

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

Civil Action No. 1:19-cv-02594-PAB-STV

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

MEDIATRIX CAPITAL INC., *et al.*,

Defendants,

and

MEDIATRIX CAPITAL FUND LTD, *et al.*,

Relief Defendants.

**MOTION FOR AN ORDER AUTHORIZING THE RECEIVER TO VALUE AND
MARKET FOR SALE REAL PROPERTY LOCATED AT 12088 TETZEL AVENUE,
PORT CHARLOTTE, FL 33981 AND 5406 S. COTTONWOOD COURT,
GREENWOOD VILLAGE, CO 80121**

CERTIFICATION UNDER D.C. COLO. LCivR 7.1(a)

In accordance with D.C.COLO.LCivR 7.1(a), counsel for the Receiver conferred with counsel for the Securities and Exchange Commission (“SEC”), counsel for all Defendants, including Michael S. Young and Bryant Sewall, counsel for various entity defendants and Receivership Relief Defendant Maria C. Young, and *pro se* Defendant Michael S. Stewart and Relief Defendant Victoria Stewart.

The SEC does not oppose the Motion. Counsel for Bryant Sewall has no objection, and *pro se* Relief Defendant Hanna Sewall has no objection.

Michael and Maria Young (together, the “Youngs”) do not oppose the Motion. In conferring with counsel for the Young Parties (as defined below), the Receiver confirmed that Michael S. Young is not waiving or forfeiting any argument he may have with respect to the Young Properties (as defined below) prior to any Court-authorized sale. The proceeds of any such sale will continue to be maintained in the Receiver’s accounting records as a Receivership Asset identified with Michael S. Young until transferred or distributed pursuant to further order of this Court.

Pro se Defendant Michael S. Stewart and *pro se* Relief Defendant Victoria Stewart do not oppose the Youngs’ decision not to contest the relief sought as to the Young Properties. They do not, however, consent to the Motion being characterized as “unopposed” as to them, and they do not concede, waive, or stipulate to any factual assertion, legal conclusion, or characterization of the underlying transaction that may bear on their own property, defenses, or rights. A copy of the Stewarts’ detailed Rule 7.1 response is attached hereto as **Exhibit A**.

Accordingly, this Motion is unopposed as to the Young Properties, but it is not represented as unopposed by Michael S. Stewart or Victoria Stewart.

I. INTRODUCTION

Mark B. Conlan (the “Receiver”), the receiver appointed pursuant to the *Order Appointing Receiver* [ECF Nos. 153] (the “Appointment Order”)¹ and 284], respectfully moves for an order authorizing him to value and market two remaining real-property assets of the Receivership Estate: the real property located at 12088 Tetzels Avenue, Port Charlotte, Florida 33981 (the “Port Charlotte Property”), and the real property and improvements at 5406 S. Cottonwood Court, Greenwood Village, Colorado 80121 (the “Greenwood Property” and, collectively with the Port Charlotte

¹ Capitalized terms used but not defined herein shall have the meaning ascribed to them in the Appointment Order.

Property, the “Young Properties”). Presently, the Receiver seeks only authority to value and market the Young Properties. Any sale of the Young Properties will require further Court approval.

The Young Properties are Recoverable Assets within the meaning of the Appointment Order and are therefore assets the Receiver may seek to preserve, value, market, and ultimately liquidate for the benefit of the Receivership Estate. The Young Properties were both listed in the Preliminary Orders of Forfeiture entered in the related criminal action. [Case No. 1:21-cr-00034 (the “Criminal Action”), ECF Nos. 439, 440]. The court in the Criminal Action later denied the Young Parties’ Second Amended Ancillary Petition, finding that they are not entitled to exclude the Young Properties from forthcoming final orders of forfeiture. *See* [Criminal Docket, ECF No. 728]. Those rulings support the relief requested here.

The requested relief is appropriate now. The criminal forfeiture proceedings have materially advanced, the Criminal Action court has rejected the Young Parties’ claimed bases to exclude the Young Properties from final forfeiture orders, Michael and Maria Young have voluntarily vacated the Greenwood Property in a spirit of cooperation, and the Receiver is working with the United States toward a claims-distribution process. Continued delay will impose unnecessary carrying costs and create avoidable risks of deterioration, market fluctuation, and reduced recoveries for victims. The Receiver should therefore be authorized to value and market the Young Properties so that any future sale process can proceed efficiently to produce the greatest benefit for the victims.

II. BACKGROUND

A. The Young Properties

The Port Charlotte Property is a series of four vacant lots located in Port Charlotte, Florida. The Port Charlotte Property is legally described as:

Lots 1, 2, 3, and 4, Block 3834, Port Charlotte Subdivision Section Seventy Two, according to the map or plat thereof as recorded in Plat Book 6, Page 28, of the Public Records of Charlotte County, Florida.

A certified, official copy of the warranty deed for the Port Charlotte Property is attached hereto as **Exhibit B**. Title to the Port Charlotte Property is held by Individual Defendant, Michael S. Young (“Michael”), and Receivership Relief Defendant, Maria C. Young (“Maria” and together with Michael, the “Youngs”).²

The Greenwood Property is a residential property located in Greenwood Village, Colorado.

The Greenwood Property is legally described as:

LOT 11, GREENWOOD TERRACE SUBDIVISION, COUNTY OF ARAPAHOE, STATE OF COLORADO, also known by street and number as: 5406 SOUTH COTTONWOOD COURT, GREENWOOD VILLAGE, CO 80121.

A certified, official copy of the warranty deed for the Greenwood Property is attached hereto as **Exhibit C**. The Greenwood Property is owned by Hase Haus, LLC, a limited liability company owned and managed by Michael and Maria (“Hase Haus” and, together with Michael and Maria the “Young Parties,” whose real property interests are the subject of this Motion). Although the Greenwood Property is owned by Hase Haus, it has been Michael and Maria’s primary residence during the pendency of this case. Michael and Maria have voluntarily vacated the property and have cooperated with the SEC and the Receiver as they await approval of their settlement agreement with the SEC.

B. Receivership Authority

On September 11, 2020, the Court entered the Appointment Order. [ECF No. 153]. The Appointment Order defines Michael as an “Individual Defendant” in this action and defines Hase

² For clarity, and because Michael and Maria share the same surname, this Motion refers to them by their first names. The Receiver does so solely to avoid confusion and intends no disrespect.

Haus and Maria as “Receivership Relief Defendants.” *Id.* The Appointment Order empowers the Receiver to identify, value, preserve, and take control of Receivership Property and Recoverable Assets. Among other powers, the Receiver is authorized:

A. To use reasonable efforts to determine the nature, location and value of all property interests of the Receivership Defendants and of the Receivership Relief Defendants Recoverable Assets, including, but not limited to, monies, funds, securities, credits, effects, goods, chattels, lands, premises, leases, claims, rights and other assets, together with all rents, profits, dividends, interest or other income attributable thereto, of whatever kind, which the Receivership Defendants and Receivership Relief Defendants own, possess, have a beneficial interest in, or control directly or indirectly (“Receivership Property” or, collectively, the “Receivership Estate”);

B. To take custody, control and possession of all Receivership Property and records relevant thereto from the Receivership Defendants; and Receivership Relief Defendants; to sue for and collect, recover, receive and take into possession from third parties all Receivership Property and records relevant thereto;

[...]

E. To take any action which, prior to the entry of this Order, could have been taken by the officers, directors, partners, managers, trustees and agents of the Receivership Defendants and Receivership Relief Defendants;

[...]

K. To take such other action as may be approved by this Court.

Id., at ¶ 4. Paragraph 16 of the Appointment Order separately authorizes the Receiver to take possession of real property that is a Recoverable Asset, while requiring Court approval before the Receiver takes action that would dispossess certain defendants from their primary residences:

The Receiver is authorized to take immediate possession of all real property of the Receivership Defendants and of the Receivership

Relief Defendants to the extent such real property is a Recoverable Asset, wherever located, including but not limited to all ownership and leasehold interests and fixtures. Notwithstanding this authority, *the Receiver shall not take any actions to dispossess Defendants of their primary residences (Michael Young: 5406 S. Cottonwood Ct., Greenwood Village, CO; Michael Stewart: 8082 E. Arroyo Hondo Rd., Scottsdale, AZ; Bryant Sewall: apartment in Ukraine) until at least ninety (90) days after entry of this order and after obtaining approval from the Court.* Upon receiving actual notice of this Order by personal service, facsimile transmission or otherwise, all persons other than law enforcement officials acting within the course and scope of their official duties, are (without the express written permission of the Receiver) prohibited from: (a) entering such premises; (b) removing anything from such premises; or, (c) destroying, concealing or erasing anything on such premises.

Id., at ¶ 16 (*emphasis added*).

C. The Prior Port Charlotte Sale Motion

On March 8, 2021, Brick Kane (the “Original Receiver”) filed a *Motion for Order Approving and Confirming Sale of Real Property Commonly Known as 12088 Tetzels Avenue, Port Charlotte, Florida and Sale and Overbid Procedures; Memorandum of Points and Authorities in Support Thereof [Supporting Declaration of Brick Kane Filed Concurrently Herewith]* [ECF No. 227] (the “Port Charlotte Sale Motion”), seeking Court authority to sell the Port Charlotte Property. [See ECF No. 227]. This Court denied the Port Charlotte Sale Motion and instead granted the joint motion by the SEC and the Youngs to preserve the Port Charlotte Property for sale at a later date. [See ECF Nos. 242, 249]. The prior denial therefore did not foreclose a sale; it simply deferred sale until the timing became appropriate.

D. The Criminal Forfeiture Proceedings

On February 4, 2021, a grand jury charged Individual Defendants, Michael S. Stewart (“Stewart”) and Bryant E. Sewall (“Sewall”) with wire-fraud and conspiracy offenses arising from the operation of Blue Isle and Mediatrix. [Criminal Action, ECF No. 1]. Following trial, Stewart

and Sewall were convicted on all counts. [*Id.*, at ECF No. 315]. Michael Young was not indicted alongside Stewart and Sewall. On November 22, 2024, the Criminal Action court entered Preliminary Orders of Forfeiture for Stewart and Sewall [Criminal Action, ECF Nos. 439, 440] (the “Preliminary Forfeiture Orders”), identifying the Young Properties as forfeitable property traceable to Stewart and Sewall’s fraud convictions arising from the operation of Blue Isle and Mediatrix. *See* [ECF Nos. 439, 440, at ¶¶ 41, 53].

On January 3, 2025, the Young Parties filed an ancillary petition seeking a determination that their interests in certain assets listed in the Preliminary Forfeiture Orders, including the Young Properties, were not subject to forfeiture [Criminal Action, ECF No. 456] (the “Ancillary Petition”). They later amended the Ancillary Petition twice, first on January 9, 2025 [Criminal Action, ECF No. 464] and again on February 20, 2025 [Criminal Action, ECF No. 502] (the “Second Amended Ancillary Petition”). In an order following each filing, the Criminal Action court noted that a hearing to determine the Young Parties’ interest could not be conducted within thirty days of the filing—as required by 21 U.S.C. § 853(n)(4)—because Stewart’s sentencing had been vacated and indefinitely postponed. *See* [Criminal Action, ECF Nos. 458, 465, 504]. Consequently, a hearing on the Young Parties’ petitions would be set within a reasonable period of time after Stewart’s sentencing and the time requirements contemplated by the scheduling order. *See id.*

On July 30, 2025, the United States filed the *United States’ Motion for Summary Judgment Regarding the Young Parties’ Interest in Asset Nos. 38-54* [Criminal Action, ECF No. 585] (the “Summary Judgment Motion”). On April 30, 2026, after additional briefing, the Criminal Action court entered the *Order Granting the United States’ Motion for Summary Judgment Regarding the Young Parties’ Interest in Asset Nos. 38—54 and Denying Petitioners’ Motion for Rule 11 Sanctions*

[Criminal Action, ECF No. 728] (the “Interest Denial Order”), granting the Summary Judgment Motion and denying the Second Amended Ancillary Petition. The Criminal Action court explained:

Consistent with the foregoing, this Court does not purport to rule that the Government may proceed to take physical custody of the Claimed Assets in contravention with any pending orders in the SEC Action. Rather, it finds only that [the Young Parties] are not entitled to the exclusion of the Claimed Assets in any forthcoming final orders of forfeiture on the grounds set forth in § 853(n)—a matter over which it assuredly has jurisdiction. It is otherwise up to the Government to seek appropriate relief in the SEC Action, and Judge Moore’s prerogative whether to grant it.

[Criminal Action, ECF No. 728 at p. 28].

E. Developments Supporting Timing for Valuation and Marketing

On August 12, 2026, counsel for the Young Parties advised the Receiver that Michael and Maria would vacate the Greenwood Property no later than August 15, 2026. On August 17, 2026, Michael provided the Receiver with the garage door code and other related information regarding how to gain entry to the Greenwood Property. The Receiver is also working with the SEC and the U.S. Attorney’s Office for the District of Denver in preparing a claims distribution motion to determine the final distribution process.

III. ARGUMENT

A. The Court Should Authorize the Receiver to Value and Market the Young Properties to Preserve and Maximize Receivership Estate Value.

1. The Young Properties are Recoverable Assets subject to the Receiver’s authority.

The Appointment Order defines Recoverable Assets as “assets of the Relief Defendants that: (a) are attributable to funds derived from investors or clients of the Defendants; (b) are held in constructive trust for the Defendants; (c) were fraudulently transferred by the Defendants; and/or (d) may otherwise be includable as assets of the estates of the Defendants.” [ECF No. 153, at p. 1].

Michael is a Defendant and Maria is a Relief Defendant in this case. Together, the Youngs are the owners of the Port Charlotte Property. *See* **Exhibit B**. The Port Charlotte Property is a Recoverable Asset within the meaning of the Appointment Order because it is traceable to the fraud. [*See* Criminal Action, ECF Nos. 439 & 440]. Moreover, the Port Charlotte Sale Motion, the responses from the Youngs and the SEC, and the Court's text order all demonstrate an acknowledgement that the Receiver can sell the Port Charlotte Property, granted the timing is appropriate. *See* [ECF Nos. 227, 242, 249]. The Court's prior denial of the Port Charlotte Sale Motion without prejudice did not foreclose a sale of the Port Charlotte Property. Rather, the Court granted the joint request of the Youngs and the SEC to preserve the Port Charlotte Property for sale at a later date. That later date has arrived. The criminal forfeiture proceedings have materially advanced, the Young Parties' claimed interests have been rejected, and the Receiver is preparing to wind down the Receivership and distribute Receivership Assets.

Likewise, Hase Haus is a Relief Defendant in this case. Hase Haus is the owner of the Greenwood Property. *See* **Exhibit C**. The Greenwood Property is a Recoverable Asset within the meaning of the Appointment Order because it is traceable to the fraud. [*See* Criminal Action, ECF Nos. 439 & 440]. Paragraph 16 of the Appointment Order acknowledges that the Greenwood Property is a Recoverable Asset by authorizing the Receiver to dispossess Michael of the property after obtaining court approval. [ECF No. 153, at ¶ 16].

2. The Young Parties are not entitled to an exclusion of the Young Properties from forthcoming final forfeiture orders.

The Interest Denial Order removes a principal obstacle to moving forward. The Criminal Action court held that the Young Parties are not entitled to exclude the Young Properties from forthcoming final orders of forfeiture. [Criminal Action, ECF No. 728]. At the same time, the Criminal Action court recognized that relief affecting the properties must be sought in this SEC

Action and remains subject to this Court's approval. *Id.* at 28. The Receiver therefore seeks precisely that relief here: authority to value and market the Young Properties, while reserving any sale for further Court approval. As such, and in anticipation of entry of the final orders of forfeiture, the Receiver should now be permitted to value and market the Young Properties so that he may later present an appropriate sale process for Court approval.

3. Valuation and marketing now will preserve value and advance an orderly distribution process.

The Receiver has broad equitable authority to preserve, protect, and enhance Receivership Estate assets. Valuing and marketing the Young Properties is a necessary step toward reducing carrying costs, preventing waste, and positioning the properties for an orderly sale process subject to this Court's approval. Continued delay serves no beneficial purpose and risks avoidable expense, deterioration, and loss of market value. Authorizing valuation and marketing now will allow the Receiver to test the market, preserve asset value, and later return to the Court with a sale process designed to maximize recoveries.

The timing is particularly appropriate now. The Youngs have vacated the Greenwood Property, eliminating the primary-residence concern addressed in paragraph 16 of the Appointment Order. The Port Charlotte Property was previously preserved for sale at a later date, and that later date has arrived in light of the developments in the criminal forfeiture proceedings. The Receiver is also working with the SEC and the U.S. Attorney's Office on a claims-distribution process. To complete that process and maximize recoveries, the Receiver must be able to value and market the remaining Receivership Estate assets. The Court should therefore authorize the Receiver to proceed with valuation and marketing, while retaining authority over any eventual sale and sale procedures.

IV. CONCLUSION

Based upon the foregoing, it is respectfully requested that the Court grant the relief requested in the Motion and enter the proposed order submitted herewith.

Dated: October 8, 2026

CONNELL FOLEY LLP

By: /s/ Dale E. Barney
Dale E. Barney
56 Livingston Avenue
Roseland, New Jersey 07068
Phone: (973) 535-0500
Email: dbarney@connellfoley.com

Counsel to Mark B. Conlan, as Receiver

EXHIBIT A

Amanda Simone

From: Victoria Stewart <vstewart1989@gmail.com>
Sent: Tuesday, October 6, 2026 9:12 PM
To: Amanda Simone
Subject: Re: Mediatrix 1:19-cv-02594 - Conferral re: Motion to Value and Market

 External email >

Amanda,

Thank you for the Rule 7.1(a) conferral.

Michael- Shawn;Stewart and Victoria M. Stewart respond solely in their own respective capacities. They understand from your email that Michael and Maria Young do not oppose the proposed motion concerning property owned directly or indirectly by the Youngs and their entities. The Stewarts do not purport to speak for the Youngs and do not object to the Youngs determining their own position concerning their property.

The Stewarts, however, do not consent to the proposed motion being characterized as “Unopposed” insofar as that designation could be understood to reflect the Stewarts’ agreement with, acquiescence in, or waiver of objection to any factual or legal predicate contained in the motion.

The Stewarts have not yet been provided the proposed motion and therefore cannot know what factual representations, legal conclusions, characterization of the underlying transactions, assertions concerning SEC or Receiver authority, tracing allegations, or collective references to “Defendants” may be contained within it.

Accordingly, for purposes of the Rule 7.1(a) conferral, please record the Stewarts’ position as follows:

Michael- Shawn; Stewart and Victoria M. Stewart do not oppose Michael and Maria Young’s decision not to contest relief concerning the Youngs’ own property. The Stewarts do not, however, consent to characterization of the proposed motion as unopposed as to them, and expressly reserve their right to object or respond to any factual assertion, legal conclusion, statutory predicate, characterization of the transactions at issue, assertion of SEC or Receiver authority, or other proposition contained in the motion that concerns, implicates, or could subsequently be asserted against Michael-Shawn;Stewart, Victoria M. Stewart, or their property or rights.

More specifically, the Stewarts expressly do not consent to, concede, or waive objection to any assertion or implication that:

1. **The transactions underlying this action have been established, as against Michael-Shawn; Stewart or Victoria M. Stewart, to constitute transactions in “securities” within the meaning of the federal securities laws.**
2. **Michael-Shawn; Stewart offered, sold, purchased, exchanged, or otherwise participated in the offer, sale, or exchange of a security, absent identification of the particular instrument, contract, transaction, or scheme alleged to constitute that security and the evidence establishing the applicable statutory elements.**
3. **The SEC has established against Michael-Shawn; Stewart or Victoria M. Stewart every statutory and evidentiary element necessary to invoke the particular securities-law remedies asserted in this action.**
4. **Property belonging to Michael-Shawn; Stewart or Victoria M. Stewart constitutes proceeds, profits, assets traceable to, or property otherwise subject to seizure, turnover, liquidation, or disposition because of a proven securities-law violation.**
5. **The Receiver possesses authority over Stewart property merely because substantially similar authority is asserted or exercised with respect to property belonging to Michael and Maria Young or any other defendant, relief defendant, entity, or third party.**
6. **Michael and Maria Young’s decision not to oppose the contemplated motion constitutes an admission, concession, stipulation, waiver, evidentiary determination, or legal determination attributable to Michael-Shawn; Stewart or Victoria M. Stewart, or capable of establishing against the Stewarts any common factual or legal issue in this action.**

For avoidance of doubt, the Youngs’ decision not to oppose relief concerning their own property is their decision. It should not be construed as resolving disputed issues applicable to other parties who have not consented to the factual or legal predicates upon which the requested relief may rely.

The Stewarts specifically preserve their position that, before similar relief may be imposed against them or their property, the SEC and/or Receiver must establish the statutory and evidentiary predicates applicable to the Stewarts themselves, including, where relevant:

- identification of the particular contract, transaction, instrument, or scheme alleged to constitute a “security”;
- the statutory provision under which that transaction is alleged to constitute a security;
- the competent evidence establishing the elements of that classification;
- the specific conduct attributed to Michael-Shawn;. Stewart;
- the statutory violation allegedly established by that conduct; and
- the legal and evidentiary nexus between any proven violation and any Stewart property against which relief is sought.

Nothing in this response should be understood as an attempt by the Stewarts to determine Michael or Maria Young’s position concerning their own property. Rather, this response is intended to ensure that the record accurately reflects that the Stewarts have **not joined in, consented to, or waived objection to any common factual or legal propositions that may appear in the contemplated motion.**

Because the actual motion has not yet been provided or filed, the Stewarts cannot presently determine whether its specific factual assertions or legal arguments require further response. They therefore expressly reserve the right to review the filed motion and object or otherwise respond to any assertion that affects or could subsequently be asserted against them, their property, their defenses, or their appellate rights.

Please accurately reflect this position in the Rule 7.1(a) certification accompanying the motion and do not characterize Michael-Shawn; Stewart or Victoria M. Stewart as unopposed to factual or legal propositions that they have expressly reserved and disputed herein.

Thank you,

Michael- Shawn; Stewart
Sui Juris

Victoria M. Stewart
Pro Se/Sui Juris

On Tue, Oct 6, 2026 at 8:52 AM Amanda Simone <asimone@connellfoley.com> wrote:

Good Morning,

Pursuant to D.C. Col. LCivR 7.1(a), we write to advise that the Receiver intends to file a motion with the Court in the above-captioned matter that seeks authorization to value and market for sale real property, owned directly or indirectly by Michael and Maria Young and their entities, and located in Port Charlotte, Florida and Greenwood Village, Colorado. Since the Youngs are the only parties with a stake in the outcome of this motion, and have already told us that they do not oppose the motion, we would like to be able to file this as "Unopposed."

Please provide any and all responses and stances on this motion by close of business tomorrow, Wednesday, October 7, 2026.

Thank you in advance.

Regards,

Amanda Simone

Amanda R. Simone*Associate*

Connell Foley LLP

[56 Livingston Avenue | Roseland, NJ 07068](#)Phone [973.535.0500](tel:973.535.0500)Direct [973.436.5766](tel:973.436.5766)Mobile [973.524.0868](tel:973.524.0868)Fax [973.535.9217](tel:973.535.9217)asimone@connellfoley.com[website](#) | [map](#) | 

A TRADITION OF LEGAL EXCELLENCE SINCE 1938

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EXHIBIT B



Electronically Certified Official Record

Agency Name:	Charlotte County Clerk of Court and County Comptroller
Clerk of the Circuit Court:	The Honorable Roger D. Eaton
Date Issued:	9/22/2026 2:56:36 PM
Unique Reference Number:	BAA-BAA-BCABF-CHECEBC-HFFBBA-F
Instrument Number:	2742412
Requesting Party Code:	100
Requesting Party Reference:	20578566

CERTIFICATION

Pursuant to Sections 90.955(1) and 90.902(1), Florida Statutes, and Federal Rules of Evidence 901(a), 901(b)(7), and 902(1), the attached document is electronically certified by The Honorable Roger D. Eaton, Charlotte County Clerk of the Circuit Court and Comptroller, to be a true and correct copy of an official record or document authorized by law to be recorded or filed and actually recorded or filed in the office of the Charlotte Clerk of the Circuit Court. The document may have redactions as required by law.

HOW TO VERIFY THIS DOCUMENT

This document contains a Unique Reference Number for identification purposes and a tamper-evident seal to indicate if the document has been tampered with. To view the tamper-evident seal and verify the certifier's digital signature, open this document with Adobe Reader software. You can also verify this document by scanning the QR code or visiting <https://Verify.Clerkecertify.com/VerifyImage>.

**The web address shown above contains an embedded link to the verification page for this particular document. If you have any problems with our web site, please contact us at (941) 505-4716 or eCertify@charlotteclerk.com.



Return to:

Name: Fairway Title Services, Inc.
Address: 5237 Summerlin Commons Blvd.
#225
Fort Myers, FL 33907
This instrument prepared by: Nicole Tansey
as a necessary incident to the fulfillment of conditions
contained in a title insurance commitment issued by it.
Property Appraisers Parcel Identification (Folio) Number(s):
File No.: 2019-535

WARRANTY DEED

This Warranty Deed Made this 3rd day of September, 2019 by **2012 Lot Pioneer, LLC, a Florida Limited Liability Company**, hereinafter called the grantor, whose post office address is: 4505 Varsity Lakes Ct, Lehigh Acres, FL 33971

to: **Michael Young and Maria Young, Husband and Wife** whose post office address is: 330 Dorado Beach E, Dorado, PR 00646 hereinafter called the grantee,

WITNESSETH: That said grantor, for and in consideration of the sum of \$10.00 Dollars, and other variable considerations, receipt whereof is hereby acknowledged, hereby grants, bargains, sells, aliens, remises, releases, conveys and confirms unto the grantee, all that certain land situated in Charlotte County, Florida, viz:

Lots 1, 2, 3 and 4, Block 3834, Port Charlotte Subdivision Section Seventy Two, according to the map or plat thereof as recorded in Plat Book 6, Page 28, of the Public Records of Charlotte County, Florida.

This property is not the homestead of the Grantor (s) nor is it contiguous to the homestead property of the Grantor (s).

TOGETHER with all the tenements, hereditaments and appurtenances thereto belonging or in anywise appertaining.

To Have and to Hold, the same in fee simple forever.

And the grantor hereby covenants with said grantee that the grantor is lawfully seized of said land in fee simple; that the grantor has good right and lawful authority to sell and convey said land; that the grantor hereby fully warrants the title to said land and will defend the same against the lawful claims of all persons whomsoever; and that said land is free of all encumbrances, except taxes accruing subsequent to 12/31/2018, reservations, restrictions and easements of record, if any.

(The terms "grantor" and "grantee" herein shall be construed to include all genders and singular or plural as the context indicates)

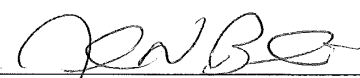


IN WITNESS WHEREOF, Grantor has hereunto set grantor's hand and seal the day and year first above written.

Signed, Sealed and Delivered in Our Presence:



Witness
Print Name: John Baschieri



2012 Lot Pioneer, LLC, By: John N Baschieri,
Managing Member



Witness
Print Name: Yolanda Centeno

STATE OF: FLORIDA
COUNTY OF: LEE

The foregoing instrument was acknowledged before me this 30th day of September, 2019 by John N Baschieri, the Managing Member of 2012 Lot Pioneer, LLC. Who is are personally known to me or who has/have produced _____ as identification.



Signature of Notary
Printed Name of Notary: Yolanda Centeno
My Commission expires: 11/6/21



Yolanda Centeno
Commission # GG158118
Expires: November 6, 2021
Bonded thru Aaron Notary

EXHIBIT C



Certified to be a full, true, and correct copy of the recorded document in my custody, Joan Lopez, Arapahoe County Clerk and Recorder.

To verify the authenticity of this copy, capture the QR code or visit:
<https://arapahoe.co.publicsearch.us/verifycert/a8nUHBhg>



Arapahoe County Clerk and Recorder

Joan Lopez

Digitally signed by: Joan Lopez
 Date: Sep 22, 2026 12:38 PM -06:00

WARRANTY DEED
 06/11/2018 09:57 AM RF: \$13.00 DF: \$160.00
 Arapahoe County Clerk, CO
 Page: 1 of 1
 Matt Crane, Clerk & Recorder
 Electronically Recorded
D8056100



State Documentary Fee
 Date: June 06, 2018
 \$160.00

Warranty Deed
 (Pursuant to 38-30-113 C.R.S.)

THIS DEED, made on June 8th, 2018 by STEVE VAN HOOK REVOCABLE TRUST DATED SEPTEMBER 20, 2007 Grantor(s), of the County of Adams and State of Colorado for the consideration of (\$1,600,000.00) ***One Million Six Hundred Thousand and 00/100*** dollars in hand paid, hereby sells and conveys to HASE HAUS, LLC, A COLORADO LIMITED LIABILITY COMPANY Grantee(s), whose street address is 6500 S. QUEBEC STREET STE 300-12, CENTENNIAL, CO 80111, County of Arapahoe, and State of Colorado, the following real property in the County of Arapahoe, and State of Colorado, to wit:

LOT 11, GREENWOOD TERRACE SUBDIVISION, COUNTY OF ARAPAHOE, STATE OF COLORADO.

also known by street and number as: 5406 SOUTH COTTONWOOD COURT, GREENWOOD VILLAGE, CO 80121

with all its appurtenances and warrants the title to the same, subject to general taxes for the year 2018 and those specific Exceptions described by reference to recorded documents as reflected in the Title Documents accepted by Grantee(s) in accordance with Record Title Matters (Section 8.2) of the Contract to Buy and Sell Real Estate relating to the above described real property; distribution utility easements, (including cable TV); those specifically described rights of third parties not shown by the public records of which Grantee(s) has actual knowledge and which were accepted by Grantee(s) in accordance with Off-Record Title Matters (Section 8.3) and Current Survey Review (Section 9) of the Contract to Buy and Sell Real Estate relating to the above described real property; Inclusions of the Property within any special tax district; Any special assessment if the improvements were not installed as of the date of Buyer's signature on the Contract to Buy and Sell Real Estate, whether assessed prior to or after Closing; and other NONE

STEVE VAN HOOK REVOCABLE TRUST DATED
 SEPTEMBER 20, 2007

By: *Steve Van Hook, Trustee*
 STEVE VAN HOOK AS TRUSTEE

State of Colorado)

County of *Arapahoe*)

The foregoing instrument was acknowledged before me on this day of June 8th, 2018 by STEVE VAN HOOK AS TRUSTEE OF THE STEVE VAN HOOK REVOCABLE TRUST DATED SEPTEMBER 20, 2007

Witness my hand and official seal

My Commission expires: *6-2-21*

Rebecca Pfoff
 Notary Public

When Recorded Return to: HASE HAUS, LLC, A COLORADO LIMITED LIABILITY COMPANY
 6500 S. QUEBEC STREET STE 300-12, CENTENNIAL, CO 80111

REBECCA PFOFF
 Notary Public
 State of Colorado
 Notary ID # 20014016484
 My Commission Expires 06-02-2021



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

Civil Action No. 1:19-cv-02594-PAB-STV

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

MEDIATRIX CAPITAL INC., *et al.*,

Defendants,

and

MEDIATRIX CAPITAL FUND LTD, *et al.*,

Relief Defendants.

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of October, 2026, I caused the foregoing to be electronically filed by means of the CM/ECF system which will send notification of such filing to parties or counsel registered with CM/ECF.

- *Motion for an Order Authorizing the Receiver to Value and Market for Sale Real Property Located at 12088 Tetzels Avenue, Port Charlotte, FL 33981 and 5406 S. Cottonwood Court, Greenwood Village, CO 80121.*

Further on the same date, I certify that I have caused the foregoing to be served on the parties as indicated on the attached service list.

CONNELL FOLEY LLP

Dated: October 8, 2026

By: /s/ Dale E. Barney

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

Civil Action No. 1:19-cv-02594-PAB-STV

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

MEDIATRIX CAPITAL INC., *et al.*,

Defendants,

and

MEDIATRIX CAPITAL FUND LTD, *et al.*,

Relief Defendants.

**[PROPOSED] ORDER AUTHORIZING THE RECEIVER TO VALUE AND MARKET
FOR SALE REAL PROPERTY LOCATED AT 12088 TETZEL AVENUE, PORT
CHARLOTTE, FL 33981 AND 5406 S. COTTONWOOD COURT, GREENWOOD
VILLAGE, CO 80121**

Upon motion (the “Motion”)¹ of the Receiver for entry of an order (the “Order”) authorizing the Receiver to value and market for sale the real property and improvements located at 5406 S. Cottonwood Court, Greenwood Village, Colorado 80121 (the “Greenwood Property”), as required by Paragraph 16 of the Appointment Order [ECF No. 153, at ¶ 16], and real property located at 12088 Tetzels Avenue, Port Charlotte, Florida 33981 (the “Port Charlotte Property” and, together with the Greenwood Property, the “Young Properties”), as required by this Court’s Text Order entered at ECF No. 249; and the Court having considered that Motion; and for good cause shown, it is hereby

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

ORDERED THAT:

1. The Motion is granted as set forth herein.
2. The Receiver is authorized to value and market the Young Properties for sale in accordance with 28 U.S.C. § 2001(b), prior Orders of this Court, and other applicable law.
3. Title to the Young Properties shall only be transferred upon further Order of the Court approving a motion(s) authorizing the Receiver to sell one or both of the Young Properties, either together or serially.
4. The Receiver is authorized to take all action necessary to carry out this Order.

IT IS SO ORDERED this ____ day of _____, 2026.

Philip A. Brimmer, U.S.D.J.