

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

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

13-cv-416

v.

SHAVERS, ET AL.

Defendants,

**PLAINTIFF SEC'S MOTION TO HOLD ENTRY OF A CIVIL CONTEMPT
ORDER AGAINST DEFENDANT TRENDON SHAVERS IN ABEYANCE**

Plaintiff Securities and Exchange Commission (the "SEC") respectfully requests that the Court hold in abeyance its request for a civil contempt order against Trendon Shavers ("Shavers"). The Commission sought contempt against Shavers because he had failed to pay the \$40.4 million disgorgement obligation ordered by this Court on September 19, 2014.

On January 6, 2022, the Court held a hearing on the Commission's contempt application. Following the hearing, the parties met and agreed to terms which were incorporated into the Court's Order entered on January 13, 2022 (Dkt. #100) requiring Shavers, among other things to: (i) respond to the Commission's request for sworn financial statements and supporting documents in the form provided by the Commission no later than January 21, 2022; and (ii) make payments of \$400 per month for six months. The Order further stated that: "[t]he Court's finding of contempt shall be held in abeyance unless and until Shavers violates the terms of this Order and the Commission seeks entry of a contempt order."

As of this date, Defendant Shavers has not provided sworn financial statements to the

Commission. Shavers also has not made the March or April payments ordered. However, the SEC is working with Shavers in an effort to resolve these issues without involving the Court.

Shavers has now agreed to:

- (i) cure the payment delinquency by paying the SEC \$800 by May 13, 2022;
- (ii) continue making payments of \$400 per month going forward with the amount to be reassessed annually (and to provide documents such as tax returns upon request);
- (iii) provide non-notarized sworn financial statements by email today; and
- (iv) provide notarized sworn financial statements by no later than June 24, 2022.

See email between SEC counsel and Shavers attached as Exhibit 1.

Accordingly, the SEC respectfully requests that the Court cancel the hearing scheduled for May 2, 2022 at 2 p.m., hold the SEC's request to hold Shavers in contempt in abeyance and permit SEC counsel to provide a status update to the Court by July 1, 2022.

Dated: Wantagh, New York
April 28, 2022

s/ Maureen Peyton King
Maureen Peyton King
Senior Trial Counsel
Securities and Exchange Commission
New York Regional Office
100 Pearl Street, Room 20-100
New York, NY 10004
Tel.: 212-336-0111
E-mail: kingmp@sec.gov