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7 Attorneys for Intervenor, Jim Gally

8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 SECURITIES AND EXCHANGE
11 COMMISSION,

12 Plaintiff,

13 v.
14

15 RALPH IANNELLIE and ESSEX
16 CAPITAL CORPORAITON,

17 Defendants.

Case No.: 2:18-cv-05008-FMO

**DECLARATION OF MICHAEL P.
DENVER IN SUPPORT OF JIM
GALLY'S MOTION TO CLARIFY,
MODIFY OR GRANT RELIEF
FROM RECEIVERSHIP
INJUNCTION; AND, TO
INTERVENE
[L.R. 7-3]**

Hearing Date: July 24, 2025

Time: 10:00 a.m.

Ctrm: 6D

Judge: Hon. Fernando M. Olguin

Complaint Filed: June 5, 2018

Trial Date: None

1 I, Michael P. Denver, hereby declare as follows:

2 1. I am an attorney licensed to practice before all courts of the State of
3 California and I am over 18 years of age. I am a principal with Denver Law, P.C.,
4 counsel for proposed Intervenor Jim Gally.

5 2. I have personal knowledge of the matters stated herein, except as to those
6 matters stated on information and belief, and as to those matters, I believe them to be
7 true. If called to testify, I could and would competently testify to the facts stated
8 below.

9 3. I met and conferred with the Receiver in May and June, 2025, SEC in
10 June 2025, Ianelli in June 2025, and attempted to meet and confer with CVL and the
11 several Intervenor in June 2025. No one consented to the relief sought herein. The
12 SEC and the Receiver made it clear the motion was necessary.

13 I declare under penalty of perjury under the laws of the United States that the
14 foregoing is true and corrected. Executed on June 23, 2025, Santa Barbara,
15 California.

16
17 /s/ Michael P. Denver

18 Michael P. Denver
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CERTIFICATE OF SERVICE

I, Michael P. Denver, hereby certify that on June 23, 2025, I electronically filed the foregoing document using the CM/ECF system which will send notification of such filing to the email addresses registered in the CM/ECF system, as denoted on the Electronic Mail Notice List.

By: /s/ Michael P. Denver
Michael P. Denver