

**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.**

\_\_\_\_\_ /

**UNOPPOSED MOTION BY RELIEF DEFENDANT BISHOP FREDERICK D.  
SHIPMAN FOR MODIFICATION OF ASSET FREEZE TO ALLOW SALE OF MOTOR  
VEHICLES TO FUND PORTION OF FINAL JUDGMENT AND INCORPORATED  
MEMORANDUM OF LAW IN SUPPORT THEREOF**

Pursuant to S.D. Fla. L.R. 7.1, Relief Defendant Bishop Frederick D. Shipman (“Bishop Shipman”), by and through his undersigned counsel, hereby moves the Court, without opposition by the Plaintiff Securities and Exchange Commission (“SEC”), for modification of the asset freeze

**UNOPPOSED MOTION BY RELIEF DEFENDANT BISHOP  
SHIPMAN FOR MODIFICATION OF ASSET FREEZE TO  
ALLOW SALE OF MOTOR VEHICLES TO FUND  
PORTION OF FINAL JUDGMENT**

SEC v. Natural Diamonds Investment Co., et al.,  
Case No. 9:19-CV-80633-RLR (S.D. Fla.)

[ECF 59, at 26] to allow him to sell certain motor vehicles so that the proceeds may be used for payment of a portion of the disgorgement and prejudgment interest awarded in the Court's Final Judgment Against Relief Defendant Frederick Shipman [ECF 164] ("Final Judgment"), and in support hereof and for good cause shown, states as follows:

**BRIEF STATEMENT OF FACTS PERTINENT TO THIS MOTION**

1. On June 11, 2019, the Court entered an Order (the "Asset Freeze Order") stating, in pertinent part:

a. Relief Defendant Frederick Shipman . . . shall hold and retain funds and other assets of defendants and presently held by him . . . in whatever form such assets may presently exist and wherever located, and shall prevent any withdrawal, sale, payment . . . , transfer, dissipation, assignment, pledge, alienation, encumbrance, disposal, or diminution in value of any such funds or other assets, which are hereby frozen.

ECF 59, at 26-27. The Asset Freeze Order further stated that the "asset freeze as to Frederick Shipman is limited at this time to \$729,000, and remains in effect until further order of this Court."

*Id.*, at 27.

2. Bishop Shipman agreed to the principal terms of a settlement with the SEC and the Final Judgment was entered by the Court on December 11, 2019. The settlement requires Bishop Shipman to pay disgorgement of \$729,000.00, together with prejudgment interest thereon in the amount of \$3,595.07, for a total of \$732,595.07 to the Court Registry (CRIS Account).

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SEC v. Natural Diamonds Investment Co., et al.,  
Case No. 9:19-CV-80633-RLR (S.D. Fla.)

3. Bishop Shipman currently owns four motor vehicles that he will sell to help fund the remaining balance of Payment 3 due to the CRIS account on or before June 8, 2020. Payments 1, 2, and \$76,334.00 of Payment 3 have already been made. *See* ECF 174 and 177. Bishop Shipman has received dealer appraisals two of the vehicles and has valued the remaining two vehicles at WeBuyAnyCar.com. A description of the vehicles is as follows:

<b>Year</b>	<b>Make</b>	<b>Model</b>	<b>Vehicle Identification Number</b>	<b>Estimated Value</b>	<b>Appraisal Source</b>
2017	Ram	Truck	1C6RR7NMXHS874574	\$27,000.00	Dealer
2017	Jeep		1C4RJFCT9HC790874	\$25,900.00	Dealer
2004	Chevrolet	SSR	1GCES14P14B111308	\$14,900.00	WeBuyAnyCar.com
2009	Jeep		1J8HG68T69T69C555894	\$2,675.00	WeBuyAnyCar.com

A copy of the vehicle registrations are attached hereto and incorporated herein by reference as **Composite Exhibit A**.

4. Bishop Shipman requests that the Court modify the Asset Freeze Order to permit him to sell the above listed vehicles, and to place the net proceeds of the sale into the CRIS Account to be credited toward that Final Judgment.

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**MEMORANDUM OF LAW**

A district court has continuing jurisdiction over a preliminary injunction and may “make any changes in the injunction that are equitable in light of subsequent changes in the facts or the law, or for any other good reason.” *Canal Auth. of State of Fla. v. Callaway*, 489 F.2d 567, 578 (5th Cir. 1974).<sup>1</sup> In the Asset Freeze Order, the Court expressly left open the possibility that the asset freeze imposed against the assets of Bishop Shipman could be modified by further order of the Court. See Asset Freeze Order, ECF 59, at 27 (“This asset freeze as to Frederick Shipman . . . remains in effect until further order of this Court.”). Bishop Shipman submits that he has shown good cause to modify the asset freeze so as to permit him to sell the above-listed motor vehicles.

**WHEREFORE**, Bishop Frederick D. Shipman, respectfully requests the entry of an order, substantially in the form attached hereto as **Exhibit B**, modifying the Asset Freeze Order [ECF 59] to permit him to sell the motor vehicles and place the net proceeds of that sale into the CRIS Account.

**LOCAL RULE 7.1(a)(3) CERTIFICATE OF COUNSEL**

Pursuant to Southern District of Florida Local Rule 7.1(a)(3), prior to filing this Motion, the

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<sup>1</sup>

*See Bonner v. City of Prichard, Ala.*, 661 F.2d 1206, 1207 (11th Cir.1981) (adopting as binding precedent all decisions of the former Fifth Circuit issued on or before September 30, 1981).

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undersigned counsel conferred with counsel for the Plaintiff, Amie Riggle Berlin, and she indicated that the Plaintiff has no opposition to the relief sought herein.

Dated: January 23, 2019

Respectfully submitted,

s/ Carl F. Schoeppl  
Carl F. Schoeppl, Trial Counsel  
Florida Bar No. 818518  
Terry A. C. Gray, Esq.,  
Florida Bar No. 100732  
Kyle G. DeValerio, Esq.,  
Florida Bar No. 18565

**SCHOEPPL LAW, P.A.**  
4651 North Federal Highway  
Boca Raton, Florida 33431-5133  
Telephone: (561) 394-8301  
Facsimile: (561) 394-3121  
Email: [carl@schoeppllaw.com](mailto:carl@schoeppllaw.com)  
Email: [tgray@schoeppllaw.com](mailto:tgray@schoeppllaw.com)  
Email: [kyle@schoeppllaw.com](mailto:kyle@schoeppllaw.com)

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

**UNOPPOSED MOTION BY RELIEF DEFENDANT BISHOP  
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Case No. 9:19-CV-80633-RLR (S.D. Fla.)

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that on January 23, 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/ Carl F. Schoeppl**

Carl F. Schoeppl, 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*

<b>Party</b>	<b>Method of Service</b>	<b>Name and Contact Information of Party's Counsel or Representative</b>
Securities and Exchange Commission, <i>Plaintiff</i>	CM/ECF	Amie Riggle Berlin, Esq. Senior Trial Counsel Securities and Exchange Commission 801 Brickell Avenue, Suite 1800 Miami, Florida 33131 Telephone: (305) 982-6322 Facsimile: (305) 536-4154 E-Mail: <a href="mailto:berlina@sec.gov">berlina@sec.gov</a>

**UNOPPOSED MOTION BY RELIEF DEFENDANT BISHOP  
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<b>Party</b>	<b>Method of Service</b>	<b>Name and Contact Information of Party's Counsel or Representative</b>
Natural Diamonds Investment Co., Eagle Financial Diamond Group Inc. a/k/a Diamante Atelier, and Argyle Coin, LLC <i>Defendants</i>	CM/ECF	Jeffrey C. Schneider, Esq. Levine Kellogg Lehman Schneider & Grossman LLP 201 South Biscayne Boulevard, 22nd Floor Miami, FL 33131 Telephone: (305) 403-8799 Email: <a href="mailto:jcs@lklsg.com">jcs@lklsg.com</a> Email: <a href="mailto:lv@lklsg.com">lv@lklsg.com</a>
Jose Aman, <i>Defendant</i>	CM/ECF	Kevin E. O'Reilly, Esq. Law Office of Kevin E. O'Reilly 55 W. Monroe Street, Suite 3600 Chicago, IL 60603-5026 Telephone: (312) 726-4510 Email: <a href="mailto:keolaw@kevineoreilly.com">keolaw@kevineoreilly.com</a>
Jonathan Seigel, <i>Defendant</i> , Harold Seigel, <i>Defendant</i> , and H.S. Management Group, LLC, <i>Relief Defendant</i>	CM/ECF	Ellen M. Kaplan Law Office of Ellen M. Kaplan PA 9900 W. Sample Road, Floor 3 Coral Springs, FL 33065-4048 Telephone: (954) 341-1309 Email: <a href="mailto:ellenkaplanesq@aol.com">ellenkaplanesq@aol.com</a>
Gold 7 of Miami, LLC, <i>Relief Defendant</i>	CM/ECF	Aaron R. Resnick, Esq. Law Office of Aaron Resnick, P.A. 100 Biscayne Boulevard, Suite 1607 Miami, FL 33132-2308 Telephone: (305) 672-7495 Email: <a href="mailto:aresnick@thefirmmiami.com">aresnick@thefirmmiami.com</a> Email: <a href="mailto:efile@thefirmmiami.com">efile@thefirmmiami.com</a>

A:\Winners Church International, Inc - SEC\Pleadings\Finals\2020 01 23 Bishop Shipman's Unopposed Motion to Modify Asset Freeze FINAL.wpd

# **EXHIBIT A**



**INSTRUCTIONS FOR ATTACHING DECAL**

1. Clean area where new annual decal is to be fixed.
2. Peel decal from this document.
3. Affix decal in the upper right corner of license plate.



**IMPORTANT INFORMATION**

SECTION 316.613, Florida Statutes, requires every operator of a motor vehicle transporting a child in a passenger car, van or pickup truck registered in this state and operated on the highways of this state, shall, if the child is 5 years of age or younger, provide the protection of the child by properly using a crash-tested, federally approved child restraint device. For children aged through 3 years, such restraint device must be a separate carrier or a vehicle manufacturer's integrated child seat. For children aged 4 through 5 years, a separate carrier, an integrated child seat, or a child booster seat may be used. For limited exceptions, see s. 316.613, F.S.

S. 320.0605, F. S., requires the registration certificate, or true copy of a rental or lease agreement, issued for any motor vehicle to be in the possession of the operator or carried in the vehicle while the vehicle is being used or operated on the roads of this state.

S. 320.02 and 627.733, F. S., requires personal injury protection and property damage liability to be continuously maintained throughout the registration period. Failure to maintain the mandatory coverage may result in the suspension of your driver license and registration.

Mail To:

**FREDERICK DALE SHIPMAN  
15659 MARINA BAY DR  
WINTER GARDEN, FL 34787**

Important note: If you cancel the insurance for this vehicle, immediately return the license plate from this registration to a Florida driver license or tax collector office or by mail to: DHSMV, Return Tags, 2900 Apalachee Parkway, Tallahassee, FL 32399. Surrendering the plate will prevent your driving privilege from being suspended.

CO/AGY 06/10 T# 1005371090  
B#

**FLORIDA TRUCK/TRACTOR REGISTRATION**

PLATE **JBTP01** DECAL **18572162** Expires **Midnight Mon 12/31/2018**

YR/MK	2017/RAM	BODY	TK	COLOR	GRY	Reg. Tax	92.79	Class Code	41
VIN	1C6RR7NMXHS874574			TITLE	129757466	Init Reg.		Tax Months	11
Plate Type	RGS	NET WT	5318	GVW	5669	County Fee	3.00	Back Tax Mos	
DL/FEID	S155244502210					Mail Fee		Credit Class	
Date Issued	01/12/2018	Plate Issued	01/12/2018			Sales Tax		Credit Months	
						Voluntary Fees			
						Grand Total	95.79		

**IMPORTANT INFORMATION**

1. The Florida license plate must remain with the registrant upon sale of vehicle.
2. The registration must be delivered to a Tax Collector or Tag Agent for transfer to a replacement vehicle.
3. Your registration must be updated to your new address within 30 days of moving.
4. Registration renewals are the responsibility of the registrant and shall occur during the 30-day period prior to the expiration date shown on this registration. Renewal notices are provided as a courtesy and are not required for renewal purposes.
5. I understand that my driver license and registrations will be suspended immediately if the insurer denies the insurance information submitted for this registration.

**FREDERICK DALE SHIPMAN  
15659 MARINA BAY DR  
WINTER GARDEN, FL 34787**

**RGS - SUNSHINE STATE PLATE ISSUED X**

MTRFS020K

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Mail To:  
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**15659 MARINA BAY DR**  
**WINTER GARDEN, FL 34787**

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CO/AGY 7 / 20 T# 1029524839  
 B# 1055167

**FLORIDA VEHICLE REGISTRATION**

PLATE	<b>GXSM52</b>	DECAL	<b>01017296</b>	Expires	<b>Midnight Sun 6/21/2020</b>				
YR/MK	<b>2017/JEEP</b>	BODY	<b>JP</b>	COLOR	<b>RED</b>	Reg. Tax	91.20	Class Code	1
VIN	<b>1C4RJFCT9HC790874</b>	NET WT	<b>5049</b>	TITLE	<b>127364349</b>	Init. Reg.		Tax Months	24
Plate Type	<b>RGS</b>					County Fee	1.00	Back Tax Mos	0
DL/FEID	<b>S155244502210</b>					Mail Fee	0.75	Credit Class	
Date Issued	<b>6/1/2018</b>	Plate Issued	<b>12/29/2016</b>			Sales Tax		Credit Months	0
						Voluntary Fees			
						Grand Total	92.95		

**FREDERICK DALE SHIPMAN**  
**15659 MARINA BAY DR**  
**WINTER GARDEN, FL 34787**

**IMPORTANT INFORMATION**

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2. The registration must be delivered to a Tax Collector or Tag Agent for transfer to a replacement vehicle.
3. Your registration must be updated to your new address within 30 days of moving.
4. Registration renewals are the responsibility of the registrant and shall occur during the 30-day period prior to the expiration date shown on this registration. Renewal notices are provided as a courtesy and are not required for renewal purposes.
5. I understand that my driver license and registrations will be suspended immediately if the insurer denies the insurance information submitted for this registration.

**RGS - SUNSHINE STATE**

**GEORGIA MVD - RECEIPT (COPY)**

FREDERICK DALE SHIPMAN  
2004 CHEV TK  
1GCES14P14B111308  
772179150228023  
023W06/21/2018 WEB

MAIL FEE 1.00  
STANDARD TAG FEE 20.00  
TOTAL FEES PAID 21.00

PURCH DT: 01/06/2015  
REG DT: 06/21/2018

35301036

ROGER COLLINS  
WARE COUNTY TAX COMMISSIONER  
800 CHURCH ST ROOM 133 P O BOX 1825  
WAYCROSS GA 31502  
(912) 287-4305

FREDERICK DALE SHIPMAN  
2004 CHEV TK  
1GCES14P14B111308  
772179150228023  
023W06/21/2018 WEB

MAIL FEE 1.00  
STANDARD TAG FEE 20.00  
TOTAL FEES PAID 21.00

PURCH DT: 01/06/2015

35301036

**STATE OF GEORGIA  
MOTOR VEHICLE REGISTRATION**

1GCES14P14B111308 - 2004 CHEV SSR TK

Tag Number: PKX8119 Expires: 06/21/2019  
Valuation 111374 \$4480 Tag Fee: 20.00  
Title Number: 772179150228023 Equip. No:  
County: 023 District: 01 Mill Rate: Fuel: G  
Farm Vehicle? N GVW: 6050 Color: YEL/YEL  
Classification: ALT PASSENGER CAR/LIGHT TRUCKS  
Insurance Status: VALID INSURANCE COVERAGE  
Customer 1 No: 001102197796 Customer 2 No:

FREDERICK DALE SHIPMAN  
1398 SOUTH FARM EDGE ROAD  
MANOR GA 31550

Signature: \_\_\_\_\_

**STATE OF GEORGIA  
MOTOR VEHICLE REGISTRATION**

1GCES14P14B111308 - 2004 CHEV SSR TK

Tag Number: PKX8119 Expires: 06/21/2019  
Valuation 111374 \$4480 Tag Fee: 20.00  
Title Number: 772179150228023 Equip. No:  
County: 023 District: 01 Mill Rate: Fuel: G  
Farm Vehicle? N GVW: 6050 Color: YEL/YEL  
Classification: ALT PASSENGER CAR/LIGHT TRUCKS  
Insurance Status: VALID INSURANCE COVERAGE  
Customer 1 No: 001102197796 Customer 2 No:

FREDERICK DALE SHIPMAN  
1398 SOUTH FARM EDGE ROAD  
MANOR GA 31550

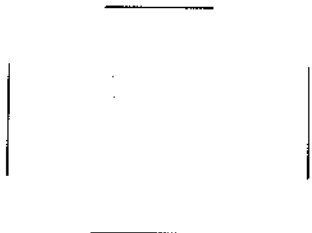
Signature: \_\_\_\_\_

THIS IS NOT A BILL  
THIS IS YOUR RECEIPT  
\*\*\* RETAIN FOR TAX PURPOSES \*\*\*

MTRFS020K

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S. 320.0605, F.S., requires the registration certificate, or true copy of a rental or lease agreement, issued for any motor vehicle to be in the possession of the operator or carried in the vehicle while the vehicle is being used or operated on roads of this state.

S. 320.02 and 627.733, F.S., requires personal injury protection and property damage liability to be continuously maintained throughout the registration period. Failure to maintain the mandatory coverage may result in the suspension of your driver license and registration.

Mail To:  
**CROSS CONNECTION CHURCH MGT LLC, FREDERICK DALE SHIPMAN**  
 C/O FREDERICK DALE SHIPMAN  
 15659 MARINA BAY DR  
 WINTER GARDEN, FL 34787

Important note: If you cancel the insurance for this vehicle, immediately return the license plate from this registration to a Florida driver license or tax collector office or mail it to: DHSMV, Return Tags, 2900 Apalachee Parkway, Tallahassee, FL 32399. Surrendering the plate will prevent your driving privilege from being suspended.

**FLORIDA VEHICLE REGISTRATION**

CO/AGY 7 / 20 T# 1029524509  
 B# 1055058

PLATE **857XZJ** DECAL **01017250** Expires **Midnight Tue 6/30/2020**

YR/MK	<b>2009/JEEP</b>	BODY	<b>UT</b>	COLOR	<b>SIL</b>	Reg. Tax	91.20	Class Code	<b>1</b>
VIN	<b>1J8HG68T69C555894</b>			TITLE	<b>103618187</b>	Init. Reg.		Tax Months	<b>24</b>
Plate Type	<b>RGS</b>	NET WT	<b>5268</b>			County Fee	1.00	Back Tax Mos	<b>0</b>
DL/FBID	-			2ND DL#	<b>S155244502210</b>	Mail Fee	0.75	Credit Class	
Date Issued	<b>6/1/2018</b>	Plate Issued	<b>1/5/2010</b>			Sales Tax		Credit Months	<b>0</b>
						Voluntary Fees			
						Grand Total	<b>92.95</b>		

**CROSS CONNECTION CHURCH MGT LLC, FREDERICK DALE SHIPMAN**  
 365 JOG ROAD  
 WEST PALM BEACH, FL 33415

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**RGS - SUNSHINE STATE**

# **EXHIBIT B**

**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., ET AL.,**

**Defendants.**

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**[PROPOSED] ORDER GRANTING UNOPPOSED MOTION BY RELIEF DEFENDANT  
BISHOP FREDERICK D. SHIPMAN FOR MODIFICATION OF ASSET FREEZE TO  
ALLOW SALE OF MOTOR VEHICLES TO FUND PORTION OF FINAL JUDGMENT**

**THIS MATTER** is before the Court on Relief Defendant Bishop Frederick D. Shipman's Unopposed Motion for Modification of Asset Freeze to Allow Sale of Motor Vehicles to Fund Portion of Final Judgment. ECF \_\_\_\_ . The Court has reviewed the Motion and is otherwise fully advised in the premises.

It is hereby **ORDERED** and **ADJUDGED**

1. The Motion Relief Defendant Bishop Frederick D. Shipman's Unopposed Motion for Modification of Asset Freeze to Allow Sale of Motor Vehicles to Fund Final Judgment [ECF \_\_\_\_] is **GRANTED**.

2. The asset freeze entered on June 11, 2019 against Relief Defendant Frederick E. Shipman [DE 59] is hereby modified for the limited purpose of allowing Relief Defendant Shipman to sell the following four (4) motor vehicles:

A. 2017 Ram Pickup Truck, Vehicle Identification Number  
1C6RR7NMXHS874574;

- B. 2017 Jeep, Vehicle Identification Number 1C4RJFCT9HC790874;
- C. 2004 Chevrolet SSR, Vehicle Identification Number 1GCES14P14B111308;
- D. 2009 Jeep, Vehicle Identification Number 1J8HG68T69T69C555894.

3. The net proceeds of such sales shall be deposited into the Court Registry (CRIS Account).

4. The June 11, 2019 asset freeze [ECF 59] otherwise **REMAINS IN EFFECT** until further order of this Court.

**DONE AND ORDERED** in Chambers, West Palm Beach, Florida, this \_\_\_\_ day of January, 2020.

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**ROBIN L. ROSENBERG**  
**UNITED STATES DISTRICT JUDGE**

Copies Furnished to Counsel of Record