

**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.

DEFENDANT'S NOTICE OF FILING SUPPLEMENTAL EXHIBIT TO [DE 227]

COMES NOW, Defendants, HAROLD SEIGEL, and Relief Defendant, H.S. MANAGEMENT GROUP, LLC, by and through undersigned counsel, and hereby files supplemental exhibit to Exhibit B- email string (redacted as to names of investors) by and between the undersigned, Defendant, Harold Seigel and the Receiver of and concerning Lavish Auctions.

From: [Jeffrey C. Schneider](#)
Sent: Friday, November 22, 2019 10:45 AM
To: [Harold Seigel](#)
Cc: [Ellen](#); [Stephanie Reed Traband](#); [Harold Seigel](#); [Client. Jonathan Seigel](#); [GAL WPB WENDY Brian](#)
Subject: RE: Inquiry from a claimant about a diamond

Harold – thanks.

All – see below.

Jeffrey C. Schneider, PA

Partner

From: Harold Seigel <harold@rarecoloreddiamonds.com>
Sent: Friday, November 22, 2019 10:37 AM
To: Jeffrey C. Schneider <jcs@klsg.com>
Subject: Re: Inquiry from a claimant about a diamond

Not the case at all. The majority of diamonds are clients diamonds that are in the clients possession.

On Fri, Nov 22, 2019 at 6:24 AM Jeffrey C. Schneider <jcs@klsg.com> wrote:

Hey, Ellen:

We're not making any accusations at all. We're getting inquiries from investors who have missing diamonds, and have learned about the auctions, so they're asking the obvious questions about whether their missing stuff is being auctioned. Please just ask Harold and confirm that that's not the case and we'll convey the message to the investors.

Many thanks.

Jeff

From: Ellen <ellenkaplanesq@aol.com>
Sent: Thursday, November 21, 2019 2:39 PM
To: Stephanie Reed Traband <srt@lksq.com>
Cc: Jeffrey C. Schneider <jcs@lksq.com>; Harold Seigel <harold@rarecolorediamonds.com>; Client. Jonathan Seigel <jonathan@rarecolorediamonds.com>; GAL WPB WENDY Brian <wendydohner@yahoo.com>
Subject: Re: Inquiry from a claimant about a diamond

Stephanie

As I am sure you are aware, my clients have not been charged with any fraud or Ponzi scheme. At most, it's been alleged they participated (albeit unknowingly) in what's claimed to be an unregistered security. Harold's current work/auction is legit; has nothing to do with securities or investment contracts; has nothing to do with NDIC, Eagle or Aman; and is not an asset of the receivership under the current lawsuit claim of the SEC.

Thank you,

Ellen Kaplan, Esq

Sent from my iPhone

On Nov 21, 2019, at 11:28 AM, Stephanie Reed Traband <srt@lksq.com> wrote:

Ellen,

I have received a call from another investor inquiring about the auction being run by Harold. I would appreciate a response to my inquiries regarding Harold's knowledge about the diamonds and a confirmation that he is confident that anything being auctioned now could not be claimed by investors in any of the Receivership entities.

Stephanie Reed Traband

Partner

From: Stephanie Reed Traband
Sent: Thursday, November 14, 2019 11:32 AM
To: 'Ellen' <ellenkaplanesq@aol.com>
Cc: Jeffrey C. Schneider <jcs@lksq.com>
Subject: RE: Inquiry from a claimant about a diamond
Importance: High

Ellen,

I received yet another call from an investor yesterday inquiring about the location of diamonds he says he owns. He mentioned hiring an attorney to pursue his claims. The fact that Harold is publicizing a diamond auction and the fact that we can't answer the questions investors are asking about their diamonds, combined with the fact that you have not answered the questions either, are causing the investors to become irate and start to threaten additional legal

action. Thus, can you please advise whether Harold knows the locations of the diamonds claimed by [REDACTED] and [REDACTED] I mentioned earlier in this email chain? If he doesn't know, then please just tell me that. If he did know, but then he gave them to Aman and lost track of them, then can you tell me that, so that we can follow up down that trail? I am assuming, but please confirm, that none of the [REDACTED] or [REDACTED] diamonds could possibly be the ones that are being auctioned now through Harold's other company.

Thanks, and I look forward to your prompt response.

Stephanie Reed Traband

Partner

From: Stephanie Reed Traband
Sent: Wednesday, November 6, 2019 3:06 PM
To: 'Ellen' <ellenkaplanesq@aol.com>
Cc: Jeffrey C. Schneider <jcs@klsg.com>
Subject: RE: Inquiry from a claimant about a diamond

Ellen,

I'm following up with you about the requests below from [REDACTED] and [REDACTED] as to the locations of the diamonds referenced in the chain below. Please let me know whether Mr. Siegel has any information as to their locations.

Thanks,

Stephanie

Stephanie Reed Traband

Partner

From: Stephanie Reed Traband
Sent: Thursday, September 26, 2019 11:43 AM
To: Ellen <ellenkaplanesq@aol.com>
Cc: Jeffrey C. Schneider <jcs@klsg.com>
Subject: RE: Inquiry from a claimant about a diamond

Ellen,

Thanks for the update. We have received a similar request from another individual, [REDACTED] who was inquiring about several diamonds. We have located of the ones on his list as being at G7, and 3 in the Receivership, but he has inquired about others for which we have no information. Could you please check with your client as to these diamonds as well? Below are the GIA numbers.

17 [REDACTED]

1 [REDACTED]

1 [REDACTED]

1 [REDACTED]

16 [REDACTED]

21 [REDACTED] 6

Also, do you have a further update about the diamonds [REDACTED] was inquiring about?

Thanks,

Stephanie

Stephanie Reed Traband

Partner

From: Ellen <ellenkaplanesq@aol.com>
Sent: Thursday, September 19, 2019 3:29 PM
To: Stephanie Reed Traband <srt@klsq.com>
Cc: Jeffrey C. Schneider <jcs@klsq.com>; Amie Berlin <BerlinA@sec.gov>
Subject: Re: Inquiry from a claimant about a diamond

Hello Stephanie

I am in receipt of your recent request of Tuesday and your current follow up. Kindly be aware that I was in trial Tuesday and also Wednesday (yesterday). Despite same, I had forwarded your inquiry to my client. I have requested my client look into your inquiry. I will respond once I have concrete information.

Thank you,

Ellen Kaplan, Esq

Sent from my iPhone

On Sep 19, 2019, at 10:36 AM, Stephanie Reed Traband <srt@klsq.com> wrote:

Ellen,

I'm just following up on the inquiry below. Were you able to obtain any information from your client about the location of this diamond?

Stephanie Reed Traband

Partner

From: Stephanie Reed Traband
Sent: Tuesday, September 17, 2019 12:00 PM
To: Ellen Kaplan Esq <ellenkaplanesq@aol.com>
Cc: Jeffrey C. Schneider <jcs@klsg.com>
Subject: Inquiry from a claimant about a diamond

Ellen,

We have received an inquiry from [REDACTED] about the location of a diamond, bearing the GIA number of 2 [REDACTED]. She has advised that it is a 0.25 carat radiant cut fancy deep pink argyle diamond (strawberry color to the naked eye) that she purchased from Harold Siegel from his online auction in June 2013. He was holding it for her in his safe. She asked if the Receivership has it, and neither the Receiver nor G7 have it. Can you please check with Mr. Siegel as to where this diamond is and let us know?

Thanks,

Stephanie

Stephanie Reed Traband

Partner
