

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

HARRY ZHABILOV,  
BILLY V. RAY, JR.,  
CHARLES DILLUVIO,  
STEPHEN APOLANT,  
DANNIE ZHABILOV,  
JONATHAN FARBER,  
CAMELOT NEVADA TRUST,  
SEACOR CAPITAL, INC.,  
SKY-DIRECT LLC, and  
WEXFORD INDUSTRIES LTD.,  
Defendants,

and

NY FARMS GROUP, INC. and  
EQUITY MARKETS ADV LLC,  
Relief Defendants.

Civil Action No. 1:24-cv-7362 (ALC)

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SEC'S NOTICE OF ADDITIONAL AUTHORITY  
CONCERNING DEFENDANTS CAMELOT AND RAY'S MOTIONS TO STRIKE

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Defendants Camelot Nevada Trust and Billy Ray moved to strike all filings signed or prepared by the Commission's former counsel, Nita Klunder, based on her prior New York State bar registration suspension. Dkt. Nos. 163, 164. The Commission opposed these motions as without legal or factual merit. ECF No. 166. As the Commission has previously notified the Court, and as Defendants have referenced in their briefs, in *SEC v. Farber*, Case No. 24-cv-273, the Honorable Judge Koetl was presented with a similar motion to strike concerning Ms.

Klunder’s bar registration. On January 30, 2026, Judge Koetl issued a decision on that Motion, denying the Motion to Strike the Complaint stating, “The argument lacks merit.” Op., p. 3. The opinion affirms that the SEC’s case there “arises under the federal securities laws and falls within the federal context,” that “[a]n attorney’s authority to practice in federal court derives from the federal court’s own admission and disciplinary power, which is independent of a state’s attorney-registration status, and that there was no prejudice from the registration suspension, which was “administrative – not for misconduct – and she was promptly reinstated.” Op., p. 3.

The Commission has attached a copy of the opinion here.

Dated: February 2, 2026

SECURITIES AND EXCHANGE COMMISSION

*/s/ Marc J. Jones* \_\_\_\_\_

Marc J. Jones (*pro hac vice*)

Rua M. Kelly (*pro hac vice*)

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**CERTIFICATE OF SERVICE**

I hereby certify that, on February 2, 2026, a true and correct copy of the foregoing document was filed through the Court’s CM/ECF system, and accordingly, the document will be sent electronically to all participants registered to receive electronic notices in this case.

*/s/ Marc J. Jones* \_\_\_\_\_

Marc J. Jones