

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

SECURITIES AND EXCHANGE COMMISSION,	)	
	)	
Applicant,	)	Misc. Action No.:
	)	
vs.	)	
	)	
JOHN OLSEN, ARCPE 1, LLC, GEMINI 1,	)	
LLC, ARCPE HOLDING, LLC, TAMIWEST,	)	
LLC, HARBOR REALTY INVESTMENT CORP.,	)	
and SUNSET HARBOR HOLDINGS, LLC,	)	
	)	
Respondents.	)	

**APPLICATION OF THE SECURITIES AND EXCHANGE COMMISSION  
FOR ORDER COMPELLING COMPLIANCE WITH ADMINISTRATIVE SUBPOENAS**

Applicant Securities and Exchange Commission (the “SEC”) moves this Court for an Order compelling compliance with administrative subpoenas served on Respondents John Olsen, ARCPE 1, LLC; GEMINI 1, LLC; ARCPE Holding, LLC; Tamiwest, LLC; Harbor Realty Investment Corp.; and Sunset Harbor Holdings, LLC (together, “Respondents”). This includes the SEC’s subpoenas issued to Respondents dated October 15, 2024 (collectively, “Subpoenas”). This application is supported by the SEC’s Memorandum of Law, the Declaration of Ty S. Martinez dated March 16, 2026, and exhibits thereto, all filed contemporaneously with this Application.

The SEC requests that this Court enter an Order:

(1) Directing Respondents to produce to the SEC, within 15 days of the date of the Order, all documents, communications, electronically stored information (“ESI”), and tangible items in Respondents’ possession, custody, or control that are responsive to the requests in the Subpoenas.

(2) Granting the SEC such other and further relief as may be necessary and appropriate

to ensure that Respondents comply with the administrative subpoenas and any Order that this Court issues; and

(3) Preserving this Court's jurisdiction over this matter to ensure that Respondents comply with the administrative subpoenas and any Orders of this Court.

Dated: March 27, 2026

Respectfully submitted,

UNITED STATES SECURITIES  
AND EXCHANGE COMMISSION

*s/ Matthew Gulde*

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*Attorneys for Applicant United States  
Securities and Exchange Commission*

**CERTIFICATE OF CONFERENCE**

The SEC submits this Certificate of Conference in accordance with Local Rule 7.1(b). Pursuant to Local Rule 7.1(a), as further outlined in the Declaration of Ty S. Martinez (“Martinez Declaration”) filed in support of this Application, on June 24, July 3, August 20, and September 10, 2025, SEC staff conferred telephonically, via video teleconference, and via email and letter with counsel for Respondents, Joshua Klein, regarding the matters addressed and relief requested in this Application. As detailed in the Martinez Declaration, Klein has stated that Respondents refuse to comply with the subpoenas. Accordingly, the SEC submit this Application to the Court as **OPPOSED**.

*s/ Matthew J. Gulde*  
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Matthew J. Gulde

**CERTIFICATE OF SERVICE**

On March 27, 2026, I served or caused to be served (1) the Application of the Securities and Exchange Commission Compelling Compliance with Administrative Subpoenas, (2) the Memorandum of Law in Support of the Application of the Securities and Exchange Commission Compelling Compliance with Administrative Subpoenas, (3) the Declaration of Ty S. Martinez dated March 24, 2026, and exhibits thereto, and (4) the Proposed Order by mailing the foregoing documents via Personal service, email, and UPS overnight delivery to:

Joshua Klein  
Petrillo Klein Boxer LLP  
855 Third Ave., 22<sup>nd</sup> Floor  
New York, NY 10017  
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*s/ Matthew J. Gulde*  
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Matthew J. Gulde