

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

COMMODITY FUTURES TRADING  
COMMISSION,

Plaintiff,

CASE NO. 8:19-cv-886-T-33SPF

v.

OASIS INTERNATIONAL GROUP, LTD.;  
OASIS MANAGEMENT, LLC;  
SATELLITE HOLDINGS COMPANY;  
MICHAEL J. DACORTA;  
JOSEPH S. ANILE II;  
RAYMOND P. MONTIE III;  
FRANCISCO "FRANK" 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  
4OAKS, LLC;

Relief Defendants.

**AMENDED<sup>1</sup>**  
**INTERVENOR UNITED STATES' MOTION TO**  
**EXTEND STAY OF ALL CIVIL PROCEEDINGS**

The United States of America, by Maria Chapa Lopez, United States Attorney for the Middle District of Florida, through the undersigned Assistant United States Attorney, respectfully requests that the Court extend the existing stay of all civil proceedings in this case for an additional period of one-hundred eighty (180) days. The government continues to have no objection to the Receiver continuing to gather assets and perform other functions tailored to gathering assets with which to compensate victims.

On June 26, 2019, the government filed the Intervenor United States' Motion for Temporary Stay of All Proceedings, Including Staying Entry of a Case Management and Scheduling Order, to Prevent Harm to Federal Criminal Investigation (Doc. 149). On July 12, 2019, this Court granted the United States' request for a stay of all civil proceedings. (Doc. 179). That stay is now scheduled to expire on January 9, 2020. (Doc. 214).

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<sup>1</sup>The only changes to this motion are the addition of Mr. DaCorta's position on the United States' request, which appears in the Rule 3.01(g) certification section of this motion, and the change to the date of expiration of the statute of limitations.

In support of this motion, the government hereby incorporates by reference its original motion for a stay (Doc. 149). The government adds that it has worked diligently to complete its investigation and resulting prosecutions since imposition of the stay. In particular, the government achieved a negotiated resolution of its criminal case against Joseph S. Anile II. *United States v. Joseph S. Anile II*, Case No. 8:19-cr-334-T-35CPT. Mr. Anile pleaded guilty on September 26, 2019 (Doc. 12), and he is scheduled to be sentenced on April 6, 2020 (Doc. 37). Moreover, the government secured an indictment against Michael J. DaCorta. *United States v. Michael J. DaCorta*, Case No. 8:19-cr-605-T-02CPT. The prosecution of Mr. DaCorta is ongoing.

Notwithstanding this significant progress, the government has been unable to complete its criminal investigation due to the complexity of the fraud scheme, including the fact that important aspects of the fraud occurred overseas, and the enormous volume of evidence amassed to date. The government anticipates being able to largely complete its investigative work within the next six months. Accordingly, for the reasons previously articulated, the government requests that the Court extend the existing stay for an additional period of one-hundred eighty

(180) days to prevent inevitable harm to the government's ongoing criminal investigation by the proceedings in this case.

Respectfully submitted,

MARIA CHAPA LOPEZ  
United States Attorney

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Rachelle DesVaux Bedke  
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**RULE 3.01(g) CERTIFICATION**

Per Rule 3.01(g), Rules of the U.S. District Court for the Middle District of Florida, the government has discussed this request for an extension of the existing stay with Jo E. Mettenburg and Jennifer J. Chapin, counsel for plaintiff Commodity Futures Trading Commission, as well as with Burton W. Wiand, the Receiver appointed by the Court. They do not object to the requested extension of the stay, so long as such stay does not impede the Receiver's ability to gather assets and perform other functions tailored to gathering assets with which to compensate victims as has been the case under the terms of the original stay.

The government communicated with criminal defense counsel for Michael J. DaCorta, Assistant Federal Public Defender Adam Allen, about the requested extension of the stay. Per Mr. Allen, defendant DaCorta has no objection to the government's request.

The government communicated with Vincent A. Citro, counsel for defendant Raymond Montie III, about the requested extension of the stay. Per Mr. Citro, defendant Montie has no objection to the government's request.

The government communicated with Allan M. Lerner, counsel for defendant Francisco "Frank" Duran, about the requested extension of the stay. Per Mr. Lerner, defendant Duran has no objection to the government's request.

The government communicated with A. Brian Phillips, counsel for defendant John J. Haas, about the requested extension of the stay. Per Mr. Phillips, defendant Haas has no objection to the government's request.

The government communicated with Scott S. Allen, Jr., counsel for Mainstream Fund Services, Inc., about the requested extension of the stay. Per Mr. Allen, defendant Mainstream Fund Services objects to the government's request.

Respectfully submitted,

MARIA CHAPA LOPEZ  
United States Attorney

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 7, 2020, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to counsel of record and to:

Adam Allen  
Federal Public Defender's Office  
Counsel for Michael J. DaCorta

I hereby certify that on January 7, 2020, a true and correct copy of the foregoing document and the notice of electronic filing were sent by electronic mail to the following non-CM/ECF participant:

Burton W. Wiand, Receiver  
*BWiand@WiandLaw.com*

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