

**DISTRICT COURT, COUNTY OF DENVER,  
STATE OF COLORADO**

1437 Bannock Street  
Denver, Colorado 80202

DATE FILED  
December 27, 2024 5:40 PM  
FILING ID: 519F7B5377079  
CASE NUMBER: 2019CV33770

Plaintiff: TUNG CHAN, Securities Commissioner for the  
State of Colorado,

v.

Defendants: MARK RAY; REVA STACHNIW; CUSTOM  
CONSULTING & PRODUCT SERVICES, LLC;  
RM FARM & LIVESTOCK, LLC; MR CATTLE  
PRODUCTION SERVICES, LLC; SUNSHINE  
ENTERPRISES; UNIVERSAL HERBS, LLC;  
DBC LIMITED, LLC.,

**COURT USE ONLY**

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*PHV Attorneys for Defendants Reva and Myron Stachniw,  
RM Farm & Livestock, LLC; and Sunshine Enterprises*

Case No.: **2019cv33770**

Courtroom: **209**

**REVA STACHNIW AND MYRON STACHNIW'S OBJECTION TO RECEIVER'S  
NOTICE OF SECOND INTERIM DISTRIBUTION**

Defendants, REVA AND MYRON STACHNIW, by and through their undersigned counsel, object to the Notice of Second Interim Distribution filed herein by the Receiver on December 9, 2024, on the same grounds as those contained in the previously-filed Objection to the Receiver's Proposed Plan of Distribution and the Objection to the Receiver's Amended Proposed Plan of Distribution, which are incorporated herein by this reference.

WHEREFORE, Reva and Myron Stachniw object to the Receiver's Notice of Second Interim Distribution.

Respectfully submitted this 27<sup>th</sup> day of December, 2024.

/s/ Donald F. Samuel

Donald F. Samuel, Esq.  
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/s/ Robin N. Loeb

Robin N. Loeb, Esq.  
Georgia Bar No. 455702  
Colorado Bar No. 19PHV5992

#### **CERTIFICATE OF SERVICE**

The undersigned certifies that on this 27<sup>th</sup> day of December, 2024, a true and correct copy of the foregoing **REVA STACHNIW AND MYRON STACHNIW'S OBJECTION TO RECEIVER'S NOTICE OF SECOND INTERIM DISTRIBUTION** was electronically filed and served on all parties of record and for which an address is available, via the Colorado Court E-Filing System (CCES).

/s/ Alan S. Thompson

Alan S. Thompson, Esq.,  
Lohf Shaiman Jacobs PC

