IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA v. NATHAN REIS (01) and STEPHANIE HOCKRIDGE A.K.A. STEPHANIE REIS (02), Defendants, and BALENTINE LLC and SEI PRIVATE TRUST COMPANY, Garnishees.	No. 4:24-CR-287-O

AFFIDAVIT OF DIANA SNYDER

I, Diana Snyder, affirm as follows:

1. I have worked as an investigator in the Civil Division of the U.S. Attorney's Office for the Northern District of Texas since March 2016.

2. I have been assigned the task of investigating the defendants Nathan Reis and Stephanie Hockridge (together, "Defendants" and individually by last name), as well as their entities in connection with the judgments and restitution orders entered in this case.

3. The information contained in this declaration is based on my review of (1) filings in this criminal case, (2) records gathered through subpoenas and other investigative tools available to the United States, and (3) information from other publicly available databases.

4. I did not include in this affidavit all the facts gathered; rather, I limited the facts to those necessary to establish that (1) Reis and Hockridge formed and funded the Mint and

Marietta Family Trusts and the Mint and Marietta Legacy Trusts and (2) the trusts have transferred their assets to Defendants, Defendants' wholly-owned corporate entities, and law firms and other entities for Defendants' benefit.

I. Defendants' formation and funding of the relevant trusts

5. The defendants first created the relevant trusts in or around 2022.

6. In 2022, Reis transferred over $46 million from his personal brokerage account to accounts titled to the Nathan J Reis 2022 Irrevocable Trust and the Nathan J Reis Family Protection Trust. *See* Affidavit of Special Agent Collin Friedemann ¶ 10, ECF No. 311-3.

7. In the same timeframe, Hockridge transferred over $29 million from her personal brokerage account to the Stephanie Reis 2002 Irrevocable Trust and the Stephanie Reis Family Protection Trust. *Id.* ¶ 11.

8. In or around May 2023, the trusts were renamed into new trusts. Reis's trusts were renamed the Mint Legacy Trust and the Mint Family Trust. Hockridge's trusts were renamed the Marietta Legacy Trust and the Marietta Family Trust. *See* Declaration of Jeremy B. Spackman ¶ 6, ECF No. 420-1. The assets of the original trusts were transferred into the newly-created trusts through decanting, which Defendants represent as "a process by which the distribution trustee of a trust may transfer the trust's assets to a new trust." *Id.* ¶ 7.

9. In response to the government's request for financial disclosure, Reis produced copies of the trust agreements for the new trusts that were formed in 2023. The trust agreements identify Reis as the grantor of the Mint Legacy Trust and the Mint Family Trust and Hockridge as the grantor of the Marietta Legacy Trust and the Marietta Family Trust. Ther agreements also show that each defendant was named a "Family Trustee" of each trust. Excerpts of the trust agreements with the relevant designation are attached as **Exhibit A**.

II. Defendants' use of trust assets for personal purposes

10. The investigation conducted by the United States revealed that the assets held by the Defendants' trusts were transferred to the Defendants' personal accounts and were otherwise sent to other entities for the Defendants' personal purposes. I outline some examples below.

11. **Direct transfers to Defendants.** The Defendants' trusts have transferred millions in assets directly to accounts owned or controlled by Defendants. These transfers have been accomplished via wire as well as direct transfers to the accounts in the Defendants' name held at SEI Private Trust Company, where Reis maintains an account ending in 8485 and Hockridge maintains an account ending in 8484. *See* ECF No. 408 (identifying Defendants' personal accounts). The transfers are summarized in the chart below. Redacted excerpts of the trusts' banking statements substantiating these transactions are attached as **Exhibit B**.

Date	Amount Transferred	Transferor	Transferee	Notes
05/23/2024	$3,500,000	Mint Family Trust	Hockridge	Asset transfer to account ending in 8484
05/12/2025	$2,000,000	Marietta Family Trust	Reis	Cash transfer to account ending in 8485
06/13/2025	$1,500,000	Marietta Family Trust	Reis	Wire notes: "Paid to Reis, Nathan J"
06/23/2025	$2,200,000	Marietta Family Trust	Reis	Cash transfer to account ending in 8485

12. **Direct transfers to Defendants' wholly-owned entity**. In response to the government's request for financial disclosure, Reis certified, under penalty of perjury, that he and Hockridge own and control US RFO Holdings, LLC and stated that its business purpose is "[i]nvestment [h]oldings." An excerpt of that financial statement with that relevant disclosure is attached as **Exhibit C.** Since the time of their creation, the Defendants' trusts have transferred at least $4 million in cash to US RFO Holdings, LLC. The cash was sent by wire transfer from the

trusts' accounts to the entity's account ending in 4466 at First National Bank of Waterloo. The transfers are summarized in the chart below. Redacted excerpts of the trusts' banking statements and US RFO Holdings, LLC's banking statement substantiating these transactions are attached as **Exhibit D**.

Date	Amount Transferred	Transferor	Transferee	Notes
10/6/2023	$2,000,000	Marietta Family Trust	US RFO Holdings, LLC	Wire transfer to US RFO Holdings, LLC account at First National Bank of Waterloo
10/10/2023	$2,000,000	Mint Family Trust	US RFO, Holdings, LLC	Wire transfer to US RFO Holdings, LLC account at First National Bank of Waterloo

13. **Payments for Defendants' benefit to large law firms.** The Defendants' trusts have wired over $20 million to large law firms for Defendants' benefit since the time the trusts were formed. Notably, $19,635,000 was transferred via wire to the Defendants' law firms on the day before and on the day of Hockridge's sentencing, November 21, 2025. The chart below summarizes these transactions. Redacted excerpts of the trusts' banking statements substantiating these transactions are attached as **Exhibit E**.

Date	Amount Transferred	Transferor	Transferee	Notes
1/7/2025	$2,000,000	Marietta Family Trust	Bryan Cave Leighton Paisner LLP	Wire notes: "Nate Reis"
11/20/2025	$600,000	Marietta Family Trust	Bryan Cave Leighton Paisner LLP	Wire notes: "Stephanie Reis"
11/20/2025	$8,500,000	Mint Family Trust	Bryan Cave Leighton Paisner LLP	Wire notes: "Stephanie Reis"
11/21/2025	$8,285,000	Marietta Family Trust	Latham & Watkins LLP	Wire notes: "FBO NATE REIS MATTER"
11/21/2025	$500,000	Mint Family Trust	Alston & Bird LLP	Wire notes: "FBO Reis/Hockridge"

11/21/2025	$1,000,000	Mint Family Trust	Latham & Watkins LLP	Wire notes: "FBO NATE REIS MATTER"
11/21/2025	$750,000	Mint Family Trust	Eversheds Sutherland (US) LLP	Wire notes: "Reis/Hockridge Matter"

14. **Transfers related to the Defendants' Puerto Rico properties.** The Defendants own two condos in Puerto Rico through wholly owned Puerto Rico LLCs, PR 4401 Ocean Drive LLC and PR 5501 Ocean Drive LLC. Puerto Rico Secretary of State records show that Defendants are authorized persons and administrators for each LLC. *See* Certificates of Formation, ECF No. 303-1. Both Defendants acknowledge that they own the Puerto Rico condos through these LLCs. *See, e.g.*, Hockridge Presentence Investigation Report ¶ 111, Dkt. 281-1; Reis Presentence Investigation Report ¶¶ 124-25, Dkt. 322-1. In late 2022, the Defendants' trusts wired over $3 million with notes indicating that the wired funds were to be used to purchase these Puerto Rico properties. In 2025, the Mint Family Trust moreover wired $5 million directly to 5501 Ocean Drive LLC. The chart below summarizes these transactions. Redacted excerpts of the trusts' banking statements substantiating these transactions are attached as **Exhibit F**.

Date	Amount Transferred	Transferor	Transferee	Notes
10/17/2022	$675,807.50	The Stephanie Reis Family Protection Trust	Account held at Banco Popular	Transfer notes: "BANCO POPULAR DE PUE 4401 OCEAN DRIVE HALF"
10/17/2022	$783,984.90	The Stephanie Reis Family Protection Trust	Account held at Banco Popular	Transfer notes: "BANCO POPULAR DE PUE 5501 OCEAN DRIVE HALF"
10/17/2022	$783,984.90	The Nathan J Reis Family Protection Trust	Account held at Banco Popular	Transfer notes: "BANCO POPULAR DE PUE 5501 OCEAN DRIVE HALF"

10/24/2022	$675,807.50	The Nathan J Reis Family Protection Trust	Account held at Banco Popular	Transfer notes: "BANCO POPULAR DE PUE 4401 OCEAN DRIVE HALF"
04/11/2025	$5,000,000	Mint Family Trust	5501 Ocean Drive LLC	

15. The government served a subpoena on Ocean Drive Development LLC, the seller of the Puerto Rico properties. In response to the subpoena, Ocean Drive Development LLC produced acknowledgement letters that appear to indicate that the 2022 transfers from the trusts identified in the preceding paragraph were used to place deposits on the Puerto Rico properties. The correspondence acknowledges "two payments of $783,969.90" from Defendants for the "second deposit of unit 5501 for Ocean Drive Building V" and "two payments of $675,792.50" from Defendants for the "second deposit of unit 4401 for Ocean Drive Building IV." Copies of that correspondence are attached as **Exhibit G**.

16. **Transfers from trusts authorized by Defendants.** Reis signed documents as the authorized signer for certain distributions of funds that were held within the account titled to The Nathan J Reis Family Protection Trust. For example, on February 7, 2023, Reis signed a request directing that the trust's account ending in 4104 send a wire of $25,000 to a law firm as a retainer payment. A copy of that wire request and redacted excerpts of the trust's banking statement substantiating that wire from its account are attached as **Exhibit H**.

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Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the above is true and correct to the best of my knowledge, information, and belief.

Executed on February 18, 2026.

/s/ *Diana Snyder*
Diana Snyder
Investigator
United States Attorney's Office