

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS

DIVISION

2021 DEC 13 PM 1:36

DEPUTY CLERK

Plaintiff

v.

4:21-CV-1310-0

Case Number

Defendant

Motion to Release Bank Accounts

I am requesting to have unfrozen and released the IGroup+ Encipher bank accounts in order for my wife and I and our family can live as we continue to cooperate with the SEC, receiver, and the court. I have attached a letter with additional details. I have spoken with Mr Polish and have emailed Ms. Williamson since I could not reach her. The amount in both bank accounts total less than \$40,000 and is used by my wife and I and 3 grown sons who have families. The total monthly need is \$2,208⁰⁰ for all of us to pay bills, eat, etc... We would be very grateful if you would help. Mr. Polish and my former counsel Chris Davis (whom I cannot afford now) can attest to my cooperation and type of people my family are. Thank you!

*Attach additional pages as needed

Date December 13, 2021

Signature *James Ikey*

Print Name James Ikey

Address 103 Bayonne Drive

City, State, Zip Manfield, Tx 76063

Telephone 469-550-0063

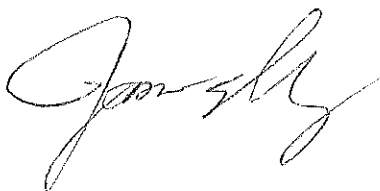
December 10, 2021

Re: Release of Funds

Jonathan Polish
Deborah Williamson,

During the process of the investigation of The Heartland Group, Encypher Bastion and all employees of iGroup Enterprises have given their best efforts to cooperate, assist, and comply with all that has been asked of them. Both companies will continue to be as helpful as possible. Having said this, both companies during the process of the Heartland investigation, have suffered tremendous losses, including but not limited to the loss of legal representation. Encypher Bastion has not received any funds from The Heartland Group since August, nor did The Heartland Group pay for the substantial legal work that was performed by Chris Davis as legal counsel to James Ikey and Encypher Bastion when his legal work was in direct relation to The Heartland Group (there is an outstanding balance owed to Chris Davis in the amount of approximately \$60,000). James and Bridy, along with three of their sons and one of their daughter-in-laws have continued to work and perform tasks for the back office administration. The funds that are in the Encypher Bastion and iGroup Enterprises bank accounts are the only resources that Bridy and James have to pay their living expenses, financial obligations, and pay the children that have worked for them. When Encypher Bastion and iGroup Enterprises were named in the law-suit that froze the bank accounts for these companies this put a tremendous hardship and loss of employment on our family. I am writing to request that the funds in the accounts for Encypher Bastion and iGroup Enterprises be released. We need to have access to these funds to assist us in paying for living expenses such as our home, car, food, medicine, gas, etc. of basic necessities. We are doing our best to seek new employment or other means of producing an income but we have immediate needs that require payment of funds we do not currently have access to. Restoring our access to these funds would hopefully help us to survive through the end of the year and through some of January. I would be enormously grateful if you would grant us the mercy of receiving this access to funds.

Per my discussion on Monday with Mr. Polish, I have attempted to reach Ms. Williamson to let her know this same situation. I spoke with Mr. Fine and asked him to relay the message, since I cannot reach Ms. Williamson. I am going to the courthouse in a few minutes and figure out filing the motion to release the bank accounts. I am requesting in the deepest way I can to help my family. Thank you very much!

A handwritten signature in black ink, appearing to read "James Ikey". The signature is fluid and cursive, with the first name "James" being more prominent and the last name "Ikey" written in a smaller, more connected script.