

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES SECURITIES AND  
EXCHANGE COMMISSION,

Plaintiff,

vs.

STEFAN QIN, VIRGIL TECHNOLOGIES  
LLC, MONTGOMERY TECHNOLOGIES  
LLC, VIRGIL QUANTITATIVE  
RESEARCH, LLC, VIRGIL CAPITAL LLC,  
and VQR PARTNERS LLC,

Defendants.

Case No.: 20-cv-10849 (JGLC)

**RECEIVER'S CLAIMS SCHEDULE**

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Pursuant to the Court’s December 20, 2024 Opinion and Order (ECF No. 339), Robert A. Musiala Jr., as the Court-appointed receiver (“Receiver”) in the above-captioned action, by and through his undersigned counsel, respectfully submits this Claims Schedule (“Claims Schedule”), which sets forth the Receiver’s Claim Determinations<sup>1</sup> with brief descriptions of any (i) Claims whose Determination has been accepted by the Claimant (each, a “Resolved Claim”) and (ii) Objections for which settlement discussions are underway or pending (each, a “Pending Objection”) for Claims timely submitted against Virgil Capital LLC, Montgomery Technologies, LLC, Virgil Technologies, LLC, Virgil Quantitative Research, LLC and VQR Partners, LLC, including without limitation the assets of Virgil Sigma Fund, LP and VQR Multistrategy Fund, LP (collectively, “Receivership Entities,” and, together with all other Recoverable Assets, collectively, “Receivership Estate”). As the Receiver has not yet been in contact with each Claimant who filed an Objection to determine whether a resolution is possible, the Claims Schedule does not yet include Objections that the Receiver believes will require adjudication by the Court (each, an “Unresolved Objection”). While the Receiver will make good faith efforts to resolve all Objections, it is likely that several may require Court adjudication. The Receiver will file an updated Claims Schedule at the appropriate time setting forth any Unresolved Objections as well as any other changes to the status of remaining Objections.

### **CLAIMS SCHEDULE**

A total of 114 Claims were timely submitted to the Receiver as of the Bar Date. Of those, two Claims were withdrawn, leaving a total of 112 Claims that were determined by the Receiver. Of the 112 Claims, the Receiver determined 83 as Allowed Claims. The Receiver determined the

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<sup>1</sup> Capitalized terms not otherwise defined herein are accorded the meaning afforded them in the Order Appointing Receiver. Order Appointing Receiver, *SEC vs. Qin*, No. 20-cv-10849 (LGS) (S.D.N.Y. Jan. 21, 2021), ECF No. 31 and Memorandum of Law in Support of Receiver’s Motion to Establish Claims Administration & Determination Procedures, *SEC vs. Qin*, No. 20-cv-10849 (JGLC) (S.D.N.Y. Apr. 8, 2024), ECF No. 303.

remaining 29 Claims as Denied Claims, unsupported by the Estate Records. Of the 83 Allowed Claims, 71 were classified as Investor Claims, eight as Employee Claims, three as Vendor/Service Provider/General Unsecured Claims; and one as an Investor/Employee Claim.

As set forth in the schedules below, 101 of the 112 Claims are classified as Resolved Claims requiring no further action by the Receiver or the Court, as there are no Pending Objections, and the Receiver's Determination is final. The 11 remaining Claims are submitted as Pending Objections, for which the Receiver and the respective Claimants are either currently engaged in negotiations to resolve the Objection or the Receiver will be reaching out to the Claimant to discuss a potential resolution.

The schedules below set forth the status of each class of Claims.

### **Resolved Claims**

#### **Resolved Investor Class Claims**

| <b>Claimant No.</b> | <b>Class</b>        | <b>Allowed Amount<sup>2</sup></b> |
|---------------------|---------------------|-----------------------------------|
| 10003               | Investor            | \$899,955.65                      |
| 10005               | Investor            | \$86,272.99                       |
| 10006               | Investor            | \$717,485.05                      |
| 10007               | Investor            | \$264,229.31                      |
| 10009               | Investor            | \$673,691.77                      |
| 10012               | Investor            | \$250,000.00                      |
| 10013               | Investor            | \$1,300,000.00                    |
| 10016               | Investor            | \$250,000.00                      |
| 10018               | Investor            | \$269,055.89                      |
| 10021               | Investor            | \$150,000.00                      |
| 10022               | Investor / Employee | \$122,000.00 <sup>3</sup>         |
| 10023               | Investor            | \$712,176.13                      |
| 10024               | Investor            | \$218,136.23                      |
| 10025               | Investor            | \$425,137.37                      |
| 10026               | Investor            | \$520,125.16                      |
| 10027               | Investor            | \$107,676.94                      |
| 10029               | Investor            | \$3,700,000.00                    |
| 10033               | Investor            | \$250,000.00                      |
| 10036               | Investor            | \$2,268,307.98                    |
| 10037               | Investor            | \$4,798,881.58                    |

<sup>2</sup> The Allowed Amount is not indicative of the amount a Claimant will or should expect to receive through any distribution(s) of Recoverable Assets. Instead, it may permit a Claimant holding an Allowed Claim with a positive Allowed Amount to be eligible for distribution(s) from the Receivership Estate depending upon the terms of a Liquidation Plan to be decided and approved by the Court at a future date following the filing of a proposed distribution plan by the Receiver.

<sup>3</sup> This represents the Allowed Amount of the Investor portion of the Claim.

| Claimant No. | Class        | Allowed Amount <sup>2</sup> |
|--------------|--------------|-----------------------------|
| 10038        | Investor     | \$400,000.00                |
| 10040        | Investor     | \$174,199.09                |
| 10041        | Investor     | \$250,025.00                |
| 10042        | Investor     | \$161,910.60                |
| 10043        | Investor     | \$1,854,257.19              |
| 10044        | Investor     | \$250,000.00                |
| 10045        | Investor     | \$250,000.00                |
| 10046        | Investor     | \$100,000.00                |
| 10047        | Investor     | \$88,056.44                 |
| 10048        | Investor     | \$3,000,000.00              |
| 10049        | Investor     | \$47,828.62                 |
| 10050        | Investor     | \$1,202,782.67              |
| 10051        | Investor     | \$100,000.00                |
| 10052        | Investor     | \$200,000.00                |
| 10055        | Investor     | \$614,915.64                |
| 10056        | Investor     | \$479,162.74                |
| 10059        | Investor     | \$895,341.00                |
| 10060        | Investor     | \$30,268.38                 |
| 10061        | Investor     | \$1,019,557.50              |
| 10062        | Investor     | \$360,261.32                |
| 10065        | Investor     | \$87,630.83                 |
| 10067        | Investor     | \$699,975.00                |
| 10069        | Investor     | \$263,775.11                |
| 10070        | Investor     | \$1,000,000.00              |
| 10073        | Investor     | \$2,350,891.77              |
| 10074        | Investor     | \$2,892,093.59              |
| 10075        | Investor     | \$3,655,722.60              |
| 10077        | Investor     | \$500,000.00                |
| 10078        | Investor     | \$490,823.48                |
| 10079        | Investor     | \$616,535.05                |
| 10080        | Investor     | \$250,000.00                |
| 10082        | Investor     | \$100,000.00                |
| 10084        | Investor     | \$300,000.00                |
| 10085        | Investor     | \$282,751.34                |
| 10086        | Investor     | \$306,685.84                |
| 10087        | Investor     | \$485,040.00                |
| 10089        | Investor     | \$298,350.91                |
| 10090        | Investor     | \$4,215,833.40              |
| 10091        | Investor     | \$103,371.31                |
| 10092        | Investor     | \$20,293.72                 |
| 10093        | Investor     | \$2,075,471.71              |
| 10095        | Investor     | \$104,732.85                |
| 10098        | Investor     | \$163,503.27                |
| 10106        | Investor     | \$200,000.00                |
| 10107        | Investor     | \$1,199,712.80              |
| 10108        | Investor     | \$258,038.36                |
| 10109        | Investor     | \$3,407,928.27              |
| 10114        | Investor     | \$20,183.55                 |
|              | <b>Total</b> | <b>\$55,811,043.00</b>      |

Resolved Employee Class Claims

| Claimant No. | Class               | Allowed Amount          |
|--------------|---------------------|-------------------------|
| 10011        | Employee            | \$3,375.00              |
| 10015        | Employee            | \$22,687.52             |
| 10022        | Investor / Employee | \$8,521.33 <sup>4</sup> |
| 10028        | Employee            | \$1,082.50              |
| 10071        | Employee            | \$11,846.15             |
| 10076        | Employee            | \$6,250.00              |
| 10083        | Employee            | \$7,750.00              |
| 10099        | Employee            | \$7,468.75              |
| 10115        | Employee            | \$4,000.00              |
| <b>Total</b> |                     | <b>\$72,981.25</b>      |

Resolved Vendor/Service Provider/Unsecured General Class Claims

| Claimant No. | Class                                         | Allowed Amount     |
|--------------|-----------------------------------------------|--------------------|
| 10014        | Vendor / Service Provider / General Unsecured | \$10,000.00        |
| 10102        | Vendor / Service Provider / General Unsecured | \$7,900.00         |
| <b>Total</b> |                                               | <b>\$17,900.00</b> |

Resolved Denied Claims

| Claimant No. | Class  | Allowed Amount |
|--------------|--------|----------------|
| 10004        | Denied | \$0.00         |
| 10008        | Denied | \$0.00         |
| 10010        | Denied | \$0.00         |
| 10017        | Denied | \$0.00         |
| 10019        | Denied | \$0.00         |
| 10032        | Denied | \$0.00         |
| 10034        | Denied | \$0.00         |
| 10039        | Denied | \$0.00         |
| 10057        | Denied | \$0.00         |
| 10063        | Denied | \$0.00         |
| 10064        | Denied | \$0.00         |
| 10066        | Denied | \$0.00         |
| 10081        | Denied | \$0.00         |
| 10088        | Denied | \$0.00         |
| 10096        | Denied | \$0.00         |
| 10097        | Denied | \$0.00         |
| 10100        | Denied | \$0.00         |
| 10101        | Denied | \$0.00         |
| 10104        | Denied | \$0.00         |
| 10110        | Denied | \$0.00         |
| 10111        | Denied | \$0.00         |
| 10112        | Denied | \$0.00         |
| 10113        | Denied | \$0.00         |
| <b>Total</b> |        | <b>\$0.00</b>  |

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<sup>4</sup> This represents the Allowed Amount of the Employee portion of the Claim

**Pending Objections**

The following 11 Claims are Pending Objections. The current Allowed Amount of each, as determined by the Receiver, is listed below. Final Determinations will be contingent upon the parties' negotiation of a settlement of the Objection. In the event a settlement is not able to be reached, the Receiver will submit such Claim to the Court for adjudication as an Unresolved Objection.

| <b>Claimant No.</b> | <b>Class</b>                                        | <b>Allowed Amount</b>  |
|---------------------|-----------------------------------------------------|------------------------|
| 10020               | Investor                                            | \$1,681,547.33         |
| 10030               | Denied                                              | \$0.00                 |
| 10031               | Denied                                              | \$0.00                 |
| 10035               | Investor                                            | \$220,000.00           |
| 10053               | Investor                                            | \$11,044,833.38        |
| 10054               | Investor                                            | \$287,044.60           |
| 10058               | Vendor / Service<br>Provider / General<br>Unsecured | \$6,000.00             |
| 10068               | Denied                                              | \$0.00                 |
| 10072               | Denied                                              | \$0.00                 |
| 10094               | Denied                                              | \$0.00                 |
| 10103               | Denied                                              | \$0.00                 |
|                     |                                                     |                        |
| <b>Total</b>        |                                                     | <b>\$13,239,425.31</b> |

Dated: June 5, 2025  
New York, New York

*/s/ Jimmy Fokas*  
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