

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

Case No. 8:09-cv-0087-T-26TBM

ARTHUR NADEL,  
SCOOP CAPITAL, LLC,  
SCOOP MANAGEMENT, INC.

Defendants,

SCOOP REAL ESTATE, L.P.  
VALHALLA INVESTMENT PARTNERS, L.P.,  
VALHALLA MANAGEMENT, INC.  
VICTORY IRA FUND, LTD,  
VICTORY FUND, LTD,  
VIKING IRA FUND, LLC,  
VIKING FUND, LLC, AND  
VIKING MANAGEMENT,

Relief Defendants.

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**NOTICE OF COMPLIANCE WITH COURT ORDER DATED OCTOBER 4, 2017**

On September 15, 2017, Burton W. Wiand, as Receiver (the “Receiver”) filed a Motion to Enforce Constructive Trust Through Turnover of Real Property, or in The Alternative, Through Foreclosure of The Receiver’s Equitable Lien (Doc. 1310) (the “Motion”), along with his Declaration in support of the Motion (Doc. 1311). Prior to filing the Motion, counsel for the Receiver conferred with counsel for the Lee’s, Mr. Benjamin Martin, regarding the Motion. Mr. Martin, on behalf of the Lee’s, confirmed in writing that they objected to the relief sought. That same day, the Motion and Declaration were sent via

U.S. Mail and email to Mr. Martin. At no point did Mr. Martin indicate that he did not represent the Lee's or that the Motion should be served directly to them.

On October 4, 2017, the Court entered an Order (Doc. 1315) directing the Receiver to immediately send a copy of the Motion (Doc. 1310) and his Declaration (Doc. 1311) to Vernon Lee and Manon Summers-Lee to their address of 4018 Via Mirada, Sarasota, Florida 34238. The Receiver hereby files this notice to inform the Court that he has complied with the Order. On October 4, 2017, counsel for the Receiver sent a copy of the Motion and Declaration to Vernon Lee and Manon Sommers-Lee via Federal Express to the aforementioned address.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on October 4, 2017, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system.

**s/Michael Lamont**

Michael S. Lamont FBN 0527122

mlamont@wiandlaw.com

Jared J. Perez, FBN 0085192

jperez@wiandlaw.com

Wiand Guerra King P.L.

3000 Bayport Drive, Suite 600

Tampa, FL 33607

Tel: (813) 347-5100

Fax: (813) 347-5198

*Attorneys for the Receiver, Burton W. Wiand*