

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

STEVE H. KARROUM

a/k/a MUSTAPHA KARROUM, et al.,

Defendants and Relief Defendant.

Civil No. 17-cv-187 (AJT/IDD)

**NOTICE BY THE SECURITIES AND EXCHANGE COMMISSION OF EXPIRATION
OF NOTICE PERIOD, REPORT ON PLAN OBJECTIONS, AND REQUEST FOR
ENTRY OF ORDER**

Further to its Motion for an Order establishing a Fair Fund, approving the proposed distribution plan, and appointing an SEC employee as the distribution agent (the “Motion”) (ECF No. 70), Plaintiff Securities and Exchange Commission (“SEC”) hereby notifies the Court of the expiration of the Plan Notice period described in the Motion and reports to the Court that it received no objections to the proposed distribution plan (the “Plan”). Accordingly, the SEC respectfully requests that the Court enter the proposed Order (ECF No. 70-3), which the SEC has resubmitted with this Notice.

By way of background, the SEC filed the Motion on March 7, 2019. The Motion stated that, immediately after filing it, the SEC would send notice of the proposed distribution plan to all identified investors in the form attached to the Motion as Exhibit B (ECF No. 70-2) and that, after April 8, 2019, the SEC would inform the Court of any objections to the proposed distribution plan and request that the Court enter an appropriate order granting the requested

relief. *Id.* at 1. This process would enable the Court to be made aware of any objections to the proposed distribution plan before entering an order approving that plan.

Immediately after filing the Motion on March 7, 2019, the SEC sent notice of the proposed distribution plan to all identified investors in the form attached to the Motion as Exhibit B, seeking any objections to the Plan by April 8, 2019. The SEC did not receive any objections to the Plan. Accordingly, the SEC now respectfully requests that the Court enter the proposed Order submitted with the Motion, a copy of which is resubmitted with this Notice.

Dated: April 11, 2019

Respectfully submitted,

/s/ Nicholas C. Margida

Nicholas C. Margida

VA Bar # 73176

Attorney for Plaintiff

SECURITIES AND EXCHANGE COMMISSION

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Washington, D.C. 20549

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Of Counsel:

Catherine E. Pappas (*pro hac vice* application granted)

CERTIFICATE OF SERVICE

I hereby certify that on April 11, 2019, I served the foregoing and all supporting papers electronically using the CM/ECF system on:

James T. Bacon
11350 Random Hills Road
Suite 700
Fairfax, VA 22030
Counsel for Sahar Karroum

I further certify that on March 7, 2019, as permitted by the Court's May 31, 2017 Order (Dkt. No. 7), the foregoing and all supporting papers were served by email on Defendant FX & Beyond Corporation at karroums@kartech-inc.com and by UPS to:

John Forest
StahlZelloe, P.C.
11350 Random Hills Road
Suite 700
Fairfax VA 22030

/s/ Nicholas C. Margida
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