A. Barry Cappello (SBN 037835) abc@cappellonoel.com 1 David L. Cousineau (SBN 298801) 2 dcousineau@cappellonoel.com CAPPELLO & NOËL LLP 3 831 State Street Santa Barbara, CA 93101 Telephone: (805) 564-2444 Facsimile: (805) 965-5950 4 5 6 Attorneys for Intervenor 915 ELM AVENUE CVL, LLC 7 8 UNITED STATES DISTRICT COURT 9 CENTRAL DISTRICT OF CALIFORNIA 10 11 Case No.: 2:18-cy-05008 SECURITIES AND EXCHANGE COMMISSION, [PROPOSED] ORDER GRANTING 12 915 ELM AVENUE CVL, LLC'S Plaintiff, 13 MOTION TO INTERVENE AND TO REMOVE CVL'S ASSETS FROM THE COURT-ORDERED VS. 14 FREEZE RALPH IANNELLI and ESSEX 15 CAPITAL CORPORATION. Hearing Date: October 24, 2019 16 Time: 10:00 a.m. Defendants. 6D Crtrm: Judge: Hon. Fernando M. Olguin 17 Complaint Filed: June 5, 2018 18 Trial Date: None 19 20 21 22 23 24 25 26 27 28

1	TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:
2	Upon proof having been made to the satisfaction of the Court, IT IS ORDERED
3	that:
4	1. 915 Elm Avenue CVL, LLC ("CVL") is granted leave to intervene;
5	2. CVL's property located at 915 Elm Avenue, Carpinteria, CA 93013 is
6	hereby removed from the freeze ordered in this Court's December 21, 2018 Order
7	Regarding Preliminary Injunction and Appointment of a Permanent Receiver [Dkt.
8	No. 66] ("December Order") and September 9, 2019 Order Regarding Permanent
9	Injunction [Dkt. No. 113] ("September Order"); and
10	3. CVL's bank accounts, aside from the one identified as account number
11	xxxxx8411 in the December Order, are not subject to the freeze ordered in December
12	Order and the September Order.
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14	DATED:, 2019
15	HON. FERNANDO M. OLGUIN
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