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UNITED STATES DISTRICT COURT

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.

Case No. 3:16-CV-00438-PK

**DECLARATION OF RONALD F.
GREENSPAN IN SUPPORT OF
PLAINTIFF SECURITIES AND
EXCHANGE COMMISSION'S
OPPOSITION TO INDIVIDUAL
DEFENDANTS' MOTION FOR
PROTECTIVE ORDER**



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I, Ronald F. Greenspan, declare as follows:

1. I am the duly appointed receiver (“Receiver”) for the Entity Defendants and forty-three related entities (“Receivership Entity”). I make this declaration in support of Plaintiff Securities and Exchange Commission’s Opposition to the Individual Defendants’ Motion for Protective Order.

2. On February 8, 2016, Entity Defendant Aequis Commercial Finance, LLC (“ACF”) retained FTI Consulting, Inc., to advise on financial matters and potential restructuring of the Aequis group of companies, including overseeing a possible liquidation and wind-down of ACF and possibly other Aequis companies. I was the engagement leader.

3. On March 16, 2016, pursuant to the Stipulated Interim Order Appointing Receiver, I was appointed as receiver for the Receivership Entity on an interim basis. [Dkt. 30.]

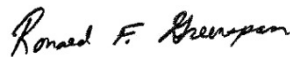
4. On April 14, 2016, pursuant to the Final Receivership Order, I was appointed as receiver of the Receivership Entity on a final basis (“Final Receivership Order”). [Dkt. 156.]

5. The Final Receivership Order states that the Receiver “holds, and is therefore empowered to waive, all privileges, including the attorney-client privilege, held by the Receivership Entity.” [Dkt. 156 ¶ 30.]

6. Pursuant to the authority given to me by the Final Receivership Order, I have waived all privileges, including the attorney-client privilege, held by the Receivership Entity.

I declare under penalty of perjury under the laws of the state of Oregon that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Dated this 5th day of May, 2017.



Ronald F. Greenspan, Receiver