

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,

Case No. 21-cv-2114 (KMM/JFD)

Plaintiff,

v.

**PLAINTIFF'S MOTION FOR
REMEDIES**

CAREBOURN CAPITAL, L.P.,
CAREBOURN PARTNERS, LLC
Relief Defendant, and CHIP ALVIN
RICE,

Defendants.

Plaintiff, United States Securities and Exchange Commission (the "SEC"), respectfully requests that the Court impose the following remedies against Defendants Carebourn Capital, L.P. ("Carebourn Capital") and Chip Rice (collectively the "Defendants"): (1) permanent injunctions as to both Defendants prohibiting them from further violating the federal securities laws as alleged in the Complaint; (2) permanent penny stock bars as to both Defendants; (3) order Defendants to pay, on a joint and several basis, disgorgement of net profits of \$10,135,738.71, and prejudgment interest of \$950,173.40, totaling \$11,085,912.11; and (4) a civil penalty of \$642,500 against each Defendant. The Court should also order Relief Defendant Carebourn Partners, LLC to pay disgorgement of \$1,109,306.50, and prejudgment interest of \$103,924.66, totaling \$1,213,231.16, based on its receipt of ill-gotten gains from Defendants' misconduct. Finally, the SEC requests that the Court order Defendants to surrender for cancellation

shares of stock from, and conversion rights under, convertible notes that issuers sold to them.

WHEREFORE, Plaintiff United States Securities and Exchange Commission respectfully requests that the Court grant its Motion for Remedies against Defendants and Relief Defendant.

Dated: February 9, 2024

Respectfully submitted,

s/ Timothy J. Stockwell

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