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*Attorneys for Receiver for Defendants
Aequitas Management, LLC; Aequitas Holdings, LLC; Aequitas
Commercial Finance, LLC; Aequitas Capital Management, Inc.;
Aequitas Investment Management, LLC*

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

AEQUITAS MANAGEMENT, LLC;
AEQUITAS HOLDINGS, LLC;
AEQUITAS COMMERCIAL FINANCE,
LLC; AEQUITAS CAPITAL
MANAGEMENT, INC.; AEQUITAS
INVESTMENT MANAGEMENT, LLC;
ROBERT J. JESENİK; BRIAN A. OLIVER;
and N. SCOTT GILLIS,

Defendants.

No. 3:16-cv-00438-JR

**JOINT NOTICE OF TERMINATION OF
RECEIVERSHIP AND TRANSFER OF
AUTHORITY AND CONTROL TO DAVID
STAPLETON AS THE SUCCESSOR
TRUSTEE/ADMINISTRATOR OF THE
AEQUITAS QUALIFIED SETTLEMENT
FUND IRREVOCABLE TRUST**



On October 17, 2023, the Receiver filed his motion seeking termination of the Receivership Estate and requesting further and additional relief (the “Closing Motion”)¹, which the Court granted on November 1, 2023 (the “Closing Order”).² The Closing Order (i) approved the Receiver’s Final Report; (ii) authorized the Receiver to perform any remaining administrative tasks and to take all actions necessary to transfer all of the Receiver’s rights and authority related to the Receivership Entity unabated until he has determined, in his sole business judgment, that all such tasks and actions have been completed to implement the relief requested in the Closing Motion; (iii) discharged and released the Receiver from the duties and responsibilities set forth in the Order Appointing Receiver; (iv) enjoined claims against the Receiver and his professional advisors; (v) authorized the appointment of David Stapleton and the Stapleton Group as successor Trustee/Administrator of the Aequitas Qualified Settlement Fund Irrevocable Trust (the “QSF”) to take appropriate actions to complete the remaining functions of the QSF and termination of the Receivership, effective upon the filing of this joint notice of termination by the Receiver and David Stapleton; and (vi) retained Court jurisdiction over the QSF until its termination prior to the dismissal of the captioned matter *SEC v. Aequitas Management, LLC, et al.*, 3:16-CV-00438-JR.

a. The Receiver Has Determined That All Tasks And Actions Needed Prior To The Transfer Of Authority and Control To David Stapleton as the Successor Trustee/Administrator of the QSF Trust Have Been Completed.

The Receiver has determined that all remaining administrative tasks required in connection with winding up the Receivership, the actions necessary to implement the relief requested in the

¹ Motion of the Receiver, Ronald F. Greenspan, For Entry of An Order: (1) Approving the Final Report and Accounting; (2) discharging and releasing the Receiver; (3) enjoining claims against the Receiver and the Receiver’s professional advisors; (4) authorizing the appointment of a successor Trustee/Administrator of the Aequitas Qualified Settlement Fund Irrevocable Trust (“QSF”) to complete the administrative functions of the QSF after the termination of the Receivership Estate; and (5) terminating the Receivership (the “Closing Motion”) [Dkt. 1042].

Closing Motion necessary prior to transferring the Receiver's rights and authority related to the Receivership Entity to the QSF are complete.

b. Joint Notice Of The Receiver And QSF Trustee Terminating the Receivership and Transferring Authority and Control To David Stapleton as the Successor/Administrator Of The QSF Trust.

Based on the foregoing determination by the Receiver that all tasks and actions needed prior to the transfer of authority and control to the QSF Trustee have been completed, the Receiver and the QSF Trustee hereby provide their Joint Notice of Termination of the Receivership and transfer of authority and control to the QSF Trustee. Termination of the Receivership and transfer of authority and control to David Stapleton shall be effective as of April 1, 2024. Thereafter all correspondence and contact regarding the QSF Trust is to be directed to Jake Diiorio; jdiiorio@stapletoninc.com; and Kent Johnson; kjohnson@stapletoninc.com.

Dated this 29th day of March, 2024.

Respectfully submitted,

SCHWABE, WILLIAMSON & WYATT, P.C.

By: /s/ Troy Greenfield

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² Order (1) Approving the Final Report and Accounting; (2) Discharging and Releasing the Receiver; (3) Enjoining Claims Against the Receiver and the Receiver's Professional Advisors; (4) Authorizing the Appointment of a Successor Trustee/Administrator of the Aequitas Qualified Settlement Fund Irrevocable Trust ("QSF") and (5) Terminating the Receivership [Dkt. 1045].