

UNITED STATE DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

2012 MAY 22 AM 11:35

MIDDLE DISTRICT OF FLORIDA  
TAMPA, FLORIDA

SECURITIES AND EXCHANGE  
COMMISSION.

Plaintiff,

v.

CASE NO. 8:09-cv-87-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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**PRO SE MOTION OF NON-PARTY MARGUERITE J. NADEL  
FOR RELIEF FROM FREEZE ON ASSETS  
(Oral Hearing Requested)**

Now comes Marguerite J. Nadel, pro se, and does hereby Move this Honorable Court for an order for relief from the restrictions imposed under order of this Court entered on February 3, 2009 as to three (3) bank accounts, to wit, account No \_\_\_16432, [Northern Trust, Sarasota, Florida, having an approximate balance of Nineteen thousand Dollars (\$19,000); account No 171005875, Northern Trust, Sarasota, Florida, having an approximate balance of Four thousand Dollars (\$4,000) and account No 00693606524, First Citizens Bank, Asheville, North Carolina,

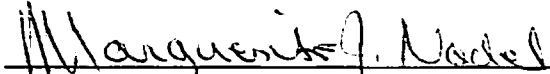
having an approximate balance of Four Thousand Five Hundred Dollars (\$4,500).

Movant states that she is not presently and has never been a defendant in this or any other related action. Pursuant to previous order of this Court, Movant has been denied access to the above referenced accounts. Movant further states that the funds held in said accounts are solely those of Movant and are in no way owned by or connected with Arthur Nadel or any of the actions that have given rise to this Action. Movant states that she is financially destitute and is in need of access to her funds for sustenance and other living expenses. An affidavit in support of this Motion is attached hereto as *Exhibit A*.

**WHEREFORE**, Movant prays the within Motion be Granted.

Movant does hereby request an oral hearing on the within Motion.

Respectfully submitted,

  
Marguerite J. Nadel, Pro Se  
3966 County View Drive  
Sarasota, FL 34233  
(941) 927-3830

**CERTIFICATE OF SERVICE**

I hereby certify that on the \_\_ day of May, 2012, a true and accurate copy of the forgoing Motion was sent via Regular US Mail, Postage pre-paid to:

Gianluca Morello  
Michael S. Lamont  
Jared J. Percz  
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Marguerite J. Nadel, Pro Se