

Respectfully submitted,

By: /s/ Charlene C. Koonce

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CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(d)(1)(B), as amended, no certificate of service is necessary because this document is being filed with the Court's electronic-filing system.

Exhibit	Document	APP Pages
A	Declaration of Charlene C. Koonce	APP000001-000003
A-1	Auction Photos	APP000004-000109
A-2	Letter to Barton Counsel dated February 13, 2023	APP000110-000112
A-3	Letter to Barton Counsel dated March 29, 2023	APP000113-000115
A-4	Email dated April 20, 2023	APP000116-000120
A-5	Email dated April 21, 2023	APP000121-000124

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

TIMOTHY BARTON, et al.

Defendants.

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No. 3:22-cv-2118-X

DECLARATION OF CHARLENE C. KOONCE
IN SUPPORT OF NOTICE OF INTENDED AUCTION
OF CONTENTS OF 2999 TURTLE CREEK BLVD

1. My name is Charlene C. Koonce. I have personal knowledge of the matters set forth in this Declaration, I am of sound mind, and I am otherwise competent to testify to these matters.

2. True and correct copies of photos identifying the contents of 2999 Turtle Creek Blvd that will be sold by auction following disposition of any objection to such sale, is attached as **Exhibit A-1**. Victoria Barton has indicated she will provide a declaration attesting to the personal origin of certain items, and upon receipt of such a declaration, or a similar but satisfactory declaration from others, the Receiver will remove the items identified in such declaration from the auction.

3. True and correct copies of letters to counsel for Mr. Barton regarding retrieval and identification of personal items dated February 13, 2023 and March 29, 2023, are attached as **Exhibit A-2** and **Exhibit A-3**, respectively.

4. A true and correct copy of an email dated April 20, 2023, I sent to counsel Defendant Timothy Barton and counsel for Max Barton requesting information related to personal

property located at 2999 Turtle Creek and which they sought to exclude from a sale, is attached as **Exhibit A-4**.

5. An email I received on April 21, 2023 from Defendant Tim Barton's counsel in response to my request for additional information about items Barton sought to exclude from the auction, is attached as **Exhibit A-5**.

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

Executed on April 21, 2023.

/s/ Charlene C. Koonce
CHARLENE C. KOONCE

EXHIBIT A-1



Lot 1 | IMAGE



Lot 5 | IMAGE



Lot 9 | IMAGE



Lot 2 | IMAGE



Lot 6 | IMAGE



Lot 10 | IMAGE



Lot 3 | IMAGE



Lot 7 | IMAGE



Lot 11 | IMAGE



Lot 4 | IMAGE



Lot 8 | IMAGE



Lot 12 | IMAGE



Lot 13 | IMAGE



Lot 17 | IMAGE



Lot 21 | IMAGE



Lot 14 | IMAGE



Lot 18 | IMAGE



Lot 22 | IMAGE



Lot 15 | IMAGE



Lot 19 | IMAGE



Lot 23 | IMAGE



Lot 16 | IMAGE



Lot 20 | IMAGE



Lot 24 | IMAGE



Lot 25 | IMAGE



Lot 29 | IMAGE



Lot 33 | IMAGE



Lot 26 | IMAGE



Lot 30 | IMAGE



Lot 34 | IMAGE



Lot 27 | IMAGE



Lot 31 |
ITEM REMOVED



Lot 35 | IMAGE



Lot 28 | IMAGE



Lot 32 | IMAGE



Lot 36 | IMAGE



Lot 37 | IMAGE



Lot 41 | IMAGE



Lot 45 | IMAGE



Lot 38 | IMAGE



Lot 42 | IMAGE



Lot 46 | IMAGE



Lot 39 | IMAGE



Lot 43 | IMAGE



Lot 47 | IMAGE



Lot 40 | IMAGE



Lot 44 | IMAGE



Lot 48 | IMAGE



Lot 49 | IMAGE



Lot 53 | IMAGE



Lot 57 | IMAGE



Lot 50 | IMAGE



Lot 54 | IMAGE



Lot 58 | IMAGE



Lot 51 | IMAGE



Lot 55 | IMAGE



Lot 59 | IMAGE



Lot 52 | IMAGE



Lot 56 | IMAGE



Lot 60 | IMAGE



Lot 61 | IMAGE



Lot 65 | IMAGE



Lot 69 | IMAGE



Lot 62 | IMAGE



Lot 66 | IMAGE



Lot 70 | IMAGE



Lot 63 | IMAGE



Lot 67 | IMAGE



Lot 71 | IMAGE



Lot 64 | IMAGE



Lot 68 | IMAGE



Lot 72 | IMAGE



Lot 73 | IMAGE



Lot 77 | IMAGE



Lot 81 | IMAGE



Lot 74 | IMAGE



Lot 78 | IMAGE



Lot 82 | IMAGE



Lot 75 | IMAGE



Lot 79 | IMAGE



Lot 83 | IMAGE



Lot 76 | IMAGE



Lot 80 | IMAGE



Lot 84 | IMAGE



Lot 85 | IMAGE



Lot 89 | IMAGE



Lot 93 | IMAGE



Lot 86 | IMAGE



Lot 90 | IMAGE



Lot 94 | IMAGE



Lot 87 | IMAGE



Lot 91 | IMAGE



Lot 95 | IMAGE



Lot 88 | IMAGE



Lot 92 | IMAGE



Lot 96 | IMAGE



Lot 97 | IMAGE



Lot 101 | IMAGE



Lot 105 |
FILE CABINETS REMOVED
FROM EVENT



Lot 98 | IMAGE



Lot 102 | IMAGE



Lot 106 |
FILE CABINETS REMOVED
FROM EVENT



Lot 99 | IMAGE



Lot 103 | IMAGE



Lot 107 |
FILE CABINETS REMOVED
FROM EVENT



Lot 100 | IMAGE



Lot 104 |
FILE CABINETS REMOVED
FROM EVENT



Lot 108 |
FILE CABINETS REMOVED
FROM EVENT



Lot 109 |
FILE CABINETS REMOVED
FROM EVENT



Lot 113 | IMAGE



Lot 117 | IMAGE



Lot 110 |
FILE CABINETS REMOVED
FROM EVENT



Lot 114 | IMAGE



Lot 118 | IMAGE



Lot 111 |
FILE CABINETS REMOVED
FROM EVENT



Lot 115 | IMAGE



Lot 119 | IMAGE



Lot 112 |
FILE CABINETS REMOVED
FROM EVENT



Lot 116 | IMAGE



Lot 120 | IMAGE



Lot 121 | IMAGE



Lot 125 | IMAGE



Lot 129 | IMAGE



Lot 122 | IMAGE



Lot 126 | IMAGE



Lot 130 | IMAGE



Lot 123 | IMAGE



Lot 127 | IMAGE



Lot 131 | IMAGE



Lot 124 | IMAGE



Lot 128 | IMAGE



Lot 132 | IMAGE



Lot 133 | IMAGE



Lot 137 | IMAGE



Lot 141 | IMAGE



Lot 134 | IMAGE



Lot 138 | IMAGE



Lot 142 | IMAGE



Lot 135 | IMAGE



Lot 139 | IMAGE



Lot 143 | IMAGE



Lot 136 | IMAGE



Lot 140 | IMAGE



Lot 144 | IMAGE



Lot 145 | IMAGE



Lot 149 | IMAGE



Lot 153 | IMAGE



Lot 146 | IMAGE



Lot 150 | IMAGE



Lot 154 | IMAGE



Lot 147 | IMAGE



Lot 151 | IMAGE



Lot 155 | IMAGE



Lot 148 | IMAGE



Lot 152 | IMAGE



Lot 156 | IMAGE



Lot 157 | IMAGE



Lot 161 | IMAGE



Lot 165 | IMAGE



Lot 158 | IMAGE



Lot 162 | IMAGE



Lot 166 | IMAGE



Lot 159 | IMAGE



Lot 163 | IMAGE



Lot 167 | IMAGE



Lot 160 | IMAGE



Lot 164 | IMAGE



Lot 168 | IMAGE



Lot 169 | IMAGE



Lot 173 | IMAGE



Lot 177 | IMAGE



Lot 170 | IMAGE



Lot 174 | IMAGE



Lot 178 | IMAGE



Lot 171 | IMAGE



Lot 175 | IMAGE



Lot 179 | IMAGE



Lot 172 | IMAGE



Lot 176 | IMAGE



Lot 180 | IMAGE



Lot 181 | IMAGE



Lot 185 | IMAGE



Lot 189 | IMAGE



Lot 182 | IMAGE



Lot 186 | IMAGE



Lot 190 |
NEWS ARTICLES REMOVED
FROM EVENT



Lot 183 | IMAGE



Lot 187 | IMAGE



Lot 191 | IMAGE



Lot 184 | IMAGE



Lot 188 | IMAGE



Lot 192 | IMAGE



Lot 193 | IMAGE



Lot 197 | IMAGE



Lot 7 | IMAGE



Lot 194 | IMAGE



Lot 198 |
IMAGE REMOVED - IGNORE
PICTURE.



Lot 8 | IMAGE



Lot 195 |
IMAGE CONTAINERS
EMPTY



Lot 199 |
IMAGE REMOVED - IGNORE
PICTURE.



Lot 9 | IMAGE



Lot 196 |
IMAGE CONTAINERS
EMPTY



Lot 200 | IMAGE



Lot 10 | IMAGE



Lot 11 | IMAGE



Lot 15 | IMAGE



Lot 19 | IMAGE



Lot 12 | IMAGE



Lot 16 | IMAGE



Lot 20 | IMAGE



Lot 13 | IMAGE



Lot 17 | IMAGE



Lot 21 | IMAGE



Lot 14 | IMAGE



Lot 18 | IMAGE



Lot 22 | IMAGE



Lot 23 | IMAGE



Lot 27 | IMAGE



Lot 31 |
ITEM REMOVED



Lot 24 | IMAGE



Lot 28 | IMAGE



Lot 32 | IMAGE



Lot 25 | IMAGE



Lot 29 | IMAGE



Lot 33 | IMAGE



Lot 26 | IMAGE



Lot 30 | IMAGE



Lot 34 | IMAGE



Lot 35 | IMAGE



Lot 39 | IMAGE



Lot 43 | IMAGE



Lot 36 | IMAGE



Lot 40 | IMAGE



Lot 44 | IMAGE



Lot 37 | IMAGE



Lot 41 | IMAGE



Lot 45 | IMAGE



Lot 38 | IMAGE



Lot 42 | IMAGE



Lot 46 | IMAGE



Lot 47 | IMAGE



Lot 51 | IMAGE



Lot 55 | IMAGE



Lot 48 | IMAGE



Lot 52 | IMAGE



Lot 56 | IMAGE



Lot 49 | IMAGE



Lot 53 | IMAGE



Lot 57 | IMAGE



Lot 50 | IMAGE



Lot 54 | IMAGE



Lot 58 | IMAGE



Lot 59 | IMAGE



Lot 63 | IMAGE



Lot 67 | IMAGE



Lot 60 | IMAGE



Lot 64 | IMAGE



Lot 68 | IMAGE



Lot 61 | IMAGE



Lot 65 | IMAGE



Lot 69 | IMAGE



Lot 62 | IMAGE



Lot 66 | IMAGE



Lot 70 | IMAGE



Lot 71 | IMAGE



Lot 75 | IMAGE



Lot 79 | IMAGE



Lot 72 | IMAGE



Lot 76 | IMAGE



Lot 80 | IMAGE



Lot 73 | IMAGE



Lot 77 | IMAGE



Lot 81 | IMAGE



Lot 74 | IMAGE



Lot 78 | IMAGE



Lot 82 | IMAGE



Lot 83 | IMAGE



Lot 87 | IMAGE



Lot 91 | IMAGE



Lot 84 | IMAGE



Lot 88 | IMAGE



Lot 92 | IMAGE



Lot 85 | IMAGE



Lot 89 | IMAGE



Lot 93 | IMAGE



Lot 86 | IMAGE



Lot 90 | IMAGE



Lot 94 | IMAGE



Lot 95 | IMAGE



Lot 99 | IMAGE



Lot 203 | IMAGE



Lot 96 | IMAGE



Lot 100 | IMAGE



Lot 204 | IMAGE



Lot 97 | IMAGE



Lot 201 | IMAGE



Lot 205 | IMAGE



Lot 98 | IMAGE



Lot 202 | IMAGE



Lot 206 | IMAGE



Lot 207 | IMAGE



Lot 211 | IMAGE



Lot 215 | IMAGE



Lot 208 | IMAGE



Lot 212 | IMAGE



Lot 216 | IMAGE



Lot 209 | IMAGE



Lot 213 | IMAGE



Lot 217 | IMAGE



Lot 210 | IMAGE



Lot 214 | IMAGE



Lot 218 | IMAGE



Lot 219 | IMAGE



Lot 223 | IMAGE



Lot 227 | IMAGE



Lot 220 | IMAGE



Lot 224 | IMAGE



Lot 228 | IMAGE



Lot 221 | IMAGE



Lot 225 | IMAGE



Lot 229 | IMAGE



Lot 222 | IMAGE



Lot 226 | IMAGE



Lot 230 | IMAGE



Lot 231 | IMAGE



Lot 235 | IMAGE



Lot 239 |
ITEM REMOVED..



Lot 232 | IMAGE



Lot 236 | IMAGE



Lot 240 | IMAGE



Lot 233 | IMAGE



Lot 237 | IMAGE



Lot 241 | IMAGE



Lot 234 | IMAGE



Lot 238 | IMAGE



Lot 242 | IMAGE



Lot 243 | IMAGE



Lot 247 | IMAGE



Lot 251 | IMAGE



Lot 244 | IMAGE



Lot 248 | IMAGE



Lot 252 | IMAGE



Lot 245 | IMAGE



Lot 249 | IMAGE



Lot 253 | IMAGE



Lot 246 | IMAGE



Lot 250 | IMAGE



Lot 254 | IMAGE



Lot 255 | IMAGE



Lot 259 | IMAGE



Lot 263 | IMAGE



Lot 256 | IMAGE



Lot 260 | IMAGE



Lot 264 | IMAGE



Lot 257 | IMAGE



Lot 261 | IMAGE



Lot 265 | IMAGE



Lot 258 | IMAGE



Lot 262 | IMAGE



Lot 266 | IMAGE



Lot 267 | IMAGE



Lot 271 | IMAGE



Lot 275 | IMAGE



Lot 268 | IMAGE



Lot 272 | IMAGE



Lot 276 | IMAGE



Lot 269 | IMAGE



Lot 273 | IMAGE



Lot 277 | IMAGE



Lot 270 | IMAGE



Lot 274 | IMAGE



Lot 278 | IMAGE



Lot 279 | IMAGE



Lot 283 | IMAGE



Lot 287 | IMAGE



Lot 280 | IMAGE



Lot 284 | IMAGE



Lot 288 | IMAGE



Lot 281 | IMAGE



Lot 285 | IMAGE



Lot 289 | IMAGE



Lot 282 | IMAGE



Lot 286 | IMAGE



Lot 290 | IMAGE



Lot 291 | IMAGE



Lot 295 | IMAGE



Lot 299 | IMAGE



Lot 292 | IMAGE



Lot 296 | IMAGE



Lot 300 | IMAGE
Showing 301 to 400 of 1,157 lots



Lot 293 | IMAGE



Lot 297 | IMAGE



Lot 301 | IMAGE



Lot 294 | IMAGE



Lot 298 | IMAGE



Lot 302 | IMAGE



Lot 303 | IMAGE



Lot 307 | IMAGE



Lot 311 | IMAGE



Lot 304 | IMAGE



Lot 308 | IMAGE



Lot 312 | IMAGE



Lot 305 | IMAGE



Lot 309 | IMAGE



Lot 313 | IMAGE



Lot 306 | IMAGE



Lot 310 | IMAGE



Lot 314 | IMAGE



Lot 315 | IMAGE



Lot 319 | IMAGE



Lot 323 | IMAGE



Lot 316 | IMAGE



Lot 320 | IMAGE



Lot 324 | IMAGE



Lot 317 | IMAGE



Lot 321 | IMAGE



Lot 325 | IMAGE



Lot 318 | IMAGE



Lot 322 | IMAGE



Lot 326 | IMAGE



Lot 327 | IMAGE



Lot 331 | IMAGE



Lot 335 | IMAGE



Lot 328 | IMAGE



Lot 332 | IMAGE



Lot 336 | IMAGE



Lot 329 | IMAGE



Lot 333 | IMAGE



Lot 337 | IMAGE



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Lot 334 | IMAGE



Lot 338 | IMAGE



Lot 339 | IMAGE



Lot 343 | IMAGE



Lot 347 | IMAGE



Lot 340 | IMAGE



Lot 344 | IMAGE



Lot 348 | IMAGE



Lot 341 | IMAGE



Lot 345 | IMAGE



Lot 349 | IMAGE



Lot 342 | IMAGE



Lot 346 | IMAGE



Lot 350 | IMAGE



Lot 351 | IMAGE



Lot 355 | IMAGE



Lot 359 | IMAGE



Lot 352 | IMAGE



Lot 356 | IMAGE



Lot 360 | IMAGE



Lot 353 | IMAGE



Lot 357 | IMAGE



Lot 361 | IMAGE



Lot 354 | IMAGE



Lot 358 | IMAGE



Lot 362 | IMAGE



Lot 363 | IMAGE



Lot 367 | IMAGE



Lot 371 | IMAGE



Lot 364 | IMAGE



Lot 368 | IMAGE



Lot 372 | IMAGE



Lot 365 | IMAGE



Lot 369 | IMAGE



Lot 373 | IMAGE



Lot 366 | IMAGE



Lot 370 | IMAGE



Lot 374 | IMAGE



Lot 375 | IMAGE



Lot 379 | IMAGE



Lot 383 | IMAGE



Lot 376 | IMAGE



Lot 380 | IMAGE



Lot 384 | IMAGE



Lot 377 | IMAGE



Lot 381 | IMAGE



Lot 385 | IMAGE



Lot 378 | IMAGE



Lot 382 | IMAGE



Lot 386 | IMAGE



Lot 387 | IMAGE



Lot 391 | IMAGE



Lot 395 | IMAGE



Lot 388 | IMAGE



Lot 392 | IMAGE



Lot 396 | IMAGE



Lot 389 | IMAGE



Lot 393 | IMAGE



Lot 397 | IMAGE



Lot 390 | IMAGE



Lot 394 | IMAGE



Lot 398 | IMAGE



Lot 399 | IMAGE



Lot 403 | IMAGE



Lot 407 | IMAGE



Lot 400 | IMAGE
Showing 401 to 500 of 1,157 lots



Lot 404 | IMAGE



Lot 408 | IMAGE



Lot 401 | IMAGE



Lot 405 | IMAGE



Lot 409 | IMAGE



Lot 402 | IMAGE



Lot 406 | IMAGE



Lot 410 | IMAGE



Lot 411 | IMAGE



Lot 415 | IMAGE



Lot 419 | IMAGE



Lot 412 | IMAGE



Lot 416 | IMAGE



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Lot 417 | IMAGE



Lot 421 | IMAGE



Lot 414 | IMAGE



Lot 418 | IMAGE



Lot 422 | IMAGE



Lot 423 | IMAGE



Lot 427 | IMAGE



Lot 431 | IMAGE



Lot 424 | IMAGE



Lot 428 | IMAGE



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Lot 425 | IMAGE



Lot 429 | IMAGE



Lot 433 | IMAGE



Lot 426 | IMAGE



Lot 430 | IMAGE



Lot 434 | IMAGE



Lot 435 | IMAGE



Lot 439 | IMAGE



Lot 443 | IMAGE



Lot 436 | IMAGE



Lot 440 | IMAGE



Lot 444 | IMAGE



Lot 437 | IMAGE



Lot 441 | IMAGE



Lot 445 | IMAGE



Lot 438 | IMAGE



Lot 442 | IMAGE



Lot 446 | IMAGE



Lot 447 | IMAGE



Lot 451 | IMAGE



Lot 455 | IMAGE



Lot 448 | IMAGE



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Lot 453 | IMAGE



Lot 457 | IMAGE



Lot 450 | IMAGE



Lot 454 | IMAGE



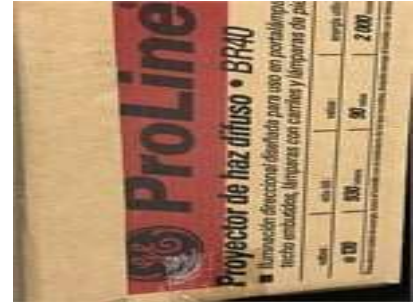
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Lot 466 | IMAGE



Lot 470 | IMAGE



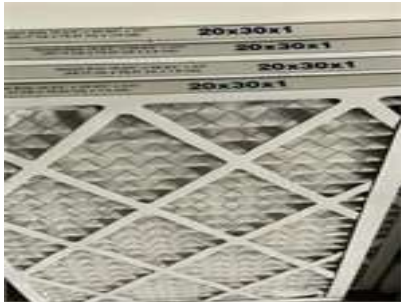
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Lot 481 | IMAGE



Lot 474 | IMAGE



Lot 478 | IMAGE



Lot 482 | IMAGE



Lot 483 | IMAGE



Lot 487 | IMAGE



Lot 491 | IMAGE



Lot 484 | IMAGE



Lot 488 | IMAGE



Lot 492 | IMAGE



Lot 485 | IMAGE



Lot 489 | IMAGE



Lot 493 | IMAGE



Lot 486 | IMAGE



Lot 490 | IMAGE



Lot 494 | IMAGE



Lot 495 | IMAGE



Lot 499 | IMAGE



Lot 503 | IMAGE



Lot 496 | IMAGE



Lot 500 | IMAGE
Showing 501 to 600 of 1,157 lots



Lot 504 | IMAGE



Lot 497 | IMAGE



Lot 501 | IMAGE



Lot 505 | IMAGE



Lot 498 | IMAGE



Lot 502 | IMAGE



Lot 506 | IMAGE



Lot 507 | IMAGE



Lot 511 | IMAGE



Lot 515 | IMAGE



Lot 508 | IMAGE



Lot 512 | IMAGE



Lot 516 | IMAGE



Lot 509 | IMAGE



Lot 513 | IMAGE



Lot 517 | IMAGE



Lot 510 | IMAGE



Lot 514 | IMAGE



Lot 518 | IMAGE



Lot 519 | IMAGE



Lot 523 | IMAGE



Lot 527 | IMAGE



Lot 520 | IMAGE



Lot 524 | IMAGE



Lot 528 | IMAGE



Lot 521 | IMAGE



Lot 525 | IMAGE



Lot 529 |
PERSONAL ITEMS
REMOVED



Lot 522 | IMAGE



Lot 526 | IMAGE



Lot 530 | IMAGE



Lot 531 | IMAGE



Lot 535 | IMAGE



Lot 539 | IMAGE



Lot 532 | IMAGE



Lot 536 | IMAGE



Lot 540 | IMAGE



Lot 533 | IMAGE



Lot 537 | IMAGE



Lot 541 | IMAGE



Lot 534 | IMAGE



Lot 538 | IMAGE



Lot 542 | IMAGE



Lot 543 | IMAGE



Lot 547 | IMAGE



Lot 551 | IMAGE



Lot 544 | IMAGE



Lot 548 | IMAGE



Lot 552 | IMAGE



Lot 545 | IMAGE



Lot 549 | IMAGE



Lot 553 | IMAGE



Lot 546 | IMAGE



Lot 550 | IMAGE



Lot 554 | IMAGE



Lot 555 | IMAGE



Lot 559 | IMAGE



Lot 563 | IMAGE



Lot 556 | IMAGE



Lot 560 | IMAGE



Lot 564 | IMAGE



Lot 557 | IMAGE



Lot 561 | IMAGE



Lot 565 | IMAGE



Lot 558 | IMAGE



Lot 562 | IMAGE



Lot 566 | IMAGE



Lot 567 | IMAGE



Lot 571 | IMAGE



Lot 575 | IMAGE



Lot 568 | IMAGE



Lot 572 | IMAGE



Lot 576 | IMAGE



Lot 569 | IMAGE



Lot 573 | IMAGE



Lot 577 | IMAGE



Lot 570 | IMAGE



Lot 574 | IMAGE



Lot 578 | IMAGE



Lot 579 | IMAGE



Lot 583 | IMAGE



Lot 587 | IMAGE



Lot 580 | IMAGE



Lot 584 | IMAGE



Lot 588 | IMAGE



Lot 581 | IMAGE



Lot 585 | IMAGE



Lot 589 | IMAGE



Lot 582 | IMAGE



Lot 586 | IMAGE



Lot 590 | IMAGE



Lot 591 | IMAGE



Lot 595 | IMAGE



Lot 599 | IMAGE



Lot 592 | IMAGE



Lot 596 | IMAGE



Lot 600 | IMAGE
Showing 601 to 700 of 1,157 lots



Lot 593 | IMAGE



Lot 597 | IMAGE



Lot 601 | IMAGE



Lot 594 | IMAGE



Lot 598 | IMAGE



Lot 602 | IMAGE



Lot 603 | IMAGE



Lot 607 | IMAGE



Lot 611 | IMAGE



Lot 604 | IMAGE



Lot 608 | IMAGE



Lot 612 | IMAGE



Lot 605 | IMAGE



Lot 609 | IMAGE



Lot 613 | IMAGE



Lot 606 | IMAGE



Lot 610 | IMAGE



Lot 614 | IMAGE



Lot 615 | IMAGE



Lot 619 | IMAGE



Lot 623 | IMAGE



Lot 616 | IMAGE



Lot 620 | IMAGE



Lot 624 | IMAGE



Lot 617 | IMAGE



Lot 621 | IMAGE



Lot 625 | IMAGE



Lot 618 | IMAGE



Lot 622 | IMAGE



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Lot 627 | IMAGE



Lot 631 | IMAGE



Lot 635 | IMAGE



Lot 628 | IMAGE



Lot 632 | IMAGE



Lot 636 | IMAGE



Lot 629 | IMAGE



Lot 633 | IMAGE



Lot 637 | IMAGE



Lot 630 | IMAGE



Lot 634 | IMAGE



Lot 638 | IMAGE



Lot 639 | IMAGE



Lot 643 | IMAGE



Lot 647 | IMAGE



Lot 640 | IMAGE



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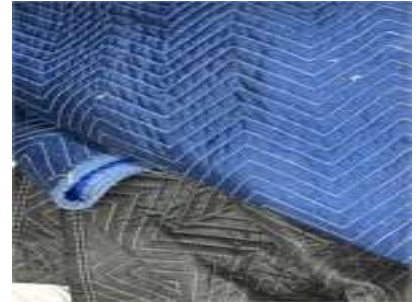
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Lot 657 | IMAGE



Lot 661 | IMAGE



Lot 654 | IMAGE



Lot 658 | IMAGE



Lot 662 | IMAGE



Lot 663 | IMAGE



Lot 667 | IMAGE



Lot 671 | IMAGE



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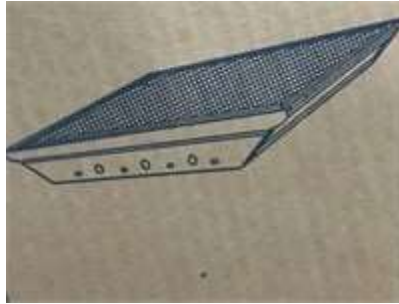
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Lot 676 | IMAGE



Lot 680 | IMAGE



Lot 684 | IMAGE



Lot 677 | IMAGE



Lot 681 | IMAGE



Lot 685 | IMAGE



Lot 678 | IMAGE



Lot 682 | IMAGE



Lot 686 | IMAGE



Lot 687 | IMAGE



Lot 691 | IMAGE



Lot 695 | IMAGE



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Lot 692 | IMAGE



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Lot 690 | IMAGE



Lot 694 | IMAGE



Lot 698 | IMAGE



Lot 699 | IMAGE



Lot 703 | IMAGE



Lot 707 | IMAGE



Lot 700 | IMAGE
Showing 701 to 800 of 1,157 lots



Lot 704 | IMAGE



Lot 708 | IMAGE



Lot 701 | IMAGE



Lot 705 | IMAGE



Lot 709 | IMAGE



Lot 702 | IMAGE



Lot 706 | IMAGE



Lot 710 | IMAGE



Lot 711 | IMAGE



Lot 715 | IMAGE



Lot 719 | IMAGE



Lot 712 | IMAGE



Lot 716 | IMAGE



Lot 720 | IMAGE



Lot 713 | IMAGE



Lot 717 | IMAGE



Lot 721 | IMAGE



Lot 714 | IMAGE



Lot 718 | IMAGE



Lot 722 | IMAGE



Lot 723 | IMAGE



Lot 727 | IMAGE



Lot 731 | IMAGE



Lot 724 | IMAGE



Lot 728 | IMAGE



Lot 732 | IMAGE



Lot 725 | IMAGE



Lot 729 | IMAGE



Lot 733 | IMAGE



Lot 726 | IMAGE



Lot 730 | IMAGE



Lot 734 | IMAGE



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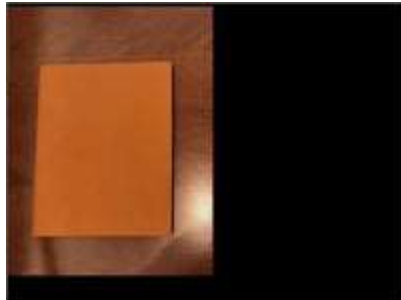
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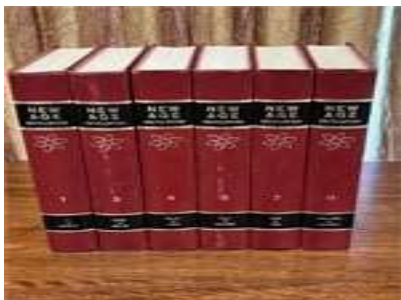
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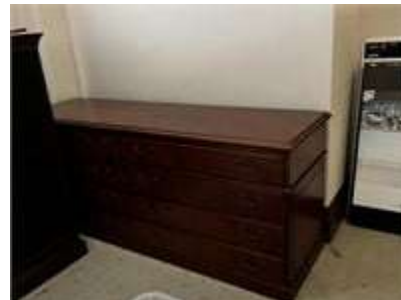
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EXHIBIT A-2



BROWN FOX

Tim Wells
214.367.6091
tim@brownfoxlaw.com

February 13, 2023

Via Email (medney@huntonak.com)

Michael Edney
Hunton Andrews Kurth LLP
2200 Pennsylvania Avenue, NW
Washington, D.C. 20037-1701

Via Email (thuffman@huntonak.com)

Ted Huffman
Hunton Andrews Kurth LLP
1445 Ross Avenue, Suite 3700
Dallas, TX 75202

Via Email (mdingman@huntonak.com)

Michael Dingman
Hunton Andrews Kurth LLP
2200 Pennsylvania Avenue, NW
Washington, D.C. 20037-1701

RE: No. 3:22-CV-2118-X; *Securities and Exchange Commission v. Timothy Barton, et al.*

Mr. Barton:

I am writing to address issues regarding retrieval of personal property. The Receiver and his counsel have previously requested, on multiple occasions, documentation detailing any personal property you claim belongs to you and is located at the Receivership Properties. To date, we have not received such a list. While the Receiver has previously permitted the supervised removal of personal property from 4107 Rock Creek Drive and 2999 Turtle Creek Boulevard on multiple occasions, continued piecemeal efforts are inefficient and waste Receivership resources.

To most efficiently and finally deal with claims regarding personal property, please provide, within ten (10) business days of receipt of this letter, (1) a list of all personal property you claim is currently in the Receiver's possession and, (2) proof of ownership, through either (a) a receipt or other sufficient proof of purchase or (b) a sworn statement that the item(s) are your personal property and that you own the property. For each item you received after March 1, 2017, if any, please include a sworn statement that the item was neither purchased with any Receivership Entity funds, nor a gift from any Receivership Entity. As we have done with every other party requesting personal property, we will analyze the documentation provided and respond in due course on whether the property may be retrieved and to schedule a time for retrieval of approved items.

Please advise any family, friends, or acquaintances who claim to have personal property in the Receiver's possession they must follow the same procedure outlined above.

If you have any questions or comments regarding this matter, feel free to contact me at 214-367-6091 or at tim@brownfoxlaw.com.

Sincerely,



Tim Wells

EXHIBIT A-3



BROWN FOX

Tim Wells
214.367.6091
tim@brownfoxlaw.com

March 29, 2023

Via Email (thuffman@huntonak.com)

Ted Huffman
Hunton Andrews Kurth LLP
1445 Ross Avenue, Suite 3700
Dallas, TX 75202

RE: No. 3:22-CV-2118-X; *Securities and Exchange Commission v. Timothy Barton, et al.*; pending in the United States District Court for the Northern District of Texas, Dallas Division

Dear Mr. Huffman:

I am in receipt of your email dated March 21, 2023, which included a list of Tim Barton's purported personal property. Because 2999 Turtle Creek (the "Turtle Creek Property") was used as an office building for the Receivership Entities, the Receiver presumes the items in the Turtle Creek Property are owned by the businesses located there. In my February 13, 2023 letter, I explained that to retrieve personal property Mr. Barton needs to provide a list of his personal property and a declaration or purchase evidence verifying that the items to be retrieved are personal property. You have provided a list, but no declaration or purchase evidence. Unless Mr. Barton can provide a declaration or purchase evidence, the items on the list are still presumed to be Receivership Property. Nevertheless, the Receiver is willing to gather and provide the following clearly personal items from the Turtle Creek Property:

- Clearly personal items in cabinets and on walls in T. Barton's office
 - *The walls have been bare since the Receiver took possession.*
- Clearly personal items in T. Barton's desk
- Clothes and all clearly personal items in bathroom of T. Barton's office
- All pictures in K. Walji's office
 - *There are no pictures in K. Walji's office. There are pictures in the closet near K. Walji's office, and the Receiver will provide those.*
- Vitamins
- Green jacket in cigar room
 - *Virtually all cigars were taken from the Turtle Creek Property and 4107 Rock Creek before the Receiver took possession of the Receivership Properties.*

Mr. Barton can then retrieve the gathered items at a mutually agreed place and time.

As detailed in my February 13, 2023 letter, to retrieve any other items, Mr. Barton must provide proof of ownership, through either (a) a receipt or other sufficient proof of ownership or (b) a declaration that the item(s) are his personal property and that the property was not purchased with any Receivership Entity funds, nor a gift from any Receivership Entity.

As I have communicated in my correspondence with V. Barton, and counsel for M. Barton, any other individuals claiming to have personal property in the Turtle Creek Property must contact the Receiver, through his counsel, and provide the same proof of personal ownership, through purchase evidence or declaration as explained above.

In accordance with the Order Governing Administration [Dkt. 63], we are in the process of retaining an auctioneer to sell the contents of the Turtle Creek Property, with the sale to occur no later than April 24, 2023. To allow sufficient time for the auctioneer to inventory and market the sale items, please provide any purchase evidence or declaration as soon as possible so that the items listed above, and any other proven personal items, can be scheduled for pick up before 12:00 pm on April 10, 2023.

Sincerely,



Tim Wells

cc: Michael Edney
Michael Dingman

EXHIBIT A-4

Charlene Koonce

Subject: FW: Link to pictures for auction
Attachments: Personal Property List.pdf

From: Charlene Koonce
Sent: Thursday, April 20, 2023 9:09 AM
To: Huffman, Ted <THuffman@hunton.com>
Cc: Edney, Michael <MEdney@huntonak.com>; victorialynnbarton@gmail.com;
nathan.baum@nortonrosefulbright.com; samuel.ramer@nortonrosefulbright.com;
christopher.cooke@nortonrosefulbright.com; Tim Wells <tim@brownfoxlaw.com>
Subject: FW: Link to pictures for auction

All: To minimize the fees both sides are continuing to spend on these issues and although we contend receipts or a declaration should be provided for all, see our response to the list you provided previously. Except as conditioned below, we agree to allow Mr. Barton to recover the items identified below.

Also, as we have discussed, a link to the auctioneer's photos of the contents of Turtle Creek is included below. By 5 p.m. on Monday, please identify by lot # any additional items in these photos that Mr. Barton, Max, or Victoria contend are their own personal property. For any additional items identified from these photos, (ie., not identified in the list you previously provided) unless the item is inherently personal, we will need a receipt showing purchase was on a personal credit card or from personal funds or a sworn statement to that effect or otherwise explaining the origin (a gift for instance).

- All items in cabinets and on walls in T. Barton's office
Agree; Everything unless clearly business
- All items in T. Barton's desk
Agree; Everything except pens and business papers
- All items in cabinet (including liquor)
Agree as to the liquor (opened and unopened)
- Clothes and all items in bathroom of T. Barton's office
Agree
- Round table chairs and desk (personal gifts from Mr. Gene Phillips)
We need you to identify these items with the lot # from the photos, and we need a sworn statement from someone that this was a gift, as well as the approximate date of the gift.
- All pictures in K. Walji's office
There were no pictures in his office; but we will turn over pictures that were in a nearby closet
- Kitchen coffee machine and nutribullet
Appears to belong to business; Need receipts or declaration
- Kitchenware, including glasses and cups
Appears to belong to business; Need receipts or declaration
- Vitamins and any remaining non-perishable food
Agree
- All items in drawers and cabinets of T. Barton's assistant's office (note: this is the office with window)
Agree; everything unless clearly business
- Green jacket and other items in cigar room (note: the cabinet on wall, when walking in on the left, has a door that pops open when pushed, with cigar collection inside)

Agree re green jacket; yes on four cigars located in the office; need receipt or declaration for anything else

- Three beds, white couch, and bedding/sheets on second floor

Agree re mattresses and bedding; need receipt or declaration for anything else

- Garage items (including large wooden dining room table and two armoires) – there should be other personal items purchased from 2000s here

Yes on large wooden dining table and chairs (lot 598) and armoires (614 and 615); otherwise need to know item numbers and description of any other items

- There are items in the corner of security office that M. Barton can identify as from his mother's house

Need to know item number; possibly need receipt or declaration, depending on nature of item

- Dining room table with rose granite by lawyer's office (from T. Barton's personal house)

Need to know item number; need receipt or declaration


Here's the link: [DFW Auction House Court Ordered Liquidation | HiBid Auctions | TEXAS](#)



Thank you.



CHARLENE KOONCE

Partner

 8111 Preston Road
Suite 300
Dallas, Texas 75225

 214.327.5000
 214.367.7503

Turtle Creek Offices

In general, many of the items in the Turtle Creek office would have been moved from prior offices and owned for over ten years.

Mr. Barton seeks to pick up or have at least the following returned:

- All items in cabinets and on walls in T. Barton's office
- All items in T. Barton's desk
- All items in cabinet (including liquor)
- Clothes and all items in bathroom of T. Barton's office
- Round table chairs and desk (personal gifts from Mr. Gene Phillips)
- All pictures in K. Walji's office
- Kitchen coffee machine and nutribullet
- Kitchenware, including glasses and cups
- Vitamins and any remaining non-perishable food
- All items in drawers and cabinets of T. Barton's assistant's office (note: this is the office with window)
- Green jacket and other items in cigar room (note: the cabinet on wall, when walking in on the left, has a door that pops open when pushed, with cigar collection inside)
- Three beds, white couch, and bedding/sheets on second floor
- Garage items (including large wooden dining room table and two armoires) – there should be other personal items purchased from 2000s here
- There are items in the corner of security office that M. Barton can identify as from his mother's house
- Dining room table with rose granite by lawyer's office (from T. Barton's personal house)

This list is notably limited by personal memory. There are other personal items that likely could be identified if Mr. Barton were permitted to walk the building.

Rock Creek House

In general, items were moved into the Rock Creek house were from a previous house. There should not be any major items in house acquired within the last two years, other than food, perishables, and other smaller items. Many items were acquired at least five, if not ten or more, years ago. All of the personal property in the home is believe to be personal, and not receivership property.

Below is a list of what Mr. Barton believes likely still exists. The list is limited by personal memory.

- M. Barton's and T. Barton's books
- Beds, mattresses, and sheets from rooms of T. Barton, M. Barton, and V. Barton, and from guest room
- Cleaning items and vacuum cleaner
- Kitchen items (including pots, pans, dishes, knives, refrigerator, silverware, coffee makers/expresso machine, nutribullet blender, juice maker/juice machine, cooking tools, toaster oven, microwave, waffle machine, etc.) – some kitchen tools and items may be in the kitchen closet
- Medicine in refrigerator
- Any remaining non-perishable food items, spices, and liquor
- Vitamins
- Foot massage machine
- Clothes
- V. Barton items (including bed, end tables, chairs, couch, refrigerator, items under V. Barton stairs, items in V. Barton kitchen, etc.)
- Any personal items located in drawers and closets
- Personal items outside (ladders, cabinets, tools, etc.)
- Personal items that were stored in cabinets and drawers
- Bathroom items (trash cans, toiletries, brushes, toiletries, towels, floor mats, etc.)
- Barbecue (in backyard)
- Outdoor chairs and couch
- Leaf blower
- Any fans
- Furniture (including white iron bench outside; lawn chairs outside; bookshelves; chairs and cabinets near kitchen breakfast area; dining room table and chairs; dining room hutch; minibar cabinet; table and chairs between kitchen and living room area; couches, chairs, and coffee table; etc.)
- Televisions
- Cigar collection (including cutters and trays)
- Any personal art, statues, or figurines (e.g., Chinese warrior wooden statues)
- Items hanging on walls (e.g., framed photographs)
- All personal mail directed to or belonging to T. Barton, M. Barton, or V. Barton

EXHIBIT A-5

Charlene Koonce

Subject: FW: Link to pictures for auction

From: Edney, Michael <MEdney@huntonak.com>

Sent: Friday, April 21, 2023 1:03 PM

To: Charlene Koonce <charlene@brownfoxlaw.com>; Huffman, Ted <THuffman@hunton.com>

Cc: victorialynnbarton@gmail.com; nathan.baum@nortonrosefulbright.com; samuel.ramer@nortonrosefulbright.com; christopher.cooke@nortonrosefulbright.com; Tim Wells <tim@brownfoxlaw.com>

Subject: Re: Link to pictures for auction

[EXTERNAL EMAIL] Do not open links or attachments if you cannot verify the sender.

Dear Ms. Koonce:

We believe that this auction requires Court approval and should await the resolution of the appeal regarding the Receiver's appointment and authorities (to be argued May 1, 2023) or at least the Receiver's motion to the District Court seeking approval of the sale of the Turtle Creek property. These items include many personal items and assumes that Mr. Barton's corporate entities will never be returned to him and resume business, which is far from certain and, in fact, the entire point of this litigation. An auction on April 24, with hardly any notice, is completely unnecessary. We ask that you delay it.

We hope involving the Court in this issue will be unnecessary. Pursuant to the rules of the Court, however, we are meeting and conferring with you on motion practice that may have to arise from these issues. If necessary, we will seek relief to stop this sale if it is not postponed (reserving all rights that the Receiver should have sought Court approval, rather the Defendant having to seek relief). We will do so by seeking a temporary restraining order, a preliminary injunction, or through other forms of relief sufficient to stop or delay the sale. At a minimum, we request that you delay the auction until the Court has had a chance to rule on our motion to stop it. (Any other course, will require a temporary restraining order application or other highly expedited motion and hearing practice before the Court.)

As you know, the Court has expressed concerns about the handling of personal property. We have tried to resolve these issues with you, to no avail, and regret that the parties cannot keep their focus on matters material to the economic value of the estate, rather than of particular personal pain to the Defendant. We remind the Receiver that its legal mandate is to preserve the status quo pending final resolution of the merits of the underlying matter, not to presume an outcome and start liquidating the Defendant's business.

Please let me know the Receiver's position on these requests for relief by the close of business today.

My very best regards,

Michael J. Edney
Hunton Andrews Kurth LLC
2200 Pennsylvania Avenue, NW
Washington, DC 20037
(202) 778-2204
medney@huntonak.com

From: Charlene Koonce <charlene@brownfoxlaw.com>
Sent: Thursday, April 20, 2023 10:09 AM
To: Huffman, Ted <THuffman@hunton.com>
Cc: Edney, Michael <MEdney@huntonak.com>; victorialynnbarton@gmail.com <victorialynnbarton@gmail.com>; nathan.baum@nortonrosefulbright.com <nathan.baum@nortonrosefulbright.com>; samuel.ramer@nortonrosefulbright.com <samuel.ramer@nortonrosefulbright.com>; christopher.cooke@nortonrosefulbright.com <christopher.cooke@nortonrosefulbright.com>; Tim Wells <tim@brownfoxlaw.com>
Subject: FW: Link to pictures for auction

Caution: This email originated from outside of the firm.

All: To minimize the fees both sides are continuing to spend on these issues and although we contend receipts or a declaration should be provided for all, see our response to the list you provided previously. Except as conditioned below, we agree to allow Mr. Barton to recover the items identified below.

Also, as we have discussed, a link to the auctioneer's photos of the contents of Turtle Creek is included below. By 5 p.m. on Monday, please identify by lot # any additional items in these photos that Mr. Barton, Max, or Victoria contend are their own personal property. For any additional items identified from these photos, (ie., not identified in the list you previously provided) unless the item is inherently personal, we will need a receipt showing purchase was on a personal credit card or from personal funds or a sworn statement to that effect or otherwise explaining the origin (a gift for instance).

- All items in cabinets and on walls in T. Barton's office
Agree; Everything unless clearly business
- All items in T. Barton's desk
Agree; Everything except pens and business papers
- All items in cabinet (including liquor)
Agree as to the liquor (opened and unopened)
- Clothes and all items in bathroom of T. Barton's office
Agree
- Round table chairs and desk (personal gifts from Mr. Gene Phillips)
We need you to identify these items with the lot # from the photos, and we need a sworn statement from someone that this was a gift, as well as the approximate date of the gift.
- All pictures in K. Walji's office
There were no pictures in his office; but we will turn over pictures that were in a nearby closet
- Kitchen coffee machine and nutribullet
Appears to belong to business; Need receipts or declaration
- Kitchenware, including glasses and cups

Appears to belong to business; Need receipts or declaration

- Vitamins and any remaining non-perishable food
Agree
- All items in drawers and cabinets of T. Barton's assistant's office (note: this is the office with window)
Agree; everything unless clearly business
- Green jacket and other items in cigar room (note: the cabinet on wall, when walking in on the left, has a door that pops open when pushed, with cigar collection inside)
Agree re green jacket; yes on four cigars located in the office; need receipt or declaration for anything else
- Three beds, white couch, and bedding/sheets on second floor
Agree re mattresses and bedding; need receipt or declaration for anything else
- Garage items (including large wooden dining room table and two armoires) – there should be other personal items purchased from 2000s here
Yes on large wooden dining table and chairs (lot 598) and armoires (614 and 615); otherwise need to know item numbers and description of any other items
- There are items in the corner of security office that M. Barton can identify as from his mother's house
Need to know item number; possibly need receipt or declaration, depending on nature of item
- Dining room table with rose granite by lawyer's office (from T. Barton's personal house)
Need to know item number; need receipt or declaration

Here's the link: [DFW Auction House Court Ordered Liquidation | HiBid Auctions | TEXAS](#)

Thank you.



CHARLENE KOONCE
Partner

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