

CAUSE NO. D-1-GN-24-001018

Sajid Maqsood, Trustee of the Sajid
& Joan M. Maqsood Revocable Trust, et al.,

Plaintiffs,

v.

Pride of Austin High Yield Fund I, LLC, et al.,

Defendants.

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IN THE DISTRICT COURT

TRAVIS COUNTY, TEXAS

201st JUDICIAL DISTRICT

**RECEIVER'S MOTION FOR SHOW CAUSE ORDER AND FOR CONTEMPT
AGAINST ROBERT J. BUCHANAN AND CCG CAPITAL GROUP, LLC**

TO THE HONORABLE DISTRICT COURT:

Gregory S. Milligan, in his capacity as the court-appointed receiver for Pride of Austin High Yield Fund I, LLC (“**POA**”) in the above-captioned action (the “**Receiver**”), by and through his undersigned counsel, files this motion for show cause order and for contempt against Defendants Robert J. Buchanan and CCG Capital Group, LLC (“**CCG**”). The Receiver requests that the Court issue a show cause order requiring Mr. Buchanan and CCG to appear and demonstrate why they should not be held in contempt of court for failing to comply with the Court’s Agreed Order Appointing Receiver (the “**Receivership Order**”). Specifically, Mr. Buchanan and CCG have failed to provide the Receiver with information that the Receivership Order expressly mandates they provide—by the deadlines imposed—and that the Receiver has otherwise requested, which are vital to the Receiver fulfilling his duties and obligations under the Receivership Order. In support, the Receiver respectfully shows the Court as follows.

BACKGROUND

A. Appointment of Receiver and Obligations imposed on CCG and Mr. Buchanan Under the Receivership Order

1. On April 30, 2024, this Court entered the Receivership Order appointing the Receiver and granting the Receiver all powers and authorities to manage the assets of POA (the “*Receivership Assets*”), including all powers to manage the Receivership Assets that had belonged to CCG, POA’s manager. **Receivership Order** ¶ 6. To effectuate these powers and authorities, it is essential that the Receiver have access to all information concerning and/or relating to the Receivership Assets. Accordingly, the Receivership Order imposes on the “officers, directors, agents, managers, general and limited partners, trustees, members, attorneys, accountants, and employees of [POA], *specifically including but not limited to Robert Buchanan and CCG*, as well as those acting in their place” the obligation to turn over all such information to the Receiver. **Receivership Order** ¶ 11 (emphasis added). More specifically, paragraphs 12 through 14 of the Receivership Order require Mr. Buchanan and CCG to provide the following information to the Receiver promptly following the Receiver’s appointment:

Within ten (10) days of the entry of th[e] [Receivership] Order, [Mr. Buchanan and CCG] shall file with the Court and serve upon the Receiver a sworn statement, listing: (a) the identity, location and estimated value of all Receivership Assets, including contact information for the party in possession of all assets of POA, held jointly or singly, including without limitation all assets held outside the territory of the United States; (b) all employees (and job titles thereof), other personnel, attorneys, accountants, and any other agents or contractors of POA; and (c) the amount and nature of all liabilities of POA, including without limitation the names, addresses, and amounts of claims of all known creditors of POA. Such sworn statement shall include the names, addresses, telephone numbers, facsimile numbers, and e-mail addresses of any financial institutions or other persons or entities holding such assets, along with the account numbers and balances. The sworn statements shall be accurate as of the date of this Order, [and] shall be signed and verified as true and complete under penalty of perjury.

Receivership Order ¶ 12.

Within fourteen (14) days of the entry of th[e] [Receivership] Order, [Mr. Buchanan and CCG] shall file with the Court and serve upon the Receiver and all interested parties a sworn statement and certification, with complete documentation, covering the period from the date of formation of POA to the present:

- (a) Of all Receivership Assets, wherever located, held by or in the name of CCG, Mr. Buchanan, or one of CCG or Buchanan's affiliates or insiders, or in which they have or had any beneficial interest, or over which POA maintained or maintains and/or exercised or exercises control, including, but not limited to: (a) all securities, investments, funds, real estate, automobiles, motorcycles or other motor vehicles, watercraft, jewelry digital assets, including but not limited to any assets contained in digital assets held at cryptocurrency exchanges, and other assets, stating the location of each; and (b) any and all accounts, including all funds held in such accounts, with any bank, brokerage, or other financial institution, or any other institution, including but not limited to casinos, held by, in the name of, or for the benefit of Mr. Buchanan, CCG, or their affiliates or insiders, directly or indirectly, or over which either of them maintained or maintains and/or exercised or exercises any direct or indirect control, or in which either of them had or has a direct or indirect beneficial interest, including the account statements from each bank, brokerage, or other financial institution;
- (b) Identifying every account at every bank, brokerage, or other financial institution: (a) over which CCG and its affiliates (as defined in the Texas Business Organizations Code), have signatory authority; or (b) opened by, in the name of, or for the benefit of, or used by, POA;
- (c) Identifying all credit, bank, charge, debit, or other deferred payment card issued or used by CCG or POA, including but not limited to the issuing institution, the card or account number(s), all persons or entities to which a card was issued and/or with authority to use a card, the balance of each account and/or card as of the most recent billing statement, and all statements for the last twelve months;
- (d) Of all assets received by POA from any person or entity, including the value, location, and disposition of any assets so received;
- (e) Of all funds received by POA. The submission must clearly identify, among other things, all investors, lenders, members, or partners, the interests they purchased or loans made, the date and amount of their investments or loans, and the current location of such funds;

- (f) Of all expenditures exceeding \$1,000 made by POA, including those made on POA's behalf by any person or entity in the preceding 12 month period;
- (g) Of all transfers of assets made by POA; and
- (h) That all books and records pertaining to POA have been turned over to the Receiver.

Receivership Order ¶ 13¹.

Within five (5) days of the entry of th[e] [Receivership] Order, [Mr. Buchanan and CCG] shall provide to the Receiver copies of POA's federal income tax returns from formation through present, with all relevant and necessary underlying documentation including but not limited to K-1s and any other information reasonably necessary for the POA investors to document for the IRS or other taxing or accounting authorities the investment losses incurred by the POA investors.

Receivership Order ¶ 14².

2. Immediately following these specific obligations, the Receivership Order reiterates that Mr. Buchanan and CCG "shall cooperate with the Receiver" and are "required to assist the Receiver in fulfilling his duties and obligations. As such, they must reasonably cooperate with *all* requests for information and documents from the Receiver regarding the Receivership Assets and administration thereof, including but not limited to information related to [POA] investments in CCG affiliates." **Receivership Order** ¶¶ 15–16 (emphases added). This cooperation and assistance shall include, among other things, "providing full access to all Receivership Assets" and "maintaining and not wasting, damaging, disposing of, or transferring in any manner any Receivership Assets." **Receivership Order** ¶ 16. The obligations contemplated in paragraphs 15 and 16 of the Receivership Order are referred to herein as the "*Cooperation Obligations*".

¹ The obligations contemplated in paragraphs 12 and 13 of the Receivership Order are referred to herein as the "*Sworn Statement Obligations*".

² The obligations contemplated in paragraph 14 of the Receivership Order are referred to herein as the "*Tax Obligations*".

3. Lastly, the Receivership Order puts Mr. Buchanan and CCG on notice that “[i]f at any time [they] cease[] to cooperate with the Receiver as necessary for the Receiver to fully perform his duties under th[e] [Receivership] Order, the Receiver *shall be entitled to immediately seek from the Court an order of contempt* and such other remedies allowed by law.” **Receivership Order** ¶ 17 (emphases added).

B. Mr. Buchanan and CCG’s Failure to Comply with the Obligations Imposed by the Receivership Order

4. Pursuant to the terms of the Receivership Order, Mr. Buchanan and CCG were required to comply with the Sworn Statement Obligations and the Tax Obligations by May 13, 2024. Neither complied. On May 15, 2024, counsel for the Receiver sent a letter to Mr. Buchanan reminding him of his obligations and demanding that he comply. A copy of the May 15 letter is attached as Exhibit A.

5. After receipt of the May letter, Mr. Buchanan responded by email with a halfhearted attempt at compliance (the “*Noncompliant E-mail*”). A copy of the Noncompliant E-mail is attached as Exhibit B. As an initial matter, the Noncompliant E-mail was not a sworn statement filed with the Court as required by the Receivership Order. Even still, in the Noncompliant E-mail, Mr. Buchanan provided inaccurate and incomplete information. Specifically, in response to the obligation to provide a list of assets belonging to POA, Mr. Buchanan sent the Receiver contact information for a real estate agent working on a piece of real property foreclosed upon by POA, and the contact information of a property management company. The response was nonsensical in the context of Mr. Buchanan’s obligations. The Noncompliant E-mail provided close to nothing more in terms of information to the Receiver and was entirely unhelpful. The Noncompliant E-mail also contained misrepresentations that POA had no liabilities to creditors and that important tax information of POA had already been provided to the Receiver, when in fact it had not.

6. In response to the Noncompliant E-mail, on May 16, 2024, counsel for the Receiver sent Mr. Buchanan a follow up email asking pointed questions concerning information that Mr. Buchanan was required to turn over. Specifically, counsel to the Receiver asked, among other things, (i) whether there was any place outside of the “Dropbox” previously provided where POA stored electronic records; (ii) where physical copies of POA’s business records reside, including, importantly, original loan documentation, and when such documents could be transferred; (iii) the location, and for turnover of, information related to investments made by POA into affiliates controlled by Mr. Buchanan, including any subscription agreements, offering memorandums, K-1’s and investor updates sent to POA from Pride of Austin Opportunity Fund, CCG Equity Fund I, and GGC Equity Fund II; (iv) specific information related to liabilities of POA to creditors; and (v) information related to tax returns of POA. A copy of the May 16 email is attached as Exhibit C. Mr. Buchanan never bothered to respond to the May 16 email, and no further information has been provided in response to it.

7. Additionally, the Receiver and counsel for the Receiver have repeatedly attempted to set up an in-person meeting with Mr. Buchanan to facilitate transition from control of POA to the Receiver. Mr. Buchanan has failed to indulge the Receiver’s request in direct violation of the Cooperation Obligations. The assets of the receivership estate include both promissory notes in favor of POA secured by liens on real property, as well as REO properties that POA has previously foreclosed upon and now holds fee title. These are complex and dynamic assets to manage, and the Cooperation Obligations, Sworn Statement Obligations, and Tax Obligations were intentional and strategic elements of the Receivership Order to aid in the Receiver’s administration of the estate. In short, Mr. Buchanan has completely ignored this Court’s Receivership Order and imposed unnecessary burden on the Receiver, all of which, of course, results in additional

administrative expense, which is borne by the investors of POA, whom Mr. Buchanan has already victimized. Beyond the additional time and costs required by the Receiver and his professionals, the inability to timely and orderly transition certain matters, such as banking matters and confirmation of coverage and payment of insurance premiums for estate property, presents an additional, and potentially significant, impairment to the receivership estate and its beneficiaries.

ARGUMENT AND AUTHORITIES

8. The Receiver requests that the Court issue a show cause order requiring Mr. Buchanan and CCG to appear and demonstrate why they should not be held in contempt of Court for failure to comply with the Court's Receivership Order. If Mr. Buchanan and CCG are unable to do so, the Receiver requests that they be held in civil contempt and confined until they comply with the Court's Receivership Order.

9. Texas courts possess the inherent power to enforce their own orders through contempt proceedings. *In re Gabbai*, 968 S.W.2d 929, 931 (Tex. 1998); Tex. Gov't Code Ann. §§ 21.001(a), § 21.002. "Contempt of court is broadly defined as disobedience to or disrespect of a court by acting in opposition to its authority." *Ex parte Chambers*, 898 S.W.2d 257, 259 (Tex. 1995). There are two types of contempt: direct and constructive. *Id.* Direct contempt occurs when a person engages in contemptuous behavior in the court's presence, while constructive contempt occurs when a person engages in such conduct outside of the court's presence, including by failing to comply with a court order. *In re Reece*, 341 S.W.3d 360, 365 (Tex. 2011); *see also Chambers*, 898 S.W.2d at 259 ("The contempt alleged in this case, violation of a written court order, outside the presence of the court, is constructive contempt."). In cases of constructive contempt, the person accused of contemptuous conduct should "be advised of the nature and occurrence of the alleged

contemptuous acts and [be given] a reasonable opportunity to address those charges.” *In re Hesse*, 552 S.W.3d 893, 898 (Tex. App.—Amarillo 2018, orig. proceeding).

10. Once the court determines a person should be held in contempt for violating a court order, the court holds the contemnor in either criminal or civil contempt. *Reece*, 341 S.W.3d at 365. In either circumstance, the court may imprison the contemnor. *See Hesse*, 552 S.W.3d at 898–99. With criminal contempt, the term of imprisonment is “fixed and definite” because it punishes the contemnor for past behavior. *Hesse*, 552 S.W.3d at 898. On the other hand, “civil contempt is ‘remedial and coercive in nature’—the contemnor carries the keys to the jail cell in his or her pocket [because] the confinement is conditioned on obedience with the court’s order.” *Reece*, 341 S.W.3d at 365 (quoting *Ex parte Werblud*, 536 S.W.2d 542, 545 (Tex. 1976)). In civil contempt cases, a person may be imprisoned for up to 18 months or until he complies with the court’s order. Tex. Gov’t Code § 21.002(h)(2). To confine a person for violating a court order, it is only necessary that the order “unequivocally commanded the [person] to perform the duties or obligations imposed on him.” *In re Johnson*, 337 S.W.3d 486, 488 (Tex. App.—Dallas 2011, no pet.).

11. Here, as detailed *supra*, Mr. Buchanan and CCG have committed constructive contempt by failing to comply with the Sworn Statement Obligations, the Tax Obligations, and the Cooperation Obligations in the Receivership Order. Accordingly, following a show cause hearing, the Receiver requests that the Court hold Mr. Buchanan and CCG in civil contempt and confine Mr. Buchanan for 180 days or until he and CCG, acting through Mr. Buchanan, comply with the Sworn Statement Obligations, Tax Obligations, and Cooperation Obligations. *See* Tex. Gov’t Code § 21.002(h)(2).

PRAYER

The Receiver respectfully requests that the Court issue an order against Mr. Buchanan and CCG requiring them to appear and show cause why they should not be held in contempt of court. Following the show cause hearing, the Receiver requests that the Court impose a civil contempt penalty of imprisonment for 180 days or until Mr. Buchanan and CCG comply with paragraphs 12 through 16 of the Receivership Order, including but not limited to, the Sworn Statement Obligations, the Tax Obligations, and the Cooperation Obligations. The Receiver also requests general relief.

Respectfully submitted,

HOLLAND & KNIGHT LLP

By: /s/ Trip Nix

William "Trip" R. Nix
State Bar No. 24092902

Trip.Nix@hklaw.com

Nicholas R. Miller
State Bar No. 24125328

Nick.Miller@hklaw.com

Hannah M. Maloney
State Bar No. 24125336

Hannah.Maloney@hklaw.com

100 Congress Avenue, Suite 1800
Austin, Texas 78701
Telephone: (512) 685-6450
Telecopier: (512) 685-6417

ATTORNEYS FOR THE RECEIVER

CERTIFICATE OF SERVICE

I hereby certify that, on June 3, 2024, a true and correct copy of the foregoing motion was served electronically upon all counsel of record via eFileTexas.

/s/ Trip Nix

Trip Nix

EXHIBIT A

Holland & Knight

100 Congress Avenue Suite 1800 | Austin, TX 78701 | T 512.685.6476 | F 512.685.6417
Holland & Knight LLP | www.hklaw.com

Trip Nix
+1 512-685-6476
Trip.Nix@hklaw.com

May 15, 2024

Robert Buchanan

(via email rjb@ccgatx.com)

Re: *Notice re: IT Services*

Mr. Buchanan:

As you are aware, on April 30, 2024, Judge Amy Clark Meachum of the 201st Judicial District Court of Travis County, Texas (the “Receivership Court”), entered an Agreed Order Appointing Receiver (the “Receivership Order”) appointing Gregory S. Milligan of HMP Advisory Holdings, LLC d/b/a Harney Partners, as the Receivership Court’s receiver (the “Receiver”) for all assets (the “Receivership Assets”) of Pride of Austin High Yield Fund I, LLC (“POA”).

As you know, you have not turned over POA’s records to the Receiver, including its QuickBooks files. The Receiver has been in contact with POA (and CCG’s) IT provider, Parried to gain access as the Receiver is entitled to under the Receivership Order. Parried has informed the Receiver that the existing account that it services, which you are in control of, will not log off. Failure to log off is contempt of the Receivership Order. Accordingly, this notice informs you that on or after 2:00 p.m. CST, Parried will disconnect the existing account holder from VPN access, and log that account off of QuickBooks and subsequently restart QuickBooks.

Sincerely,

HOLLAND & KNIGHT LLP

/s/ Trip Nix
William R. “Trip” Nix
For the Firm

WN/tg

EXHIBIT B

From: [Robert J Buchanan](#)
To: [Maloney, Hannah M \(AUST - X24391\)](#)
Cc: [Nix, Trip \(AUST - X26476\)](#); [Greg Milligan](#); [ewhite](#); [Miller, Nicholas R \(AUST - X26457\)](#)
Subject: RE: Notice of Non-Compliance with Receivership Order
Date: Wednesday, May 15, 2024 1:09:55 PM

[External email]

Greg and Erik,

Within **ten (10) days** of the entry of the Receivership Order, file with the Court and serve upon the Receiver a sworn statement, listing: (a) the identity, location and estimated value of all Receivership Assets, including contact information for the party in possession of all assets of POA; (b) all employees (and job titles thereof), other personnel, attorneys, accountants, and any other agents or contractors of POA; and (c) the amount and nature of all liabilities of POA, including without limitation the names, addresses, and amounts of claims of all known creditors of POA.

A: POA Assets:

Wing Dinger Property Real Estate Agent – Joyce Mitchell
joycemitchell468@yahoo.com (903) 802-1438 I believe she has received an offer and needs to speak with someone asap

Fulshear Property Management Company – **Trent Vacek, CCIM** P: 713.961.4666 | F: 713.961.5730 tvacek@cmirealestate.com I believe he needs to get direction on a few items. Please contact him asap

B. POA has no employees or attorneys at this time. Insurance is handled through Rod Limely Principal 115 Kohlers Xing Unit 305 Kyle, TX 78640 512-262-3388 rod@haysinsurancegroup.com

C. POA has no liabilities to creditors

Within **fourteen (14) days** of the entry of the Receivership Order, file with the Court and serve upon the Receiver and all interested parties a sworn statement and certification, with complete documentation, covering the period from the date of formation of POA to the present certain information, including (a) all Receivership Assets; (b) bank accounts; (c) all credit, bank, charge, debit, or other deferred payment cards; (d) all assets received by POA; (e) all funds received by POA; (f) all expenditures exceeding \$1,000.00 made by POA; (g) all transfers of assets made by POA; and (h) all books and records pertaining to POA.

All of this information can be found in the Quickbooks files. There are no credit cards etc.

Within **five (5) days** of the entry of the Receivership Order, provide to the Receiver copies of POA's federal income tax returns from formation through present, with all relevant and necessary underlying documentation including but not limited to K-1s and any other information reasonably necessary for the POA investors to document for the IRS or other taxing or accounting authorities the investment losses incurred by the POA investors.

This has been added to the dropbox link that was previously sent to Erik and Greg.

Let me know if I can be of anymore help

Sincerely,
ROBERT BUCHANAN
CCG A Family of Companies
512.687.3456 O
CCGATX.COM

From: Hannah.Maloney@hklaw.com <Hannah.Maloney@hklaw.com>
Sent: Tuesday, May 14, 2024 10:49 AM
To: Robert J Buchanan <rjb@CCGATX.COM>
Cc: Trip.Nix@hklaw.com; Greg Milligan <gmilligan@harneypartners.com>; Erik White <ewhite@harneypartners.com>; Nick.Miller@hklaw.com
Subject: Notice of Non-Compliance with Receivership Order

Mr. Buchanan,

Please see the attached correspondence on behalf of Gregory S. Milligan, Receiver for Pride of Austin High Yield Fund I, LLC.

Regards,

Hannah Maloney | Holland & Knight

Associate
Holland & Knight LLP
100 Congress Ave., Suite 1800 | Austin, Texas 78701
Phone 512.647.4391 | Fax 512.685.6417
hannah.maloney@hklaw.com | www.hklaw.com

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EXHIBIT C

From: [Nix, Trip \(AUST - X26476\)](#)
To: [Robert J Buchanan](#); [Maloney, Hannah M \(AUST - X24391\)](#)
Cc: [Greg Milligan](#); [ewhite](#); [Miller, Nicholas R \(AUST - X26457\)](#)
Subject: RE: Notice of Non-Compliance with Receivership Order
Date: Thursday, May 16, 2024 9:30:30 PM

Robert –

In addition to the below, and in order to be in compliance with the order, we need to know the following:

- **Electronically Stored Business Records:** Outside of what is in the Dropbox, is there anywhere else where POA stores business records, electronically? If so, let us know where and provide Greg and Erik with access immediately.
- **Physical Records:** In addition to any electronically stored business records, we need to know where any physical copies of POA business records are, including invoices, statements, etc. that support any prior disbursements from the Fund. Importantly, we need to know where the original loan documents are.
- **Records Related to Investments in Affiliates:** We need to see all records, including subscription agreements, offering memorandums, K-1's, investor updates, etc. related to any investments that were made by Pride of Austin into CCG Funds, including:
 - Pride of Austin Opportunity Fund
 - CCG Equity Fund I
 - CCG Equity Fund II
- With respect to liabilities, we need to see:
 - All records/invoices related to Husch Blackwell and any unpaid service provider to REO properties including GCs
 - All contracts, open orders related to work at REO properties
 - Engagement letter with Potts Blacklock Senterfitt, PLLC as well as any outstanding invoices
 - There are rent expenses charged to POA in QuickBooks – please provide underlying lease or contract that supports these charges
- **Tax returns:** These are not in the dropbox. Please provide us (i) all filed tax returns; and (ii) let us know who the fund employed as an accountant for any of the last four years.

I think it would be good if we could set a time to meet in person and discuss outstanding issues. We can do it at your office if that is convenient. Can you be available on Tuesday or Wednesday of next week?

Trip Nix | Holland & Knight

Partner

Holland & Knight LLP

100 Congress Ave., Suite 1800 | Austin, Texas 78701

Phone 512.685.6476 | Fax 512.685.6417

trip.nix@hklaw.com | www.hklaw.com

[Add to address book](#) | [View professional biography](#)

From: Robert J Buchanan <rjb@CCGATX.COM>

Sent: Wednesday, May 15, 2024 1:10 PM

To: Maloney, Hannah M (AUST - X24391) <Hannah.Maloney@hklaw.com>

Cc: Nix, Trip (AUST - X26476) <Trip.Nix@hklaw.com>; Greg Milligan

<gmilligan@harneypartners.com>; Erik White <ewhite@harneypartners.com>; Miller, Nicholas R (AUST - X26457) <Nick.Miller@hklaw.com>

Subject: RE: Notice of Non-Compliance with Receivership Order

[External email]

Greg and Erik,

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A: POA Assets:

Wing Dinger Property Real Estate Agent – Joyce Mitchell
joycemitchell468@yahoo.com (903) 802-1438 I believe she has received an offer and needs to speak with someone asap

Fulshear Property Management Company – **Trent Vacek, CCIM** P: 713.961.4666 | F: 713.961.5730 tvacek@cmirealestate.com I believe he needs to get direction on a few items. Please contact him asap

B. POA has no employees or attorneys at this time. Insurance is handled through Rod Limely Principal 115 Kohlers Xing Unit 305 Kyle, TX 78640 512-262-3388 rod@haysinsurancegroup.com

C. POA has no liabilities to creditors

Within **fourteen (14) days** of the entry of the Receivership Order, file with the Court and serve upon the Receiver and all interested parties a sworn statement and certification, with complete documentation, covering the period from the date of formation of POA to the present certain information, including (a) all Receivership Assets; (b) bank accounts; (c) all credit, bank, charge, debit, or other deferred payment cards; (d) all assets received by POA; (e) all funds received by POA; (f) all expenditures exceeding \$1,000.00 made by POA; (g) all transfers of assets made by POA; and (h) all books and records pertaining to POA.

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IRS or other taxing or accounting authorities the investment losses incurred by the POA investors.

This has been added to the dropbox link that was previously sent to Erik and Greg.

Let me know if I can be of anymore help

Sincerely,
ROBERT BUCHANAN
CCG A Family of Companies
512.687.3456 O
CCGATX.COM

From: Hannah.Maloney@hklaw.com <Hannah.Maloney@hklaw.com>
Sent: Tuesday, May 14, 2024 10:49 AM
To: Robert J Buchanan <rjb@CCGATX.COM>
Cc: Trip.Nix@hklaw.com; Greg Milligan <gmilligan@harneypartners.com>; Erik White <ewhite@harneypartners.com>; Nick.Miller@hklaw.com
Subject: Notice of Non-Compliance with Receivership Order

Mr. Buchanan,

Please see the attached correspondence on behalf of Gregory S. Milligan, Receiver for Pride of Austin High Yield Fund I, LLC.

Regards,

Hannah Maloney | Holland & Knight

Associate
Holland & Knight LLP
100 Congress Ave., Suite 1800 | Austin, Texas 78701
Phone 512.647.4391 | Fax 512.685.6417
hannah.maloney@hklaw.com | www.hklaw.com

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Tammy Greenblum on behalf of William Nix

Bar No. 24092902

tammy.greenblum@hklaw.com

Envelope ID: 88370736

Filing Code Description: Motion for Contempt

Filing Description: RECEIVER'S MOTION FOR SHOW CAUSE ORDER
AND FOR CONTEMPT AGAINST ROBERT J. BUCHANAN AND CCG
CAPITAL GROUP, LLC

Status as of 6/3/2024 2:19 PM CST

Associated Case Party: PRIDE OF AUSTIN HIGH YIELD FUND I, LLC

Name	BarNumber	Email	TimestampSubmitted	Status
Jameson Watts		jameson.watts@huschblackwell.com	6/3/2024 1:46:55 PM	SENT
Dee Baatz		dee.baatz@huschblackwell.com	6/3/2024 1:46:55 PM	SENT
Maya Dokic		Maya.Dokic@huschblackwell.com	6/3/2024 1:46:55 PM	SENT
Christine Deacon		christine.deacon@huschblackwell.com	6/3/2024 1:46:55 PM	SENT

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Hannah Maloney		hannah.maloney@hklaw.com	6/3/2024 1:46:55 PM	SENT
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Tammy Greenblum on behalf of William Nix

Bar No. 24092902

tammy.greenblum@hklaw.com

Envelope ID: 88370736

Filing Code Description: Motion for Contempt

Filing Description: RECEIVER'S MOTION FOR SHOW CAUSE ORDER
AND FOR CONTEMPT AGAINST ROBERT J. BUCHANAN AND CCG
CAPITAL GROUP, LLC

Status as of 6/3/2024 2:19 PM CST

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