

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
(Palm Beach Division)**

Case No. 9:19-CV-80633-ROSENBERG

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

NATURAL DIAMONDS INVESTMENT CO.,
et al.,

Defendants,

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

Relief Defendants.

**RECEIVER’S UNOPPOSED SUPPLEMENTAL MOTION FOR TRANSFER OF FUNDS
PREVIOUSLY DEPOSITED INTO REGISTRY OF THE COURT**

Jeffrey C. Schneider, not individually, but solely in his capacity as the Court-appointed Receiver (the “Receiver”) for Natural Diamonds Investment Co. (“NDIC”), Eagle Financial Diamond Group, Inc. (“EFDG”), and Argyle Coin, LLC (“Argyle”) (collectively, the “Receivership Entities”), moves the Court for the transfer of funds (further described below) previously deposited into the registry of the Court.

1. This motion is filed because, upon filing the prior motion and during conversations with the Clerk, the Receiver discovered that additional monies had been deposited into the Court registry, but had not yet been docketed.

2. As this is a supplemental motion, the Receiver will not set forth again the background of this case, but instead will adopt and incorporate the information contained in DE 280.

3. After this Court entered its Order Granting Receiver's Motion for Transfer of Funds Previously Deposited into Registry of the Court [DE 282] on February 16, 2021, counsel for the Receiver contacted the Clerk's office to facilitate the transfer. During the course of these discussions, the Clerk determined that there had been an additional deposit that had not been docketed. As such, that amount was not included in the Receiver's prior motion.

4. The Clerk has since docketed the deposit of an additional \$43,486.00 [DE 283] that was made on April 16, 2020 by Frederick Shipman.

5. As set forth in the prior motion, pursuant to the Final Judgments entered against Winner's Church and the Shipmans, the Receiver is permitted to file a motion for transfer of the deposited funds to the Receiver for the benefit of the Receivership Estate and its victims, once an order of disgorgement has been entered against one of the Receivership Entities and/or Aman.. On February 12, 2021, the Court issued final judgments that included disgorgement orders against Eagle, Natural and Argyle, all three Receivership Entities [DE 279].

6. Therefore, now that the Receiver is aware of additional money, the Receiver seeks Court authorization for the transfer of those additional funds (\$43,486), along with any accrued interest, to the Receiver. Assuming the Court grants this Motion, the Receiver will deposit the funds into the receivership account opened for purposes of this proceeding and will use those funds for the benefit of the Receivership Estate and its victims.

Local Rule Certification

Pursuant to Local Rule 7.1(a)(3), the Receiver hereby certifies that he has conferred with counsel for the SEC and the remaining defendant (Jose Aman) regarding the requested relief, and they had no objection. As the Receiver conferred with the SEC and Mr. Aman about the transfer

of all of the funds, the Receiver did not separately seek their approval, but did make the SEC aware that an additional motion would be filed.

WHEREFORE, the Receiver respectfully requests that this Court grant this Motion, issue the proposed Order attached as Exhibit A, and provide such other relief as is just and proper.

Dated: February 23, 2021

Respectfully submitted,

**LEVINE KELLOGG LEHMAN
SCHNEIDER + GROSSMAN LLP**
201 South Biscayne Boulevard
Citigroup Center, 22nd Floor
Miami, FL 33131
Telephone: (305) 403-8788
Facsimile: (305) 403-8789

By: s/Stephanie Reed Traband
STEPHANIE REED TRABAND
Florida Bar No. 0158471
srt@lklsg.com
ar@lklsg.com
Counsel for the Receiver

-and-

SALLAH ASTARITA & COX, LLC
Co-counsel for the Receiver
3010 North Military Trail, Suite 210
Boca Raton, FL 33431
Tel.: (561) 989-9080
Fax: (561) 989-9020

CERTIFICATE OF SERVICE

I hereby certify that on February 23, 2021, 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 or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who do not receive such.

By: /s/ Stephanie Reed Traband
STEPHANIE REED TRABAND

SERVICE LIST

Counsel for Securities and Exchange Commission:

Amie Riggle Berlin, Esq.
Senior Trial Counsel
Linda S. Schmidt, Esq.
Senior Trial Counsel
Securities and Exchange Commission
801 Brickell Avenue, Suite 1800
Miami, Florida 33131
Email: berlina@sec.gov

Counsel for Harold Seigel, Jonathan Seigel, and H.S. Management Group LLC:

Ellen M. Kaplan, Esq.
Law Office of Ellen M. Kaplan P.A.
9900 W Sample Rd Fl 3
Coral Springs, Florida 33065
Email: ellenkaplanesq@aol.com

Counsel for Gold 7 of Miami, LLC:

Aaron Resnick, Esq.
Law Offices of Aaron Resnick, P.A.
100 Biscayne Boulevard, Suite 1607
Miami, Florida 33132
E-mail: aresnick@thefirmmiami.com

Counsel for Winners Church, Frederick Shipman, and Whitney Shipman:

Carl Schoeppl, Esq.
Terry A.C. Gray, Esq.
Schoeppl Law, P.A.
4651 North Federal Highway
Boca Raton, Florida 33431
Email: carl@schoeppllaw.com
tgray@schoeppllaw.com

Via Email

Jose Aman, pro se

E-mail: joseaman123@gmail.com

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
(Palm Beach Division)**

Case No. 9:19-CV-80633-ROSENBERG

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

NATURAL DIAMONDS INVESTMENT CO.,
et al.,

Defendants,

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

Relief Defendants.

**ORDER GRANTING RECEIVER’S SUPPLEMENTAL MOTION FOR TRANSFER
OF FUNDS PREVIOUSLY DEPOSITED INTO REGISTRY OF THE COURT**

THIS CAUSE came before the Court upon the Receiver’s Supplemental Motion for Transfer of Funds Previously Deposited into Registry of the Court (the “Motion”) [DE ____]. Having reviewed the Motion and the record in this case, the Court finds granting the Motion is in the Estate’s best interests. Accordingly, it is hereby

ORDERED AND ADJUDGED as follows:

1. The Receiver’s Motion is **GRANTED**.
2. The Clerk of Court shall transfer from the registry of the Court to the Receiver, Jeffrey C. Schneider, the funds previously deposited for this matter totaling \$43,486, as memorialized in DE 283, along with any accrued interest on those funds.
3. Funds shall be payable to “Jeffrey C. Schneider, Receiver for Argyle Coin, LLC” and sent by check, wire, or by any other means deemed to be most efficient and agreed to by the

Clerk and the Receiver. The Receiver shall provide whatever information is required by the Clerk for the electronic transfer of funds. The Receiver's mailing address: Jeffrey C. Schneider, 201 South Biscayne Boulevard, 22nd Floor, Citigroup Center, Miami, FL 33131.

DONE and ORDERED in Chambers at West Palm Beach, Palm Beach County, Florida on this ____ day of February, 2021.

ROBIN L. ROSENBERG
UNITED STATES DISTRICT JUDGE

Copies to Counsel of Record