

**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.

SEIGEL'S VERIFIED SWORN NOTICE OF PRODUCTION

COMES NOW, Defendants, HAROLD SEIGEL, and Relief Defendant, H.S. MANAGEMENT GROUP, LLC, by and through undersigned counsel, and upon Verification herein informs the Court as to the sworn nature of the accountings and identification of accounts, production of which copies of documents and information Defendants *had previously submitted to the SEC, in compliance with the TRO [D.E. 12]*, through:

- 1) sworn deposition testimony of Seigel- as agreed to by the SEC-during which Receiver was in attendance and otherwise made inquiry of the Deponent;

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- 2) or otherwise through submission of written documents and information, which the undersigned submits, had Receiver specifically requested or otherwise conferred *prior* to the filing of [his] Motion To Compel, as required by Local Rule 7.1, would most certainly have obviated the need for litigation and the unfortunate and unnecessary expenditure of investor funds.

The undersigned warrants that the documents referenced herein were produced to the Receiver this date, Monday, 6/29/2020 prior to 12:00 noon - well within the 24 hour business day period and time from when Receiver filed his Motion To Compel, to wit: 4: 30 p.m. on Friday, 6/26/2020 to include:

- A. A sworn accounting of all funds (compensation, commissions, income including assets, shares or property) and other benefits (including provision of services of a personal or mixed business and personal nature) received directly or indirectly, ***from Aman or received by H.S. Management;***
- B. A sworn accounting of all assets funds or other property, real or personal, ***held by Aman or H.S. Management***, jointly or individually, or for its direct or indirect beneficial interest or over which it maintains control wherever situated, stating the location, value and disposition of each such asset, fund or property;
- C. A sworn identification of all accounts (including but not limited to, bank accounts, savings accounts, securities accounts and deposits of any kind, and wherever situated) in ***which Seigel and H.S. Management*** (whether solely or jointly), directly or indirectly (including through a corporation, partnership, relative, friend or nominee), ***either has an interest or over which he has power or right to exercise control;***

I, Harold Seigel, individually as Defendant, and on behalf of Relief Defendant, H.S.

Management, hereby attests that the information provided the Receiver this date, to the best of my knowledge and belief, is truthful and accurate. Sworn by me this date, 6/29/2020 at 11:38am


—HAROLD SEIGEL, Individually and on
Behalf of H.S. Management, LLC

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Notice has been eserved via CM/ECF on all counsel of record listed below this 29th day of June, 2020.

Respectfully submitted,

 /EK/

ELLEN M KAPLAN, ESQ

FBN 0875228

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