

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:20-cv-21964-CMA

SECURITIES AND EXCHANGE COMMISSION,	:
	:
Plaintiff,	:
	:
v.	:
	:
TCA FUND MANAGEMENT GROUP CORP., <i>et al.</i> ,	:
	:
Defendants.	:
_____	:

PLAINTIFF SECURITIES AND EXCHANGE COMMISSION’S (“SEC”) OPPOSITION TO THOMAS DAY’S MOTION SEEKING CLARIFICATION ON SCOPE OF BLANKET STAY AND RELIEF FROM THE SAME

The SEC opposes Thomas Day’s request to lift [DE 209] the Court-ordered stay on litigation [DE 5] for the reasons described in the Receiver’s Objection thereto [DE 223].

Additionally, Mr. Day’s alleged whistleblower activity does not warrant a lifting of the stay. The SEC’s Whistleblower Program, which is administered through the SEC’s Office of the Whistleblower, provides a specific process through which the SEC may provide a monetary award to eligible individuals who come forward with high quality information that leads to an SEC enforcement action where more than \$1,000,000 in sanctions is ordered. Therefore, any potential recovery under the SEC’s Whistleblower Program would come from the SEC, not the Receivership estate.

March 24, 2022

Respectfully submitted,

By: /s/ Stephanie N. Moot
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served on all counsel of record identified on the attached Service List via transmission of Notices of Electronic Filing generated by CM/ECF this 24th day of March, 2022.

/s/ Stephanie N. Moot

SERVICE LIST

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