

ARCHER & GREINER, P.C.  
1211 Avenue of the Americas  
New York, New York 10036  
Tel: (212) 682-4940  
Allen G. Kadish<sup>1</sup>  
Harrison H.D. Breakstone<sup>2</sup>  
Email: akadish@archerlaw.com  
hbreakstone@archerlaw.com

*Counsel for Allen D. Applbaum as Receiver*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

United States Securities and Exchange  
Commission,

Plaintiff,

v.

Jonathan Larmore, et al.,

Defendants, and

Michelle Larmore; Marcia Larmore;  
CSL Investments, LLC;  
MML Investments, LLC;  
Spike Holdings, LLC;  
and JMMAL Investments, LLC,

Relief Defendants.

Case No. CV-23-02470-PHX-DLR

**NOTICE OF NO OBJECTION  
TO RECEIVER'S FIFTH  
APPLICATION OF RECEIVER  
FOR ALLOWANCE AND  
PAYMENT OF PROFESSIONAL  
FEES AND REIMBURSEMENT  
OF EXPENSES FOR THE  
PERIOD JANUARY 1, 2025  
THROUGH MARCH 31, 2025  
[ECF NO. 358]**

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<sup>1</sup> Admitted *pro hac vice*.

<sup>2</sup> Admitted *pro hac vice*.

1 Allen D. Applbaum, as receiver for ArciTerra Companies, LLC, and related entities,  
2 by and through his counsel, Archer & Greiner, P.C., hereby files this notice (the “Notice”),  
3 as follows:  
4

5 1. The Receiver filed the *Fifth Application of Receiver for Allowance and*  
6 *Payment of Professional Fees and Reimbursement of Expenses for the Period January 1,*  
7 *2025 through March 31, 2025*, dated May 19, 2025 [ECF No. 358] (the “Application”).  
8

9 2. On June 2, 2025, the deadline for responses and objections to the Application  
10 passed pursuant to Rule 6 of the Federal Rules of Civil Procedure and Rules 7.2 and 7.3 of  
11 the Local Rules of Civil Procedure.

12 3. The only objection to the Application was *Relief Defendant Michelle*  
13 *Larmore’s Limited Objection and Reservation of Rights* [ECF No. 371] (the “Limited  
14 Objection”).  
15

16 4. The Limited Objection was resolved by the *Fifth Stipulation in Respect of*  
17 *Reservation of Rights of Relief Defendant Michelle Larmore*, filed June 5, 2025 [ECF No.  
18 373], and *Order Approving Fifth Stipulation in Respect of Reservation of Rights of Relief*  
19 *Defendant Michelle Larmore*, dated April 4, 2025 [ECF No. 374].  
20

21 5. Pursuant to paragraph 53 of the *Order Appointing Receiver, Freezing Assets,*  
22 *and Imposing Litigation Injunction*, dated May 6, 2024 [ECF No. 154], the Receiver files  
23 this Notice of No Objection.  
24  
25  
26  
27  
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1           6.     Submitted herewith is the proposed order filed as an exhibit to the  
2 Application. The Receiver respectfully seeks issuance and entry thereof.

3 Dated: June 9, 2025

ARCHER & GREINER, P.C.

4  
5 By: \_\_\_\_\_

6 Allen G. Kadish<sup>1</sup>

7 Harrison H.D. Breakstone<sup>2</sup>

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*Counsel for Allen D. Applbaum as Receiver*

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FOR THE DISTRICT OF ARIZONA

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Michelle Larmore; Marcia Larmore;  
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and JMMAL Investments, LLC,

Relief Defendants.

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**[PROPOSED] ORDER  
APPROVING AND ALLOWING  
PAYMENT OF RECEIVER'S  
PROFESSIONALS' FEES AND  
EXPENSES FOR JANUARY 1, 2025  
THROUGH MARCH 31, 2025**

The Court has considered the Fifth Application (the "Application") for allowance and payment of professionals' fees and reimbursement of expenses for StoneTurn Group LLP ("StoneTurn") and Archer & Greiner, P.C. ("Archer," and together, the "Retained Personnel") for the period of January 1, 2025 through March 31, 2025 (the "Application Period"); and upon consideration of any and all responses and replies relating to the Application; and due and sufficient notice of the Application having been given; and no other or further notice need be given; and after due deliberation; and this Court having jurisdiction over this matter, the above-captioned defendants and relief defendants, and over the property of the receivership estate; and it appearing that the relief sought in the

1 Application is reasonable and in the best interest of the receivership estate, its creditors,  
2 and other parties in interest;

3 **NOW, THEREFORE, UPON THE FOREGOING FINDINGS AND THE**  
4 **RECORD BEFORE THIS COURT, IT IS HEREBY ORDERED:**  
5

6 1. The Application is GRANTED to the extent set forth herein.

7 **STONETURN GROUP, LLP**  
8

9 2. StoneTurn's fees in the amount of \$1,114,807.95 for services rendered  
10 during the Application Period are approved.

11 3. The sum of \$334,442.39 (30%) of the approved fees shall be held back until  
12 further order of the Court.

13 4. Therefore, the sum of \$780,365.57 shall be paid to StoneTurn.

14 5. StoneTurn's expenses in the amount of \$70,818.40 are approved for  
15 reimbursement and shall be paid.  
16

17 **ARCHER & GREINER, P.C.**  
18

19 6. Archer's fees in the amount of \$337,244.40 for services rendered during the  
20 Application Period are approved.

21 7. The sum of \$101,173.32 (30%) of the approved fees shall be held back until  
22 further order of the Court.

23 8. Therefore, the sum of \$236,071.08 shall be paid to Archer.

24 9. Archer's expenses in the amount of \$409.33 are approved for reimbursement  
25 and shall be paid.  
26

27 10. This Court reserves jurisdiction and authority to implement the terms hereof.  
28

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