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 8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
 10 SAN FRANCISCO DIVISION

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 12 SECURITIES AND EXCHANGE COMMISSION,

13 Plaintiff,

14 vs.

15 VIPER CAPITAL MANAGEMENT, LLC,  
 16 COMPASS CAPITAL MANAGEMENT, LLC, and  
 EDWARD SEWON EHEE,

17 Defendants,

18 and

19 COMPASS WEST FUND, LP, VIPER FOUNDERS  
 20 FUND, LP, VIPER INVESTMENTS, ALBERT  
 EHEE, ROBERT EHEE and JENNIFER EHEE,

21 Relief Defendants.  
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Civil Action No. C-06-6966-SI

(Related to Case Nos.  
 C 07-02507 SI  
 C-07-02508 SI  
 C 07-02509 SI)

**PLAINTIFF SECURITIES AND  
 EXCHANGE COMMISSION'S  
 SCHEDULE OF DISTRIBUTION OF  
 REMAINING FUNDS**

Judge: Susan Illston  
 Courtroom: 10

**SCHEDULE OF DISTRIBUTION OF REMAINING FUNDS**

Plaintiff Securities and Exchange Commission (“Commission”) proposes the following schedule for distribution of the funds that remain in the Court Registry from Edward Ehee’s payment of approximately \$318,000 pursuant to the Final Judgment that this Court entered against him on January 30, 2008.

As soon as practicable, but no later than March 13, 2009, the Commission will move the Court for an order to disburse funds to pay tax obligations for 2008 and to pay Tax Administrator fees. Concurrent with the motion and proposed order to disburse funds to pay tax obligations and fees for 2008, the Commission will move the Court for an order to distribute all funds remaining in the Court Registry to the Tax Administrator to hold in a reserve fund to pay 2009 tax obligations and any other residual expenses. Any monies remaining in the Tax Administrator’s reserve fund after the payment of 2009 tax obligations and other residual expenses will be distributed, at the direction of the Commission, to either the United States Treasury or to the harmed investors in this action.<sup>1</sup>

The Commission does not expect any additional filings in this action once the money in the Court Registry has been distributed to the Tax Administrator.

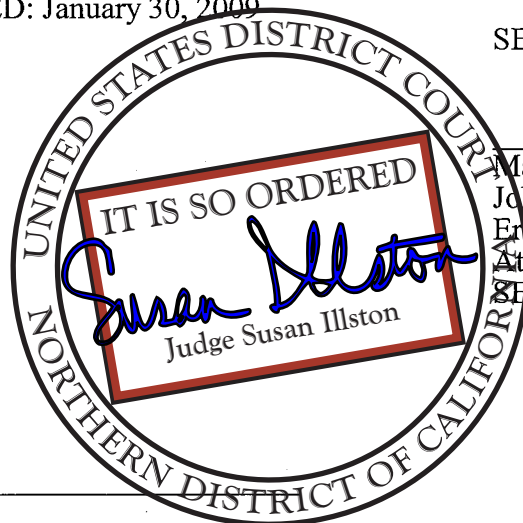
DATED: January 30, 2009

SECURITIES AND EXCHANGE COMMISSION

/s/ Eric M. Brooks

Marc J. Fagel  
John S. Yun  
Eric M. Brooks  
Attorneys for Plaintiff

SECURITIES AND EXCHANGE COMMISSION



<sup>1</sup> When the Commission moves the Court for an order to disburse the remaining funds to the Tax Administrator, the Commission will have a better understanding of the amount of funds remaining and will state in its motion and proposed order whether the funds will go to the United States Treasury or to the harmed investors.