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9
10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 **SECURITIES AND EXCHANGE**
13 **COMMISSION,**

14 **Plaintiff,**

15 **vs.**

16 **STEVEN J. SUSOEFF and STEVE**
17 **SUSOEFF, LLC (dba Meritage**
18 **Financial Group),**

19 **Defendants.**

Case No. 2:23-cv-00173-JCM-EJY

CONSENT OF STEVEN J. SUSOEFF

1 1. Defendant Steven J. Susoeff (“Defendant”) acknowledges having been
2 served with the complaint in this action, enters a general appearance, and admits the
3 Court’s jurisdiction over Defendant and over the subject matter of this action.

4 2. Without admitting or denying the allegations of the complaint (except as
5 provided herein in paragraph 12 and except as to personal and subject matter
6 jurisdiction, which Defendant admits), Defendant hereby consents to the entry of the
7 final Judgment in the form attached hereto (the “Final Judgment”) and incorporated
8 by reference herein, which, among other things:

- 9 a. permanently restrains and enjoins Defendant from violation of
10 Sections 17(a)(1) and 17(a)(3) of the Securities Act of 1933
11 (“Securities Act”), 15 U.S.C. §§ 77q(a)(1), (a)(3), Section 10(b) of
12 the Securities Exchange Act of 1934 (“Exchange Act”), 15 U.S.C.
13 § 78j(b), and Rules 10b-5(a) and 10b-5(c) thereunder, 17 C.F.R.
14 §§ 240.10b-5(a), (c), and Sections 206(1) and 206(2) of the
15 Investment Advisers Act (“Advisers Act”), 15 U.S.C. §§ 80b-6(1),
16 (2);
- 17 b. orders Defendant to pay disgorgement in the amount of \$54,232, plus
18 prejudgment interest thereon in the amount of \$11,695; and
- 19 c. orders Defendant to pay a civil penalty in the amount of \$144,566
20 under Securities Act Section 20(d), 15 U.S.C. § 77t(d), Exchange Act
21 Section 21(d)(3), 15 U.S.C. § 78u(d)(3), and Advisers Act Section
22 209(e), 15 U.S.C. § 80b-9(e).

23 3. Defendant acknowledges that the civil penalty paid pursuant to the Final
24 Judgment may be distributed pursuant to the Fair Fund provisions of Section 308(a)
25 of the Sarbanes-Oxley Act of 2002. Regardless of whether any such Fair Fund
26 distribution is made, the civil penalty shall be treated as a penalty paid to the
27 government for all purposes, including all tax purposes. To preserve the deterrent
28 effect of the civil penalty, Defendant agrees that he shall not, after offset or reduction

1 of any award of compensatory damages in any Related Investor Action based on
2 Defendant's payment of disgorgement in this action, argue that he is entitled to, nor
3 shall he further benefit by, offset or reduction of such compensatory damages award
4 by the amount of any part of Defendant's payment of a civil penalty in this action
5 ("Penalty Offset"). If the court in any Related Investor Action grants such a Penalty
6 Offset, Defendant agrees that he shall, within 30 days after entry of a final order
7 granting the Penalty Offset, notify the Commission's counsel in this action and pay
8 the amount of the Penalty Offset to the United States Treasury or to a Fair Fund, as
9 the Commission directs. Such a payment shall not be deemed an additional civil
10 penalty and shall not be deemed to change the amount of the civil penalty imposed in
11 this action. For purposes of this paragraph, a "Related Investor Action" means a
12 private damages action brought against Defendant by or on behalf of one or more
13 investors based on substantially the same facts as alleged in the Complaint in this
14 action.

15 4. Defendant agrees that he shall not seek or accept, directly or indirectly,
16 reimbursement or indemnification from any source, including but not limited to
17 payment made pursuant to any insurance policy, with regard to any civil penalty
18 amounts that Defendant pays pursuant to the Final Judgment, regardless of whether
19 such penalty amounts or any part thereof are added to a distribution fund or otherwise
20 used for the benefit of investors. Defendant further agrees that he shall not claim,
21 assert, or apply for a tax deduction or tax credit with regard to any federal, state, or
22 local tax for any penalty amounts that Defendant pays pursuant to the Final
23 Judgment, regardless of whether such penalty amounts or any part thereof are added
24 to a distribution fund or otherwise used for the benefit of investors.

25 5. Defendant waives the entry of findings of fact and conclusions of law
26 pursuant to Rule 52 of the Federal Rules of Civil Procedure.

27 6. Defendant waives the right, if any, to a jury trial and to appeal from the
28 entry of the Final Judgment.

1 7. Defendant enters into this Consent voluntarily and represents that no
2 threats, offers, promises, or inducements of any kind have been made by the
3 Commission or any member, officer, employee, agent, or representative of the
4 Commission to induce Defendant to enter into this Consent.

5 8. Defendant agrees that this Consent shall be incorporated into the Final
6 Judgment with the same force and effect as if fully set forth therein.

7 9. Defendant will not oppose the enforcement of the Final Judgment on the
8 ground, if any exists, that it fails to comply with Rule 65(d) of the Federal Rules of
9 Civil Procedure, and hereby waives any objection based thereon.

10 10. Defendant waives service of the Final Judgment and agrees that entry of
11 the Final Judgment by the Court and filing with the Clerk of the Court will constitute
12 notice to Defendant of its terms and conditions. Defendant further agrees to provide
13 counsel for the Commission, within thirty days after the Final Judgment is filed with
14 the Clerk of the Court, with an affidavit or declaration stating that Defendant has
15 received and read a copy of the Final Judgment.

16 11. Consistent with 17 C.F.R. 202.5(f), this Consent resolves only the claims
17 asserted against Defendant in this civil proceeding. Defendant acknowledges that no
18 promise or representation has been made by the Commission or any member, officer,
19 employee, agent, or representative of the Commission with regard to any criminal
20 liability that may have arisen or may arise from the facts underlying this action or
21 immunity from any such criminal liability. Defendant waives any claim of Double
22 Jeopardy based upon the settlement of this proceeding, including the imposition of
23 any remedy or civil penalty herein. Defendant further acknowledges that the Court's
24 entry of a permanent injunction may have collateral consequences under federal or
25 state law and the rules and regulations of self-regulatory organizations, licensing
26 boards, and other regulatory organizations. Such collateral consequences include, but
27 are not limited to, a statutory disqualification with respect to membership or
28 participation in, or association with a member of, a self-regulatory organization. This

1 statutory disqualification has consequences that are separate from any sanction
2 imposed in an administrative proceeding. In addition, in any disciplinary proceeding
3 before the Commission based on the entry of the injunction in this action, Defendant
4 understands that he shall not be permitted to contest the factual allegations of the
5 complaint in this action.

6 12. Defendant understands and agrees to comply with the terms of 17 C.F.R.
7 § 202.5(e), which provides in part that it is the Commission's policy "not to permit a
8 defendant or respondent to consent to a judgment or order that imposes a sanction
9 while denying the allegations in the complaint or order for proceedings," and "a
10 refusal to admit the allegations is equivalent to a denial, unless the defendant or
11 respondent states that he neither admits nor denies the allegations." As part of
12 Defendant's agreement to comply with the terms of Section 202.5(e), Defendant: (i)
13 will not take any action or make or permit to be made any public statement denying,
14 directly or indirectly, any allegation in the complaint or creating the impression that
15 the complaint is without factual basis; (ii) will not make or permit to be made any
16 public statement to the effect that Defendant does not admit the allegations of the
17 complaint, or that this Consent contains no admission of the allegations, without also
18 stating that Defendant does not deny the allegations; (iii) upon the filing of this
19 Consent, Defendant hereby withdraws any papers filed in this action to the extent that
20 they deny any allegation in the complaint; and (iv) stipulates solely for purposes of
21 exceptions to discharge set forth in Section 523 of the Bankruptcy Code, 11 U.S.C.
22 § 523, that the allegations in the complaint are true, and further, that any debt for
23 disgorgement, prejudgment interest, civil penalty or other amounts due by Defendant
24 under the Final Judgment or any other judgment, order, consent order, decree or
25 settlement agreement entered in connection with this proceeding, is a debt for the
26 violation by Defendant of the federal securities laws or any regulation or order issued
27 under such laws, as set forth in Section 523(a)(19) of the Bankruptcy Code, 11 U.S.C.
28 § 523(a)(19). If Defendant breaches this agreement, the Commission may petition the

1 Court to vacate the Final Judgment and restore this action to its active docket.
2 Nothing in this paragraph affects Defendant's: (i) testimonial obligations; or (ii) right
3 to take legal or factual positions in litigation or other legal proceedings in which the
4 Commission is not a party.

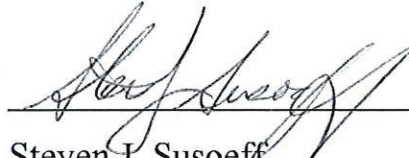
5 13. Defendant hereby waives any rights under the Equal Access to Justice
6 Act, the Small Business Regulatory Enforcement Fairness Act of 1996, or any other
7 provision of law to seek from the United States, or any agency, or any official of the
8 United States acting in his or her official capacity, directly or indirectly,
9 reimbursement of attorney's fees or other fees, expenses, or costs expended by
10 Defendant to defend against this action. For these purposes, Defendant agrees that
11 Defendant is not the prevailing party in this action since the parties have reached a
12 good faith settlement.

13 14. Defendant agrees to waive all objections, including but not limited to,
14 constitutional, timeliness, and procedural objections, to the administrative proceeding
15 that will be instituted when the judgment is entered.

16 15. Defendant agrees that the Commission may present the Final Judgment
17 to the Court for signature and entry without further notice.


18 16. Defendant agrees that this Court shall retain jurisdiction over this matter
19 for the purpose of enforcing the terms of the Final Judgment.

20
21 Dated: October 18, 2024


22 Steven J. Susoeff

23 On October 10, 2024, Steven J. Susoeff, a person known to me,
24 personally appeared before me and acknowledged executing the foregoing Consent.




Notary Public
Commission expires: Jan. 7, 2026

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Approved as to form:

/s/ Kimberly P. Stein

KIMBERLY P. STEIN (Nev. Bar No. 8675)
3275 South Jones Blvd., Suite 105
Las Vegas, Nevada 89146

Attorney for Defendant Steven J. Susoeff

PROOF OF SERVICE

I am over the age of 18 years and not a party to this action. My business address is:

U.S. SECURITIES AND EXCHANGE COMMISSION,
444 S. Flower Street, Suite 900, Los Angeles, California 90071
Telephone No. (323) 965-3998; Facsimile No. (213) 443-1904.

On December 20, 2024, I caused to be served the document entitled **CONSENT OF STEVEN J. SUSOEFF** on all the parties to this action addressed as stated on the attached service list:

OFFICE MAIL: By placing in sealed envelope(s), which I placed for collection and mailing today following ordinary business practices. I am readily familiar with this agency’s practice for collection and processing of correspondence for mailing; such correspondence would be deposited with the U.S. Postal Service on the same day in the ordinary course of business.

PERSONAL DEPOSIT IN MAIL: By placing in sealed envelope(s), which I personally deposited with the U.S. Postal Service. Each such envelope was deposited with the U.S. Postal Service at Los Angeles, California, with first class postage thereon fully prepaid.

EXPRESS U.S. MAIL: Each such envelope was deposited in a facility regularly maintained at the U.S. Postal Service for receipt of Express Mail at Los Angeles, California, with Express Mail postage paid.

HAND DELIVERY: I caused to be hand delivered each such envelope to the office of the addressee as stated on the attached service list.

UNITED PARCEL SERVICE: By placing in sealed envelope(s) designated by United Parcel Service (“UPS”) with delivery fees paid or provided for, which I deposited in a facility regularly maintained by UPS or delivered to a UPS courier, at Los Angeles, California.

ELECTRONIC MAIL: By transmitting the document by electronic mail to the electronic mail address as stated on the attached service list.

E-FILING: By causing the document to be electronically filed via the Court’s CM/ECF system, which effects electronic service on counsel who are registered with the CM/ECF system.

FAX: By transmitting the document by facsimile transmission. The transmission was reported as complete and without error.

I declare under penalty of perjury that the foregoing is true and correct.

Date: December 20, 2024

/s/ Charles E. Canter

Charles E. Canter

1 *SEC v. Steven J. Susoeff, et al.*
2 **United States District Court—Nevada**
3 **Case No. 2:23-cv-00173-JCM-EJY**

4 **SERVICE LIST**

5 Kimberly P. Stein, Esq.
6 kps@fdlawlv.com
7 FLANGAS LAW GROUP
8 3275 South Jones Blvd., Suite 105
9 Las Vegas, Nevada 89146
10 Phone: (702) 971-2258
11 *Attorney for Defendants Steven J. Susoeff and Steve Susoeff, LLC*

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

STEVEN J. SUSOEFF and STEVE
SUSOEFF, LLC (dba Meritage
Financial Group),

Defendants.

Case No. 2:23-cv-00173-JCM-EJY

**FINAL JUDGMENT AS TO STEVEN
J. SUSOEFF**

1 The Securities and Exchange Commission having filed a Complaint and
2 Defendant Steven J. Susoeff having entered a general appearance; consented to the
3 Court’s jurisdiction over Defendant and the subject matter of this action; consented to
4 entry of this Final Judgment without admitting or denying the allegations of the
5 Complaint (except as to jurisdiction and except as otherwise provided herein in
6 paragraph V); waived findings of fact and conclusions of law; and waived any right
7 to appeal from this Final Judgment:

8 I.

9 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that Defendant is
10 permanently restrained and enjoined from violating Sections 17(a)(1) and 17(a)(3) of
11 the Securities Act of 1933 (the “Securities Act”), 15 U.S.C. §§ 77q(a), in the offer or
12 sale of any security by the use of any means or instruments of transportation or
13 communication in interstate commerce or by use of the mails, directly or indirectly:

14 (i) to employ any device, scheme, or artifice to defraud; or
15 (ii) to engage in any transaction, practice, or course of business which
16 operates or would operate as a fraud or deceit upon the purchaser
17 by, directly or indirectly, (1) creating a false appearance or otherwise deceiving any
18 person, or (1) disseminating false or misleading documents, materials, or information
19 or making, either orally or in writing, any false or misleading statement in any
20 communication with any investor or prospective investor, about:

- 21 (A) any investment strategy or investment in securities,
- 22 (B) the prospects for success of any product or company,
- 23 (C) the use of investor funds,
- 24 (D) compensation to any person,
- 25 (E) Defendant’s qualifications to advise investors; or
- 26 (F) the allocation of securities trades among investors or clients.

27 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as
28 provided in Federal Rule of Civil Procedure 65(d)(2), the foregoing paragraph also

1 binds the following who receive actual notice of this Final Judgment by personal
2 service or otherwise: (a) Defendant’s officers, agents, servants, employees, and
3 attorneys; and (b) other persons in active concert or participation with Defendant or
4 with anyone described in (a).

5 II.

6 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that Defendant is
7 permanently restrained and enjoined from violating, directly or indirectly, Section
8 10(b) of the Securities Exchange Act of 1934 (the “Exchange Act”), 15 U.S.C.
9 § 78j(b), and Rules 10b-5(a) and 10b-5(c) promulgated thereunder, 17 C.F.R.
10 §§ 240.10b-5(a), (c), by using any means or instrumentality of interstate commerce,
11 or of the mails, or of any facility of any national securities exchange, in connection
12 with the purchase or sale of any security:

- 13 (i) to employ any device, scheme, or artifice to defraud; or
- 14 (ii) to engage in any act, practice, or course of business which operates or
15 would operate as a fraud or deceit upon any person

16 by, directly or indirectly, (1) creating a false appearance or otherwise deceiving any
17 person, or (1) disseminating false or misleading documents, materials, or information
18 or making, either orally or in writing, any false or misleading statement in any
19 communication with any investor or prospective investor, about:

- 20 (A) any investment strategy or investment in securities,
- 21 (B) the prospects for success of any product or company,
- 22 (C) the use of investor funds,
- 23 (D) compensation to any person,
- 24 (E) Defendant’s qualifications to advise investors; or
- 25 (F) the allocation of securities trades among investors or clients.

26 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as
27 provided in Federal Rule of Civil Procedure 65(d)(2), the foregoing paragraph also
28 binds the following who receive actual notice of this Final Judgment by personal

1 service or otherwise: (a) Defendant’s officers, agents, servants, employees, and
2 attorneys; and (b) other persons in active concert or participation with Defendant or
3 with anyone described in (a).

4 III.

5 IT IS HEREBY FURTHER ORDERED, ADJUDGED, AND DECREED that
6 Defendant is permanently restrained and enjoined from violating Section 206(1) and
7 Section 206(2) of the Investment Advisers Act of 1940 (“Advisers Act”), 15 U.S.C.
8 §§ 80b-6(1), (2), as an investment adviser by use of the mails or any means or
9 instrumentality of interstate commerce, directly or indirectly:

10 (i) to employ any device, scheme, or artifice to defraud any client or
11 prospective client; or
12 (ii) to engage in any transaction, practice, or course of business which
13 operates as a fraud or deceit upon any client or prospective client
14 by, directly or indirectly, (1) creating a false appearance or otherwise deceiving any
15 person, or (1) disseminating false or misleading documents, materials, or information
16 or making, either orally or in writing, any false or misleading statement in any
17 communication with any investor or prospective investor, about:

- 18 (A) any investment strategy or investment in securities,
- 19 (B) the prospects for success of any product or company,
- 20 (C) the use of investor funds,
- 21 (D) compensation to any person,
- 22 (E) Defendant’s qualifications to advise investors; or
- 23 (F) the allocation of securities trades among investors or clients.

24 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as
25 provided in Federal Rule of Civil Procedure 65(d)(2), the foregoing paragraph also
26 binds the following who receive actual notice of this Judgment by personal service or
27 otherwise: (a) Defendant’s officers, agents, servants, employees, and attorneys; and
28 (b) other persons in active concert or participation with Defendant or with anyone

1 described in (a).

2 IV.

3 IT IS HEREBY FURTHER ORDERED, ADJUDGED, AND DECREED that
4 Defendant is liable for disgorgement of \$54,232, representing net profits gained as a
5 result of the conduct alleged in the Complaint, together with prejudgment interest
6 thereon in the amount of \$11,695, and a civil penalty in the amount of \$144,566 in
7 accordance with Securities Act Section 20(d), 15 U.S.C. § 77t(d), Exchange Act
8 Section 21(d)(3), 15 U.S.C. § 78u(d)(3), and Advisers Act Section 209(e), 15 U.S.C.
9 § 80b-9(e). Defendant shall satisfy this obligation by paying \$210,493 to the
10 Securities and Exchange Commission within 30 days after entry of this Final
11 Judgment.

12 Defendant may transmit payment electronically to the Commission, which will
13 provide detailed ACH transfer/Fedwire instructions upon request. Payment may also
14 be made directly from a bank account via Pay.gov through the SEC website at
15 <http://www.sec.gov/about/offices/ofm.htm>. Defendant may also pay by certified
16 check, bank cashier's check, or United States postal money order payable to the
17 Securities and Exchange Commission, which shall be delivered or mailed to

18 Enterprise Services Center
19 Accounts Receivable Branch
20 6500 South MacArthur Boulevard
21 Oklahoma City, OK 73169

22 and shall be accompanied by a letter identifying the case title, civil action number,
23 and name of this Court; Steven J. Susoeff as a defendant in this action; and specifying
24 that payment is made pursuant to this Final Judgment.

25 Defendant shall simultaneously transmit photocopies of evidence of payment
26 and case identifying information to the Commission's counsel in this action. By
27 making this payment, Defendant relinquishes all legal and equitable right, title, and
28

1 interest in such funds and no part of the funds shall be returned to Defendant.

2 The Commission may enforce the Court’s judgment for disgorgement and
3 prejudgment interest by using all collection procedures authorized by law, including,
4 but not limited to, moving for civil contempt at any time after 30 days following entry
5 of this Final Judgment.

6 The Commission may enforce the Court’s judgment for penalties by the use of
7 all collection procedures authorized by law, including the Federal Debt Collection
8 Procedures Act, 28 U.S.C. § 3001 et seq., and moving for civil contempt for the
9 violation of any Court orders issued in this action. Defendant shall pay post judgment
10 interest on any amounts due after 30 days of the entry of this Final Judgment pursuant
11 to 28 U.S.C. § 1961. The Commission shall hold the funds, together with any interest
12 and income earned thereon (collectively, the “Fund”), pending further order of the
13 Court.

14 The Commission may propose a plan to distribute the Fund subject to the
15 Court’s approval. Such a plan may provide that the Fund shall be distributed pursuant
16 to the Fair Fund provisions of Section 308(a) of the Sarbanes-Oxley Act of 2002. The
17 Court shall retain jurisdiction over the administration of any distribution of the Fund
18 and the Fund may only be disbursed pursuant to an Order of the Court.

19 Regardless of whether any such Fair Fund distribution is made, amounts
20 ordered to be paid as civil penalties pursuant to this Judgment shall be treated as
21 penalties paid to the government for all purposes, including all tax purposes. To
22 preserve the deterrent effect of the civil penalty, Defendant shall not, after offset or
23 reduction of any award of compensatory damages in any Related Investor Action
24 based on Defendant’s payment of disgorgement in this action, argue that he is entitled
25 to, nor shall he further benefit by, offset or reduction of such compensatory damages
26 award by the amount of any part of Defendant’s payment of a civil penalty in this
27 action (“Penalty Offset”). If the court in any Related Investor Action grants such a
28 Penalty Offset, Defendant shall, within 30 days after entry of a final order granting

1 the Penalty Offset, notify the Commission’s counsel in this action and pay the amount
2 of the Penalty Offset to the United States Treasury or to a Fair Fund, as the
3 Commission directs. Such a payment shall not be deemed an additional civil penalty
4 and shall not be deemed to change the amount of the civil penalty imposed in this
5 Judgment. For purposes of this paragraph, a “Related Investor Action” means a
6 private damages action brought against Defendant by or on behalf of one or more
7 investors based on substantially the same facts as alleged in the Complaint in this
8 action.

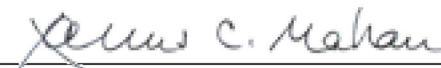
9 V.

10 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, solely for
11 purposes of exceptions to discharge set forth in Section 523 of the Bankruptcy Code,
12 11 U.S.C. § 523, the allegations in the complaint are true and admitted by Defendant,
13 and further, any debt for disgorgement, prejudgment interest, civil penalty or other
14 amounts due by Defendant under this Final Judgment or any other judgment, order,
15 consent order, decree or settlement agreement entered in connection with this
16 proceeding, is a debt for the violation by Defendant of the federal securities laws or
17 any regulation or order issued under such laws, as set forth in Section 523(a)(19) of
18 the Bankruptcy Code, 11 U.S.C. §523 (a)(19).

19 VI.

20 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that this Court
21 shall retain jurisdiction of this matter for the purposes of enforcing the terms of this
22 Final Judgment.

23 Dated: December 23, 2024

24 
25 _____
26 United States District Judge
27
28

PROOF OF SERVICE

I am over the age of 18 years and not a party to this action. My business address is:

U.S. SECURITIES AND EXCHANGE COMMISSION,
444 S. Flower Street, Suite 900, Los Angeles, California 90071
Telephone No. (323) 965-3998; Facsimile No. (213) 443-1904.

On December 20, 2024, I caused to be served the document entitled **FINAL JUDGMENT AS TO STEVEN J. SUSOEFF** on all the parties to this action addressed as stated on the attached service list:

OFFICE MAIL: By placing in sealed envelope(s), which I placed for collection and mailing today following ordinary business practices. I am readily familiar with this agency’s practice for collection and processing of correspondence for mailing; such correspondence would be deposited with the U.S. Postal Service on the same day in the ordinary course of business.

PERSONAL DEPOSIT IN MAIL: By placing in sealed envelope(s), which I personally deposited with the U.S. Postal Service. Each such envelope was deposited with the U.S. Postal Service at Los Angeles, California, with first class postage thereon fully prepaid.

EXPRESS U.S. MAIL: Each such envelope was deposited in a facility regularly maintained at the U.S. Postal Service for receipt of Express Mail at Los Angeles, California, with Express Mail postage paid.

HAND DELIVERY: I caused to be hand delivered each such envelope to the office of the addressee as stated on the attached service list.

UNITED PARCEL SERVICE: By placing in sealed envelope(s) designated by United Parcel Service (“UPS”) with delivery fees paid or provided for, which I deposited in a facility regularly maintained by UPS or delivered to a UPS courier, at Los Angeles, California.

ELECTRONIC MAIL: By transmitting the document by electronic mail to the electronic mail address as stated on the attached service list.

E-FILING: By causing the document to be electronically filed via the Court’s CM/ECF system, which effects electronic service on counsel who are registered with the CM/ECF system.

FAX: By transmitting the document by facsimile transmission. The transmission was reported as complete and without error.

I declare under penalty of perjury that the foregoing is true and correct.

Date: December 20, 2024

/s/ Charles E. Canter

Charles E. Canter

SEC v. Steven J. Susoeff, et al.
United States District Court—Nevada
Case No. 2:23-cv-00173-JCM-EJY

SERVICE LIST

Kimberly P. Stein, Esq.
kps@fdlawlv.com
FLANGAS LAW GROUP
3275 South Jones Blvd., Suite 105
Las Vegas, Nevada 89146
Phone: (702) 971-2258
Attorney for Defendants Steven J. Susoeff and Steve Susoeff, LLC