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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, *ET AL.*,

Defendants.

Case No. 3:16-cv-00438-JR

**[PROPOSED] ORDER APPROVING  
COMPROMISES OF CLAIMS,  
AUTHORIZING PERFORMANCE OF  
SETTLEMENT AGREEMENTS, AND  
AUTHORIZING DISBURSEMENT OF  
FUNDS HELD IN A SEGREGATED  
ACCOUNT**

This matter came before the Court on the Receiver’s Motion For Order (1) Approving  
The Compromise Of Claims, (2) Authorizing Performance of Settlement Agreements, and (3)  
Authorizing Disbursement Of Funds Held In A Segregated Account (Dkt. No. 980). On behalf



of the Receivership Entity, the Receiver executed settlement agreements with the following counterparties (“Settlement Agreements”):

- Gillis Management Solutions, Inc.
- Ocean Avenue Financial Services, LLC
- The Liquidating Trust of the Bankruptcy Estate of Tango Delta Financial, Inc.
- Michael Pirello
- Petrawest, Ltd. and Gerald T. Raydon
- Jae Son
- Larry Welch
- The Welch Family 2008 Revocable Trust dtd 10/15/2008
- Mary Greenheck

The Court having considered all papers filed and proceedings held herein and otherwise being fully informed,

**NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED**

that:

- (1) the Settlement Agreements are approved;
- (2) the Receiver is authorized to perform on each of the Settlement Agreements; and
- (3) the Receiver is further authorized to disburse \$2,483,403.38 plus accrued interest held

in a segregated account, to be utilized in accordance with the terms of the Receivership Order, the Court-approved Distribution Plan, and the Settlement Agreement with the Liquidating Trust of the Bankruptcy Estate of Tango Delta Financial, Inc.

**IT IS SO ORDERED.**

Dated: June \_\_\_\_\_, 2022.

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United States Magistrate Judge Jolie A. Russo

SUBMITTED BY:

SCHWABE, WILLIAMSON & WYATT, P.C.

By: s/ Troy D. Greenfield

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Attorneys for the Receiver and Receivership Entity