

**Troy D. Greenfield**, OSB #892534  
Email: tgreenfield@schwabe.com  
**Lawrence R. Ream** (Admitted *Pro Hac Vice*)  
Email: lream@schwabe.com  
Schwabe, Williamson & Wyatt, P.C.  
1211 SW 5th Ave., Suite 1900  
Portland, OR 97204  
Telephone: 503.222.9981  
Facsimile: 503.796.2900

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;  
AEQUITAS HOLDINGS, LLC; AEQUITAS  
COMMERCIAL FINANCE, LLC;  
AEQUITAS CAPITAL MANAGEMENT,  
INC.; AEQUITAS INVESTMENT  
MANAGEMENT, LLC; ROBERT J.  
JESENİK; BRIAN A. OLIVER; and N.  
SCOTT GILLIS,

Defendants.

No. 3:16-cv-00438-JR

**NOTICE OF SETTLEMENT**



The Receiver and the Liquidating Trustee have reached a settlement of the various claims between the Receivership Entity and the Tango Delta Financial, Inc. Liquidating Trust. The settlement is contingent upon Court approval. The Receiver and the Liquidating Trustee are in the process of formally documenting the settlement, and the Receiver will soon file a motion to approve the compromise of claims and authorize performance.

The Receiver and the Liquidating Trustee respectfully request that the Court remove the Receiver's Motion to Enforce Receivership Injunction and Receivership's Classification of the American Student Financial Group, Inc. Claim [Dkt. No. 923] from the Court's calendar, without prejudice.

Dated this 1<sup>st</sup> day of April, 2022.

Respectfully submitted,

SCHWABE, WILLIAMSON & WYATT, P.C.

By: s/ Troy D. Greenfield  
Troy D. Greenfield, OSB #892534  
[tgreenfield@schwabe.com](mailto:tgreenfield@schwabe.com)  
Lawrence R. Ream (Admitted *Pro Hac Vice*)  
[lream@schwabe.com](mailto:lream@schwabe.com)  
Telephone: 503.222.9981  
*Attorneys for the Receiver and Receivership Entity*

SUSSMAN SHANK LLP

By: s/ Susan S. Ford  
Susan S. Ford, OSB #842203  
[sford@sussmanshank.com](mailto:sford@sussmanshank.com)  
Telephone: 503.227.1111

PULMAN CAPPUCCIO & PULLEN LLP

By: s/ Randall A. Pulman  
Randall A. Pulman (TSB No. 16393250)  
(Admission *pro hac vice* pending)  
[rpulman@pulmanlaw.com](mailto:rpulman@pulmanlaw.com)  
Telephone: 210.222.9494

*Attorneys for the Tango Delta Financial,  
Inc. Liquidating Trust and Liquidating  
Trustee*