

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

SECURITIES AND EXCHANGE COMMISSION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil No. 1:18-cv-01262
	)	
TODD ELLIOTT HITT, ET. AL.,	)	
	)	
Defendants.	)	
	)	
UNITED STATES OF AMERICA,	)	
	)	
v.	)	Criminal No. 1:19-cr-43
	)	
TODD ELLIOTT HITT,	)	
	)	
Defendant.	)	
	)	

**MOTION TO (I) APPROVE FINAL FINAL FEE APPLICATIONS, (II) APPROVE  
FINAL DISTRIBUTIONS, AND (III) DETERMINE CRIMINAL RESTITUTION,**

Christopher L. Perkins, the court-appointed Receiver/Special Master in the above-captioned proceedings (“**Movant**”), pursuant to this Court’s October 15, 2018 and February 23, 2019 Orders, respectfully submits this Motion To (I) Approve Final Fee Applications, (II) Approve Final Distributions, And (III) Determine Criminal Restitution (“**Motion**”).

As more fully explained in the accompanying Memorandum In Support of the Motion, the Movant has completed the liquidation of all estate assets, prepared and filed final tax returns, and made preparations for final distributions to Investor Victims and Creditors.

WHEREFORE, for the reasons stated herein and in the Memorandum In Support, the Movant respectfully requests that the Court enter an Order approving the relief sought in this Motion, and granting such other relief as is appropriate.

Dated: December 4, 2020

CHRISTOPHER L. PERKINS,  
RECEIVER/SPECIAL MASTER

/s/

Christopher L. Perkins (Virginia Bar No. 41783)  
Eckert Seamans Cherin & Mellott, LLC  
919 East Main Street  
Suite 1300  
Richmond, Virginia 23219  
Telephone: (804) 788-9636  
Facsimile: (804) 698-2950  
[christopher.perkins@eckertseamans.com](mailto:christopher.perkins@eckertseamans.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 4<sup>th</sup> day of December 2020, a true and correct copy of the foregoing was filed with the Court through the Clerk's CM/ECF filing system and served on all persons receiving electronic notice in this case, all Investor Victims, Creditors, and Parties In Interest, and/or by first-class mail, postage prepaid, to all parties listed below:

Nicholas C. Margida  
Charles J. Felker  
Patrick R. Costello  
U.S. Securities & Exchange Commission  
100 F Street NE  
Washington, D.C. 20549  
*Counsel for the SEC*

David H. Dickieson  
Danny Onorato  
Hilary LoCicero  
Schertler & Onorato LLP  
901 New York Avenue NW, Suite 500 West  
Washington, D.C. 20001  
*Counsel for the Defendants and the  
Receivership Defendants*

Michael J. Lichtenstein  
Shulman Rogers  
12505 Park Potomac Avenue  
Potomac, MD 20854  
*Counsel for Eagle Bank*

F. Douglas Ross  
Odin, Feldman & Pittleman, P.C.  
1775 Wiehle Avenue, Suite 400  
Reston, VA 20190  
*Counsel for Freedom Bank*

Jeff J. Marwil  
Proskauer Rose LLP  
70 West Madison, Suite 3800  
Chicago, IL 60602  
*Counsel for Matthew Bullock*

Ralph E. Kipp, Esq.  
The Law Offices of Ralph E. Kipp, P.L.C.  
10615 Judicial Drive, Suite 501  
Fairfax, VA 22030  
*Counsel for An Ping Corporation*

Barry Boss  
Cozen O'Connor  
1200 19<sup>th</sup> Street NW  
Washington, DC 20036  
*Counsel for Brett Hitt, Hitt Family  
and Hitt Construction*

James M. Sack  
The Sack Law Firm, P.C.  
8270 Greensboro Drive, Suite 810  
McLean, VA 22102  
*Counsel for Herndon Station, LLC  
and various investors/creditors*

Robert M. Marino  
Redmon Peyton & Braswell, LLP  
510 King Street, Suite 301  
Alexandria, VA 22314  
*Counsel for ATC Financial LLC and  
Brian Casey*

Jack Garson  
Garson Law LLC  
7910 Woodmont Avenue, Suite 650  
Bethesda, MD 20814  
*Counsel for Glen Ferguson*

