

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

COMMODITY FUTURES TRADING
COMMISSION,

Plaintiff,

v.

FIRST STATE DEPOSITORY COMPANY,
LLC, ARGENT ASSET GROUP, LLC, AND
ROBERT LEROY HIGGINS,

Defendants.

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CASE NO.: 1:22-cv-01266-RGA

SUPPLEMENT TO THE ACCOUNTANTS' REPORT

Kelly M. Crawford, as the court-appointed Receiver (“Receiver”), submits the supplemental report of the Receiver’s accounting firm, respectfully showing the Court as follows:

1. Upon his appointment as Receiver, and pursuant to paragraph 29(f) of the *Order Granting Plaintiff’s Motion for an Ex Parte Statutory Restraining Order, Appointment of a Temporary Receiver, and Other Equitable Relief* [Dkt. 12](the “SRO”), the Receiver engaged the Baker Tilly accounting firm (the “Accountants”) to conduct an audit and physical inventory of the precious metals and other assets at 100 Todds Lane, Wilmington, Delaware, the headquarters of Defendants First State Depository Company, LLC (“FSDC”) and Argent Asset Group, LLC (“Argent”).

2. The Accountants conducted the audit and physical inventory of the precious metals and other assets at 100 Todds Lane in Wilmington, Delaware, and prepared a report with

their findings. A true and correct copy of the Accountants' Report was filed with the Court on January 9, 2023 [D.I. 78-1], and posted on the receivership website.

3. Since the filing of the Accountants' Report with the Court, the Accountants obtained additional information that resulted in a slight modification of the original findings of the Accountants. Accordingly, the Accountants provided the Receiver with their "Supplement to Report on Facility Inventory and Analysis to date" (the "Accountants' Supplemental Report") dated January 20, 2023, that is attached hereto as **Exhibit A**. The Receiver will post the Accountants' Supplemental Report on the receivership website, www.fsdreceivership.com, and the Accountants' Report and Supplemental Report will be used by the Receiver in the distribution and claims process the Receiver proposes to the Court.

Respectfully submitted on January 23, 2023

ASHBY & GEDDES, P.A.

/s/

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 23, 2023, I electronically filed the foregoing document with the clerk of the U.S. District Court, District of Delaware, using the electronic case filing system of the court, and the electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record.

/s/ _____