



UNITED STATES  
**SECURITIES AND EXCHANGE COMMISSION**  
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WASHINGTON, D.C. 20549

OFFICE OF THE  
GENERAL COUNSEL

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September 4, 2025

**VIA ECF**

David J. Smith, Clerk of Court  
United States Court of Appeals for the Eleventh Circuit  
56 Forsyth Street, N.W.  
Atlanta, GA 30303

**Re: *SEC v. Spartan Securities Group, Ltd.* (No. 22-13129)  
FRAP 28(j) letter**

Dear Mr. Smith:

I write on behalf of the Securities and Exchange Commission, appellee, to advise this Court of the Ninth Circuit's attached decision in *SEC v. Sripetch*, No. 24-3830 (September 3, 2025). *Sripetch* agreed with the First Circuit and held, consistent with the Commission's argument in this case, that "an award of disgorgement does not require a showing that investors experienced pecuniary harm." Op. 4 (citing *SEC v. Navellier*, 108 F.4th 19 (1st Cir. 2024)); *see also* SEC Br. 36; SEC FRAP 28(j) letter, ECF 80-1 (June 2, 2025).

Respectfully submitted,

/s/ Daniel Staroselsky  
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**CERTIFICATE OF INTERESTED PERSONS AND  
CORPORATE DISCLOSURE STATEMENT**

*SEC v. Spartan*, No. 22-13129

Pursuant to Rule 26.1 of the Federal Rules of Appellate Procedure and Circuit Rule 26.1-1, Appellee Securities and Exchange Commission submits this Certificate of Interested Persons and Corporate Disclosure Statement listing all persons and entities with an interest in the outcome of this action:

1. Aristocrat (ASCC), microcap issuer involved in charged conduct
2. Barbero, Megan, former attorney for the Commission
3. Changing Technologies (CHGT), microcap issuer involved in charged conduct
4. Conley, Michael A., former attorney for the Commission
5. Court Document Services, Inc. n/k/a ChinAmerica Andy Movie Entertainment Media Co. (CAME), microcap issuer involved in charged conduct
6. Covington, Hon. Virginia M. Hernandez, District Court Judge
7. Dhillon Law Group, Inc., defendants-appellants counsel's law firm
8. Dilley, Carl E., defendant-appellant
9. Dinello Restaurant Ventures, Inc., n/k/a AF Ocean Investment Management Company (AFAN), microcap issuer involved in charged conduct
10. Eldred, Micah J., defendant-appellant
11. Envoy Group, Corp. (BLGI), microcap issuer involved in charged conduct

**CERTIFICATE OF INTERESTED PERSONS AND  
CORPORATE DISCLOSURE STATEMENT (cont'd)**

*SEC v. Spartan*, No. 22-13129

12. E-Waste Corp. n/k/a EZ Raider Co. (EZRG), microcap issuer involved in charged conduct
13. Fernandez, Wilfredo, attorney for the Commission
14. First Independence Corp. n/k/a Codesmart Holdings, Inc. (ITEN), microcap issuer involved in charged conduct
15. First Social Networx, Corp. n/k/a Rebel Group, Inc. (MOXG), microcap issuer involved in charged conduct
16. First Titan n/k/a GlobeStar Therapeutics Corp. (RSTC), microcap issuer involved in charged conduct
17. First Xeris, microcap issuer involved in charged conduct
18. Global Group. n/k/a Tyme Technologies, Inc. (TYME), microcap issuer involved in charged conduct
19. Grilli, Peter J., mediator
20. Island Capital Management, defendant-appellant
21. Johnson, Alise M., attorney for the Commission
22. Kelly, Michael J., attorney for the Commission
23. Kids Germ n/k/a Topaz Resources, Inc. (TOPZ), microcap issuer involved in charged conduct
24. Kruckenberg, Caleb, attorney for the defendants
25. Morales-Christiansen, Anna P., attorney for the defendants
26. Nestor, Christine, attorney for the Commission
27. Neutra Corp. (NTPR), microcap issuer involved in charged conduct

**CERTIFICATE OF INTERESTED PERSONS AND  
CORPORATE DISCLOSURE STATEMENT (cont'd)**

*SEC v. Spartan*, No. 22-13129

28. New Civil Liberties Alliance, legal organization representing defendants-appellants
29. Obscene Jeans n/k/a MyGo Games Holding Co. (OBJE), microcap issuer involved in charged conduct
30. On the Move n/k/a Artificial Intelligence Technology Solutions (AITX), microcap issuer involved in charged conduct
31. Pacific Legal Foundation, legal organization representing defendants-appellants
32. PurpleReal.com, Corp., microcap issuer involved in charged conduct
33. Rainbow Coral Corp. (RBCC), microcap issuer involved in charged conduct
34. Rollins, Kara M., attorney for the defendants-appellants
35. Sarelson, Matthew S., attorney for the defendants
36. Spartan Securities Group, Ltd., defendant-appellant
37. Staroselsky, Daniel, attorney for the Commission
38. Sum, Alice K., attorney for the Commission
39. Top to Bottom Pressure Washing, Inc. n/k/a Ibex Advanced Mortgage Technology, Inc. (IBXM), microcap issuer involved in charged conduct
40. Tuite, Hon. Christopher P., Magistrate Judge
41. U.S., Securities and Exchange Commission, plaintiff-appellee
42. Ulmer & Berne LLP, defendant counsel's law firm
43. Vecchione, John J., attorney for the defendants-appellants

**CERTIFICATE OF INTERESTED PERSONS AND  
CORPORATE DISCLOSURE STATEMENT (cont'd)**

*SEC v. Spartan*, No. 22-13129

44. VonderHeide, Heidi E., attorney for the defendants-appellants
45. Quality Wallbeds, Inc. n/k/a Horrison Resources Inc. (SLPC), microcap issuer involved in charged conduct
46. Wolper, Alan M., attorney for the defendants

## **CERTIFICATE OF COMPLIANCE**

I certify that this letter complies with Fed. R. App. P. 28(j) because the letter contains 87 words.

/s/ Daniel Staroselsky  
Daniel Staroselsky  
Attorney for Appellee,  
Securities and Exchange Commission

September 4, 2025

### **CERTIFICATE OF SERVICE**

I certify that on September 4, 2025, I electronically filed the foregoing with the Clerk of Court for the United States Court of Appeals for the Eleventh Circuit by using the Court's CM/ECF system. I further certify that all participants in this case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Daniel Staroselsky  
Daniel Staroselsky  
Attorney for Appellee,  
Securities and Exchange Commission