

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

COMMODITY FUTURES TRADING
COMMISSION,

Plaintiff,

v.

Case No. 8:19-cv-00886-VMC-SPF

OASIS INTERNATIONAL GROUP,
LIMITED, ET AL.,

Defendants,

and

MAINSTREAM FUND SERVICES,
INC., ET AL.,

Relief Defendants.

**MOTION FOR ENTRY OF CONSENT ORDER OF PRELIMINARY INJUNCTION
AGAINST RELIEF DEFENDANT MAINSTREAM FUND SERVICES, INC.**

Plaintiff Commodity Futures Trading Commission (“Plaintiff” or “CFTC”) respectfully moves this Court for entry of a Consent Order of Preliminary Injunction and Other Equitable Relief Against Relief Defendant Mainstream Fund Services, Inc. (“Relief Defendant Mainstream”). Attached to this motion is a signed consent from Relief Defendant Mainstream, as well as a proposed Consent Order of Preliminary Injunction and Other Equitable Relief Against Relief Defendant Mainstream Fund Services, Inc.

A separate Order Appointing Receiver and Staying Litigation like that found at Doc. #44 is not included because Mainstream consents to that prior order in this proposed order at

¶4. Relief Defendant Mainstream has previously indicated its consent to Doc. #44. *See* Doc. #37 at ¶9. In addition, the Order Appointing Receiver and Staying Litigation already binds Relief Defendant Mainstream. *See* Doc. #44 at ¶¶ 2, 11, 13, 16, 29, and 30.

If the Court enters this Consent Order of Preliminary Injunction and Other Equitable Relief Against Relief Defendant Mainstream, then the hearing set for May 30, 2019 at 1:00 p.m. is no longer necessary because Relief Defendant Mainstream is the only remaining party to be heard on this issue on that date. *See* Doc. #40 at ¶ 1, Doc. #57, and Doc. #63.

WHEREFORE, the CFTC respectfully requests entry of the Consent Order of Preliminary Injunction and Other Equitable Relief Against Relief Defendant Mainstream Fund Services, Inc., as well as a notice canceling the hearing set for May 30.

Dated: May 28, 2019

Respectfully submitted by,

**COMMODITY FUTURES TRADING
COMMISSION**

By: /s/ Jennifer J. Chapin
Jo E. Mettenburg, jmettenburg@cftc.gov
TRIAL COUNSEL
Jennifer J. Chapin, jchapin@cftc.gov
J. Alison Auxter, aauxter@cftc.gov
Attorneys for Plaintiff
COMMODITY FUTURES TRADING
COMMISSION
4900 Main Street, Suite 500
Kansas City, MO 64112
(816) 960-7700
(816) 960-7751 (fax)

CERTIFICATE OF SERVICE

I hereby certify that on May 28, 2019, I filed a copy of the foregoing with the Clerk of the Court via the CM/ECF system, which served all parties of record who are equipped to receive service of documents via the CM/ECF system.

I hereby certify that on May 28, 2019, I provided service of the foregoing via electronic 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 ANILE

I hereby certify that on May 28, 2019, I provided service of the foregoing via electronic mail, to the following unrepresented party:

Francisco "Frank" L. Duran (fduran@oasisig.com)