

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 9:19-80633-ROSENBERG/REINHART

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

NATURAL DIAMONDS INVESTMENT CO.,
et al.,

Defendants, and

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

Relief Defendants.

**PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S
NOTICE OF SETTLEMENTS AND UNOPPOSED MOTION FOR 60 DAYS
TO FILE A MOTION TO SET DISGORGEMENT AND CIVIL PENALTY AMOUNTS
AS TO DEFENDANT JOSE AMAN AND TO FILE THE CONSENTS AND
FINAL JUDGMENTS AGAINST ALL OTHER PARTIES**

Plaintiff Securities and Exchange Commission seeks a 60-day stay of all deadlines in this case so that undersigned counsel can obtain authorization from the Commissioners of the S.E.C. to file its Motion for Final Judgment against Defendant Jose Aman and a Motion to Enter Final Judgments based on the Consents of all other remaining Defendants and Relief Defendants in this case. These Motions and Finals Judgments, if entered, would resolve all remaining claims against all remaining Defendants and Relief Defendants in this case, obviating the need for trial in this case.

A. Tentative Settlement Agreements with Defendants Harold Seigel and Jonathan Seigel and Relief Defendants H.S. Management Group and Gold 7 of Miami LLC

Undersigned counsel has reached tentative settlement agreements with Defendants Harold Seigel (“H. Seigel”) and Joseph Seigel (“J. Seigel”) and Relief Defendants H.S. Management Group LLC (“H.S. Management”) and Gold 7 of Miami, LLC (“Gold 7”).

Defendants H. Seigel and J. Seigel and Relief Defendant H.S. Management Group have executed and delivered to undersigned counsel their Consents to Final Judgment. Relief Defendant Gold 7 of Miami, LLC has reached a tentative settlement in principle with undersigned counsel and the Receiver in this case, and we will have an executed Consent to Final Judgment by Monday, June 8, 2020 as well as a related executed agreement between Gold 7 and the Receiver.

If authorized by the Commissioners, the S.E.C. will file the tentative settlement agreements against Defendants H. Seigel and J. Seigel and Relief Defendants H.S. Management and Gold 7, seeking entry of the Final Judgments to which they have consented. These Final Judgments would resolve all claims and relief against these parties, obviating the need for trial against them. Undersigned counsel requires 60 days to obtain authorization from the Commissioners of the S.E.C. for these settlements.

Therefore, Plaintiff requests 60 days to file the Consents and Final Judgments as to the Seigels, H.S. Management, and Gold 7.

B. Defendant Jose Aman

Defendant Jose Aman has agreed to a bifurcated settlement, which is a Judgment in which the amounts of disgorgement, prejudgment interest, and a civil penalty will be decided on the S.E.C.'s motion, with allegations of the Complaint deemed as true solely for purposes of the motion to set the disgorgement, prejudgment interest, and civil penalty amounts in the Final Judgment against Aman. Aman has sent us the signature page of the Consent, and we anticipate having the notarized version by Monday, June 8. This settlement with Aman obviates the need for trial against him, leaving only the amounts of monetary relief to be decided upon motions.

Undersigned counsel requires 60 days to obtain authorization from the Commissioners of the S.E.C. as to the amounts of disgorgement, prejudgment interest, and civil penalty the S.E.C. will seek against Aman in the Final Judgment. The Final Judgment would resolve all claims against Aman and obviate the need for trial against him.

C. The Corporate Defendants

The Receiver is consenting to relief against the Corporate Defendants, and undersigned requires 60 days to obtain authorization from the Commission regarding the amounts of disgorgement, prejudgment interest, and a civil penalty against them. The settlement and Final Judgment would obviate the need for trial against the Corporate Defendants.

The 60-day stay of all Court deadlines is not being sought for purposes of delay, but to avoid the need for unnecessary litigation in this case. As the Court previously resolved the claims against Relief Defendants Winners Church, Frederick Shipman, and Whitney Shipman, the settlements set forth in this Motion would resolve all remaining claims against all remaining Defendants and Relief Defendants in this case, obviating the need for trial against any party in this case.

Accordingly, the S.E.C. seeks 60 days to file: (1) the Consents to Final Judgment of the Receiver (on behalf of the Corporate Defendants), Harold Seigel, and Jonathan Seigel, and of Relief Defendants H.S. Management and Gold 7; and (2) a Motion for Final Judgment against Aman, setting the disgorgement, prejudgment interest, and civil penalty amounts against him.

June 3, 2020

Respectfully submitted,

By: Amie Riggle Berlin
Amie Riggle Berlin
Senior Trial Counsel
Florida Bar No. 630020
Direct Dial: (305) 982-6322
Direct email: berlina@sec.gov

Attorney for Plaintiff
SECURITIES AND EXCHANGE COMMISSION
801 Brickell Avenue, Suite 1800
Miami, Florida 33131
Telephone: (305) 982-6300
Facsimile: (305) 536-415

CERTIFICATE OF CONFERRAL

Undersigned counsel conferred with all counsel and pro se Defendant Jose Aman in this case, and they all agree with the relief sought herein.

s/Amie Riggle Berlin
Amie Riggle Berlin

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 3, 2020, 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 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.

Amie Riggle Berlin
Amie Riggle Berlin

Aaron R. Resnick, Esq.
The Law Offices of Aaron Resnick, P.A.
100 Biscayne Boulevard, Suite 1607
Miami, FL 33132
Tel: 305-672-7495
Email: aresnick@thefirmmiami.com
Counsel for Relief Defendant Gold 7 of Miami, LLC

Ellen M. Kaplan
Law Office of Ellen M. Kaplan PA 9900
W. Sample Road, Floor 3 Coral Springs,
FL 33065-4048
Tel: 954-341-1309
Email: ellenkaplanesq@aol.com
Counsel for Jonathan Seigel, Harold Seigel and H.S. Management Group, LLC, Defendants

Jeffrey C. Schneider, Esq.
Levine Kellogg Lehman Schneider & Grossman, LLP 201
South Biscayne Boulevard, 22nd Floor
Miami, FL 33131
Tel: 305-403-8799 Court
Email: jcs@lklsg.com
Appointed Monitor
Corporate Representative for Natural Diamonds Investment Co. and Eagle Financial Diamond Group Inc. aka Diamante Atelier, Defendants and Court Appointed Receiver for Argyle Coin, LLC

Jose Aman
c/o Jean Marquez
20805 Grouper Drive
Cutler Bay, FL 33189
Tel: 305-795-0818
Email: joseaman123@gmail.com
ProSe