

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No.: 19-cv-02594-RM-SKC

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

MEDIATRIX CAPITAL INC., *et al.*,

Defendants,

and

MEDIATRIX CAPITAL FUND LTD., *et al.*,

Relief Defendants.

JOINT STATUS REPORT

Plaintiff Securities and Exchange Commission (“SEC”) and counsel for Defendants and Relief Defendants respectfully submit this Joint Status Report as requested by the Court in ECF No. 285.

1. Discovery activities. The SEC, Defendants Michael Young, Relief Defendant Maria Young, Salve Regina Trust, TF Alliance LLC, West Beach LLC, Casa Conejo LLC, and Hase Haus LLC, and Defendants Michael Stewart, Bryant Sewall, Mediatrix Capital, Inc., Blue Isle Markets Inc. (St. Vincent & the Grenadines), Blue Isle Markets Ltd., and Relief Defendants Victoria Stewart and Hanna Ohonkova Sewall exchanged Rule 26 disclosures on or about November 19, 2021. Relief Defendants Keystone Business Trust, Weinzell LLC, the 1989 Foundation, Mediatrix Capital PR LLC, and Blue Isle Markets

Inc. (Cayman Islands) have not made Rule 26 disclosures. The SEC has produced the documents identified in its Rule 26 disclosures to Defendants. The SEC has asked all Defendants and Relief Defendants to produce the documents identified in their Rule 26 disclosures. In response, the Young Defendants identified a hard drive with a large amount of data, and the SEC agreed to process the drive into a production format which, among other things, made the data searchable. The SEC is returning the processed data to the Youngs' counsel for review and production. The Stewart and Sewall Defendants, along with the entity Defendants and Relief Defendants, have not produced the documents identified in their Rule 26 disclosures. Discovery consistent with the partial stay entered by the Court is proceeding, albeit slower than the SEC anticipated. *See* ECF No. 269.

2. Pending and unresolved discovery disputes. See above regarding the lack of initial document disclosures of the Stewart and Sewall Defendants, the entity Defendants, and the Relief Defendants. Some Relief Defendant entities have also not answered the Complaint (*e.g.*, the Keystone Business Trust).
3. Settlement update. The parties have discussed settlement, but do not appear to be close to resolving any aspect of this case through settlement.
4. Pending motions. There are two pending motions before the court, Michael and Maria Young's Motion for Order Terminating Receiver's Pre-Judgment Collection Activities against Religious Charities and for Return of Funds Improperly Collected, or, in the Alternative, for Permission to Advise the Charities of their Rights and Request for Hearing, ECF No. 274, and the SEC's Motion to Modify Asset Freeze to Permit the

Transfer of Funds, Including Certain Disputed Funds, from Equiti UK to the Receiver,
ECF No. 295.

Respectfully submitted this 19th day of January, 2022.

s/ Stephen C. McKenna

Stephen C. McKenna
Mark L. Williams
Attorneys for Plaintiff
U.S. Securities and Exchange Commission
1961 Stout Street, Suite 1700
Denver, CO 80294-1961
Phone: 303.844.1036
Phone: 303.844.1046
Mckennas@sec.gov
Williamsm@sec.gov

s/ Vivian Rivera Drohan

Vivian Rivera Drohan
Drohan Lee LLP
5 Penn Plaza
New York, NY 10001
Phone: 212.710.0004
vdrohan@dlkny.com

Jeffrey R. Thomas
Thomas Law LLC
3773 Cherry Creek North Dr., Suite 600
Denver, CO 80209
Phone: 720.330.2805
jthomas@thomaslawllc.com

*Attorneys for Defendants Mediatrix Capital Inc.,
Blue Isle Markets Inc., Blue Isle Markets Ltd.,
Michael S. Stewart, Bryant E. Sewall, Victoria M.
Stewart and Hanna Ohonkova Sewall*

s/ Tracy L. Ashmore _____

Tracy L. Ashmore
Robinson Waters & O’Dorisio, P.C.
1099 18th St., Ste 2600
Denver, CO 80202
Phone: 303.297.2600
tashmore@rwolaw.com

Attorney for Defendant Michael S. Young, Maria C. Young, Salve Regina Trust, West Beach LLC, TF Alliance LLC, Hase Haus LLC and Casa Conejo LLC

Certificate of Service

I hereby certify that on January 19, 2022, I caused the foregoing to be electronically filed by using the CM/ECF system. I further certify that a copy of the foregoing was served upon the following counsel of record via the Court's CM/ECF system:

Mark B. Conlan
Natasha M. Songonuga
Gibbons PC
300 Delaware Ave., Suite 1015
Wilmington, DE 19801-1671
nsongonuga@gibbonslaw.com; MConlan@gibbonslaw.com

Attorney to Mark B. Conlan, as Receiver

s/ Nicole L. Nesvig
Senior Litigation Paralegal