

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION

CASE NO.: 2:09-CV-229-FTM-29SPC

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

vs.

FOUNDING PARTNERS CAPITAL MANAGEMENT
and WILLIAM L. GUNLICKS,

Defendants,

FOUNDING PARTNERS STABLE-VALUE FUND, LP,
FOUNDING PARTNERS STABLE-VALUE FUND II, LP,
FOUNDING PARTNERS GLOBAL FUND, LTD., and
FOUNDING PARTNERS HYBRID-VALUE FUND, LP,

Relief Defendants.

**RECEIVER'S NOTICE OF COMPLIANCE WITH [D.E. 655]
AND OF NO OBJECTIONS TO PROPOSED DISTRIBUTION**

Receiver Daniel S. Newman, not individually, but solely in his capacity as the Court-appointed receiver ("Receiver") for Founding Partners Capital Management Company ("FPCM"); Founding Partners Stable-Value Fund, L.P.; Founding Partners Stable-Value Fund II, L.P.; Founding Partners Global Fund, Ltd.; and Founding Partners Hybrid-Value Fund, L.P. (collectively, the "Receivership Entities"), respectfully submits this notice ("Notice") of compliance with the Court's Order dated July 15, 2025 (the "Objection Order") [D.E. 655] and that he and his professionals have not received any objections to the final distribution contained in

the Receiver's Final Report, Request for Payment of Fees and Costs, Motion for Final Distribution, and Motion to Close Receivership ("Motion") [D.E. 654].

The Receiver filed the Motion on July 11, 2025. The Securities and Exchange Commission did not object to the relief sought by the Receiver in the Motion. On July 15, 2025, the Court entered at the Objection Order [D.E. 655] setting forth a procedure for objections to the final distribution ("Objection Procedure"). The Receiver timely complied with all notice requirements under the Objection Procedure. The Objection Procedure set a 14-day deadline for submission of any objections to the Motion, such that any objections were due by July 29, 2025.

Accordingly, as of the date of this notice, the deadline for objections has passed and the Receiver has not received any objections, nor have any objections been filed. As such, the Objection Procedure has been completed, and the Receiver is prepared to begin the process of making the final distribution upon entry by the Court of an order granting the relief requested in Section VIII of the Motion (pp. 20-21), which will begin the process of closing out the Receivership.

Dated: August 13, 2025.

Respectfully submitted,

NELSON MULLINS RILEY & SCARBOROUGH

Attorneys for Receiver
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2 South Biscayne Boulevard
Miami, FL 33131
Tel: (305) 373-9400

By: /s/ Christopher Cavallo

Christopher Cavallo, Esq.
Florida Bar No. 0092305
Jonathan Etra, Esq.
Florida Bar No. 0686905

CERTIFICATE OF SERVICE

I hereby certify that on August 13, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing is being served this day on all counsel of record identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel who are not authorized to receive electronically Notices of Electronic Filing.

By: /s/ Christopher Cavallo
Christopher Cavallo, Esq.

SERVICE LIST

Teresa J. Verges, Esq. U.S. Securities and Exchange Commission 801 Brickell Avenue Suite 1800 Miami, FL 33131 305-982-6317 305-536-4154 (fax) vergest@sec.gov <i>Counsel for U.S. Securities and Exchange Commission</i> <i>Service via CM/ECF</i> <u>Service via CM/ECF</u>	Gabrielle Lyn D'Alemberte, Esq. Law Offices of Robert L. Parks, P.L. 2121 Ponce de Leon Blvd. Suite 505 Coral Gables, FL 33134 305-445-4430 305-445-4431 (fax) Gabrielle@rlplegal.com <i>Counsel for William & Pamela Gunlicks</i> <u>Service via CM/ECF</u>
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