

Ms. Dobos was a former girlfriend of one of the principals of I.B. Capital, Michel Geurkink. Prior to the misappropriation of funds from I.B. Capital, Mr. Geurkink and Ms. Dobos retained a lawyer to assist them in forming a Seychelles domiciled company, Riknik & Sons, Ltd. ("Riknik"). Because Mr. Geurkink did not want to be publicly affiliated with Riknik, Ms. Dobos was named the ultimate beneficial owner of Riknik. See attached sworn affidavit of Michel Geurkink (exhibit 1).

Riknik received USD \$7.2 million of the approximately \$35 million in funds that Messrs. Geurkink and Echade misappropriated from I.B. Capital. Those funds are presently frozen (at the request of the Dutch Public Prosecutor's Office ("DPPO") in a bank in Slovakia, Ceskoslovenska Obchodna Banka ("CO Banka"). The Receiver prepared assignment documents for Ms. Dobos to execute which would have assigned the Riknik account at CO Banka to the Receiver. According to her counsel, Ms. Dobos would not execute the assignment documents unless she was able to keep a portion of the funds in the Riknik account.

Last fall, Messrs. Geurkink and Echade were convicted of money laundering in a criminal trial which took place in the Netherlands. Part of the evidence in the money laundering trial was the misappropriation of funds from I.B. Capital that are now on deposit in the Riknik account. As a result of these convictions, the DPPO communicated to the Receiver that it would be working with the Slovakian law enforcement authorities and CO Banka to have the \$7.2 million in the Riknik account transferred to the Receivership estate. While that communication occurred approximately 45 days ago, those funds have not yet been transferred to the Receivership estate.

For the foregoing reasons, the Receiver requests that Zsofia Dobos be dismissed from this case without prejudice.

The Receiver is simultaneously filing a Motion for Entry of Final Judgment against the six other defendants named in this proceeding; it is the Receiver's intent to close this case. If there is a

need for the Court's further assistance in connection with the 2019 matter, it will be reopened under Civil Action No. A-12-CV-0862-LY.

PRAYER FOR RELIEF

The Receiver respectfully requests the Court dismiss Defendant Zsofia Dobos without prejudice.

Respectfully submitted,

By: /s/ Guy Hohmann

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CERTIFICATE OF SERVICE

On April 25, 2022, I electronically filed the foregoing document with the Clerk of the Court of the U.S. District Court, Western District of Texas.

/s/ Guy Hohmann

Guy Hohmann

CERTIFICATE OF CONFERENCE

The Receiver conferred with Timothy Mulreany, counsel for the CFTC, who stated the CFTC is not opposed to this motion or the relief requested therein.

/s/ Guy Hohmann

Guy Hohmann



CH/2021.1539.01

SWORN STATEMENT

Today, the twenty-third day of September two thousand twenty-one, _____
appeared before me, Cornelia Holdinga, civil law notary in Amsterdam: _____
Michel Geurkink, born in Winterswijk, the Netherlands, on the fifteenth day of January
nineteen hundred and seventy-two, residing at Kloetenseweg 47, 7101 TW _____
Winterswijk, the Netherlands single and not registered as a partner, holder of a Dutch –
passport with number NSJODKC23, of Dutch nationality. _____

The person appearing declared that he wished to make a sworn statement. _____

I, civil law notary, then asked the person appearing if he would promise that the _____
statement to be made by him and recorded in this deed would be entirely truthful. _____

The person appearing then stated: "that I promise". _____

The person appearing then declared as follows: _____

- (1) My name is Michel Geurkink. I reside at Kloetenseweg 47, 7101 TW _____
Winterswijk Netherlands. _____
- (2) I had a relationship with Zsofia Dobos (hereinafter, "Ms. Dobos") for over _____
twelve years and the relationship ended in approximately March or April two _____
thousand twelve. In the last few years (the IB Capital period) I made a lot of _____
money compared to before and we decided to open a company to hold assets –
and to use that company to buy a house. _____
- (3) Based upon communications between Ms. Dobos and me, she knew exactly _____
what I did. Specifically, she knew I was cutting corners and profiting from _____
clients' losses. _____
- (4) She didn't mind this at all as she was also profiting from it by being able to buy _____
expensive things like designer bags, etcetera and live a life of luxury. _____
- (5) Ms. Dobos's motto always was that everybody cuts corners and if I can get _____
away with it, why not? _____

- (6) Ms. Dobos's mother (Dobosne Nemeth Ottilia) was also involved in assisting to hide the money I had misappropriated from IB Capital. At times, the misappropriated funds were kept at Ms. Dobos's parents' residence located at 6100 kiskunfelegyhaza Hungary, Platan Utca 16/3.
- (7) Ms. Dobos's mother also opened safe-deposit boxes at banks in Kiskunfelegyhaza in Hungary (the town where Ms. Dobos's parents lived) to make sure the cash was safe. It was very clear to Ms. Dobos this was not a common business practice.
- (8) Towards the end of two thousand eleven, Ms. Dobos and I visited the office of a lawyer by the name of Peter Varga Puskas in Budapest to discuss setting up an offshore entity. In that same time period, Mr. Puskas visited the office of Crystal Worldwide in Budapest to buy the ready-made shelf company Riknik & Sons Ltd. ("Riknik"). Riknik was purchased to eventually buy a house and real estate with it.
- (9) Riknik opened a bank account at Ceskoslovenska Obchodna Banka ("CO Banka") in Slovakia. Ms. Dobos was the ultimate beneficial owner of Riknik. She was aware of this because she signed documents to this effect in the presence of me and legal counsel (Peter Varga Puskas). Ms. Dobos provided Mr. Puskas with a limited power of attorney so that he could open the Riknik account at CO Banka. Ms. Dobos was very well aware of this bank account's existence and approved (as the ultimate beneficial owner of Riknik) of Mr. Puska's opening of this bank account. Ms. Dobos was aware that she was being named as the ultimate beneficial owner of Riknik and she even signed documents to that effect in my presence along with Peter Varga Puskas at the offices of Crystal Worldwide, Ltd.

SWORN STATEMENT.

The statement contained in this deed is a sworn statement within the meaning of Section 52 subsection 1 of the Dutch Notarial Profession Act (*Wet op het notarisambt*).

END.

The appearing person is known to me, civil law notary.

This deed was executed today in Amsterdam.



The substance of the deed was stated and explained to the appearing person. _____

The appearing person declared not to require a full reading of the deed, to have taken –
note of the contents of this deed and to consent to it. _____

Subsequently, this deed was read out in a limited form, and immediately thereafter
signed by the appearing person and myself, civil law notary. _____

Signed.

ISSUED FOR TRUE COPY



