

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

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

13-cv-416

v.

SHAVERS, ET AL.

Defendant.

**DECLARATION OF MAUREEN PEYTON KING IN SUPPORT OF THE SECURITIES
AND EXCHANGE COMMISSION'S MOTION TO COMPEL DISCOVERY**

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 motion to compel the production of documents in this case.

3. In connection with post-judgment discovery, the Commission issued a document request to Shavers dated August 3, 2021, attached hereto as Ex. 1, at one address and then another.

4. The UPS delivery document is attached hereto as Ex. 2.

5. Shavers claims he did not receive the document request, dated August 3, 2021 at either address.

6. Shavers also received the document request by email on November 30. Ex. 4.

7. After Shavers' learned of the asset freeze, he contacted the Commission by phone and agreed to provide documents by December 3rd. Shavers has not yet provided any documents in response to the Commission's request.

8. The Commission has identified individuals who may have information relevant to Shavers' ability to pay. The Commission sought Shavers' consent to these witnesses appearing as witnesses, but Shavers would not agree unconditionally. Instead, he replied: "I object to asking anyone to do anything beyond what they want to do." A copy of the email is attached hereto as Ex. 3.

Dated: Wantagh, New York

s/ Maureen Peyton King

December 6, 2021

Maureen Peyton King
Judith A. Weinstock
Securities and Exchange Commission
New York Regional Office
200 Vesey Street, Room 400
New York, NY 10281-1022
Tel.: 212-336-0111 (King)
E-mail: kingmp@sec.gov