

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)

(Proposed) Order to Show  
Cause

The Court having considered the Motion of the Securities and Exchange Commission (the "SEC") for an Order to Show Cause why the Court should not transfer collections on the final judgment entered in this matter (the "PlexCorps Fair Fund") to the Receiver appointed in *AUTORITÉS DES MARCHÉS FINANCIERS v. DOMINIC LACROIX, et al.*, No.: 200-11-025040-182, Superior Court, Quebec, Canada (the "Canadian Proceeding") for distribution pursuant to the approved plan in the Canadian Proceeding (the "U.S. Plan");

And the SEC having represented to the Court that notice of this possible disposition was previously provided to investors by SEC on or about November 20, 2019, along with an opportunity to object and identification of both the SEC webpage for this matter and the Receiver's website for the Canadian Proceeding (the "Notice"), as further described in its January 2, 2020 status report to the Court (D.E. 118);

And English translations of the plans by which the Receiver will distribute the PlexCorps Fair Fund (the "U.S. Plan") and the Canadian Receivership Estate (the "Canadian Plan") (collectively, the "Plans") being publicly available on the SEC website at: <https://www.sec.gov/divisions/enforce/claims/plexcorps.htm>;

And the Defendants taking no position with respect to the Motion;

And for good cause shown,

**IT IS HEREBY ORDERED** that the Motion is **GRANTED**.

**I.**

**IT IS FURTHER ORDERED THAT** within three business days of the issuance of this Order, the SEC shall:

- (1) publish this Order on the SEC webpage established for this case:

<https://www.sec.gov/divisions/enforce/claims/plexcorps.htm> (the “SEC Webpage”);

- (2) provide this Order to the Receiver for publication on its website for the Canadian Proceeding, along with English translations of the Plans:

<https://www.raymondchabot.com/en/companies/public-records/dominic-lacroix-2/> (the “Receiver’s Website”); and

- (3) Send a copy of this Order to the investors who previously objected to distribution through the Receiver in correspondence to the SEC or the Court.

Publication as described, along with the publication of this Order through the Court’s ECF system, and the November 20, 2019 dissemination of the Notice, shall constitute and suffice as notice of the proposed disposition of the PlexCorps Fair Fund and the opportunity to object to interested parties.

**II.**

**IT IS FURTHER ORDERED THAT** individuals and entities who purchased PlexCoin tokens through its initial coin offering (“Potential Claimant”) shall show cause, if there is any, why this Court should not enter an Order approving the proposed transfer of the PlexCorps Fair

Fund to the Receiver for distribution pursuant to the U.S. Plan. Objections shall be made by correspondence **received by the SEC no later than 11:59 p.m. EST within thirty days of this Order (the “Objection Due Date”)**, at the following electronic mail address:

[ENF-SEC-DISTRIBUTIONS-PLEXCORP@SEC.GOV](mailto:ENF-SEC-DISTRIBUTIONS-PLEXCORP@SEC.GOV)

The correspondence must clearly state that the submitting entity is a Potential Claimant as defined above, or otherwise state fully and clearly the entity’s interest in this matter, and the entity’s objection(s) to the proposed transfer. The submitting entity must include all documentation necessary to support the objection. Any and all factual assertions must be concluded with the following declaration, if true, followed by the submitting person’s signature and the date of signature:

I declare pursuant to 28 U.S.C. §1746, under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct.

All correspondence must include current contact information for the submitting person, including, if available, an email address and mobile telephone number. Objections will be publicly filed by the SEC with the Court, as further set forth below in Section IV.

To the extent a submitting entity seeks to include in their submission sensitive information such as a social security number, financial account number, or home address, they should encrypt the submission prior to sending, sending the password in a separate email, or submit it pursuant to the next paragraph. **Please do not send claims information; only objections to the proposed transfer are being solicited.**

If a submitting entity is unable to securely submit their objection by email, they may send it addressed as set forth below. The submission must be received by the SEC no later than the Objection Due Date.

Catherine E. Pappas/ Brian Beirne  
SEC Office of Distributions- PlexCorps Fair Fund  
100 F. Street NE, Mail Stop 5012  
Washington, DC 20549

Failure to timely submit an objection in accordance with this section will result in the objection being waived. Proof of timely receipt by the SEC will be the burden of the submitting entity.

### III.

**IT IS FURTHER ORDERED that**, if no objections to the proposed transfer are timely submitted, the SEC shall:

- a) File a notice so advising the Court (the “Notice of No Objection”), accompanied by a proposed Order approving the transfer.
- b) Post a copy of the Notice of No Objection and proposed Order on the SEC Webpage.

Upon receipt of such notice from the SEC, the Court may enter an Order approving the proposed transfer without further notice or passage of time.



### IV.

**IT IS FURTHER ORDERED THAT**, if objections are timely received pursuant to this Order, the SEC shall file them, with sensitive information redacted, together with its response, within 50 days of the entry of this Order, with copies of its response served by electronic, First Class, or Overnight Mail upon any objecting entity. The SEC may submit an alternative proposal for the disposition of the PlexCorps Fair Fund (the “Alternative Proposal”) if and as appropriate. If the SEC submits an Alternative Proposal, the Alternative Proposal, and any

accompanying filings, will be made available to all Potential Claimants and interested parties through the SEC Webpage. Such publication, along with the publication through the Court's ECF system, shall constitute and suffice as notice of the Alternative Proposal. No further objection period will be provided unless expressly ordered by the Court.

If the Court deems it necessary or appropriate, the Court may conduct a hearing before approving the proposed transfer of the PlexCorps Fair Fund to the Receiver or the Alternative Proposal. Notice of a hearing shall be provided through the Court Docket, the SEC Webpage, and if and as otherwise ordered by the Court.

SO ORDERED, this 17 date of February, 2022,

  
  
The Honorable Carol Bagley Amon  
U.S. District Judge