

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

**SECURITIES AND EXCHANGE COMMISSION,
Plaintiff,**

v.

**PLEXCORPS
(a/k/a and d/b/a PLEXCOIN and SIDEPAY.CA),
DOMINIC LACROIX, and
SABRINA PARADIS-ROYER,
Defendants.**

17 Civ. 7007 (CBA) (RML)

**Notice by the Securities and Exchange Commission of
No Objection Pursuant to the Order to Show Cause (D.E. 124)**

Pursuant to the Order to Show Cause entered by this Court (D.E. 124), Plaintiff Securities and Exchange Commission (“SEC”) states as follows:

1. Within three business days of the issuance of the Order to Show Cause, the SEC published the Order to Show Cause on the SEC webpage established for this case: <https://www.sec.gov/divisions/enforce/claims/plexcorps.htm> (the “SEC Webpage”).
2. Within three business days of the issuance of the Order to Show Cause, the SEC provided the Order to Show Cause to the Receiver appointed in *AUTORITÉS DES MARCHÉS FINANCIERS v. DOMINIC LACROIX, et al.*, No.: 200-11-025040-182, Superior Court, Quebec, Canada (the “Receiver”) for publication on the Receiver’s website.
3. Within three business days of the issuance of the Order to Show Cause, the SEC sent a copy of the Order to Show Cause to the three investors who previously communicated objections to the SEC’s plan to distribute collections through the Receiver in correspondence to the SEC or the Court (the “Prior Objectors”).

4. The SEC Webpage received 174 external hits¹ from the date the Order to Show Cause and related documents were published on that webpage through March 27, 2022.

5. The Receiver's Webpage received 60 external hits from the date the Order to Show Cause was published on the Receiver's webpage through March 27, 2022.

6. As of the date of this filing, the SEC staff has received no objections to the SEC's request that the Court enter an Order approving the transfer of the PlexCorps Fair Fund to the Receiver for distribution pursuant to the Receiver's U.S. Plan (the "Proposed Transfer"). By way of further information:

- a. One of the Prior Objectors informed the SEC that he, and the investors with whom he has been in contact, "have no objection whatsoever to the SEC's recommendation." The other two Prior Objectors did not respond to the Order to Show Cause.
- b. An additional investor contacted the SEC during the pendency of the Order to Show Cause. The investor confirmed receipt of the SEC's November 20, 2019 Notice described in the Order to Show Cause (the "2019 Notice") and inquired about the submission of late claims. The SEC staff alerted him to the pending Order to Show Cause and forwarded his request on the submission of late claims to the Receiver. The SEC has not heard anything more from this investor; the investor has not submitted an objection to the Proposed Transfer and/or otherwise responded to the Order to Show Cause.
- c. On March 22, 2022 (after the expiration of the Order to Show Cause), the SEC staff received electronic mail correspondence that it could not access. The SEC staff sent

¹ By "external hits," we mean 174 requests made by parties outside of the SEC to a web server to go to the SEC webpage.

an electronic response to the sender, asking the sender to re-send the correspondence. The sender has not re-sent the correspondence. The SEC notes that it has communicated with this investor in the past; the investor received the 2019 Notice and did not object to the Proposed Transfer at that time; and that the investor's prior communications have been inquiries regarding the distribution as opposed to objections.

7. On March 29, 2022, the Receiver informed the SEC staff that it has not received any communications from, or had contacts with, interested parties in connection with the Order to Show Cause and/or the Proposed Transfer.

8. The Tax Administrator has informed the SEC that it should withhold a reserve of \$1,623.08, comprised of \$1583.08 for tax administration fees and expenses, and \$40 for tax obligations (the "Reserve"). The accompanying proposed Order excludes the Reserve from the amount to be sent to the Receiver. The SEC shall disburse the Reserve in accordance with the Court's Order entered January 20, 2022, D.E. 122.

9. Pursuant to the Order to Show Cause, and for the reasons set forth above and in the SEC's letter requesting a pre-motion conference regarding the Order to Show Cause (D.E. 123), the SEC respectfully requests that the Court enter the accompanying proposed Order Directing the Transfer of Funds to the Canadian Receiver and Related Relief. In accordance with the Order to Show Cause, a copy of this Notice and the proposed Order will be published on the SEC Webpage.

Dated March 30, 2022

Respectfully submitted,

s/ Catherine E. Pappas
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