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12 **IN THE UNITED STATES DISTRICT COURT**  
13 **FOR THE DISTRICT OF ARIZONA**  
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15 Securities and Exchange Commission,

16 Plaintiff,

17 v.

18 Jonathan Larmore, *et al.*,

19 Defendants and Relief  
20 Defendants.  
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Case No.: 23-CV-2470-PHX-DLR

**SEC'S RESPONSE REGARDING  
SIXTH APPLICATION OF RECEIVER  
FOR ALLOWANCE AND PAYMENT  
OF PROFESSIONAL FEES AND  
REIMBURSEMENT [DKT NO. 420]**

1 Plaintiff Securities and Exchange Commission (“SEC”) respectfully submits this  
2 Response in support of the Sixth Application of Receiver for Allowance and Payment of  
3 Professional Fees and Reimbursement for the Period April 1, 2025, Through June 30, 2025  
4 (Dkt No. 420) (“the Sixth Application”).

5 The Receiver submitted the Sixth Application on August 15, 2025, seeking the  
6 Court’s approval and authorization for the payment of specified fees and expenses  
7 requested therein (Dkt No. 420). On August 28, 2025, Relief Defendant Michelle Larmore  
8 filed a Limited Objection to the Sixth Application and Reservation of Rights (Dkt No. 426)  
9 (“the Limited Objection”). The Limited Objection argues that the Receiver may not be  
10 paid or reimbursed from Receivership Assets held by Receivership Entities in light of the  
11 prior exclusive jurisdiction doctrine and because, according to the Limited Objection, those  
12 assets are subject to the exclusive jurisdiction of the Maricopa County Superior Court. (*Id.*  
13 at 2-5.) On September 4, 2025, the Receiver submitted a Reply to the Limited Objection  
14 arguing that (a) Relief Defendant Michelle Larmore is estopped from asserting the prior  
15 exclusive jurisdiction doctrine based on her prior consent to the terms of the Receivership  
16 Order; and (b) the prior exclusive jurisdiction doctrine is inapplicable under the  
17 circumstances and irrelevant to the Receivership and the duties of the Receiver. (Dkt No.  
18 430 at 2-9.)

19 The SEC respectfully submits that the Court should grant the requests in the  
20 Receiver’s Sixth Application for the reasons set forth in the Sixth Application and in the  
21 Receiver’s Reply in Support of the Sixth Application.  
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1 Dated: September 9, 2025

Respectfully submitted,

3 /s/ Michael J. Friedman

4 Michael J. Friedman

Neal Jacobsen

Heather E. Marlow

Amanda L. Straub

Attorneys for Plaintiff

Securities and Exchange Commission

**CERTIFICATE OF SERVICE**

I hereby certify that on September 9, 2025, I caused a true and correct copy of the foregoing document to be served on all counsel of record via the Court's ECF system, and on Jonathan Larmore via United States First Class Mail, postage prepaid, at the following address:

Jonathan Larmore, Reg. #04456-511  
FCI Lewisburg  
Federal Correctional Institution  
Satellite Camp  
P.O. Box 1000  
Lewisburg, PA 17837

/s/ Michael J. Friedman  
Michael J. Friedman