UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

COMMODITY FUTURES TRADING COMMISSION, Plaintiff, v. PHILLIP WILLIAMS, DEVIN JOHNSON, BACKWARD HAT CAPITAL FUND LP, BH CAPITAL FUND I LP, BH CAPITAL FUND III LP, BH CAPITAL FUND IV LP, BHC V LLC, BH CAPITAL FUND VI LP, BH CAPITAL FUND IX LP, BACKWARD HAT GROUP LLC, BH CAPITAL FUND X LP, BH CAPITAL FUND IX-2 LP, BACKWARD HAT CAPITAL MANAGEMENT LLC, WILLIAM CODY HARVEY (Relief Defendant), KMAP INC. (Relief Defendant), ALLEN JOHNSON GROUP LLC (Relief Defendant), WILLIAM HARVEY GROUP, LLC (Relief Defendant), Defendants.	)	No. 1:26-cv-02477-JPH-CSW *SEALED*

TEMPORARY RESTRAINING ORDER AND ASSET FREEZE ORDER

IT IS HEREBY ORDERED THAT:

DEFINITIONS

1. For the purposes of this Order, the following definitions apply:

2. The term "**assets**" encompasses any legal or equitable interest

in, right to, or claim to, any real or personal property or business, undertaking, or enterprise, whether individually or jointly, directly or indirectly controlled, and wherever located, including but not limited to: chattels, goods, instruments, equipment, fixtures, general intangibles, rights, effects, leaseholds, mail or other deliveries, inventory, checks, notes, accounts (including, but not limited to, bank accounts, accounts at other financial institutions, crypto asset exchange accounts, and crypto asset wallets), credits, receivables, lines of credit, contracts, loans, stock and other ownership interests, financial derivatives (including spot, futures, options, or swaps contracts), insurance policies, retainers held by agents for the provision of professional or other services, and all funds, wherever located, whether in the United States or outside the United States.

3. The term "**record**" encompasses the terms "document" and "electronically stored information" as those terms are used in Fed. R. Civ. P. 34(a), and includes, but is not limited to, all writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or other data compilations—stored in any medium from which information can be obtained or translated, if necessary, into reasonable usable form. The term "record" also refers to each and every such item in Defendants' and Relief Defendants' actual or constructive possession, including but not limited to: (i) all such items within the custody or control of any agents, employers, employees, or partners of the Defendants and Relief Defendants; and (ii) all items that Defendants and Relief Defendants have a legal or equitable right

to obtain from another person. A draft or non-identical copy is a separate item within the meaning of the term. A record also includes the file and folder tabs associated with each original and copy.

I. Asset Freeze Order Prohibiting the Withdrawal, Transfer, Removal, Dissipation, and Disposal of Assets

4. Defendants and Relief Defendants are immediately restrained and enjoined, except as otherwise ordered by this Court, from directly or indirectly withdrawing, transferring, removing, dissipating or otherwise disposing of any assets, wherever located, including Defendants' and Relief Defendants' assets held outside the United States, except as provided otherwise in Sections IV, V, and VI of this Order, or as otherwise ordered by the Court.

5. Notwithstanding the provisions of this Section I, at the request of a Temporary Receiver, Defendants, Relief Defendants, and any other person who has possession, custody, or control of any of Defendants' and Relief Defendants' assets shall transfer possession of all assets subject to this Order to the Temporary Receiver.

6. The assets affected by this Order shall include existing assets and assets acquired after the effective date of this Order.

II. Maintenance of and Access to All Records Relating to the Business Activities and Business and Personal Finances

7. Defendants and Relief Defendants are restrained from directly or indirectly destroying, altering, or disposing of, in any manner, any records that relate or refer to the business activities or business or personal finances of any Defendant or Relief Defendant.

8. Representatives of the CFTC shall be immediately allowed to inspect any records relating or referring to the business activities or business or personal finances of the Defendants and Relief Defendants, including, but not limited to, both hard-copy and electronically stored records, wherever they may be situated and whether they are in the possession of Defendants, Relief Defendants, or others. To ensure preservation and facilitate meaningful inspection and review of these records, Defendants and Relief Defendants shall allow CFTC representatives to make copies of said records, and if on-site copying of the records is not practicable, CFTC representatives may make such copies off-site. After any such off-site copying, Plaintiff shall promptly return the original records and devices upon which the records are stored.

9. When inspecting records that are subject to this Order, including those contained on computers, mobile device, or any other electronic devices, the CFTC must undertake reasonable measures to prevent review of the Defendants' or Relief Defendants' privileged communications and/or other nonbusiness, nonfinancial materials by the CFTC's attorneys and other staff who are part of the litigation team in this matter. Moreover, Defendants and Relief Defendants (or their counsel) shall promptly contact Plaintiff's counsel to assert any claims of privilege (or other legal objections) relating to the contents of any records that are subject to this Order and promptly cooperate with Plaintiff's counsel to develop reasonable protocols to isolate and prevent disclosure of claimed privileged and/or other nonbusiness, nonfinancial materials to the CFTC's attorneys and other staff who are part of the litigation

team in this matter. However, nothing herein shall excuse Defendants or Relief Defendants from full and immediate compliance with this Court's Order permitting Plaintiff to inspect the records that relate to Defendants' or Relief Defendants' business activities and their business and personal finances.

III. Notice to Financial Institutions and Others That Hold or Control Assets or Records

10. To ensure the effectiveness of the asset freeze and pending further Order of this Court, any bank, other financial or brokerage institution (including any introducing broker, futures commission merchant, or retail foreign exchange dealer), crypto asset exchange, other business entity, or person that receives actual notice of this Order and holds, controls, or maintains custody of any asset of Defendants or Relief Defendants, shall not, in active concert or participation with Defendants or Relief Defendants, permit Defendants or Relief Defendants or other persons to withdraw, transfer, remove, dissipate, or otherwise dispose of any of Defendants' or Relief Defendants' assets, except as directed by further order of the Court.

11. Any bank, other financial or brokerage institution (including any introducing broker, futures commission merchant, or retail foreign exchange dealer), crypto asset exchange, other business entity, or person that receives notice of this Order by personal service or otherwise shall not, in active concert or participation with any Defendant or Relief Defendant, directly or indirectly destroy, alter, or dispose of, in any manner, any records relating to the business activities and business and personal finances of any Defendant or Relief Defendant.

12. Furthermore, any bank, other financial or brokerage institution (including any introducing broker, futures commission merchant, or retail foreign exchange dealer), crypto asset exchange, other business entity, or person that receives actual notice of this Order and holds, controls, or maintains custody of any asset titled in the name of, held for the benefit of, or otherwise under the control of any Defendants and Relief Defendants, or has held, controlled, or maintained custody of any asset of any Defendant and Relief Defendant at any time since **July 1, 2022** shall not, in active concert or participation with Defendants and Relief Defendants, deny a request by the CFTC to inspect all records pertaining to every asset owned, controlled, managed, or held by, on behalf of, or for the benefit of Defendants and Relief Defendants, including, but not limited to, originals or copies of account applications, account statements, signature cards, checks, drafts, deposit tickets, transfers to and from accounts, all other debit and credit instruments or slips, currency transaction reports, 1099 forms, and safe deposit box logs. As an alternative to allowing inspection of records, any bank, other financial or brokerage institution (including any introducing broker, futures commission merchant, or retail foreign exchange dealer), crypto asset exchange, other business entity, or person that receives actual notice of this Order may provide copies of records requested by the CFTC.

IV. Persons Bound by this Order

13. This Order is binding on any person who receives actual notice of this Order by personal service or otherwise and is acting in the capacity of an

officer, agent, servant, employee, or attorney of the Defendants or Relief Defendants, or is in active concert or participation with the Defendants or Relief Defendants.

V. Bond Not Required of Plaintiff

14. As Plaintiff CFTC has made a proper showing under Section 6c(b) of the CEA, 7 U.S.C. § 13a-1(b), it is not required to post any bond in connection with this Order.

* * *

This Order is issued at 12:30 p.m. eastern standard time, November 18, 2026. In the absence of an order extending it, this Order shall expire at 11:59 p.m. fourteen calendar days following its entry.

SO ORDERED.

Date: 11/18/2026

James Patrick Hanlon

James Patrick Hanlon
United States District Judge
Southern District of Indiana

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