

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

COMMODITY FUTURES TRADING
COMMISSION,

Case No. 8:19-CV-886-T-33SPF

Plaintiff,

v.

OASIS INTERNATIONAL GROUP,
LIMITED; OASIS MANAGEMENT, LLC;
SATELLITE HOLDINGS COMPANY;
MICHAEL J DACORTA; JOSEPH S.
ANILE, II.; RAYMOND P MONTIE III;
FRANCISCO "FRANK" L. DURAN; and
JOHN J. HAAS,

Defendants;

and

MAINSTREAM FUND SERVICES, INC.;
BOWLING GREEN CAPITAL
MANAGEMENT LLC; LAGOON
INVESTMENTS, INC.; ROAR OF THE
LION FITNESS, LLC; 444 GULF OF
MEXICO DRIVE, LLC; 4064 FOUNDERS
CLUB DRIVE, LLC; 6922 LACANTERA
CIRCLE, LLC; 13318 LOST KEY PLACE,
LLC; and 4 OAKS LLC,

Relief Defendants.

RECEIVER’S UNOPPOSED MOTION TO (1) APPROVE PROCEDURE TO ADMINISTER CLAIMS AND PROOF OF CLAIM FORM, (2) ESTABLISH DEADLINE FOR FILING PROOF OF CLAIM FORMS, AND (3) PERMIT NOTICE BY MAIL AND PUBLICATION AND INCORPORATED MEMORANDUM OF LAW

Burton W. Wiand, as receiver over the above-captioned defendants and relief defendants (the “**Receiver**” and the “**Receivership**”), respectfully moves this Court for an order (1) approving the Proof of Claim Form attached as **Exhibit A** and the procedure to administer claims set forth in this motion, including the Claims Process Instructions attached as **Exhibit B**; (2) establishing a deadline for filing claims against the Receivership; and (3) permitting notice of the deadline by mail and by publication in The New York Times (national edition), The Sarasota Herald-Tribune (local edition), and on the Receiver’s website (www.oasisreceivership.com) in the form attached as **Exhibit C** (the “**Notice**”).¹

Background

On April 15, 2019, the Commodity Futures Trading Commission (“**CFTC**”) instituted this action to stop a fraudulent foreign currency (“**forex**”) trading scheme perpetrated by the defendants. That same day, the Court entered an order appointing Burton W. Wiand as temporary Receiver over the assets of the following individuals and entities: (1) defendants Oasis International Group, Limited; Oasis Management, LLC; Michael J. DaCorta; Joseph S. Anile, II; Francisco “Frank” L. Duran; Satellite Holdings Company; John J. Haas; and Raymond P. Montie, III (collectively, the “**defendants**”) and (2) relief defendants Mainstream Fund Services, Inc.; Bowling Green Capital Management, LLC; Lagoon Investments, Inc.; Roar of the

¹ The Receiver has control of software used by certain defendants to communicate with investors. The Receiver also has email addresses for many of the investors, either from the software or from the registration section of the Receiver’s website. The Receiver anticipates also using email to inform claimants of developments in the claims process.

Lion Fitness, LLC; 444 Gulf of Mexico Drive, LLC; 4064 Founders Club Drive, LLC; 6922 Lacantera Circle, LLC; 13318 Lost Key Place, LLC; and 4Oaks LLC (collectively, the “**relief defendants**”). The foregoing defendants and relief defendants are referred to as the “**Receivership Entities.**”² On July 11, 2019, the Court entered an order superseding and consolidating two prior orders appointing the Receiver. *See* Doc. 177 (the “**Consolidated Order**”); *see also* Doc. 7 and Doc. 44.

Pursuant to the Consolidated Order, the Receiver’s appointment was necessary for the following purposes:

marshalling and preserving all assets (real, personal, intangible, or otherwise) of the Defendants and the Relief Defendants ... as well as the assets of any other entities or individuals that: (a) are attributable to funds derived from pool participants, lenders, investors, or clients of the Defendants and/or Relief Defendants; (b) are held in constructive trust for the Defendants and/or Relief Defendants; (c) were fraudulently transferred by the Defendants and/or Relief Defendants; and/or (d) may otherwise be includable as assets of the estates of the Defendants and/or Relief Defendants....

See Doc. 177 at 2. To that end, the Receiver has the duty and power “[t]o take custody, control and possession of all Receivership Property and records relevant thereto from the Receivership Defendants; to sue for and collect, recover, receive and take into possession from third parties all Receivership Property and records relevant thereto.” *See* Doc. 177 ¶ 8.B. The Receiver also has the obligation to report to the Court the “status of creditor claims proceedings, after such proceedings have been commenced.” *See id.* ¶ 56.F.

² While Mainstream Fund Services, Inc. (“**Mainstream**”) is a relief defendant, the Receiver is not acting as Receiver over all of Mainstream’s assets. Mainstream maintained three accounts at Citibank, N.A. One of those accounts contained funds in the amount of approximately \$6,012,397.78 belonging to Oasis International Group, Limited. Mainstream transferred those funds to the Receiver. The other accounts held by Mainstream are not included in this Receivership at this time. *See* Docs. 13 and 14.

In accordance with the terms and conditions of the Consolidated Order, the Receiver, among other things, took possession of certain Receivership Entities' assets and is currently in the process of administering those assets, working to recover additional assets, and determining the extent of the Receivership Entities' liabilities. The defendants and certain of the relief defendants were involved in the offer and sale of preferred stock and purported notes in connection with entities that claimed to be participants in commodities trading of foreign currencies or currency-related contracts. In reality, the purported investment opportunity was a fraudulent scheme in which money raised from new investors³ and additional money raised from existing investors was used to (1) pay fictitious returns and purported principal redemptions to existing investors; (2) pay purported management, advisory, incentive and/or referral fees; and (3) pay unauthorized personal and business expenses. While some investors received funds from the Receivership Entities, others did not.

For the foregoing reasons, to determine the extent of the Receivership Entities' legal obligations, and to allow investors, creditors, and any other interested parties to advise the Receiver of any possible claims against the Receivership Entities, the Receiver proposes that the Court approve the Proof of Claim Form attached as **Exhibit A** and the procedures to administer claims set forth below, including the Claims Process Instructions attached as **Exhibit B**.

Relief Requested

Pursuant to the Consolidated Order, the Receiver was obligated to take possession of the Receivership Entities' assets for the benefit of defrauded creditors and to take whatever other

³ In many instances, investors were referred to as purported "lenders." All individuals or entities who invested or purportedly "lent" money to the Receivership Entities were actually investors and are referred to as such in this motion and all claims process documents.

steps are necessary for the creditors' protection. The Receiver's goal is ultimately to marshal and distribute liquidated assets to creditors with allowed claims (the "**Distributions**") in a fair and equitable manner.⁴ The Receiver has already collected approximately \$9 million in liquid assets and has liquidated or is in the process of liquidating additional assets (at present totaling approximately \$3 million) that will be forwarded to the Treasury for eventual distribution to victims through this claims process. To expedite the distribution of these and future-collected assets, the Receiver moves the Court to establish the process for determining claims so that collected funds can begin to be distributed at the earliest possible time. The Receiver will submit a proposed distribution plan for approval by the Court in a subsequent motion.

A. Claim Bar Date.

The Receiver seeks entry of an order establishing a deadline by which all claimants holding a claim against a Receivership Entity arising out of the activities of the Receivership Entities (the "**Claimants**") must assert their claim (the "**Claim Bar Date**").⁵ The Receiver

⁴ The Distributions will be made from two sources, which will ultimately be consolidated: (1) money collected by the Receiver independent of any civil or criminal forfeiture proceeding and (2) money forfeited to the government either directly or in connection with the sale of forfeited assets like real estate, gold, and silver. Pursuant to a memorandum of understanding between the Receiver and the United States Marshals Service, the Receiver is selling the forfeited assets and remitting the proceeds to the government. At the appropriate time, the Receiver will file a petition or petitions for remission, seeking the return of the funds for distribution through this claims process. Certain regulations restrict the type of claimant that can receive a distribution from forfeited funds. To conserve resources, the Receiver nevertheless intends to conduct a single, consolidated claims process. These matters will be addressed more fully when the Receiver moves the Court to approve his claim determinations, which will occur after he has reviewed and analyzed the claims submitted pursuant to this motion.

⁵ The Receiver will calculate and insert the specific date for the Claim Bar Date in the Notice, Claims Process Instructions, and Proof of Claim Form. The proposed Notice, Claims Process Instructions, and Proof of Claim Form currently contain blanks where the Receiver intends to insert this date.

proposes that the Claim Bar Date be set 90 days from the mailing of the Proof of Claim Form to known possible Claimants. This date will allow the Receiver sufficient time to arrange for and publish the proposed Notice and give potential Claimants sufficient time to file a claim with the Receiver. Claimants must file claims to participate in any distribution of Receivership assets. The Receiver proposes that any claim received after the Claim Bar Date be disallowed.

A Claim Bar Date is necessary to allow as many Claimants as possible to participate in the claims process while also allowing the Receiver to obtain certainty in a reasonably prompt fashion of the total amount of potential claims to the Receivership assets. Such certainty is necessary to be able to determine the amount of money each Claimant with an allowed claim is entitled to receive and to facilitate a timely claims resolution and distribution process.

B. Notice by Mail and Publication.

The Receiver and his professionals have spent time gathering and examining documents and other data relating to the Receivership Entities. Based on the review of these documents, the Receiver believes he has identified most (if not substantially all) of the Receivership Entities' investors. As to these known potential Claimants, the Receiver generally possesses last known mailing addresses. The Receiver has determined, however, that the Receivership Entities' records may lack completely accurate information regarding investment activities, including a limited number of last known mailing addresses. In addition, some known Claimants may have moved or otherwise changed addresses. The Receiver also possesses email addresses for many known potential Claimants, but the Receiver does not believe he possesses email addresses for all potential Claimants.

The Receiver's knowledge is limited to (1) the documents and information he has been

able to obtain from the Receivership Entities, financial institutions, and investors and (2) other information he has gathered. It is possible that some Claimants may be currently unknown, and the identities of these potential Claimants are not reasonably ascertainable. As such, providing notice of the Claim Bar Date to all potential Claimants by direct mail alone is not possible.

Based upon the documents reviewed and information gathered to date, investors and other potential creditors are located throughout at least 30 states, with a slight concentration in the Northeast and Florida. Given the geographically broad area in which potential Claimants are located and the significant expense associated with publication of the Notice in each of the states where potential Claimants may reside and the relatively few (if any) interested parties who might benefit from such publication, the Receiver proposes publishing the Notice in the national edition of The New York Times and in The Sarasota Herald-Tribune for one day at least 45 days prior to the Claim Bar Date.⁶

The Sarasota Herald-Tribune has been reporting on the scheme and the Receivership. Given that newspaper's coverage of the scheme and the fact that much of the scheme was conducted from offices in the Sarasota area, the Receiver believes that potential Claimants located in the Sarasota area and those located outside the area may be following the coverage and would benefit from the publication. The Receiver further proposes to publish the Proof of Claim Form and Notice on his website at www.oasisreceivership.com and, as noted above, the

⁶ The cost of a one-day advertisement for the Notice in the national edition of The New York Times is approximately \$2,200, and the same advertisement in The Sarasota Herald-Tribune costs approximately \$405.

Receiver also intends to communicate developments in the claims process to known investors through email communications.⁷

Therefore, the Receiver seeks permission to provide notice of the Claim Bar Date to known potential Claimants by mail to their last known address and to unknown Claimants by publication in the national edition of The New York Times, The Sarasota Herald-Tribune, and on the Receiver's website. The Notice of the Claim Bar Date will be in the form attached as **Exhibit C**. The Claim Bar Date will apply to all creditors and victims of the Oasis scheme. The Receiver believes that such notice is reasonably calculated to inform all known and unknown Claimants of the Claim Bar Date.

C. Procedures to Be Applied to the Administration of Claims.

The Receiver has developed a proposed procedure and Proof of Claim Form to efficiently and equitably identify potential Claimants and the amount and validity of any claim. The Receiver's proposed procedure will ensure certainty as to the total number and amount of claims against the Receivership Estate and thus allow for an equitable distribution among Claimants. The Receiver's proposed procedure also will lessen the burden on many known Claimants.

The Receiver and his professionals have spent considerable time and resources examining voluminous documents relating to the Receivership Entities. Based on this examination and to the extent possible, the Receiver has determined a "**Net Investment Amount**" for most of the known investors. The Net Investment Amount for an investor is calculated by adding all amounts contributed by the pertinent investor and subtracting all payments made to that investor and/or in connection with that investment, regardless of whether

⁷ In addition, the United States intends to send a letter to all victim-investors it has identified,

those payments were characterized as interest, earnings, returns or redemptions of principal, incentive fees, referral fees, or any other terminology. For example, an investor who invested total funds of \$100,000 and received \$50,000 in distributions would have a Net Investment Amount of \$50,000.

To make the process of submitting a claim less burdensome for investors, the Receiver proposes that he mail a Proof of Claim Form to each known investor. The Receiver will include Claims Process Instructions in the form attached as **Exhibit B**. Further, if the Receiver has sufficient reliable information to determine the Net Investment Amount for an investor, the Receiver proposes to include the calculated Net Investment Amount with the Proof of Claim Form for the pertinent investor. If the investor receives a Net Investment Amount and agrees with the amount identified, then the investor does not need to provide any further documentation supporting his or her claim. However, the investor must still complete and sign the Proof of Claim Form under penalty of perjury and return it to the Receiver before the Claim Bar Date, as specified below.

If the investor disagrees with the Net Investment Amount or if the Receiver determines to not include a Net Investment Amount, then the investor must provide the amount he or she contends is correct and legible copies of all documents on which the claim is based or, if documents are not available, an explanation as to why the documents are not available. If an investor invested through an IRA or jointly with another individual and also individually, the Receiver will send the investor multiple Proof of Claim Forms. The investor must complete and return each Proof of Claim Form to preserve all claims.

notifying them of the existence of the Receivership and the Receiver's website.

If the Receiver discovers that the Net Investment Amount provided on an attachment to the Proof of Claim Form is not accurate, he will amend the Net Investment Amount and provide notice of the amendment to the investor. The investor will then have the later of either the Claim Bar Date or thirty (30) days from the date the amendment was sent to return an amended Proof of Claim Form to preserve his or her claims. Similarly, subject to the Receiver's discretion to be exercised in an equitable manner and in the best interests of the Receivership, the Receiver may send notice of a deficiency in a submitted Proof of Claim Form to the submitting Claimant. The Claimant will then have the later of either the Claim Bar Date or thirty (30) days from the date the notice of deficiency was mailed to correct the deficiency as directed by the Receiver to preserve his or her claim. The Receiver also may request additional information from a Claimant. A Claimant's failure to cure a deficiency or provide additional information may result in denial of the claim.

It is unlikely that the Receiver will recover sufficient funds to pay all allowed claims in full. In receiverships, Claimants with allowed claims generally recover a percentage of their loss. As such, the Net Investment Amount will serve as the basis for determining the recipients and amounts of Distributions for victim-investors.⁸ The identification of a Net Investment Amount does not mean that the investor has a valid claim. The Receiver reserves the right to object to the validity of any claim notwithstanding the identification of any such amount.

Each Proof of Claim Form submitted must conform substantially to and must contain all

⁸ To the extent any non-investor claims are submitted (for example, a claim submitted by an individual or entity who provided repair services to a Receivership property before the appointment of the Receiver), the Receiver will recommend and seek the Court's approval of a method for addressing and resolving such claims consistent with the goals of the Receivership.

of the information sought in the Proof of Claim Form approved by the Court. The Receiver reserves the right to reject any altered Proof of Claim Form. A rejection will be treated as a deficiency, and the Claimant will have the time indicated above within which to submit an acceptable Proof of Claim Form. Each Proof of Claim Form must be signed by the Claimant or, if the Claimant is not an individual, by an authorized agent of the Claimant. The Claimant must attest under penalty of perjury that the information, including any information provided by the Receiver, is true and correct. Each Proof of Claim Form must be legible, written in English, and denominated in United States currency. The submission of a claim will subject the Claimant to the jurisdiction of the United States District Court for the Middle District of Florida.

All Proof of Claim Forms must be sent so as to be received on or before the Claim Bar Date at the following address:

Burton W. Wiand, Receiver
c/o Maya M. Lockwood, Esq.
WIAND GUERRA KING P.A.
5505 West Gray Street
Tampa, FL 33609

Facsimile and email copies of Proof of Claim Forms will be accepted only if received on or before the Claim Bar Date and the original executed Proof of Claim Form is received no later than three (3) days after transmission of the facsimile and/or email. Failure to provide an original executed Proof of Claim Form within the time specified may result in denial of the claim. Facsimile copies must be sent to (813) 347-5198 to the attention of Burton W. Wiand, Receiver c/o Maya Lockwood, and email copies must be sent to mgura@wiandlaw.com. It is the Claimants' responsibility to ensure that Proof of Claim Forms are delivered to the Receiver.

In a subsequent motion, the Receiver will recommend to the Court that any properly

completed and timely filed claim be considered allowed if it is established that: (1) the claim arises from or in connection with the fraudulent investment scheme set forth in the complaint filed by the CFTC in this action; (2) losses recognized by law resulted from such activities; (3) any alleged claim and losses are supported by appropriate documentation and are consistent with the books and records available to the Receiver; and (4) no ground exists for denying the claim.

After the Claim Bar Date expires and the Receiver has evaluated all submitted claims, he will seek approval from this Court regarding: (1) allowed claim amounts; (2) priority of claims; (3) a process for the resolution of objections to claim determinations and priorities reached by the Receiver; and (4) if needed, the establishment of reserves for administration of the Receivership, for litigation, and for disputed claims and priorities (until such time as the disputes are resolved).

At the appropriate time, as determined by the Receiver, he will file a motion for a proposed plan of distribution. The motion will identify the total assets in the Receivership Estate at that time and the total amount of allowed claims. The plan will exclude persons prohibited from receiving distributions of assets forfeited by the United States Attorney, as prescribed by 28 C.F.R. § 9.8(b)(3). After Court approval, any Distribution to the Claimants will be made in an equitable manner and in accordance with the appropriate priority, and no Claimant shall receive more than his or her respective allowed amount. The Receiver intends to seek Court approval to make interim Distributions so that defrauded investors who suffered losses receive Distributions as soon as possible.

All administrative expenses, including attorneys' and other professionals' fees and costs,

litigation expenses, and other administrative costs, such as expenses for publishing notice will be paid from the Receivership Estate. These administrative expenses will be paid or reserved before any Distribution is made. The Receiver has not made any prior request for the relief sought in this motion to this or any other Court.

The Receiver requests that the Court (1) approve the Proof of Claim Form attached as **Exhibit A** and the claims administration procedures set forth in this motion, including the Claims Process Instructions attached as **Exhibit B**; (2) establish a deadline for receipt of claims that is 90 days from the mailing of the Proof of Claim Form to known possible Claimants (the Claim Bar Date); and (3) permit notice of the deadline in the form attached as **Exhibit C** by (a) first class U.S. mail to the last known addresses of all known potential Claimants, (b) publication in the national edition of The New York Times and in The Sarasota Herald-Tribune, and (c) publication on the Receiver's website as described above. For the Court's convenience, a proposed order granting this motion is attached as **Exhibit D**.

MEMORANDUM IN SUPPORT

The Court's power to supervise an equity receivership and to determine the appropriate actions to be taken in its administration is extremely broad. *S.E.C. v. Elliott*, 953 F.2d 1560, 1566 (11th Cir. 1992); *S.E.C. v. Hardy*, 803 F.2d 1034, 1038 (9th Cir. 1986). "A district court has summary jurisdiction over receivership proceedings and may deviate from the Federal Rules of Civil Procedure in favor of exercising its broad powers and wide discretion to determine relief." *S.E.C. v. Torchia*, 922 F.3d 1307, 1316 (11th Cir. 2019) (internal quotations omitted). The Court's wide discretion derives from the inherent powers of an equity court to fashion relief.

Bendall v. Lancer Mgmt. Grp., LLC, 523 F. App'x 554, 557 (11th Cir. 2013) (citing *Elliott*, 953 F.2d at 1566). The relief sought by the Receiver falls squarely within those powers.

In receivership proceedings, “[e]very person who has any claim or demand against the estate or property in the custody of the court through the receiver, . . . must assert such claim or demand in the court in which such receiver was appointed.” Ralph E. Clark, Clark on Receivers § 646, at 1132 (3rd ed. 1992); *see also S.E.C. v. Morriss*, 2014 WL 585395, at *3 (E.D. Mo. Feb. 14, 2014) (holding that claimant forfeited his right to either claim or object to a distribution by failing to submit a claim). One way for claimants to assert a claim is for claimants to be authorized “under a general order of the appointing court [to file their] claim with the receiver.” Clark on Receivers § 646, at 1132. The receiver may agree or disagree with the claim, which claim is ultimately approved or disapproved by the court. *Id.*; *see also S.E.C. v. Founding Partners Capital Mgmt.*, 2014 WL 2993780, at *1 (M.D. Fla. July 3, 2014) (agreeing with and adopting the receiver’s recommendations concerning investor claims). “The claims should be definite enough to enable the receiver to pass on their validity, fairness and legality and to place them in their proper and legal category of claims for preference, if any.” Clark on Receivers § 651, at 1142.

In addition to approving the proof of claim form, it is not unusual for a court overseeing a receivership to enter an order limiting the time within which claims must be presented. *See S.E.C. v. Onix Capital, LLC*, 2018 WL 1124435 (S.D. Fla. 2018) (“among these broad powers is the power to establish proof of claim procedures and set an effective claims bar date”) (citations omitted). An order limiting the time within which claims must be submitted has been deemed to be necessary to “lay the foundation for the court to order payments to creditors and distribution

to those entitled to receive.” Clark on Receivers § 651, at 1142. Furthermore, a court with jurisdiction over a receivership, by advertisement and by proper notices by mail, by publication and otherwise should take measures to notify interested parties affected by the receivership. *Id.* § 652, at 1143; *see also S.E.C. v. Neal*, 2007 WL 1231790, at *1 (D. Or. Apr. 24, 2007) (denying claimant’s objection to the denial of his claim filed after the claims bar date despite claimant’s assertion that he never received notice where notice to claimants was published in newspapers and online). This Court has previously approved procedures, proof of claim forms, and bar dates such as those proposed in this motion. *See, e.g., S.E.C. v. A. Nadel et. al.*, Case No. 8:09-cv-00087-RAL-TBM, Order Doc. 391 (M.D. Fla. Apr. 21, 2010); *S.E.C. v. A. Nadel et. al.*, Case No. 8:09-cv-00087-RAL-TBM, Order Doc. 1241 (M.D. Fla. June 17, 2016).

Under the terms and conditions of the Consolidated Order, the Receiver, among other things, is authorized, empowered, and directed to (a) administer the assets of the Receivership Entities and (b) determine the extent of liabilities the Receiver believes to be the legal obligations of the Receivership Entities. *See* Doc. 177. In exercising his duties, the Receiver has determined that it is reasonable, advisable, and in the best interest of the Receivership that the Court approve the claims administration procedure, Notice, Claim Bar Date, Proof of Claim Form, and Claims Process Instructions set forth in this motion and in the attached exhibits.

WHEREFORE, Burton W. Wiand, as Receiver, respectfully requests that this Court enter an order (1) approving the Proof of Claim Form attached as **Exhibit A** and the claims administration procedure as set forth in this motion, including the Claims Process Instructions attached as **Exhibit B**, (2) establishing the Claim Bar Date requested herein, (3) permitting notice of the deadline in the form attached as **Exhibit C** and as described above, and

(4) allowing all such further relief as this Court deems just and proper.

LOCAL RULE 3.01(G) CERTIFICATION OF COMPLIANCE

Counsel for the Receiver has conferred with counsel for the CFTC and the United States and is authorized to represent to the Court that neither the CFTC nor the United States oppose the relief requested in this motion. Defendant DaCorta, defendant Montie, defendant Haas, defendant Anile, defendant Duran, and relief defendant Mainstream have no objection to the relief requested in the motion. The other entities (except Satellite Holdings, which is associated with defendant Haas) have defaulted. As such, the Receiver believes this motion is unopposed.

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on February 3, 2020, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. I have also provided the following non-CM/ECF participant with a true and correct copy of the foregoing by electronic mail and US mail to:

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Attorneys for the Receiver, Burton W. Wiand

EXHIBIT A

PROOF OF CLAIM FORM

COMMODITY FUTURES TRADING COMMISSION,
Plaintiff,

v.

OASIS INTERNATIONAL GROUP, LIMITED; OASIS
MANAGEMENT, LLC; SATELLITE HOLDINGS COMPANY;
MICHAEL J DACORTA; JOSEPH S. ANILE, II.; RAYMOND
P MONTIE III; FRANCISCO "FRANK" L. DURAN; and
JOHN J. HAAS,
Defendants;

and

MAINSTREAM FUND SERVICES, INC.; BOWLING GREEN
CAPITAL MANAGEMENT LLC; LAGOON INVESTMENTS,
INC.; ROAR OF THE LION FITNESS, LLC; 444 GULF OF
MEXICO DRIVE, LLC; 4064 FOUNDERS CLUB DRIVE,
LLC; 6922 LACANTERA CIRCLE, LLC; 13318 LOST KEY
PLACE, LLC; and 4 OAKS LLC,
Relief Defendants.

Case Number: 8:19-cv-886-T-33SPF
U.S. District Court Middle District of Florida (Tampa Division)

Name and address of Claimant
(Please print or type):

ATTENTION: The Honorable Virginia M. Hernandez Covington of the United States District Court, Middle District of Florida, entered orders appointing Burton W. Wiand as Receiver over the assets of the above-captioned defendants and relief defendants (individually, a **"Receivership Entity,"** and collectively, **"Receivership Entities"**). On _____, the Court issued an order establishing a Claim Bar Date for all claims and approving this Proof of Claim Form and the basic procedures to administer any claims. To be eligible to receive a distribution from the Receivership Entities' assets, you must complete and return this Proof of Claim Form and, if applicable, provide the requested documentation, so that it is received on or before _____, to **Burton W. Wiand, Receiver, c/o Maya M. Lockwood, Esquire, Wiand Guerra King P.A., 5505 West Gray Street, Tampa, Florida 33609.** *The proper filing of this completed claim form may entitle you to receive a distribution from the Receivership. Altered forms will not be accepted.*

The information provided in this Proof of Claim Form will be used to determine your distribution, if any, from the Receivership. The Receiver has the right to dispute and/or verify any information you have provided to determine the proper distribution amount, if any, to which you may be entitled. The Receiver further has the right to amend any information he may have provided as to your Net Investment Amount. **By identifying and providing a Net Investment Amount for an investor the Receiver does not waive any right to (1) deny, contest the validity of, or otherwise object to a claim or (2) if warranted, amend the provided Net Investment Amount.**

IMPORTANT INFORMATION TO READ PRIOR TO SUBMITTING THIS FORM

ANY PERSON OR ENTITY SUBMITTING THIS PROOF OF CLAIM FORM SUBMITS TO THE EXCLUSIVE JURISDICTION OF THE ABOVE-CAPTIONED COURT FOR ALL PURPOSES, INCLUDING, WITHOUT LIMITATION, AS TO ANY CLAIMS, OBJECTIONS, DEFENSES, OR COUNTERCLAIMS THAT COULD BE OR HAVE BEEN ASSERTED BY THE RECEIVER AGAINST SUCH CLAIMANT OR THE HOLDER OF SUCH CLAIM IN CONNECTION WITH THIS RECEIVERSHIP, INCLUDING, THOSE ARISING OUT OF (1) ANY DEALING OR BUSINESS TRANSACTED BY OR WITH ANY RECEIVERSHIP ENTITY AND/OR (2) ANY DEALING OR BUSINESS TRANSACTED THAT RELATES IN ANY WAY TO ANY RECEIVERSHIP PROPERTY. CLAIMANT FURTHER AGREES BY MAKING THIS SUBMISSION TO WAIVE ANY RIGHT TO A JURY TRIAL WITH RESPECT TO SUCH CLAIMS, OBJECTIONS, DEFENSES, AND COUNTERCLAIMS.

IF THIS COMPLETED FORM, SIGNED UNDER PENALTY OF PERJURY, IS NOT RECEIVED BY THE RECEIVER AT THE ABOVE-REFERENCED ADDRESS BY _____, YOU WILL BE FOREVER BARRED FROM ASSERTING ANY CLAIM AGAINST THE RECEIVERSHIP ENTITIES' ASSETS AND YOU WILL NOT BE ELIGIBLE TO RECEIVE ANY DISTRIBUTIONS FROM THE RECEIVER.

General Instructions:

You **must** answer each and every question on the following pages. If you are an investor, however, you do not need to answer questions 17-19, which are specific to Non-Investor Claimants. Similarly, Non-Investor Claimants do not need to answer questions 8-16, which are specific to Investor Claimants. Please answer each question applicable to you as fully as possible. If you need additional space to complete an answer, please attach a separate sheet of paper and indicate the number of the question for which you are providing the additional information. If the question does not apply to you, please write "not applicable." If the answer to the question is "no" or "none," please answer as such.

1. Full name of the Claimant (the person or entity making this claim to Receivership assets). _____

2. If this form is being completed by a person other than the Claimant or on behalf of an entity, please provide the full name, address, telephone number, and email address of the person completing this form and the basis for that person's authority to act on the Claimant's behalf. **If you are a power of attorney, trustee, or other fiduciary completing this form on behalf of the Claimant in question 1, you must provide documentation with this Proof of Claim Form reflecting your legal authority to do so.**

3. If this form is being completed on behalf of an entity, please provide the full names of the entity's officers, directors, trustees, managing agents, shareholders, partners, beneficiaries, and any other party with an interest in the entity. _____

4. Provide **one** mailing address where the Claimant authorizes the receipt of all future communications relating to this claim, including any possible distribution payment the Claimant may receive. It is the Claimant's sole responsibility to advise the Receiver of any change to this address after the submission of this form.

5. Provide **one** email address for the Claimant where the Claimant authorizes the receipt of all future electronic communications relating to this claim. It is the Claimant's sole responsibility to advise the Receiver of any change to this email address after the submission of this form.

Do you consent to the receipt of electronic communications from the Receiver in lieu of mailed communications where feasible and in the Receiver's discretion? Yes ____ No ____

6. Provide **one** telephone number for the Claimant. It is the Claimant's sole responsibility to advise the Receiver of any change to this telephone number after the submission of this form. _____
7. Provide the basis for your claim (please check applicable boxes):
- Investor
 - Provided Goods or Services to a Receivership Entity
 - Other (specify basis) _____

If you are not an investor, write "Not Applicable" to questions 8 through 16. If you are an investor, write "Not Applicable" to questions 17 through 19. All Claimants must answer questions 1-7 and question 20.

Questions Specific to Investors

8. Please refer to Exhibit A attached to this document. If sufficient information is available, this Exhibit provides the following information: (1) the total amount invested; (2) the total payments received; and (3) the Net Investment Amount. Do the amounts listed in the Exhibit accurately represent the total amount of your investment and all funds you received related to this investment? Failure to respond to this question will mean that you agree with the amounts listed in the Exhibit.
- _____ Yes, I agree with the amounts listed. _____ No, I do not agree with the amounts listed.

If you answered yes, you do not have to respond to questions 9, 10, and 11. If you answered no, you must answer questions 9, 10, and 11 and provide copies of the documents requested.

9. Please provide the following information regarding your investment in or with, or interest in, any Receivership Entity, and attach copies of all checks, bank or other financial account statements, invoices, wire transfer confirmations, and other documents relating to your answer.

1st investment in or with the Receivership Entities:

totaled \$ _____ and was made on _____ (date); through a check (or wire transfer) made payable to _____ and drawn on account number _____ with _____ (identify financial institution).

If applicable, 2nd investment in or with the Receivership Entities:

totaled \$ _____ and was made on _____ (date); through a check (or wire transfer) made payable to _____ and drawn on account number _____ with _____ (identify financial institution).

If additional investments were made, please attach a separate sheet identifying (1) those amounts, (2) the dates on which they were made, (3) the payee of the check (or recipient of the wire transfer), and (4) the account number and financial institution on which the check was drawn or the wire transfer initiated.

Total amount you are claiming you invested with the Receivership Entities: \$ _____

10. Have you ever received any money from a Receivership Entity, including as an "interest" payment, "return of principal," or "referral fee" relating to your investment or for any other reason? ____ Yes ____ No. If yes, please provide the following information for each amount received, and attach copies of all checks, bank or other financial account statements, wire transfer confirmations, and other documents relating to your answers.

	<u>Date</u>	<u>Amount</u>	<u>Payor/Payee of check/wire</u>
A.	_____	_____	_____
B.	_____	_____	_____
C.	_____	_____	_____

If any additional amounts were received from any Receivership Entity, please attach a separate sheet identifying those amounts, the dates on which they were received, and the payor and payee of the check(s) or wire transfers.

Total amount you are claiming you received from the Receivership Entities: \$ _____

11. **State the total amount of your claim (this is the amount that you are claiming you are owed from the Receivership): \$ _____**

12. Did you receive any other funds or anything of value other than money (for example, a car or shares of stock) from any Receivership Entity or anyone acting on their behalf? Yes ____ No _____. If yes, please identify how much or what you received, from whom, and the date it was received. _____

13. Provide the name of the person or persons who solicited your investment in or with the Receivership Entities.

14. Please explain the way in which you came to learn about Oasis International Group, Oasis Management, and/or Satellite Holdings Company and thereafter invest in or with them, including the person who introduced you to these entities, the statements made by that person, any documents provided by that person, meetings you had with the representative(s) of those entities, information that you relied on, and any other information.

15. Are you related by blood or marriage to any of the individual defendants or relief defendants? ____ Yes ____ No. If yes, to whom are you related and what is the relationship. _____

16. Did you receive any commissions, referral fees, compensation for the acquisition of lenders, or any other compensation of any nature from any Receivership Entity? ____ Yes ____ No. If yes, please identify how

much or what you received, from whom, and the date it was received. _____

Questions Specific To Non-Investor Claimants

17. If you were not an investor, state with specificity how you claim an interest in any distribution by the Receivership Entities (for example, you provided goods or services to a Receivership Entity for which you have not been paid). _____

18. State the amount you claim you are owed by any Receivership Entity. \$ _____
Attach copies of all documents relating to your claim (for example, copies of all invoices submitted to a Receivership Entity and copies of records of all payments received from same). If you delivered goods to a Receivership Entity, include a copy of the document confirming receipt by a representative of the Receivership Entity.

19. Identify your contact person or persons at the Receivership Entities. _____

Question for all Claimants:

20. Have you sued, threatened suit, or otherwise commenced any lawsuits, arbitrations, actions, or other proceedings, or made any demands against any person or entity relating in any way to your claim and/or any Receivership entity? ___ Yes ___ No. If yes, identify the nature and status of any such action, the date the action was initiated, the name of the attorney who commenced the action, and the amount of any money you received in connection with any such action. _____

Send this completed and signed, under penalty of perjury, Proof of Claim Form and legible copies of any documentation requested in this form to **Burton W. Wiand, Receiver, c/o Maya M. Lockwood, Esquire, Wiand Guerra King P.A., 5505 West Gray Street, Tampa, Florida 33609, SO THAT IT IS RECEIVED NO LATER THAN _____.**

IF YOU DO NOT AGREE WITH ANY AMOUNTS PROVIDED ON EXHIBIT A OR NO AMOUNTS WERE PROVIDED ON EXHIBIT A, YOU MUST PROVIDE COPIES OF ALL DOCUMENTS OR OTHER MATERIALS THAT ARE RELATED IN ANY WAY TO YOUR INVESTMENT IN THE RECEIVERSHIP ENTITIES, OR, IF YOU ARE NOT AN INVESTOR, TO YOUR CLAIM AGAINST A RECEIVERSHIP ENTITY, INCLUDING COPIES OF YOUR CANCELLED CHECKS, BANK OR OTHER FINANCIAL ACCOUNT STATEMENTS SHOWING ALL TRANSFERS OF FUNDS BETWEEN (OR FOR THE BENEFIT OF) YOU AND THE RECEIVERSHIP ENTITIES, STATEMENTS FROM THE RECEIVERSHIP ENTITIES, WIRE TRANSFER CONFIRMATIONS, AND ANY OTHER DOCUMENTS REGARDING YOUR CLAIM.

By signing below, I certify under penalty of perjury pursuant to Florida law that the information provided in this form is true and correct. If this claim is being submitted by more than one person, all persons submitting the claim must sign below certifying under penalty of perjury that the information provide is true and correct.

Signature of Claimant: _____

Print Name: _____

Date: _____

Title (if any): _____

EXHIBIT A

Investor Name:

Amount Invested:	\$
Total Payments:	\$
Net Investment Amount:	\$

THE RECEIVER HAS PROVIDED THE ABOVE INFORMATION BASED UPON DOCUMENTS AVAILABLE TO HIM. THESE FIGURES ARE BELIEVED TO BE ACCURATE AND REASONABLE CONCLUSIONS. PLEASE CAREFULLY REVIEW THE ABOVE AMOUNTS. IF THE NUMBERS PROVIDED ARE NOT CONSISTENT WITH YOUR RECORDS, IT IS YOUR OBLIGATION TO PROVIDE TRUE AND CORRECT INFORMATION TO THE RECEIVER. IF YOU CONFIRM THAT THE ABOVE AMOUNTS ACCURATELY REPRESENT THE AMOUNT YOU INVESTED, ALL AMOUNTS YOU RECEIVED RELATING TO THIS INVESTMENT, AND ANY OTHER FUNDS YOU RECEIVED FROM THE RECEIVERSHIP ENTITIES, YOU ARE DOING SO UNDER PENALTY OF PERJURY.

BY IDENTIFYING AND PROVIDING THE ABOVE FIGURES, THE RECEIVER DOES NOT WAIVE ANY RIGHT TO (1) DENY, CONTEST THE VALIDITY OF, OR OTHERWISE OBJECT TO A CLAIM OR, (2) IF WARRANTED, AMEND ANY OF THE PROVIDED FIGURES.

EXHIBIT B

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

COMMODITY FUTURES TRADING
COMMISSION,

Case No. 8:19-CV-886-T-33SPF

Plaintiff,

v.

OASIS INTERNATIONAL GROUP,
LIMITED; OASIS MANAGEMENT, LLC;
SATELLITE HOLDINGS COMPANY;
MICHAEL J DACORTA; JOSEPH S.
ANILE, II.; RAYMOND P MONTIE III;
FRANCISCO "FRANK" L. DURAN; and
JOHN J. HAAS,

Defendants;

and

MAINSTREAM FUND SERVICES, INC.;
BOWLING GREEN CAPITAL
MANAGEMENT LLC; LAGOON
INVESTMENTS, INC.; ROAR OF THE
LION FITNESS, LLC; 444 GULF OF
MEXICO DRIVE, LLC; 4064 FOUNDERS
CLUB DRIVE, LLC; 6922 LACANTERA
CIRCLE, LLC; 13318 LOST KEY PLACE,
LLC; and 4 OAKS LLC,

Relief Defendants.

CLAIMS PROCESS INSTRUCTIONS

TO ALL PERSONS AND ENTITIES WITH CLAIMS AGAINST THE DEFENDANTS
AND/OR RELIEF DEFENDANTS:

On April 15, 2019, the Commodity Futures Trading Commission ("CFTC") initiated this action against the Defendants and Relief Defendants seeking emergency relief to stop a fraudulent foreign currency trading scheme and requested that the Court appoint a Receiver. As

a result of this action, the Court appointed Burton W. Wiand as Receiver over the assets of the Defendants and Relief Defendants (collectively, the “**Receivership Entities**”).¹

The Receiver and his professionals have spent considerable time and resources examining voluminous documents relating to the Receivership Entities. Based on this examination and to the extent possible, the Receiver has determined a “**Net Investment Amount**” for substantially all of the known investors. The Net Investment Amount for an investor is calculated by adding all amounts contributed by the pertinent investor and subtracting all payments made to that investor and/or in connection with that investment, regardless of whether those payments were characterized as “interest,” “earnings,” “returns or redemptions of principal,” “incentive fees,” “referral fees,” or any other terminology. For example, an investor who invested total funds of \$100,000 and received \$50,000 in distributions in connection with that investment would have a Net Investment Amount of \$50,000. If an investor made multiple investments over time, those investments and any and all transfers to that investor related to those investments would be combined in one Net Investment Amount. For example, an investor who invested \$10,000 in January 2016 and received “interest” payments in the total amount of \$1,600 on this investment and also invested \$40,000 in November 2016 and received “interest” payments in the total amount of \$4,200 on that investment would have a total investment amount of \$50,000 and total payments of \$5,800 for a resulting Net Investment Amount of \$44,200.

The Net Investment Amount will serve as the basis for determining the recipients and amounts of distributions for victim investors. **By identifying and providing a Net Investment Amount (as may be provided in the Proof of Claim Forms mailed to investors where the Receiver has determined to do so), the Receiver does not waive any right to (1) deny, contest the validity of, or otherwise object to a claim or (2) if warranted, amend the provided Net Investment Amount.** If amendment of a Net Investment Amount is warranted, the Receiver will provide notice of the amendment to the affected investor and give the investor an opportunity to respond.

On _____, the Court entered an Order establishing _____ (the “**Claim Bar Date**”) as the last date for each person or entity (including individuals, partnerships, corporations, joint venturers, estates, trusts, and governmental units) to submit a claim against the Receivership Entities.

Any person or entity that submits a claim submits to the exclusive jurisdiction of the United States District Court for the Middle District of Florida for all purposes, including, without limitation, as to any claims, objections, defenses, or counterclaims that could be or have been asserted by the Receiver against such Claimant or the holder of such claim in connection with this Receivership, including those arising out of (1) any dealing or business transacted by or with any Receivership Entity or (2) any dealing or business transacted that relates in any way to any Receivership property. Further, Claimants waive any right to a jury trial with respect to such claims, objections, defenses, and counterclaims.

¹ While Mainstream Fund Services, Inc. (“**Mainstream**”) is a relief defendant, the Receiver is not acting as Receiver over all of Mainstream’s assets. Some assets held by Mainstream are not included in this Receivership at this time. *See* Docs. 13 and 14.

The Claim Bar Date and the procedures set forth below for filing a claim apply to all creditors and victims of the Oasis scheme.

1. WHO MUST FILE A PROOF OF CLAIM FORM

If you think that you are owed money by any of the Receivership Entities or that you may otherwise have a claim against them, you **MUST** file a Proof of Claim Form to share in distributions from the Receivership. A claim based on acts or omissions of any Receivership Entity must be filed on or before the Claim Bar Date, even if such claim is not now mature, fixed, liquidated, or certain, or does not become mature, fixed, liquidated, or certain before the Claim Bar Date.

2. WHAT TO FILE

To make the process less burdensome for investors, the Court authorized the Receiver to provide a Net Investment Amount on an attachment to the Proof of Claim Form for each investor for whom the Receiver has sufficient reliable information to do so. If you were provided a Net Investment Amount on the attachment to the Proof of Claim Form you received and you agree with the amounts identified, then you do not need to provide to the Receiver any documentation supporting your claim. However, you **must** still complete and sign the Proof of Claim Form under penalty of perjury and return it to the Receiver so that it is **received** on or before the Claim Bar Date, as specified in section 3 below.

If you disagree with the Net Investment Amount provided on the attachment to the Proof of Claim Form that you received or no Net Investment Amount was identified on the attachment to the Proof of Claim Form, you must provide to the Receiver by the Claim Bar Date (1) the amounts you contend are the correct amounts you invested in and received from any Receivership Entity and (2) legible copies of all documents on which you base your claim or, if documents are not available, a detailed explanation as to why the documents are not available.

If you were not an investor but believe you are or may be a creditor of one or more of the Receivership Entities, you must provide to the Receiver by the Claim Bar Date (1) the amount you contend you are owed from any Receivership Entity; (2) any amounts received from any Receivership Entity; and (3) legible copies of all documents on which you base your claim (i.e., all invoices for goods or services provided, loan documents, etc., as applicable) or, if documents are not available, a detailed explanation as to why the documents are not available.

If you invested in your individual name and also in the name of your individual retirement account (“IRA”) or jointly with another individual, you will receive multiple Proof of Claim Forms. You **must** complete, sign, and return each Proof of Claim Form you receive to preserve all of your claims. Failure to timely return a completed and signed Proof of Claim Form for a claim will forever bar any claim related to that investment.

If the Receiver discovers that the Net Investment Amount provided on an attachment to the Proof of Claim Form is not accurate, the Receiver will amend the Net Investment Amount and provide notice of the amendment to the investor. The investor then will have the later of either (1) the Claim Bar Date or (2) thirty (30) days from the date the notice was provided to the investor to return an amended Proof of Claim Form to the Receiver. Failure to timely return a

completed and signed amended Proof of Claim Form for a claim will forever bar any claim related to that investment.

Similarly, subject to the Receiver's discretion, the Receiver may send notice of a deficiency in a submitted Proof of Claim Form to you. You will then have the later of either the Claim Bar Date or thirty (30) days from the date the notice of deficiency was provided to you to correct the deficiency as directed by the Receiver. The Receiver also reserves the right to request additional information from any Claimant. If you receive a request for additional information, you will have the same amount of time as is allowed for curing a deficiency to provide the additional information requested. Failure to cure a deficiency or provide additional information may result in denial of your claim.

Each Proof of Claim Form submitted **must** conform substantially to the Proof of Claim Form approved by the Court and provide responses to all of the questions in the Proof of Claim Form that either (1) was mailed to you along with these Instructions or (2), if you have not received one by mail, was posted on the Receiver's website at www.oasisreceivership.com. A copy of a Proof of Claim Form also may be obtained from Mary E. Gura, Wiand Guerra King P.A., 5505 West Gray Street, Tampa, FL 33609, (813) 347-5100.

Each Proof of Claim Form submitted **must** be signed under penalty of perjury by the Claimant or, if the Claimant is not an individual, by an authorized agent of the Claimant. By signing the Proof of Claim Form the Claimant attests that all information, including any information provided by the Receiver is true and correct. Each Proof of Claim Form **must** be legible, written in English, and denominated in United States currency.

It is your sole responsibility to advise the Receiver of any change to your mailing address, email address, and telephone number after you submit a claim to ensure that you receive any and all future communications regarding your claim, including any possible distribution payment you may be entitled to receive.

The Receiver will recommend to the Court that any properly completed and timely filed claim be considered allowed if it is established that: (1) the claim arises from or in connection with the fraudulent investment scheme set forth in the complaint filed by the CFTC in this action; (2) losses recognized by law resulted from such activities; (3) any alleged claim and losses are supported by appropriate documentation and are consistent with the books and records available to the Receiver; and (4) no ground exists for denying the claim.

3. WHEN AND WHERE TO FILE

Except as provided for herein, original Proof of Claim Forms must be delivered by mail or otherwise so as to be **received on or before** _____ at the following address:

Burton W. Wiand, Receiver
c/o Maya M. Lockwood, Esq.
WIAND GUERRA KING P.A.
5505 West Gray Street
Tampa, FL 33609

DO NOT SEND YOUR PROOF OF CLAIM FORM TO THE COURT OR JUDGE PRESIDING OVER THIS CASE.

Facsimile and email copies of Proof of Claim Forms will be accepted only if received by the Receiver on or before the Claim Bar Date and the original executed Proof of Claim Form is received by the Receiver no later than three (3) days after transmission of the facsimile and/or email. Failure to provide an original executed Proof of Claim Form within the time specified may result in denial of the claim. Facsimile copies must be sent to (813) 347-5198 to the attention of Burton W. Wiand, Receiver c/o Maya M. Lockwood, and email copies must be sent to mgura@wiandlaw.com. It is the Claimants' responsibility to ensure that Proof of Claim Forms are delivered to the Receiver.

4. CONSEQUENCES OF FAILURE TO FILE A CLAIM BY THE BAR DATE

ANY HOLDER OF A CLAIM OR POTENTIAL CLAIM THAT FAILS TO FILE A PROOF OF CLAIM FORM (1) THAT FULLY COMPLIES WITH ALL REQUIREMENTS SET FORTH HEREIN AND (2) BY THE CLAIM BAR DATE WILL BE FOREVER BARRED, ESTOPPED, AND ENJOINED FROM ASSERTING SUCH CLAIM AGAINST THE RECEIVERSHIP ENTITIES, THEIR SUCCESSORS, THEIR RESPECTIVE PROPERTY, THE RECEIVER, OR THE RECEIVERSHIP, AND FROM PARTICIPATING IN ANY DISTRIBUTION FROM THIS RECEIVERSHIP.

A holder of a claim or potential claim against a Receivership Entity may wish to consult an attorney regarding this claims process. The firm of Wiand Guerra King P.A. acts as attorneys for the Receiver and its lawyers cannot give personal legal or other advice to Claimants.

Dated _____, Tampa, Florida.

EXHIBIT C

**NOTICE OF DEADLINE REQUIRING FILING OF
PROOF OF CLAIM FORMS ON OR BEFORE _____**

TO ALL PERSONS AND ENTITIES WITH CLAIMS AGAINST ANY OF THE DEFENDANTS AND/OR RELIEF DEFENDANTS (the "Receivership Entities") in connection with the matter Commodity Futures Trading Commission v. Defendants Oasis International Group, Limited; Oasis Management, LLC; Satellite Holdings Company; Michael J. DaCorta; Joseph S. Anile, II; Raymond P. Montie III; Francisco "Frank" L. Duran; and John J. Haas; and Relief Defendants Mainsteam Fund Services, Inc.; Bowling Green Capital Management LLC; Lagoon Investments, Inc.; Roar of the Lion Fitness, LLC; 444 Gulf of Mexico Drive, LLC; 4064 Founders Club Drive, LLC; 6922 LaCantera Circle, LLC; 13318 Lost Key Place, LLC; 4 Oaks LLC, Case No. 8:19-CV-886-T-33SPF (M.D. Fla.).

Notice is hereby given that, on _____, the Honorable Virginia M. Hernandez Covington of the United States District Court, Middle District of Florida, issued an order establishing a claims process for the submission of claims to the assets of the Receivership Entities. The order establishes a Claim Bar Date of _____, as the last date for each person or entity (including individuals, partnerships, corporations, joint venturers, estates, trusts, and governmental units) to submit a claim against the Receivership Entities. Failure to timely submit a completed and signed Proof of Claim Form by the Claim Bar Date will forever bar any claim you may have. Information concerning the claims process and all related documents and the Proof of Claim Form necessary to submit a claim may be obtained from the Receiver's website at www.oasisreceivership.com, or by requesting a copy from the Receiver by email to mgura@wiandlaw.com, or by telephone call to Mary Gura at (813) 347-5100.

EXHIBIT D

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

COMMODITY FUTURES TRADING
COMMISSION,

Case No. 8:19-CV-886-T-33SPF

Plaintiff,

v.

OASIS INTERNATIONAL GROUP,
LIMITED; OASIS MANAGEMENT, LLC;
SATELLITE HOLDINGS COMPANY;
MICHAEL J DACORTA; JOSEPH S.
ANILE, II.; RAYMOND P MONTIE III;
FRANCISCO "FRANK" L. DURAN; and
JOHN J. HAAS,

Defendants;

and

MAINSTREAM FUND SERVICES, INC.;
BOWLING GREEN CAPITAL
MANAGEMENT LLC; LAGOON
INVESTMENTS, INC.; ROAR OF THE
LION FITNESS, LLC; 444 GULF OF
MEXICO DRIVE, LLC; 4064 FOUNDERS
CLUB DRIVE, LLC; 6922 LACANTERA
CIRCLE, LLC; 13318 LOST KEY PLACE,
LLC; and 4 OAKS LLC,

Relief Defendants.

**ORDER GRANTING RECEIVER'S UNOPPOSED MOTION TO (1) APPROVE
PROCEDURE TO ADMINISTER CLAIMS AND PROOF OF CLAIM
FORM, (2) ESTABLISH DEADLINE FOR FILING PROOF OF CLAIM FORMS,
AND (3) PERMIT NOTICE BY MAIL AND PUBLICATION**

This cause comes before the Court for consideration of the Receiver's Unopposed Motion to (1) Approve Procedure to Administer Claims and Proof of Claim Form, (2) Establish Deadline for Filing Proof of Claim Forms, and (3) Permit Notice by Mail and Publication (Doc. ____).

Having considered the Motion, and being otherwise fully advised, it is **ORDERED AND ADJUDGED** that:

1. The Motion is GRANTED.
2. Each person or entity that asserts a claim against the Receivership arising out of or related in any way to the acts, conduct, or activities of the Receivership Entities and the fraudulent investment scheme set forth in the complaint filed by the CFTC in this action must submit an original, written Proof of Claim Form, as attached to the Motion as Exhibit A, to the Receiver, Burton W. Wiand, c/o Maya M. Lockwood, Esq., Wiand Guerra King P.A., 5505 West Gray Street, Tampa, Florida 33609, **to be received on or before 90 days from the mailing of the Proof of Claim Form to known possible Claimants** (the "Claim Bar Date"). Any person or entity that fails to submit a claim to the Receiver on or before the Claim Bar Date (*i.e.*, fails to take the necessary steps to ensure that the Proof of Claim Form is received by the Receiver on or before the Claim Bar Date), shall be forever barred and precluded from asserting any claim against any Receivership Entity or the Receivership. The Claim Bar Date will apply to all creditors and victims of the Oasis scheme.
3. The notice procedures for the Claim Bar Date provided in the Motion shall be sufficient and reasonably calculated to provide notice to all creditors if made by (a) first class U.S. mail to the last known addresses of known potential Claimants, (b) by publication on one day in the national edition of The New York Times and on one day in the local edition of The Sarasota Herald-Tribune, and (c) by publication on the Receiver's website at

www.oasisreceivership.com. The Notice shall be in substantially the form attached to the Motion as Exhibit C. The Court hereby authorizes that the costs of publication be paid directly from Receivership assets.

4. The Proof of Claim Form attached to the Motion as Exhibit A and the claims administration procedures set forth in the Motion as well as the Claims Process Instructions attached as Exhibit B to the Motion are approved.

DONE AND ORDERED at Tampa, Florida, this ____ day of _____, 2020.

UNITED STATES DISTRICT COURT JUDGE