

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

SECURITIES AND EXCHANGE COMMISSION,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Case No.: 3-09-CV-0298-N
	§	
STANFORD INTERNATIONAL BANK, LTD.,	§	
STANFORD GROUP COMPANY,	§	
STANFORD CAPITAL MANAGEMENT, LLC,	§	
R. ALLEN STANFORD, JAMES M. DAVIS, and	§	
LAURA PENDERGEST-HOLT,	§	
	§	
Defendants.	§	
	§	

**MOTION FOR ORDER TO SHOW CAUSE WHY REBECCA REEVES-STANFORD,
MELIDA VIERA, AND JOHN PRIOVOLOS SHOULD NOT BE HELD IN CONTEMPT**

Ralph S. Janvey, Receiver, respectfully moves the Court for an order directing Rebecca Reeves-Stanford, Melida Viera, and John Priovolos to show cause why they should not be held in contempt for failure to comply with the Receivership Orders. Despite having full knowledge of the Receivership Orders, Rebecca Reeves-Stanford—with the apparent assistance of attorneys Melida Viera and John Priovolos—sold certain real property traceable to the Receivership Estate.

Reeves has had a decades-long relationship with Robert Allen Stanford and was the beneficiary of funds transferred to her of at least \$1.4 million. Reeves used the money to, among other things, purchase a home in Key Biscayne, Florida. After the Receiver became aware of the existence of that property, he served Reeves with a subpoena seeking more information about the funds used to purchase the property. Reeves then promptly sold the home

and transferred the sale proceeds to offshore accounts in the Cook Islands and New Zealand. These actions constitute contempt of this Court's orders and Reeves, and her attorneys, should be appropriately sanctioned. The Receiver also seeks its reasonable attorneys' fees and expenses in bringing and prosecuting the Motion.

In support hereof, the Receiver has filed concurrently with this Motion the arguments, authorities, and evidence contained and referenced in the "Brief in Support of Receiver's Motion for Order to Show Cause Why Rebecca Reeves-Stanford, Melida Viera, and John Priovolos Should Not Be Held in Contempt." Such materials are incorporated herein.

Respectfully submitted,

BAKER BOTTS L.L.P.

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ATTORNEYS FOR RECEIVER

RALPH S. JANVEY

CERTIFICATE OF CONFERENCE

Counsel for Receiver conferred with the parties to this case. Counsel for Receiver conferred with Bradford Cohen, current counsel for Rebecca Reeves-Stanford, who stated that he opposes this motion and the relief sought herein. Counsel for Receiver attempted to confer with John Priovolos, but received no response and assumes he opposes this motion and the relief sought herein. Counsel for Receiver conferred with Melida Viera, who stated that she opposes this motion and the relief sought herein. Counsel for the Receiver conferred with David B. Reece, counsel for the SEC, who stated that the SEC does not oppose this motion and the relief sought herein. Counsel for the Receiver conferred with John Little, Court-appointed Examiner, who stated that he does not oppose this motion and the relief sought herein, but reserves the right to respond further. Counsel for the Receiver conferred with Manuel P. Lena, Jr. counsel for U.S.D.O.J. (IRS) who stated that the IRS has no position on the relief sought herein. Counsel for the Receiver conferred with David Finn, counsel for James Davis, who stated that Mr. Davis has no position on the relief sought herein. Counsel for the Receiver conferred with Ruth Schuster, counsel for R. Allen Stanford, who stated that her client does not oppose the motion and the relief sought herein, but reserves the right to respond further. Counsel for the Receiver attempted to confer with Jeff Tillotson, counsel for Laura Pendergest-Holt, but received no response. Therefore, this motion is opposed.

/s/ Kevin M. Sadler

Kevin M. Sadler

CERTIFICATE OF SERVICE

On August 13, 2009, I electronically submitted the foregoing brief, the motion, the appendix, and the proposed order with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2). I further certify that I have served the following by electronic mail and certified U.S. Mail, return-receipt requested:

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s/ Kevin M. Sadler

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