

APN # 1418-27-411-006

*0200 026A-RIT*

The undersigned hereby affirms that this document submitted for recording does not contain the social security number of any person or persons.

(Pursuant to NRS 239b.030)

Recording Requested by and Return to:

TICORTITLE OF NEVADA, INC.  
1483 US Highway 395 N, Suite B

Gardnerville, NV 89410

*Stipulation and Order  
regarding 1314 Cave Rock  
Drive, Unit B*

\_\_\_\_\_  
(Title on Document)

This page added to provide additional information required by NRS 111.312 Sections 1-2 (Additional recording fee applies).

This cover page must be typed or printed clearly in black ink only.

1 Christy J. White (D.C. Bar No. 974102)  
2 U.S. Securities and Exchange Commission  
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4 Washington, DC 20549  
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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 **SECURITIES AND EXCHANGE**  
11 **COMMISSION,**  
12 **Plaintiff,**  
13 **v.**  
14 **DAVID B. KAPLAN, ESQ., ET AL,**  
15 **Defendant, and**  
16 **LISA M. KAPLAN, et al.**  
17 **Relief Defendants.**

18 **Case No.: 3:16-cv-00270-MMD-VPC**

19 **Honorable Miranda Du**

20 **STIPULATION AND ORDER**  
21 **REGARDING 1314 CAVE ROCK**  
22 **DRIVE, UNIT B**

23 Plaintiff, the United States Securities and Exchange Commission ("SEC" or  
24 "Commission"), by its undersigned counsel, Christy J. White, defendant, David B. Kaplan, Esq.,  
25 and relief defendant, Lisa M. Kaplan, hereby stipulate as follows:

26 WHEREAS, on May 19, 2016, the Commission brought suit against David B. Kaplan,  
27 Esq. ("David Kaplan"), Synchronized Organizational Solutions, LLC, Synchronized  
28 Organizational Solutions International, Ltd. ("SOSI"), and Manna International Enterprises, Inc.,  
as Defendants, and Lisa M. Kaplan ("Lisa Kaplan"), The Water-Walking Foundations, Inc., and  
Manna Investments, LLC, as Relief Defendants (ECF No. 1);

WHEREAS, on May 20, 2016, this Court entered a Temporary Restraining Order and  
Asset Freeze ("2016 Asset Freeze") against the Defendants, Relief Defendants, and their agents,  
servants, employees, attorneys-in-fact, and those persons in active concert or participation with  
them which ordered them to retain funds and other assets held by the Defendants and Relief

1 Defendants, directly or indirectly, and to prevent the “withdrawal, sale, payment..., transfer,  
2 dissipation, assignment, pledge, alienation, encumbrance, disposal, or diminution of value” of  
3 such assets which included real property located at 1314 Cave Rock Drive, Unit B, Lake Tahoe,  
4 Nevada (“Subject Property”) (ECF No. 13);

5  
6 WHEREAS, on January 8, 2018, a final judgment was entered in favor of the  
7 Commission and against the Defendants requiring them to pay disgorgement in the amount of  
8 \$7,139,884.87, together with prejudgment interest thereon in the amount of \$680,157.61, for a  
9 total of \$7,820,042.48 and also ordered David Kaplan to pay a civil penalty of \$300,000 (ECF  
10 No. 105);

11  
12 WHEREAS, on January 8, 2018, a final judgment was entered in favor of the  
13 Commission and against Relief Defendant, Lisa Kaplan, for disgorgement in the amount of  
14 \$340,764.75, together with prejudgment interest thereon in the amount of \$26,762.65, for a total  
15 of \$367,527.40<sup>1</sup> (ECF No. 106);

16  
17 WHEREAS, the Commission, David Kaplan and Lisa Kaplan having reached an  
18 agreement whereby Lisa Kaplan may sell the Subject Property for fair market value so that the  
19 excess proceeds from the sale can be applied to the current outstanding balance of her judgment  
20 debt and as otherwise agreed; and

21  
22 WHEREAS, Lisa Kaplan listed the Subject Property for sale on or around October 26,  
23 2020, and has received a bona fide, pending offer for fair market value for the purchase of the  
24 same;

25  
26 IT IS HEREBY STIPULATED AND AGREED that:

27  
28 <sup>1</sup> Also, on January 8, 2018, judgments were entered against the two entity Relief Defendants, Manna Investments, LLC, and Water-Walking Foundation, Inc., for disgorgement and prejudgment interest in the total amounts of \$521,537.13, and \$644,376.08, respectively

