in Violation of Section 5(a) and 5(c) of the Securities Act Against All Defendants**

156. The Winners Church Relief Defendants repeat each of the responses they have set forth above in paragraphs 1 through 137 of the Complaint, however, this Count of the Complaint is not directed to any of the Winners Church Relief Defendants and as a result, they are not obligated to provide any response to the allegations contained therein.

157. This Count of the Complaint is not directed to any of the Winners Church Relief Defendants and as a result, they are not obligated to provide any response to the allegations contained in this paragraph.

158. This Count of the Complaint is not directed to any of the Winners Church Relief Defendants and as a result, they are not obligated to provide any response to the allegations contained in this paragraph.

159. This Count of the Complaint is not directed to any of the Winners Church Relief Defendants and as a result, they are not obligated to provide any response to the allegations

contained in this paragraph.

**RELIEF REQUESTED**

With respect to the Wherefore Clause, as it pertains to the Winners Church Relief Defendants, the Winners Church Relief Defendants deny that the Commission is entitled to any relief against any or all of them and requests that the Court deny the relief sought against them and enter such other and further relief as the Court deems just and proper:

**I.**

**Temporary Restraining Order and Preliminary Injunction**

With respect to the relief sought here, as it pertains to the Winners Church Relief Defendants, the Winners Church Relief Defendants deny that the Commission is entitled to any relief against any or all of them and requests that the Court deny the relief sought against them and enter such other and further relief as the Court deems just and proper.

**II.**

**Permanent Injunction**

With respect to the relief sought here, as it pertains to the Winners Church Relief Defendants, the Winners Church Relief Defendants deny that the Commission is entitled to any relief against any or all of them and requests that the Court deny the relief sought against them and enter such other and further relief as the Court deems just and proper.

**III.**

**Asset Freeze and Sworn Accountings**

With respect to the relief sought here, as it pertains to the Winners Church Relief Defendants, the Winners Church Relief Defendants have no objection to providing a sworn accounting and in

fact, have already done so, but maintain that this Court is lacking in jurisdiction over the Winners Church Relief Defendants in that they are not proper “relief defendants.” With respect to the remainder of the relief sought here, as it pertains to the Winners Church Relief Defendants, the Winners Church Relief Defendants deny that the Commission is entitled to any relief against any or all of them and requests that the Court deny the relief sought against them and enter such other and further relief as the Court deems just and proper.

**IV.**

**Records Preservation**

With respect to the relief sought here, as it pertains to the Winners Church Relief Defendants, the Winners Church Relief Defendants have no objection to preserving their related records, but maintain that this Court is lacking in jurisdiction over the Winners Church Relief Defendants in that they are not proper “relief defendants.”

**V.**

**Disgorgement**

With respect to the relief sought here, as it pertains to the Winners Church Relief Defendants, the Winners Church Relief Defendants deny that the Commission is entitled to any relief against any or all of them, including disgorgement, and requests that the Court deny the relief sought against them and enter such other and further relief as the Court deems just and proper.

**VI.**

**Penalties**

The Relief sought here is not directed to any of the Winners Church Relief Defendants and as a result, they are not obligated to provide any response to the allegations contained in this

paragraph. To the extent this paragraph does pertain to the Winners Church Relief Defendants, the Winners Church Relief Defendants deny that the Commission is entitled to any relief against any or all of them and requests that the Court deny the relief sought against them and enter such other and further relief as the Court deems just and proper.

**VII.**

**Appointment of Receiver**

The Relief sought here is not directed to any of the Winners Church Relief Defendants and as a result, they are not obligated to provide any response to the allegations contained in this paragraph.

**VIII.**

**Further Relief**

With respect to the relief sought here, as it pertains to the Winners Church Relief Defendants, the Winners Church Relief Defendants deny that the Commission is entitled to any relief against any or all of them and requests that the Court deny the relief sought against them and enter such other and further relief as the Court deems just and proper.

**IX.**

**Retention of Jurisdiction**

The Winners Church Relief Defendants maintain that this Court is lacking in jurisdiction over the Winners Church Relief Defendants in that they are not proper “relief defendants.” With respect to the remainder of the relief sought here, as it pertains to the Winners Church Relief Defendants, the Winners Church Relief Defendants deny that the Commission is entitled to any relief against any or all of them and requests that the Court deny the relief sought against them and enter

such other and further relief as the Court deems just and proper.

**DEMAND FOR JURY TRIAL**

The Winners Church Relief Defendants demand a trial by jury on any issues or facts triable to a jury in this case.

**WINNERS CHURCH RELIEF DEFENDANTS' AFFIRMATIVE DEFENSES AND AVOIDANCES**

**FIRST AFFIRMATIVE DEFENSE AND AVOIDANCE**

Pursuant to 15 U.S.C. § 78u(d)(5), the Court's subject matter jurisdiction over each of the Winners Church Relief Defendants is contingent upon their proper categorization as "relief defendants" but the Winners Church Relief Defendants have been wrongly categorized as such. The key elements to defining a relief defendant are that the "person (1) has received ill-gotten funds, and (2) does not have a legitimate claim to those funds." *See SEC v. Sun Capital, Inc.*, 209-CV-229-FTM-29SPC, 2009 WL 1362634, at \*1 (M.D. Fla. May 13, 2009). The Winners Church Relief Defendants are not properly designated as "relief defendants" because under Florida state law, each of them holds a legitimate and justified ownership interest in the monies that they received as religious donations from Aman.

**SECOND AFFIRMATIVE DEFENSE AND AVOIDANCE**

Pursuant to 15 U.S.C. § 78u(d)(5), the Court's subject matter jurisdiction over each of the Winners Church Relief Defendants is contingent upon their proper categorization as "relief defendants" but the Winners Church Relief Defendants have been wrongly categorized as such. The key elements to defining a relief defendant are that the "person (1) has received ill-gotten funds, and (2) does not have a legitimate claim to those funds." *See SEC v. Sun Capital, Inc.*,

209-CV-229-FTM-29SPC, 2009 WL 1362634, at \*1 (M.D. Fla. May 13, 2009). The Winners Church Relief Defendants are not properly designated as “relief defendants” because the SEC is unable to demonstrate that all of the monies they received as donations came from “ill gotten” gains. Since some of the monies received by the Winners Church Relief Defendants emanated from Aman’s legitimate business activities, the Winners Church Relief Defendants cannot be equitably disgorged of those funds.

### **THIRD AFFIRMATIVE DEFENSE AND AVOIDANCE**

The Fifth and Fourteenth Amendments to the United States Constitution afford each of the Winners Church Relief Defendants certain procedural due process guarantees when faced with a deprivation of property or a right to property by an agency of the U.S. Government. The Winners Church Relief Defendants — improperly designated as “relief defendants” — are being afforded mere summary procedures and are not being afforded sufficient procedural due process in connection with the Plaintiff’s efforts to deprive them of their property. For example, the Winners Church Relief Defendants have received no documents, nor been permitted any inquiry, into the Plaintiff’s allegations that Aman was operating a Ponzi scheme, that Aman made donations to the Winners Church Relief Defendants with actual intent to defraud investors, as opposed to sincere religious beliefs, or that the monies Aman donated were entirely derived from actions he took in violation of the federal securities laws.

### **FOURTH AFFIRMATIVE DEFENSE AND AVOIDANCE**

The Fifth and Fourteenth Amendments to the United States Constitution afford each of the Winners Church Relief Defendants certain substantive due process guarantees against government action that infringes upon or undermines their rights to freely practice their religion. The Plaintiff’s



improper categorization of the Winners Church Relief Defendants as “relief defendants” imposes a substantial and unjustified burden upon their respective freedoms to practice their religious beliefs. The Winners Church Relief Defendants ascribe to Biblical scriptures according to which Christians are called upon to donate or “tithe” a portion of their income to the Church, and according to which they are called upon to make certain “freewill offerings” to the Church’s staff and leadership. The Plaintiff’s actions unreasonably interfere and burden the Winners Church Relief Defendants’ exercise of their religious freedoms by, for example, prohibiting them from accepting religious donations in good faith without erecting procedures and systems to verify the source and context of the donations. The imposition of such procedures and investigatory measures would in and of itself create a chilling effect upon would be donors and practicing Christians who would elect not to tithe or donate than to be required to undergo a background check to do so. The structure demanded by the SEC is fundamentally in opposition to Christian principles and practices such that it unjustifiably burdens and violates the Winners Church Relief Defendants’ right to freely practice their religion.

#### **FIFTH AFFIRMATIVE DEFENSE AND AVOIDANCE**

The Religious Freedom Restoration Act of 1993 ("RFRA"), 42 U.S.C. §§ 2000bb et seq., prohibits the federal government from undertaking certain actions that impose a substantial burden on the practice of religion. The U.S. Government’s application of 15 U.S.C. § 78u(d)(5) to freeze and clawback religious donations received, in good faith, by churches and their officiants, imposes a substantial burden on the free exercise of religion. Each of the Winners Church Relief Defendants ascribes to Biblical scriptures according to which Christians are called upon donate or “tithe” a portion of their income to the Church, and according to which they are called upon to make certain “freewill offerings” to the Church’s staff and leadership. The Plaintiff’s actions substantially burden

the Winners Church Relief Defendants' exercise of their religious freedom by, for example, prohibiting them from accepting religious donations in good faith, without erecting procedures and systems to verify the source and context of the donations. The imposition of such procedures and investigatory measures would in and of itself create a chilling effect upon would be donors and practicing Christians who would elect not to tithe or donate than to be required to undergo a background check to do so. The structure demanded by the SEC is fundamentally in opposition to Christian principles and practices such that it unjustifiably burdens and violates the Winners Church Relief Defendants' right to practice their religion. The U.S. Government's actions here are not the least restrictive means to satisfy the interests the Government holds in protecting victims of securities fraud or deterring further violations.

#### **SEVENTH AFFIRMATIVE DEFENSE AND AVOIDANCE**

Pursuant to 15 U.S.C. § 78u(d)(5), the Court's subject matter jurisdiction over each of the Winners Church Relief Defendants is contingent upon their proper categorization as "relief defendants" but the Winners Church Relief Defendants have been wrongly designated as such. The key elements to defining a relief defendant are that the "person (1) has received ill-gotten funds, and (2) does not have a legitimate claim to those funds." *See SEC v. Sun Capital, Inc.*, 209-CV-229-FTM-29SPC, 2009 WL 1362634, at \*1 (M.D. Fla. May 13, 2009). The Winners Church Relief Defendants are not properly designated as "relief defendants" because many of the donations that Aman made were in exchange for a good or a service, such as spiritual counseling, foreign trips, and the like. Accordingly, value was given for those donations such that the Winners Church Relief Defendants have a legitimate claim to those donations.

**EIGHTH AFFIRMATIVE DEFENSE AND AVOIDANCE**

Between 2014 and 2019, Bishop Frederick Shipman paid federal income taxes on the religious donations he received from Aman. As a result, he is entitled to a setoff against the Plaintiff for the amount of income taxes he paid to the federal government.

Dated: June 18, 2019  
Boca Raton, Florida

Respectfully submitted,

**/s/ Carl F. Schoeppl, Esq.**

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*Counsel for Relief Defendants Winners Church  
International, Inc. of West Palm Beach Florida;  
Bishop Frederick D. Shipman; and Pastor Whitney  
Shipman*

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that on June 18, 2019, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. I also certify that the foregoing document is being served on this date on all counsel of record, party representatives, or *pro se* parties on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by the CM/ECF system or in some other authorized manner as specified below for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

**s/ Terry A. C. Gray, Esq.**

Terry A. C. Gray, Esq.

Carl F. Schoepl, Esq.

Kyle G. DeValerio, Esq.

*One of the Attorneys for Relief Defendants Winners Church International, Inc. of West Palm Beach Florida, Bishop Frederick D. Shipman; and Pastor Whitney Shipman*

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