

**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:

Gerard Marrone
Law Office of Gerard Marrone, P.C.
66-85 73rd Place
Second Floor
Middle Village, NY 11379
gmarronelaw@gmail.com
Counsel for Defendant Joseph S. Anile, II

Michael DaCorta
13313 Halkyn Point
Orlando, FL 32832
cdacorta@yahoo.com
Pro Se

Franciso “Frank” Duran
535 Fallbrook Drive
Venice, FL 34292
flduran7@gmail.com
Pro Se

s/ Jared J. Perez
Jared J. Perez, FBN 0085192
jperez@wiandlaw.com
Eric Feld, FBN 92741
efeld@wiandlaw.com
WIAND GUERRA KING P.A.
5505 West Gray Street
Tampa, FL 33609
Tel.: (813) 347-5100
Fax: (813) 347-5198

Attorneys for the Receiver, Burton W. Wiand