

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

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

- against -

**REGINALD (“REGGIE”) MIDDLETON,
VERITASEUM, INC., and
VERITASEUM, LLC,**

Defendants.

19 Civ. 04625 (WFK) (VMS)

**ORAL ARGUMENT
REQUESTED**

**DEFENDANTS’ FRCP 60(D)3 MOTION TO VACATE ORDER FOR FRAUD UPON THE
COURT**

Defendants Reginald (“Reggie”) Middleton, Veritaseum, Inc., and Veritaseum, LLC respectfully move the Court to vacate D.E. 61, Consent Order and Judgement, for fraud upon the court, as well as returning Defendants assets, dismissing the complaint (without prejudice) and awarding attorney fees and costs since August, 2017 through the completion of these proceedings for the reasons set forth in the supporting memorandum, declarations and exhibits attached thereto.

May 30, 2025

/s Franklin Jason Seibert

Franklin Jason Seibert
Seibert Law
3202 Coral Ridge Dr
League City, TX 77573
971-235-5764
jason@seibert-law.com
Counsel for Defendants