

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

13-cv-416

v.

SHAVERS, ET AL.

Defendants,

**DECLARATION OF MAUREEN PEYTON KING IN SUPPORT
OF PLAINTIFF'S APPLICATION FOR AN ORDER TO SHOW CAUSE
WHY DEFENDANT TRENDON SHAVERS SHOULD NOT
BE HELD IN CIVIL CONTEMPT**

I, Maureen Peyton King, pursuant to 28 U.S.C. § 1746, do hereby declare as follows:

1. I am a senior trial counsel employed by the Securities and Exchange Commission (the "Commission") in its New York Regional Office. I am personally familiar with the facts set forth herein.

2. I make this declaration in support of the Commission's application for an order to show cause why Defendant Trendon Shavers ("Shavers") should not be held in civil contempt.

3. The Amended Judgment, Docket Entry 90, obligates Shavers and an entity he controlled jointly and severally, to pay disgorgement of \$38,638,569 and prejudgment interest thereon in the amount of \$1,766,098, for a total of \$40,404,667. The Amended Judgment also requires Shavers to pay a \$150,000 civil penalty, which is not being sought in this proceeding.

4. To date, Shavers has paid \$400 toward the Judgment – and only after the contempt hearing.

5. Shavers has not provided the Commission with sworn financial statements.

6. Shavers has not provided documents for the entire relevant period, January 1, 2018 through the present for categories of documents including tax returns.

7. Shavers correspondence with Commission counsel is reflected in Exs. 1-3.

8. A true and correct excerpt of the January 6, 2022 contempt hearing is attached hereto as Ex. 4.

9. A proposed order is attached as Ex. 5.

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

Executed at Wantagh, New York, on February 15, 2022.

s/Maureen Peyton King
Maureen Peyton King