

Date: November 20, 2019

Investor Notice of Distribution Plan  
*SEC v. PlexCorps, et al., Case No. 17-cv-7007 (CBA) (RML) (E.D.N.Y.)*

By this Notice, the plaintiff, the United States Securities and Exchange Commission (the “SEC”) is notifying you of its intent to propose to the U.S. District Court for the Eastern District of New York (the “District Court”), that collections in the civil action identified above (the “Civil Action”) be sent to the Receiver appointed in the related Canadian Proceeding (the “Canadian Receiver”) for distribution pursuant to a plan approved by the governing Canadian Court. Your receipt of this Notice DOES NOT mean you will receive a distribution; that determination will be made if and when a distribution is approved by a court and you are determined eligible for a distribution under a court-approved plan. Please read this Notice in its entirety.

**Background**

On December 1, 2017, the SEC filed the Civil Action against PlexCorps, Dominic LaCroix, and Sabrina Paradis-Royer (collectively, the “Defendants”), and at the same time, sought and obtained temporary restraining orders to stop the Defendants’ dissemination of a series of material false and misleading statements and the misappropriation of investor assets in connection with the illegal offering for unregistered securities known as PlexCoins through the PlexCoin Initial Coin Offering (the “ICO”). The SEC charged the Defendants, variously, with violations of the antifraud and registration provisions of the federal securities laws. On October 2, 2019, the District Court entered a final judgment by consent against the Defendants (the “Final Judgment”). The Final Judgment, among other things, ordered the Defendants to jointly and severally disgorge \$4,563,468 plus \$348,145 in prejudgment interest, and Dominic LaCroix and Sabrina Paradis-Royer are ordered to each pay a \$1,000,000 civil penalty. The Final Judgment further requires the Defendants to forego their rights to the entirety of the investor funds seized by the Canadian Receiver, totaling more than \$4 million, as well as more than \$800,000 in investor funds held by U.S.-based entities that were subject to an asset freeze issued by the District Court.

**The SEC’s Plan for Distributing Collected Funds**

At this time, the SEC anticipates coordinating any distribution to harmed investors with the Autorité des marchés financiers of Quebec by seeking an order from the District Court sending the collections in the Civil Action to the Canadian Receiver for inclusion in the distribution by the Canadian Receiver to all harmed investors in the PlexCoin ICO pursuant to a distribution plan approved by the Canadian Court. The SEC believes that the efficiencies realized through a single consolidated distribution by the Canadian Receiver will result in more assets distributed to harmed investors in the shortest amount of time. The distribution plan proposed by the Receiver (the “Canadian Plan”) is available, in English, [here](#), and also on the PlexCorps claims page of SEC website, available [here](#).<sup>1</sup> The SEC is informed that the Claims Process Order, or the order setting out the claims process, which is referenced in the Canadian Plan, will be posted on the Receiver’s website, [here](#); the SEC will also post the Claims Process Order on the PlexCorps claims page of the SEC website upon receipt. Additional information regarding the Civil Action and any updates to the information included in this Notice will be posted on the SEC’s website.

---

<sup>1</sup> If the embedded links do not work or you are receiving this in hard copy, the address for the Canadian Plan (translated) is [https://media.cdn.raymondchabot.com/app/uploads/2018/07/plan-de-distribution\\_anglais.pdf](https://media.cdn.raymondchabot.com/app/uploads/2018/07/plan-de-distribution_anglais.pdf), the PlexCorps claims page of the SEC Website is <https://www.sec.gov/divisions/enforce/claims/plexcorps.htm>, and the Receiver’s Website is <https://www.raymondchabot.com/en/companies/public-records/dominic-lacroix/>. If you are unable to access these websites and/or you do not have access to the Internet, please let the SEC know by contacting us as described later in this Notice.

## Procedure for Objection(s)

If you are a U.S. resident or citizen and you object to the SEC's plan to recommend to the District Court that collections in the Civil Action be distributed through the Canadian Receiver, you may submit that objection in writing to the address set forth below *or* attend the hearing being held by the Canadian Court, currently anticipated during the week of December 16, 2019 (the "Hearing").<sup>2</sup> The Hearing date, location, and time, once known, will be posted on the PlexCorps claims page of SEC website. If you choose to submit your objection in writing to the address set forth below, **your objection must be received at that address no later than December 9, 2019**, so that the SEC can review, respond, ask questions, and/or communicate the objections, as appropriate, to the Canadian Receiver. Please present any objection in English.

In order to be considered, any objection must:

- set forth the case name and number: *SEC v. PlexCorps, et al., 17-cv-7007 (E.D.N.Y.)*;
- include your full name, address, email address, telephone number, and social security number;
- state whether you are a U.S. resident or citizen;
- state how you received this Notice (by email from \_\_\_\_\_, or by \_\_\_\_\_) (necessary to determine if you are already included on the email distribution list);
- specify **BOTH** if and when you purchased tokens in the PlexCoin ICO, and if you continue to hold some or all of the tokens purchased in the PlexCoin ICO;
- clearly state the objection, and include all documentation necessary to understand and support the objection; and
- complete your submission with the following (if true) above the signature line, and sign the document: "I declare under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct. Executed on \_\_\_\_\_, 2019".

If you are part of a group of investors sharing the same concerns about the SEC's plan, **please send one objection** in the form specified above and provide full contact information for each joining investor as attachment(s), **including for each joining investor** the information in the 2<sup>nd</sup> through 5<sup>th</sup> bullets, above. **Any such group objection will be given the same weight** as would separate objections from each joining investor, and one group objection will enable us to review and process objections faster. Objections should be sent to: Securities and Exchange Commission, Catherine E. Pappas, c/o Office of Distributions, 100 F Street, N.E., Mail Stop 5876, Washington, D.C. 20549.

Alternatively, you may submit your objection by email to: [ENFOfficeofDistributions@sec.gov](mailto:ENFOfficeofDistributions@sec.gov). Please include "*SEC v. PlexCorps, et al., 17-cv-7007 (E.D.N.Y.)*" in the subject line of the email. **FOR YOUR PROTECTION, please encrypt the email before sending** to protect the personally identifiable or sensitive information included. The submission must be in the form and have the content and signature specified above.

**Unless you attend the Hearing, failure to submit objection(s) in accordance with these directions for receipt at the address or email address above by December 9, 2019 will result in waiver of all objections.**

After December 9, 2019, the SEC will, as appropriate, review, respond, ask questions, and/or communicate unresolved objections to the Canadian Receiver before the Hearing. The SEC anticipates making a recommendation to the District Court based on, among other things, the objections received through this process, the resolution of objections by the Canadian Court, and, ultimately, what the SEC determines to be in the best interest of investors.

---

<sup>2</sup> This is **NOT** the **claims process**; the SEC anticipates that claims will be solicited by the Canadian Receiver at a later time.