

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**SECURITIES AND EXCHANGE
COMMISSION,**
Plaintiff,

v.

CHRISTOPHER A. FAULKNER, et al.,
Defendants,

and

**TAMRA M. FREEDMAN and
JETMIR AHMEDI,**
Relief Defendants.

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Case No.: 3:16-cv-01735-D

**RECEIVER’S RESPONSE REGARDING THE NOTICES OF CLAIM FILED BY
JLB LEGACY, LLC, JERICHO 5002, LLC AND JERICHO 1031, LLC**

Thomas L. Taylor III (“Receiver”), Court-appointed temporary receiver in the above-entitled action (“Enforcement Action”), respectfully files this response with respect to three notices of purported claims filed of record with this Court on September 5, 2019 by JLB Legacy, LLC, Jericho 5002, LLC and Jericho 1031, LLC (“Claimants”). ECF Nos. 479, 480, 481, respectively (“Claims”).

Counsel for the Claimants asserts in the Claims that they are filed “as required by this Court’s order dated March 26, 2019 [DE 419].” Claims at 1. As an initial matter, Receiver notes that the Court’s March 26, 2019 order (ECF No. 419) (as amended by Order dated March 28, 2019 (ECF No. 424)) subsequently was held in abeyance until further order of the Court by Order dated June 10, 2019 (ECF No. 444). Accordingly, no plan of distribution has been approved by the Court at this time.

Moreover, to the extent that the Court's future order regarding a plan of distribution instructs claimants to assert claims against the Receivership Estate in a manner similar to the Orders entered at ECF Nos. 419 and 424, potential claimants are not required to file such claims with the Court. Rather, claimants need only "contact the Receiver [in writing] and identify themselves to him ... on or before the Claim Bar Date...." ECF No. 424 at 3 (footnote omitted).

Any potential claimant that wishes to assert a claim against the Receivership Estate need only timely contact the Receiver in writing with respect to same.

Dated: September 9, 2019

Respectfully submitted,

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COURT-APPOINTED RECEIVER

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COUNSEL FOR RECEIVER

CERTIFICATE OF SERVICE

I certify that on September 9, 2019 I filed the foregoing document through the Court's CM/ECF filing system, and with permission emailed a copy to counsel Anthony W. Austin (aaustin@fclaw.com), which satisfy service requirements under FED. R. CIV. P. 5(b)(2)(E).

/s/ Andrew Goforth

Andrew M. Goforth