

**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.

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**RECEIVER’S SIXTH INTERIM MOTION FOR  
ORDER AWARDING FEES, COSTS, AND REIMBURSEMENT OF  
COSTS TO RECEIVER AND HIS PROFESSIONALS**

Burton W. Wiand, the Court-appointed receiver over the assets of the above-captioned defendants and relief defendants (the “**Receiver**” and the “**Receivership**” or “**Receivership Estate**”) pursuant to the Court’s order dated July 11, 2019 (the “**Consolidated Order**”),<sup>1</sup> respectfully moves the Court for the entry of an order awarding fees and the reimbursement of costs to the Receiver and his professionals. *See* Doc. 98 (approving retention of professionals). This motion covers all fees and costs incurred from July 1, 2020 through September 30, 2020. The Standardized Accounting Report (the “**Accounting Report**”) for the time covered by this motion is attached as **Exhibit 1**.<sup>2</sup>

### **Case Background and Status**

As of the date of filing this motion, the Court has appointed Burton W. Wiand as Receiver over the assets of the following entities and individuals:

- a) Defendants Oasis International Group, Limited; Oasis Management, LLC; Satellite Holdings Company; Michael J. DaCorta; Joseph S. Anile, II; Francisco “Frank” L. Duran; John J. Haas; and Raymond P. Montie, III; and
- b) Relief defendants Mainstream Fund Services, Inc.;<sup>3</sup> Bowling Green Capital Management, LLC; Lagoon Investments, Inc.; Roar of the Lion Fitness, LLC;

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<sup>1</sup> On July 11, 2019, the Court entered the Consolidated Order (Doc. 177), which combined and superseded two prior orders (Docs. 7 and 44) and is now the operative document governing the Receiver’s activities.

<sup>2</sup> The Commodity Futures Trading Commission (“**CFTC**” or the “**Commission**”) provided the Receiver with detailed Billing Instructions for Receivers in Civil Actions Commenced by the Commission (the “**Billing Instructions**”). The Accounting Report is one of the requirements contained in the Billing Instructions.

<sup>3</sup> 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 these 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.

444 Gulf of Mexico Drive, LLC; 4064 Founders Club Drive, LLC; 6922 Lacantera Circle, LLC; 13318 Lost Key Place, LLC; and 4Oaks LLC.

*See* Doc. 177. The foregoing defendants and relief defendants are collectively referred to as the “**Receivership Entities**.”

On October 30, 2020, the Receiver filed his Sixth Interim Report (Doc. 327) (the “**Interim Report**”). The Interim Report contains comprehensive and detailed information regarding the case background and status; the recovery of assets; financial information about Receivership Entities; the Receiver’s proposed course of action regarding assets in the Receivership Estate; the establishment of a claims process; and related (and/or contemplated) litigation involving Receivership Entities. The Receiver incorporates the Interim Report into this motion and has attached a true and correct copy of the Interim Report as **Exhibit 2** for the Court’s convenience. The Interim Report addresses all activity that resulted in the fees and costs sought in this motion.

### **Professional Services Rendered and Costs Incurred**

The Consolidated Order authorizes the Receiver to “solicit persons and entities (‘Retained Personnel’) to assist him in carrying out the duties and responsibilities described in this Order” and states that the “Receiver and Retained Personnel are entitled to reasonable compensation and expense reimbursement from the Receivership Estates,” subject to approval by the Court. *See* Doc. 177 ¶¶ 59, 60. The Consolidated Order also requires that the Receiver obtain the Court’s authorization of the retention of any Retained Personnel. *See* Doc. 177 ¶ 59. On May 30, 2019, the Receiver filed a motion approve the retention of professionals (Doc. 87), which the Court granted on June 6, 2019 (Doc. 98). The Receiver also filed motions to approve the retention of special foreign counsel in Belize and the

Cayman Islands (Docs. 133 and 184), which the Court granted on June 21, 2019 and August 27, 2019, respectively (Docs. 138 and 187). The Receiver filed motions to approve the retention of Sallah Astarita & Cox, LLC (the “**Sallah Firm**”) as counsel and Sergio C. Godinho as litigation consultant in connection with the investigation and prosecution of claims against Mainstream (Docs. 238 and 253), which the Court granted on April 7, 2020 (Doc. 261).<sup>4</sup> On March 24, 2020, the Receiver filed a motion to retain John Waechter and Englander Fischer (“**Englander Fischer**”) (Doc. 258), which the Court granted on April 13, 2020 (Doc. 264).

Pursuant to the Consolidated Order and the aforementioned orders, the Receiver retained (1) Wiand Guerra King P.A. (“**WGK**”) to provide legal services; (2) KapilaMukamal, LLP (“**KM**”) to provide forensic accounting services; (3) PDR CPAs (“**PDR**”) to provide general accounting and tax services; (4) RWJ Group, LLC (“**RWJ**”) to provide asset management and investigative services; (5) E-Hounds, Inc. (“**E-Hounds**”) to provide computer forensic services; (6) Glenn D. Godfrey & Company LLP (the “**Godfrey Firm**”) to provide legal services in Belize; (7) Maples Group to provide legal services in the Cayman Islands; (8) Sergio Godinho with SEDA Experts, LLC to provide litigation consulting in connection with litigation against Mainstream; and (9) Englander Fischer to assist the Receiver and his counsel with clawback litigation (collectively, the “**Professionals**”).<sup>5</sup>

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<sup>4</sup> The Sallah Firm has been engaged on a contingency fee basis and thus will not be included in interim fee motions.

<sup>5</sup> The Godfrey Firm, Maples Group, and Sergio Godinho did not incur expenses or provide services for the time covered by this motion and therefore are not included in this motion.

As shown in the Interim Report, the Professionals have provided services and incurred expenses to investigate the affairs of the Receivership Entities, preserve Receivership assets, attempt to locate and recover additional assets, analyze investor information for the claims process and litigation, and institute and administer the claims process. These services are for the benefit of aggrieved investors, creditors, and other interested parties.

**I. The Receiver.**

The Receiver requests the Court award him fees for the professional services rendered from July 1, 2020 through September 30, 2020, in the amount of \$25,884.00. The standard hourly rate the Receiver charges clients in private litigation is \$500. However, the Receiver agreed, for purposes of his appointment as the Receiver, that his hourly rate would be reduced to \$360, representing a twenty-eight percent discount off the standard hourly rate that he charges clients in comparable matters. This rate was set forth in the Receiver's submission to the CFTC. *See* Doc. 87, Ex. A.

The Receiver commenced services immediately upon his appointment. The Receiver has billed his time for these activities in accordance with the Billing Instructions, which request that this motion contain a narrative of each "business enterprise or litigation matter" for which outside professionals have been employed. The Billing Instructions identify each such business enterprise or litigation matter as a separate "project." Further, the Billing Instructions request that time billed for each project be allocated to one of several Activity

Categories.<sup>6</sup> In addition to the work of the Receivership, the Receiver created two separate projects for litigation commenced on April 14, 2020.

**A. The Receivership.**

For the time covered by this motion, the work of the Receiver and WGK focused on investigating the fraud and related activities, locating and taking control of Receivership assets, investigating and pursuing additional assets for the Receivership, analyzing investor information for the claims process and litigation, and instituting and administering the claims process. These activities of the Receiver are set forth in detail in the Interim Report. Ex. 2. A copy of the statement summarizing the Receiver's services rendered for the Receivership is attached as **Exhibit 3**. The Receiver's time and fees for services rendered for each Activity Category from July 1, 2020 through September 30, 2020, are as follows:

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<sup>6</sup> The Activity Categories set forth by the Commission in the Billing Instructions are as follows: (1) Asset Analysis and Recovery, which is defined as identification and review of potential assets including causes of action and non-litigation recoveries; (2) Asset Disposition, which is defined as sales, leases, abandonment and related transaction work (where extended series of sales or other disposition of assets is contemplated, the Billing Instructions provide that a separate category should be established for each major transaction); (3) Business Operations, which is defined as issues related to operation of an ongoing business; (4) Case Administration, which is defined as coordination and compliance activities, including preparation of reports to the court, investor inquiries, etc.; and (5) Claims Administration and Objections, which is defined as expenses in formulating, gaining approval of and administering any claims procedure. The Billing Instructions provide that time spent preparing motions for fees may not be charged to the Receivership Estate. In accordance with these instructions, the Receiver created an additional Activity Category for work on fees motions and has accounted for time spent on such work but has not charged any amount for that work.

**Receivership**  
**Receiver's Time and Fees for Services Rendered**

| Activity Category           | Hours Expended | Fee Amount         |
|-----------------------------|----------------|--------------------|
| Asset Disposition           | 25.60          | \$9,216.00         |
| Asset Analysis and Recovery | 18.20          | \$6,552.00         |
| Business Operations         | 3.70           | \$1,332.00         |
| Case Administration         | 1.30           | \$468.00           |
| Claims Administration       | 4.20           | \$1,512.00         |
| <b>TOTAL</b>                | <b>53.00</b>   | <b>\$19,080.00</b> |

**B. Discrete Litigation Projects.**

In conjunction with the Receivership, the following two discrete litigation projects have been formally commenced by the Receiver.

**1. Recovery of False Profits from Investors.**

This is a project involving the Receiver's efforts to recover false profits from investors whose purported accounts received monies in an amount that exceeded their investments. (*See also* Ex. 2 § V.1.d.) These purported profits were false because they were not based on any trading or investment gain, but rather were fruits of a Ponzi scheme that consisted of funds of new and existing investors. With the Court's approval, the Receiver engaged in a pre-suit resolution process with investors who received such false profits. *See* Docs. 237 and 247. The pre-suit resolution process was fruitful, as discussed in the Interim Report. Ex. 2 at 28-29. However, many investors did not take advantage of the opportunity afforded by this process. On March 24, 2020, the Receiver moved the Court for authority to file clawback litigation. Doc. 258. The Court granted the Receiver's motion on April 13, 2020. Doc. 264. Pursuant to the Consolidated Order and the Court's express authorization, on April 14, 2020, the Receiver filed a clawback complaint against numerous non-settling

investors. A copy of the statement summarizing the Receiver's services rendered for this project from July 1, 2020 through September 30, 2020 is attached as **Exhibit 4**. The Receiver's time and fees for services rendered for each Activity Category are as follows:

**Recovery from Investors**  
**Receiver's Time and Fees for Services Rendered**

| Activity Category           | Hours Expended | Fee Amount        |
|-----------------------------|----------------|-------------------|
| Asset Analysis and Recovery | 14.70          | \$5,292.00        |
| <b>TOTAL</b>                | <b>14.70</b>   | <b>\$5,292.00</b> |

**2. Litigation Against Raymond P. Montie.**

This is a project involving the Receiver's clawback litigation against Raymond P. Montie, which seeks to recover approximately \$1.7 million in fraudulent transfers and as much as \$50 million for aiding and abetting or personally committing breaches of fiduciary duty. (*See also* Ex. 2 § V.1.e.) A copy of the statement summarizing the Receiver's services rendered for this project from July 1, 2020 through September 30, 2020 is attached as **Exhibit 5**. The Receiver's time and fees for services rendered for each Activity Category are as follows:

**Litigation Against Raymond P. Montie**  
**Receiver's Time and Fees for Services Rendered**

| Activity Category           | Hours Expended | Fee Amount        |
|-----------------------------|----------------|-------------------|
| Asset Analysis and Recovery | 4.20           | \$1,512.00        |
| <b>TOTAL</b>                | <b>4.20</b>    | <b>\$1,512.00</b> |

**II. Wiand Guerra King P.A.**

The Receiver requests the Court award WGK fees for professional services rendered and costs incurred from July 1, 2020 through September 30, 2020, in the amounts of



\$184,952.00 and \$3,360.68, respectively. A categorization and summary of all costs for which WGK seeks reimbursement is attached as **Exhibit 6**.<sup>7</sup>

As an accommodation to the Receiver and to conserve the resources of the Receivership Estate, WGK's attorneys and paralegals have agreed to reduce their standard rates by as much as 30 percent as provided in the fee schedule attached as **Exhibit 7**. WGK began providing services immediately upon the appointment of the Receiver. The activities of WGK for the time covered by this motion are set forth in the Interim Report. *See* Ex. 2. WGK has billed time for these activities in accordance with the Billing Instructions.

**A. The Receivership.**

As discussed above, the work of the Receiver and WGK focused on investigating the fraud and related activities, locating and taking control of Receivership assets, investigating and pursuing additional assets for the Receivership, analyzing investor information for the claims process and litigation, and instituting and administering the claims process. Ex. 2. A copy of the statement summarizing the services rendered and costs incurred by WGK from July 1, 2020 through September 30, 2020, is attached as **Exhibit 8**. WGK's time and fees for services rendered on this matter for each Activity Category are as follows:

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<sup>7</sup> As noted on **Exhibit 6**, a total of \$942.00 in costs fall within the category of "other." These "other" costs include: (1) \$487.50 for monthly service charges and work performed on the Receivership website; (2) \$315.75 in charges related to e-commerce costs associated with relief defendant Roar of the Lion Fitness, LLC or similar matters, including domain registration, hosting, and other web services; (3) \$33.75 for the publication of notice of the proposed sale of Receivership property; and (4) \$105.00 for court reporter charges. All costs are itemized on **Exhibit 8**, referenced below.

**Receivership**  
**WGK's Time and Fees for Services Rendered**

| Activity Category           | Hours Expended | Fee Amount          |
|-----------------------------|----------------|---------------------|
| Asset Disposition           | 60.80          | \$12,237.00         |
| Asset Analysis and Recovery | 181.40         | \$55,602.50         |
| Business Operations         | 13.50          | \$1,822.50          |
| Case Administration         | 34.00          | \$7,377.00          |
| Claims Administration       | 292.50         | \$52,166.00         |
| <b>TOTAL</b>                | <b>582.20</b>  | <b>\$129,205.00</b> |

**B. Discrete Litigation Projects.**

In conjunction with the Receivership, the following two discrete litigation projects have been formally commenced by the Receiver.

**1. Recovery of False Profits from Investors.**

As discussed above in Section I.B.1, this is a project involving the Receiver's clawback litigation to recover false profits from investors whose purported accounts received monies in an amount that exceeded their investments. (*See also* Ex. 2 § V.1.d.) These purported profits were false because they were not based on any trading or investment gain, but rather were fruits of a Ponzi scheme that consisted of funds of new and existing investors. A copy of the statement summarizing the services rendered and costs incurred by WGK from July 1, 2020 through September 30, 2020 for this project is attached as **Exhibit 9**. WGK's time and fees for services rendered for each Activity Category are as follows:

**Recovery from Investors**  
**WGK's Time and Fees for Services Rendered**

| Activity Category           | Hours Expended | Fee Amount         |
|-----------------------------|----------------|--------------------|
| Asset Analysis and Recovery | 77.70          | \$20,365.00        |
| <b>TOTAL</b>                | <b>77.70</b>   | <b>\$20,365.00</b> |

## 2. **Litigation Against Raymond P. Montie.**

This is a project involving the Receiver's clawback litigation against Raymond P. Montie which seeks to recover approximately \$1.7 million in fraudulent transfers and as much as \$50 million for aiding and abetting or personally committing egregious breaches of fiduciary duty. (*See also* Ex. 2 § V.1.e.) A copy of the statement summarizing the services rendered and costs incurred by WGK from July 1, 2020 through September 30, 2020 for this project is attached as **Exhibit 10**. WGK's time and fees for services rendered for each Activity Category are as follows:

### **Litigation Against Raymond P. Montie** **WGK's Time and Fees for Services Rendered**

| Activity Category           | Hours<br>Expended | Fee Amount         |
|-----------------------------|-------------------|--------------------|
| Asset Analysis and Recovery | 116.40            | \$35,382.00        |
| <b>TOTAL</b>                | <b>116.40</b>     | <b>\$35,382.00</b> |

## III. **Englander Fischer.**

The Receiver requests the Court award Englander Fischer fees for professional services rendered and costs incurred from July 1, 2020 through September 30, 2020 in the amount of \$99,422.27. On March 24, 2020, the Receiver sought the approval of the retention of John Waechter and Englander Fischer to assist the Receiver and his primary counsel, WGK, with the clawback litigation explained in Sections I.B.1 and I.B.2 above. Doc. 258. The Court granted the Receiver's motion on April 13, 2020. Doc. 264. The Receiver's clawback litigation is proceeding against numerous defendants who received false profits as well as Raymond P. Montie. As an accommodation to the Receiver, Mr. Waechter agreed to a reduced rate of \$335 per hour for his work on behalf of the Receivership. Copies of the

statements summarizing the services rendered and costs incurred by Englander Fischer from July 1, 2020 through September 30, 2020 are attached as **Exhibit 11**.

Englander Fischer's invoices do not contain a summary of the professionals' hours. Therefore, a summary of the professionals' hours rendered during the time covered by this motion is set forth below.

| <b>Professional</b>    | <b>Hours</b> | <b>Rate</b> | <b>Total</b> |
|------------------------|--------------|-------------|--------------|
| John Waechter (JWW)    | 66.80        | \$335.00    | \$22,378.00  |
| Beatriz McConnell (BM) | 141.00       | \$335.00    | \$47,235.00  |
| Alicia Gangi (AG)      | 58.90        | \$225.00    | \$13,252.50  |
| Julie Kapusta (JK)     | 17.70        | \$225.00    | \$3,982.50   |
| Tara Dillon (TD)       | 4.00         | \$150.00    | \$600.00     |
| Diedre Turner (DT)     | 0.20         | \$150.00    | \$30.00      |
| Andrew Frederick (AF)  | 2.00         | \$150.00    | \$300.00     |
| Fees                   |              |             | \$87,778.00  |
| Disbursements          |              |             | \$11,644.27  |
| Total                  | 290.60       |             | \$99,422.27  |

#### **IV. KapilaMukamal, LLP.**

The Receiver requests the Court award KM fees for professional services rendered and costs incurred from July 1, 2020 through September 30, 2020, in the amount of \$3,632.29. KM is a forensic accounting firm that specializes in insolvency and restructuring, Ponzi schemes, fraud investigations, insolvency taxation, business valuation, and litigation support. At the Receiver's request, KM performed forensic reconstructions of numerous bank accounts, which required the analysis of thousands of transactions involving hundreds of investors. Through this analysis, KM has identified the individualized amounts most investors lost in connection with the scheme as well the amounts certain other investors gained as a result of the scheme. KM's analysis allowed the Receiver to (1) institute a claims process to return money to defrauded investors (with approved claims); and (2) begin

litigation against those that profited from the scheme. KM's analysis also will allow the Receiver, among other things, to calculate a total loss amount for additional litigation against third parties and related purposes. As an accommodation to the Receiver and to conserve the resources of the Receivership Estate, Soneet Kapila, a principal of KM, has agreed to reduce his hourly billing rate and to discount all other forensic accounting work by 15 percent. KM started providing services for the Receivership on April 30, 2019. Copies of the statements summarizing the services rendered and costs incurred for the pertinent period are attached as composite **Exhibit 12**.

**V. PDR CPAs.**

The Receiver requests the Court award PDR fees for professional services rendered and costs incurred from July 1, 2020 through September 30, 2020, in the amount of \$7,782.21. PDR is an accounting firm that specializes in tax matters and has extensive experience with the tax treatment of settlement funds. PDR is assisting the Receiver with internal Receivership accounting, financial reporting, and tax preparation and filing. PDR started providing services for the Receivership on May 17, 2019. Copies of the statements summarizing the services rendered and costs incurred for the pertinent period are attached as composite **Exhibit 13**.

**VI. E-Hounds, Inc.**

The Receiver requests the Court award E-Hounds fees for professional services rendered and costs incurred from July 1, 2020 through September 30, 2020, in the amount of \$4,747.50. E-Hounds is a computer forensics firm that assists the Receiver in securing and analyzing electronic data. E-Hounds started providing services for the Receivership on April

22, 2019. Copies of the statements summarizing the services rendered and costs incurred for the pertinent period are attached as composite **Exhibit 14**.

**VII. The RWJ Group, LLC.**

The Receiver requests the Court award RWJ fees for professional services rendered and costs incurred from July 1, 2020 through September 30, 2020, in the amounts of \$5,940.00 and \$624.46, respectively. RWJ, which is owned and operated by Roger Jernigan, is an asset management and investigation firm. Mr. Jernigan assists the Receiver with overseeing ongoing business operations and property recovered by the Receiver, including aiding with efforts to sell such businesses and property. His efforts are designed to ensure that Receivership assets are maintained and/or enhanced to allow for maximum recovery for the Receivership Estate. RWJ started providing services for the Receivership on April 18, 2019. Copies of the statements summarizing the services rendered and costs incurred for the pertinent period are attached as composite **Exhibit 15**.

**MEMORANDUM OF LAW**

It is well settled that this Court has the power to appoint a receiver and to award the receiver and those appointed by him fees and costs for their services. *See, e.g., S.E.C. v. Elliott*, 953 F.2d 1560 (11th Cir. 1992) (receiver is entitled to compensation for faithful performance of his duties); *Donovan v. Robbins*, 588 F. Supp. 1268, 1272 (N.D. Ill. 1984) (“[T]he receiver diligently and successfully discharged the responsibilities placed upon him by the Court and is entitled to reasonable compensation for his efforts.”); *S.E.C. v. Custable*, 1995 WL 117935 (N.D. Ill. Mar. 15, 1995) (receiver is entitled to fees where work was of high quality and fees were reasonable); *S.E.C. v. Mobley*, 2000 WL 1702024 (S.D.N.Y. Nov.

13, 2000) (court awarded reasonable fees for the receiver and his professionals); *see also* Doc. 7 ¶ 40 & Doc. 44 ¶ 58. The determination of fees to be awarded is largely within the discretion of the trial court. *See Monaghan v. Hill*, 140 F.2d 31, 34 (9th Cir. 1944). In determining reasonable compensation for the services rendered by the Receiver and his Professionals, the Court should consider the circumstances surrounding the Receivership. *See Elliot*, 953 F.2d at 1577.

Here, because of the nature of this case, it is necessary for the Receiver to employ attorneys and accountants experienced and familiar with financial frauds, federal receiverships, banking, and finance. Further, to perform the services required and achieve the results obtained to date, the skills and experience of the Receiver and the Professionals in the areas of fraud, commodities, computer and accounting forensics, and financial transactions are indispensable.

As discussed above, the Receiver and WGK have discounted their normal and customary rates as an accommodation to the Receivership and to conserve Receivership assets. The rates charged by the attorneys and paralegals are at or below those charged by attorneys and paralegals of comparable skill from other law firms in the Middle District of Florida.

This case has been time-intensive for the Receiver and his Professionals because of the need to resolve many issues rapidly and efficiently. The attached Exhibits detail the time, nature, and extent of the professional services rendered by the Receiver and his Professionals for the benefit of investors, creditors, and other interested parties. The Receiver anticipates

that additional funds will be obtained through the Receiver's negotiations or litigation with third parties.

Although the CFTC investigated and filed the initial pleadings in this case, as directed by the Consolidated Order (*see, e.g.*, Doc. 177 ¶ 44), the Receiver is now involved with the investigation and forensic analysis of the events leading to the commencement of the pending action, the efforts to locate and gather investors' money, the determination of investor and creditor claims and any ultimate payment of these claims. While the Receiver is sensitive to the need to conserve the Receivership Entities' assets, he believes the fees and costs expended to date were reasonable, necessary, and benefited the Receivership. The Commission has no objection to the relief sought in this motion. *Cf. Custable*, 1995 WL 117935 at \*7 ("In securities law receiverships, the position of the SEC in regard to the awarding of fees will be given great weight.").

### **CONCLUSION**

Under the Consolidated Order, the Receiver, among other things, is authorized and empowered to engage professionals to assist him in carrying out his duties and obligations. The Consolidated Order further provides that he apply to the Court for authority to pay himself and his Professionals for services rendered and costs incurred. In exercising his duties, the Receiver has determined that the services rendered and their attendant fees and costs were reasonable, necessary, advisable, and in the best interests of the Receivership.



WHEREFORE, Burton W. Wiand, the Court-appointed Receiver, respectfully requests that this Court award the following sums and direct that payment be made from the Receivership assets:<sup>8</sup>

|                           |              |
|---------------------------|--------------|
| Burton W. Wiand, Receiver | \$25,884.00  |
| Wiand Guerra King P.A.    | \$188,312.68 |
| Englander Fischer         | \$99,422.27  |
| KapilaMukamal, LLP        | \$3,632.29   |
| PDR CPAs                  | \$7,782.21   |
| E-Hounds, Inc.            | \$4,747.50   |
| RWJ Group, LLC            | \$6,564.46   |

### **LOCAL RULE 3.01(g) CERTIFICATION OF COUNSEL**

Undersigned counsel for the Receiver has conferred with counsel for the CFTC and is authorized to represent to the Court that the CFTC does not oppose the relief requested in this motion. As with previous fee applications, the United States (as an intervening party) takes no position on the motion. Defendants Anile, Montie, Haas, and Duran as well as relief defendant Mainstream do not oppose the relief requested in this motion. Finally, defendant DaCorta stated that he “will always oppose the collection of fees for the [R]eceiver while the case has been stayed.” The stay, however, does not apply to the Receiver, which the Court has expressly stated each time it has implemented or extended the stay. In addition, the Court has granted prior fee applications during the stay and over similar objections from defendant DaCorta. Given these circumstances and the fact that no other party opposes the requested relief, the Receiver respectfully asks that the Court grant the motion.

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<sup>8</sup> A proposed order is attached as **Exhibit 16**.

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that on November 20, 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 participants 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.  
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Middle Village, NY 11379  
[gmarronelaw@gmail.com](mailto:gmarronelaw@gmail.com)  
*Counsel for Defendant Joseph S. Anile, II*

Michael DaCorta  
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**s/ Jared J. Perez**

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5505 West Gray Street  
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Tel.: (813) 347-5100  
Fax: (813) 347-5198

*Counsel for the Receiver, Burton W. Wiand*

### **RECEIVER'S CERTIFICATION**

The Receiver has reviewed this Sixth Interim Motion for Order Awarding Fees, Costs, and Reimbursement of Costs to Receiver and His Professionals (the “**Motion**”).

To the best of the Receiver's knowledge, information, and belief formed after reasonable inquiry, the Motion and all fees and expenses herein are true and accurate and comply with the Billing Instructions provided to the Receiver by the Commodity Futures Trading Commission.

All fees contained in the Motion are based on the rates listed in the fee schedule, attached as Exhibit 7. Such fees are reasonable, necessary, and commensurate with (if not below the hourly rate that is commensurate with) the skill and experience required for the activity performed.

The Receiver has not included in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay (except to the extent that any such amortization is included within the permitted allowable amounts set forth in the Billing Instructions for photocopies and facsimile transmission).

To the extent the Receiver seeks reimbursement for any service which the Receiver justifiably purchased or contracted for from a third party (such as copying, imaging, bulk mail, messenger service, overnight courier, computerized research, or title and lien searches), the Receiver has requested reimbursement only for the amount billed to the Receiver by the third-party vendor and/or paid by the Receiver to such vendor. The Receiver is not making a profit on such reimbursable services.

The Receiver believes that the fees and expenses included in this Motion were incurred in the best interests of the Receivership Estate. With the exception of the Billing Instructions and the Court-approved engagements described above, the Receiver has not entered into any agreement, written or oral, express or implied, with any person or entity concerning the amount of compensation paid or to be paid from the Receivership Estate, or any sharing thereof.

**s/ Burton W. Wiand**

Burton W. Wiand, as Receiver

# **EXHIBIT 1**

## Standardized Accounting Report Form

Standardized Accounting Report for Oasis Management LLC Receivership

Civil Court Docket No. 8:19-cv-00886-VMC-SPF

Reporting Period 07/01/2020 to 09/30/2020

|                |   | Details       | Subtotal      | Grand Total             | Notes  |
|----------------|---|---------------|---------------|-------------------------|--|
| Line 1         | <b>Beginning Balance (As of 07/01/2020)</b>       |               |               | \$ 11,411,920.12        |  |
|                | <b>Increases in Fund Balance</b>                  |               |               |                         |  |
| Line 2         | Business Income                                   | \$ 4,588.00   |               |                         | Rental/Mortgage Income                             |
| Line 3         | Cash and Securities                               | 0.00          |               |                         | Cash from Frozen Accts.                            |
| Line 4         | Interest/Dividend Income                          | \$ 11,803.31  |               |                         | Interest Income                                    |
| Line 5         | Asset Liquidation                                 | \$ 164,252.89 |               |                         | Sale of Real Estate/Misc                           |
| Line 6         | Third-Party Litigation Income                     | 134,812.66    |               |                         | Clawback settlements                               |
| Line 7         | Other Miscellaneous                               |               |               |                         |  |
|                | <b>Total Funds Available - Totals Line 1 - 7</b>  |               | \$ 315,456.86 | \$ 11,727,376.98        |  |
|                | <b>Decreases in Fund Balance</b>                  |               |               |                         |  |
| Line 9         | Disbursements to Investors                        |               |               |                         |  |
| Line 10        | Disbursements for Receivership Operations         |               |               |                         |  |
| 10a            | Disbursements to Receiver/Other Professionals     |               |               |                         |  |
| 10b            | Third-Party Litigation Expenses                   |               |               |                         |  |
| 10c            | Asset Expenses                                    | \$ 26,236.17  |               |                         | Condo fees, Insurance, Repairs, Maint, & Utilities |
| 10d            | Tax Payments                                      |               |               |                         | County Sales & Property Tax                        |
|                | <b>Total Disbursements for Receivership Ops.</b>  |               | \$ 26,236.17  |                         |  |
| Line 11        | Disbursements Related to Distribution Expenses    |               |               |                         |  |
| Line 12        | Disbursement to Court/Other                       |               |               |                         |  |
| Line 13        | Other   |               |               |                         |  |
|                | <b>Total Funds Disbursed - Total Lines 9 - 13</b> |               | \$ 26,236.17  | \$ 26,236.17            |  |
| <b>Line 14</b> | <b>Ending Balance (as of 09/30/2020)</b>          |               |               | <b>\$ 11,701,140.81</b> |  |

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**Standardized Accounting Report Form**

Standardized Accounting Report for Oasis Management LLC Receivership  
Civil Court Docket No. 8:19-cv-00886-VMC-SPF  
From Inception to 09/30/2020

|  | Details         | Subtotal         | Grand Total             | Notes                       |
|--|-----------------|------------------|-------------------------|-----------------------------|
| Line 1 <b>Beginning Balance</b>                        |                 |                  | -                       |                             |
| <b>Increases in Fund Balance</b>                       |                 |                  |                         |                             |
| Line 2 Business Income                                 | \$ 41,306.13    |                  |                         | Rental/Mortgage Income      |
| Line 3 Cash and Securities                             | \$ 8,661,433.46 |                  |                         | Cash from Frozen Accts.     |
| Line 4 Interest/Dividend Income                        | \$ 141,734.78   |                  |                         | Interest Income             |
| Line 5 Asset Liquidation                               | \$ 3,745,278.24 |                  |                         | Sale of Real Estate/Misc    |
| Line 6 Third-Party Litigation Income                   | 438,319.67      |                  |                         | Clawback settlements        |
| Line 7 Other Miscellaneous                             | \$ 820.00       |                  |                         | Cash from J. Anile House,   |
| <b>Total Funds Available - Totals Line 1 - 7</b>       |                 | \$ 13,028,892.28 | \$ 13,028,892.28        |                             |
| <b>Decreases in Fund Balance</b>                       |                 |                  |                         |                             |
| Line 9 Disbursements to Investors                      |                 |                  |                         |                             |
| Line 10 Disbursements for Receivership Operations      |                 |                  |                         |                             |
| 10a Disbursements to Receiver/Other Professionals      | \$ 950,888.77   |                  |                         |                             |
| 10b Third-Party Litigation Expenses                    |                 |                  |                         |                             |
| 10c Asset Expenses                                     | \$ 285,828.10   |                  |                         | Condo fees, Insurance,      |
| 10d Tax Payments                                       | \$ 90,034.60    |                  |                         | Repairs, Maint, & Utilities |
| <b>Total Disbursements for Receivership Ops.</b>       |                 | \$ 1,326,751.47  |                         | County Sales & Property Tax |
| Line 11 Disbursements Related to Distribution Expenses |                 |                  |                         |                             |
| Line 12 Disbursement to Court/Other                    | 1,000.00        |                  |                         | Belize Reg. Fee             |
| Line 13 Other  | -               |                  |                         |                             |
| <b>Total Funds Disbursed - Total Lines 9 - 13</b>      |                 | \$ 1,327,751.47  | \$ 1,327,751.47         |                             |
| <b>Line 14 Ending Balance (as of 09/30/2020)</b>       |                 |                  | <b>\$ 11,701,140.81</b> |                             |

|            |   |   |
|------------|---|---|
| Line<br>15 | Number of Claims  | 784   |
| 15a        | No. of Claims Received This Reporting Period              | 2   |
| 15b        | No. of Claims Received Since Inception of Estate          | 784   |
| Line<br>16 | Number of Claimants/Investors                             | TBD (pending analysis for duplicative claims, etc.) |
| 16a        | No. of Claimants/Investors Paid This Reporting period     | 0   |
| 16b        | No. of Claimants/Investors Paid Since Inception of Estate | 0   |

Receiver:

By:  Burton W. Wiand, Receiver  
Signature Printed Name

Date: 10/30/2020



# **EXHIBIT 2**

**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.

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**THE RECEIVER’S SIXTH INTERIM REPORT**

Receivership Information and Activity from July 1, 2020 through September 30, 2020.

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## **INTRODUCTION**

Burton W. Wiand, the Court-appointed receiver over the assets of the above-captioned defendants and relief defendants (the “**Receiver**” and the “**Receivership**” or “**Receivership Estate**”), files this Sixth Interim Report to inform the Court, investors, creditors, and others interested in this Receivership of activities to date as well as the Receiver’s proposed course of action. The Receiver has established an informational website, [www.oasisreceivership.com](http://www.oasisreceivership.com), which he has updated periodically. The Receiver will continue to update the website regarding the Receiver’s most significant actions, important Court filings, and other items that might be of interest to the public. This Sixth Interim Report, as well as all previous and subsequent reports, will be posted on the website.<sup>1</sup>

### **Overview of Significant Activities During this Reporting Period**

During the time covered by this Sixth Interim Report, the Receiver and his professionals engaged in the following significant activities:

- Conducted a mediation with Mainstream Fund Services, Inc. on October 13, 2020 and continued attempts to resolve the Receiver’s claims;
- Obtained Court approval and closed the sale of 16904 Vardon Terrace #106 in Lakewood Ranch, Florida for **\$184,000** (gross of closing costs and expenses);
- Entered into a second agreement to sell 13318 Lost Key Place in Lakewood Ranch, Florida for **\$1,100,000** (gross of closing costs and expenses);

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<sup>1</sup> As directed by the Court, the Receiver will submit his next interim report and subsequent reports within thirty days after the end of each calendar quarter. Where possible, the Receiver has also included information about events occurring between September 30, 2020 (the end of the reporting period) and the date of this filing.

- Continued to list and market an additional six properties for sale (one of which is pending) through Coldwell Banker<sup>2</sup> for a total of approximately **\$4,565,000** (gross of closing costs, mortgages, and expenses);
- Continued renting 6300 Midnight Pass Road, No. 1002 in Sarasota, Florida to short-term guests for approximately **\$2,000 per week**;
- Collected **\$11,803.31** in interest income on seized funds;
- Continued and substantially completed analyzing approximately **784 proof of claim forms totaling approximately \$70 million** in furtherance of the claims process approved by the Court during earlier reporting periods (*see infra* § VI);
- Continued to prosecute and reach settlements in a “clawback” action against **94 defendants** who received “false profits” or other avoidable transfers from the Ponzi scheme underlying this enforcement action (*see infra* § V.1.d.);
- Obtained (subject to final orders, which will be submitted to the Court shortly after this filing) default judgments against 41 defendants, totaling almost **\$2 million**, and obtained Clerk’s defaults against an additional 8 defendants, totaling more than **\$520,000**;
- Obtained Court approval of 10 clawback settlements with 15 defendants worth **\$99,414.39**, and through a second motion, obtained Court approval of an additional 5 settlements with 8 defendants in the total amount of **\$109,148.48** (the Receiver has already collected most of that money, but some settlements contain payment plans);
- Collected **\$134,812.66** in litigation income for a total of **\$438,319.67** since inception through both pre-suit resolution procedures and post-suit settlements of clawback litigation;
- Continued to prosecute a second clawback action against Raymond P. Montie, III, seeking to recover approximately \$1.7 million in fraudulent transfers and as much as \$50 million for aiding and abetting or committing breaches of fiduciary duty and defeated Montie’s first attempt to dismiss the litigation (a second motion to dismiss is pending);
- Continued to cooperate with the Department of Justice regarding its efforts to repatriate approximately **\$2 million** from the United Kingdom; and

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<sup>2</sup> See [www.oasisreceivership.com/assets-for-sale](http://www.oasisreceivership.com/assets-for-sale); *see also infra* § III.C.

- Continued efforts to repatriate **\$560,000** from Belize in cooperation with local counsel.

### **Overview of Significant Activities Since the Beginning of this Receivership**

Since the beginning of this Receivership, the Receiver and his professionals engaged in the following significant activities:

- Served subpoenas or the order appointing the Receiver and freezing the assets of the defendants and relief defendants on approximately **100 individuals and entities** who could have assets or records belonging to the Receivership Estate;
- Seized more than **\$8.6 million** from frozen bank accounts at numerous financial institutions;
- Liquidated an additional approximately **\$3,745,278.24** (net) in forfeited assets, subject to agreements with the Department of Justice and the United States Marshals Service;
- Retained legal counsel (domestic and foreign), forensic accountants, tax accountants, a technology services firm, and an asset manager to assist the Receiver and obtained Court approval of those engagements;
- Substantially completed (subject to limited additional documents sought through subpoenas) forensic reconstructions of at least 25 bank accounts, including more than 26,000 individual transactions;
- Interviewed dozens of individuals, including certain defendants, employees, sales agents, investors, legal counsel, and accountants;
- Established an informational website for investors and other interested parties;
- Collected hundreds of thousands of pages of documents from dozens of nonparties, including employees, banks, credit card companies, accountants, and lawyers; and
- Fielded hundreds of calls from investors and/or their counsel.

The above activities are discussed in more detail in the pertinent sections of this Sixth Interim Report and also in the Receiver's previous interim reports.

## **BACKGROUND**

### **I. Procedure and Chronology**

On April 15, 2019, the Commodity Futures Trading Commission (“CFTC”) filed a complaint (Doc. 1) against (1) defendants Oasis International Group, Limited (“**OIG**”); Oasis Management, LLC (“**Oasis Management**”); Michael J. DaCorta (“**DaCorta**”); Joseph S. Anile, II (“**Anile**”); Francisco “Frank” L. Duran (“**Duran**”); Satellite Holdings Company (“**Satellite Holdings**”); John J. Haas (“**Haas**”); and Raymond P. Montie, III (“**Montie**”) (collectively, the “**defendants**”) and (2) relief defendants Mainstream Fund Services, Inc. (“**Mainstream**”); Bowling Green Capital Management, LLC (“**Bowling Green**”); Lagoon Investments, Inc. (“**Lagoon**”); Roar of the Lion Fitness, LLC (“**Roar of the Lion**”); 444 Gulf of Mexico Drive, LLC (“**444 Gulf of Mexico**”); 4064 Founders Club Drive, LLC (“**4064 Founders Club**”); 6922 Lacantera Circle, LLC (“**6922 Lacantera**”); 13318 Lost Key Place, LLC (“**13318 Lost Key**”); and 4Oaks LLC (“**4Oaks**”) (collectively, the “**relief defendants**”). The foregoing defendants and relief defendants are referred to as the “**Receivership Entities**.”

The complaint charges the defendants with violations of the Commodity Exchange Act and CFTC regulations and seeks to enjoin their violations of these laws regarding a fraudulent foreign currency (“**forex**”) trading scheme. The CFTC alleges that between mid-April 2014 and April 2019, the defendants fraudulently solicited over 700 U.S. residents to invest in two forex commodity pools – Oasis Global FX, Limited and Oasis Global FX, S.A. (collectively, the “**Oasis Pools**”). The CFTC also asserts that the defendants raised approximately \$75 million from these investors and misappropriated over \$28 million of the



pool funds to make payments to other pool participants and over \$18 million for unauthorized personal and business expenses, including the transfer of at least \$7 million to the relief defendants.<sup>3</sup>

On the same day the CFTC filed its complaint, April 15, 2019, the Court entered an order appointing Burton W. Wiand as temporary Receiver for the Receivership Entities (Doc. 7) (the “**SRO**”). The Court directed him, in relevant part, to “[t]ake exclusive custody, control, and possession of the Receivership Estate,” which includes “all the funds, properties, premises, accounts, income, now or hereafter due or owing to the Receivership Defendants, and other assets directly or indirectly owned, beneficially or otherwise, by the Receivership Defendants.” *See id.* at p. 14, ¶ 32 & p. 15, ¶ 30.b. The SRO also imposed a temporary injunction against the defendants and relief defendants, froze their assets, and required an accounting of all investor funds and other assets within five business days following service of the order or, in most cases, by April 25, 2019. *Id.* at 19.

As of the date of this report, all defendants and relief defendants have either defaulted or consented to the entry of a preliminary injunction against them (with some differences unique to the circumstances of each party). *See* Docs. 35, 43, 44, 82, 85, 172, 174-77. On July 11, 2019, the Court entered a Consolidated Receivership Order, which is now the operative document governing the Receiver’s activities. Doc. 177 (the “**Consolidated Order**”). Pursuant to the Consolidated Order and its predecessors (*see* Docs. 7, 44), the Receiver has the duty and authority to (1) administer and manage the business affairs, funds,

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<sup>3</sup> On June 12, 2019, the CFTC filed an amended complaint (Doc. 110), which contains additional allegations about certain defendants and relief defendants.

assets, and any other property of the Receivership Entities; (2) marshal and safeguard the assets of the Receivership Entities; and (3) investigate and institute legal proceedings for the benefit of the Receivership Entities and their investors and other creditors as the Receiver deems necessary.

On June 26, 2019, the Department of Justice, through the United States Attorney's Office for the Middle District of Florida (the "**DOJ**"), moved to stay this litigation to protect an ongoing criminal investigation. Doc. 149. The Court granted the DOJ's motion on July 12, 2019 but exempted the Receiver's activities from the stay. Doc. 179. The Court also required the DOJ to provide periodic status reports during the stay. *Id.*

On August 8, 2019, defendant Anile pled guilty to three counts involving the scheme – (1) conspiracy to commit wire and mail fraud; (2) engaging in an illegal monetary transaction; and (3) filing a false income tax return. *See United States of America v. Joseph S. Anile, II*, Case No. 8:19-cr-334-T-35CPT (M.D. Fla.) (the "**Anile Criminal Action**" or "**ACA**"). A copy of Anile's plea agreement was attached as Exhibit A to the Receiver's Second Interim Report (Doc. 195), and he is scheduled to be sentenced on November 18, 2020 at 9:30 AM in Tampa courtroom 7A before Judge Mary S. Scriven. ACA Doc. 46.

On December 17, 2019, a federal grand jury returned a two-count indictment against defendant DaCorta, alleging conspiracy to commit wire and mail fraud as well as engaging in an illegal monetary transaction. *See United States of America v. Michael J. DaCorta*, Case No. 8:19-cr-605-T-02CPT (M.D. Fla.) (the "**DaCorta Criminal Action**" or "**DCA**"). A copy of the indictment was attached as Exhibit A to the Receiver's Third Interim Report.

According to the grand jury, as early as November 2011, DaCorta entered a conspiracy to defraud investors by making numerous fraudulent representations. *See* DCA Doc. 1 ¶ 14b.-d.

It was a further part of the conspiracy that conspirators would and did use funds “loaned” by victim-investors to: (i) conduct trades, via an offshore broker, in the FOREX market, which trades resulted in catastrophic losses; (ii) make Ponzi-style payments to victim-investors; (iii) pay expenses associated with perpetuating the scheme; and (iv) purchase million-dollar residential properties, high-end vehicles, gold, silver, and other liquid assets, to fund a lavish lifestyle for conspirators, their family members and friends, and otherwise for their personal enrichment.

*Id.* at ¶ 14k. DaCorta’s jury trial is scheduled for the trial term commencing May 3, 2021 before Judge William F. Jung. DCA Doc. 30. A status conference is now scheduled for February 11, 2021. *Id.*

On July 16, 2020, the DOJ moved the Court to extend the stay in this enforcement action for an additional six months to protect its ongoing investigation. Doc. 282. After briefing by certain parties, the Court granted the motion and extended the stay until January 25, 2021. Doc. 290. The extension of the stay does not impact the Receiver, who is continuing to marshal assets, develop a claims process, and plan litigation, consistent with his Court-ordered mandate.

## **II. Overview of Preliminary Findings**

The Consolidated Order authorizes, empowers, and directs the Receiver to “investigate the manner in which the financial and business affairs of the Receivership Defendants were conducted....” Doc. 177 ¶ 44. Pursuant to that mandate, the Receiver is in the process of obtaining and reviewing records from Receivership Entities and third parties. The Receiver has formed some preliminary conclusions based on his review of a portion of the records received and interviews with employees, lawyers, accountants, and others. While

these conclusions are not final and might change as the Receiver's investigation progresses, the Receiver believes they should be shared with the Court, the investors, and other potentially interested parties.

There is abundant evidence that the defendants were operating a fraudulent investment scheme. The scheme began with the sale of preferred shares in OIG, which is registered in the Cayman Islands. The shares promised a 12% dividend that was to be derived from trading by a related company: first, Oasis Global FX, Limited and then Oasis Global FX, S.A. – *i.e.*, the Oasis Pools. These companies were registered in New Zealand and Belize, respectively, and were purportedly introducing brokers that would trade currencies or currency-related contracts. The 12% return was to be derived from trading profits and transaction income earned by the brokers. The preferred shares were sold to investors through a private placement memorandum that contained significant false representations and omitted numerous material facts, including that DaCorta, the “Chief Investment Officer,” was prohibited from currency trading through a prior regulatory action in the United States. As the scheme grew, other companies – Oasis Management and Satellite Holdings – were used to gather investments and funnel them into the scheme. Preferred shareholders became purported “lenders” who were told they were lending money to certain defendants. Investors were regularly sent statements showing an account with a principal amount and accrued and accruing earnings. All of this was false, as confirmed by defendant Anile's guilty plea.

As the scheme matured, the perpetrators created a website that investors could access to view their purported accounts. Investors' account pages showed that they were credited

with a 1% “interest” payment each month and, on a daily basis, a portion of purported trading income earned by the scheme’s trading entity.<sup>4</sup> The scheme was successful and proliferated because of the continued deception of the investors with respect to their purported accounts. They were led to believe that they held valuable loan accounts that continually earned money when, in fact, the scheme appears to have been insolvent since its inception. As an example, when the CFTC stopped the scheme in April 2019, the fraudulent website showed investors that they were owed an aggregate of over \$120 million. In truth, OIG only had assets of approximately \$10 million and was losing money continually.

The Receiver’s preliminary analysis indicates that a total of approximately \$80 million was raised from investors.<sup>5</sup> An analysis from the beginning of 2017 indicates that approximately \$20 million was deposited for trading, which resulted in substantial losses. The remainder of the money raised from investors was used to make Ponzi payments to other investors, to pay expenses to perpetuate the scheme, and to enrich the defendants. The actual

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<sup>4</sup> Specifically, many investors were told by those perpetrating the scheme that the investors would receive a portion of the “spread pay” that Oasis Global FX, S.A. earned from its purported role as a broker of forex transactions for OIG. The spread pay, however, was nothing more than a markup on all transactions and served to increase the losses in the OIG account. No spread pay (or any portion thereof) was ever distributed to an investor. Rather, it was a ruse used to deceive investors into believing that they were receiving enhanced returns when, in fact, fictitious amounts were being credited to their fraudulent accounts. In truth, Oasis Global FX, S.A. and its traders conducted continually and routinely unprofitable trades and lost almost all the investors’ money. The fabrication of returns based on purported spread pay was an integral part of the system through which the perpetrators lured investors into the scheme.

<sup>5</sup> To the extent these numbers differ from those alleged by the CFTC, the Receiver understands that the CFTC only considered transactions within the pertinent statute of limitations while the Receiver is reviewing all available transactions.

amount of out-of-pocket losses to investors and the projected amount of claims is yet to be determined, but it will likely exceed \$45 million.

### **ACTIONS TAKEN BY THE RECEIVER**

During this reporting period, the Receiver has taken steps to fulfill his mandates under the Consolidated Order and its predecessors. *See* Doc. 177 ¶ 56.A.

### **III. Securing The Receivership Estate**

Attached as **Exhibit A** to this Sixth Interim Report is a cash accounting report showing (1) the amount of money on hand from July 1, 2020, less operating expenses plus revenue, through September 30, 2020, and (2) the same information from the beginning of the Receivership (as opposed to the current reporting period). *See* Doc. 177 ¶ 56.B. & C. This cash accounting report does not reflect non-cash or cash-equivalent assets. Thus, the value of all property discussed below is not included in the accounting report. From July 1, 2020 through September 30, 2020, the Receiver collected income of \$315,456.86.<sup>6</sup>

#### **A. Cooperation with the Department of Justice, Federal Bureau of Investigation, and United States Marshals Service**

As discussed more fully in the Receiver's First Interim Report (Doc. 113), on April 17, 2019, the DOJ, through the United States Attorney's Office for the Middle District of Florida, filed a civil forfeiture action against almost all the properties identified below in § III.C. *See United States of America v. 13318 Lost Key Place, Lakewood Ranch, Florida et*

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<sup>6</sup> As explained in footnote 1, to the extent possible, the Receiver has included in this Sixth Interim Report transactions and events occurring after September 30, 2020 to give the Court and others the most current overview of the Receiver's activities. Money collected after that date, however, is not reflected in Exhibit A. Those collections will be included in the Receiver's next interim report.

*al.*, Case No. 8:19-cv-00908 (M.D. Fla.) (the “**Forfeiture Action**” or “**FA**”) (FA Doc. 1 ¶ 1). In addition, the Federal Bureau of Investigation (“**FBI**”) instituted administrative forfeiture proceedings against, at minimum, the vehicles described in § III.D.1 and the cash, gold, and silver described in § III.D.2. The Receiver, the DOJ, and the United States Marshals Service (“**USMS**”) reached agreements governing the forfeiture and sale of this property as well as the transfer and remission of the sale proceeds. *See* Doc. 105, Ex. A (Consent Forfeiture Agreement); Ex. B (Memorandum of Understanding or “**MOU**”); Ex. C (Liquidation Plan). On June 7, 2019, the Receiver moved the Court to approve these agreements (Doc. 105), and the Court granted the Receiver’s motion on June 13, 2019 (Doc. 112). According to the MOU, “[t]he Receiver has sole discretion to decide the logistics of the sale of the Forfeited Receivership Assets, on the terms and in the manner the Receiver deems most beneficial to the Receivership Estate and with due regard to the realization of the true and proper value of such property.” Doc. 105, Ex. B. The MOU also recognizes that “[a]ll sales of Receivership Assets, including Forfeited Receivership Assets, must comply with the provisions set forth in the Receivership Orders.” *Id.* After the Receiver sells a property subject to forfeiture, the Receiver will transfer the net proceeds to the USMS for deposit in the Department of Justice Asset Forfeiture Fund. *Id.* The Receiver will subsequently file one or more petitions for remission with the DOJ, and the sale proceeds will be returned for distribution to defrauded investors through a claims process supervised by this Court. *See infra* § VI.

The Forfeiture Action and the FBI’s administrative forfeiture proceedings are largely complete, and pursuant to the MOU, the Receiver has begun listing and marketing the

relevant properties for sale, arranging auctions, and seeking potential purchasers through appropriate and cost-effective means.

On October 9, 2020, the Receiver transferred \$3,295,119.91 to the USMS pursuant to the MOU. Because this occurred after the end of the current reporting period, the transfer is not yet reflected in Exhibit A. These funds will be remitted to the Receiver in connection with the claims process and his distribution plan. The transfer and remission are intended to comply with certain forfeiture regulations and will not affect the total amount of money available for distribution to claimants. It is also anticipated that over \$2,000,000 that was recovered by British authorities will also be remitted to the Receiver for distribution after receipt by the Department of Justice.

#### **B. Freezing Bank Accounts and Liquid Assets**

As explained in the First Interim Report, the Receiver identified and/or froze approximately \$11 million at various financial institutions in the United States, the United Kingdom, and Belize. The Receiver opened a money market account for the Receivership at ServisFirst Bank (the “**Receivership Account**”).<sup>7</sup> The Receiver has now deposited more than \$8.6 million of the frozen funds into this account.<sup>8</sup> The remaining amount is almost entirely comprised of the money held in Belize and the United Kingdom, as discussed below. The Receiver will attempt to obtain as much of that money as possible and to identify any other accounts containing assets belonging to the Receivership Estate. A list of pertinent bank or

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<sup>7</sup> The Receiver also opened a checking/operating account for making disbursements.

<sup>8</sup> Carolyn DaCorta – defendant DaCorta’s wife – paid \$32,100 for a membership in the Long Boat Key Club one week before the Receiver was appointed. The Receiver obtained a \$30,000 refund without the need for litigation, which is included in the above calculation.



other financial accounts organized by defendant, relief defendant, and/or affiliated entity is attached as **Exhibit B**.

### **1. The ATC Account in the United Kingdom**

On April 18, 2019, the Receiver served London-based ATC Brokers LTD (“ATC”) with a copy of the SRO and requested that ATC freeze all accounts associated with the defendants and relief defendants. In cooperation with domestic law enforcement and the United Kingdom’s National Crime Agency, ATC identified and froze one account in the name of Oasis Global FX, S.A., which contained \$2,005,368.28. The repatriation of that money has been complicated by jurisdictional issues, including international treaties and other agreements. The DOJ has assumed responsibility for repatriating the money for the ultimate benefit of the Receivership Estate. Since the Receiver’s prior interim report, the DOJ has obtained a final order of forfeiture in the Anile Criminal Action regarding the funds and is continuing to take additional steps necessary for repatriation. *See* ACA Doc. 43. According to the order, “[c]lear title to the FOREX Account [as defined in the order] is now vested in the United States of America.” *Id.* The Receiver will cooperate with the United States, through the DOJ, to facilitate repatriation and remission of the funds for the ultimate benefit of the Receivership Estate. At present, the Receiver believes the money is secure and will not be dissipated pending the resolution of these issues.

The Receiver understands that certain individuals have been representing to investors that there is more than \$100,000,000 dollars in unrecovered funds in the United Kingdom. Those representations are based on, at best, a misunderstanding of the fraudulent documents created to perpetuate the scheme, or at worst, complete fabrications. Neither (1) the DOJ and

the FBI; (2) the CFTC and its forensic accountants; (3) the Receiver and his forensic accountants; nor (4) the United Kingdom's National Crime Agency have identified any such funds or accounts. Nevertheless, the Receiver believes ATC's role in the scheme is much deeper and more significant than previously indicated, and the Receiver is taking steps to obtain discovery from and pursue litigation against ATC, as further explained below in Section V.2.c.

## 2. Financial Assets in Belize

Shortly after his appointment, the Receiver learned that Oasis Global FX Limited owned an account (x4622) at Choice Bank Limited ("**Choice Bank**") in Belize. On June 29, 2018, however, regulators in Belize revoked Choice Bank's license and appointed a liquidator. The Receiver's local counsel has identified two deposits at Choice Bank – one for \$31,000 and one for \$32,000. Counsel has contacted the liquidator regarding the Receiver's claim to those funds, and the liquidator has acknowledged receipt of the claim. The liquidator anticipates paying 52% of all claims but has not yet established a date for payment. If the liquidator pays the Receiver's claims at the anticipated percentage, the Receivership Estate would recover approximately \$32,760. Local counsel is continuing to work with the liquidator to resolve this matter.

The Receiver also learned that Oasis Global FX, S.A. has an account at Heritage Bank Limited ("**Heritage Bank**") in Belize containing \$500,000. The Receiver believes that money served as a bond that allowed Oasis Global FX, S.A. to operate as a broker-dealer in Belize. On May 7, 2019, the Belize International Financial Services Commission suspended the entity's trading licenses. On October 22, 2019, the Receiver and defendant Anile

executed corporate documents to take legal control of Oasis Global FX, S.A. (in addition to the powers conferred by the Consolidated Order). The Receiver's local counsel is working with the Director General of the Belize International Financial Services Commission to issue a letter to Heritage Bank, which would allow the funds to be released and repatriated. Local counsel has also prepared the documents necessary to dissolve (or at least unregister) Oasis Global FX, S.A., which the Receiver has been advised is required to recover the funds.

### **C. Securing Real Property**

The Receivership Estate contains (or previously contained) numerous parcels of real property, including single-family homes, condominiums, and a waterfront office building.<sup>9</sup> In the Consolidated Order and its predecessors, the Court directed the Receiver to “[t]ake all steps necessary to secure the business and other premises under the control of the Receivership Defendants” (Doc. 7 at 15-16) and to “take immediate possession of all real property of the Receivership Defendants, wherever located, including but not limited to all ownership and leasehold interests and fixtures” (Doc. 44 ¶ 19; Doc. 177 ¶ 19). The Receiver's ability to sell properties during this reporting period has been substantially and negatively impacted by the Covid-19 virus and related stay-at-home orders. The Receiver is adapting and continuing sales efforts, but the duration of these disruptions and the resultant effect on the real estate market remains uncertain. The Receiver's actions in fulfillment of his mandate are explained in the following subsections. *See* Doc. 177 ¶ 56.D.

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<sup>9</sup> In addition to the properties discussed below, relief defendant 444 Gulf of Mexico Drive, LLC holds an \$80,000 mortgage on the property located at 1605 55th Avenue West, Bradenton, Florida 34207. The mortgage matures on December 1, 2021 and pays the Receivership Estate \$200 per month.

### 1. 444 Gulf of Mexico Drive, Longboat Key, Florida

OIG used the two-story property located at 444 Gulf of Mexico Drive #3 in Longboat Key, Florida as an office (the “**Office**”). On November 8, 2019, the Receiver entered into an agreement to sell the Office for \$2,100,000 (gross of commissions, taxes, asset expenses, and other closing costs). The Receiver moved the Court to approve the sale, and the Court granted the Receiver’s motion. *See* Docs. 201, 206, 208, 209. The transaction closed on January 3, 2020 and resulted in a net recovery of \$1,994,155.06. For more information, please see the Receiver’s prior interim reports.

### 2. 13318 Lost Key Place, Lakewood Ranch, Florida

Defendant DaCorta used the two-story property located at 13318 Lost Key Place in Lakewood Ranch, Florida as his residence (the “**DaCorta Residence**”). It was owned by relief defendant 13318 Lost Key Place, LLC. DaCorta was a principal of that entity until the Receiver’s appointment. The property contains approximately 4,980 square feet, including five bedrooms, seven bathrooms, and a pool. The DaCorta Residence appears to have been purchased on March 18, 2016 for approximately \$1,000,000. There is no mortgage. The 2020 tax assessed value of the DaCorta Residence is \$898,285. The DOJ obtained a final judgment of forfeiture with respect to this property on July 16, 2019. *See* FA Doc. 60. The Receiver and his realtors have listed the property for sale at \$1,235,000.<sup>10</sup>

On July 2, 2020, the Receiver entered into an agreement to sell the DaCorta residence for \$1,100,000. The Receiver moved the Court to approve the sale (Doc. 297), and the Court granted the motion (Doc. 308), but the purchasers were unable to close the transaction due to

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<sup>10</sup> *See* [www.oasisreceivership.com/assets-for-sale/13318-lost-key-place/](http://www.oasisreceivership.com/assets-for-sale/13318-lost-key-place/).

a tax issue. As such, the Receiver moved the Court to vacate its prior order, which motion the Court also granted. *See* Docs. 320, 321. The purchasers also paid the Receiver \$10,000 as a form of damages due to their failure to close the transaction. That money will inure to the benefit of the Receivership Estate.

Subsequently, the Receiver entered into a second agreement with a new purchaser to sell the property for \$1,100,00. That agreement is contingent on the new purchaser selling his current home, which transaction is scheduled to close in November. The Receiver will move the Court to approve this second agreement at the appropriate time.

### 3. **6922 Lacantera Circle, Lakewood Ranch, Florida**

The two-story property located at 6922 Lacantera Circle in Lakewood Ranch, Florida (“**Lacantera**”) was owned by relief defendant 6922 Lacantera Circle, LLC. On January 7, 2020, the Receiver entered into an agreement to sell Lacantera for \$2,050,000. The Receiver moved the Court to approve the sale, and the Court granted that motion. *See* Docs. 221, 226. The Receiver closed the sale, and the net proceeds of \$372,823.83 are now within the Receivership Estate. For more information, please see the Receiver’s prior interim reports.

### 4. **4064 Founders Club Drive, Sarasota, Florida**

Defendant Anile used the two-story property located at 4064 Founders Club Drive in Sarasota, Florida (“**Founders Club**”) as his residence.<sup>11</sup> It was owned by relief defendant

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<sup>11</sup> Similarly, 4058 Founders Club Drive in Sarasota, Florida is a vacant lot (the “**Founders Club Lot**”) owned by 4058 Founders Club Drive, LLC. Defendant Anile was a principal of that entity, although it is not a relief defendant. The Founders Club Lot appears to have been purchased on March 26, 2018 for approximately \$190,000. There is no mortgage. The 2020 tax assessed value of the Founders Club Lot is \$119,300. The DOJ obtained a final judgment  
(footnote cont’d)

4064 Founders Club Drive, LLC. Defendant Anile was a principal of that entity until the Receiver's appointment. The property contains approximately 7,230 square feet, including five bedrooms, numerous bathrooms, a wine cellar, game room, theater room, and a pool. Founders Club appears to have been purchased on October 20, 2017 for approximately \$1,775,000. Steven and Natalee Herrig hold a \$1,065,000 mortgage on the property with a balloon payment due on October 20, 2021. The 2020 tax assessed value of Founders Club is \$1,365,100. The DOJ obtained a final judgment of forfeiture with respect to this property on August 30, 2019. *See* FA Doc. 65. The Receiver initially listed the property for sale at \$2,250,000 and has since reduced the price to \$1,950,000.<sup>12</sup>

#### 5. 7312 Desert Ridge Glen in Lakewood Ranch, Florida

Defendant Francisco Duran used the two-story property located at 7312 Desert Ridge Glen in Lakewood Ranch, Florida as his residence ("**Desert Ridge**"). It is owned by 7312 Desert Ridge Glen, LLC. Defendant DaCorta was a principal of that entity until the Receiver's appointment. The property contains approximately 3,889 square feet, including four bedrooms, four-and-a-half bathrooms, and a pool. Desert Ridge appears to have been purchased on November 9, 2017 for approximately \$575,000. There is no mortgage on the property. The 2020 tax assessed value of Desert Ridge is \$800,539. The DOJ obtained a

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of forfeiture with respect to this property on August 20, 2019. *See* FA Doc. 63. [The property is listed for sale at \\$240,000.](#)

<sup>12</sup> *See* [www.oasisreceivership.com/assets-for-sale/4064-founders-club-drive/](http://www.oasisreceivership.com/assets-for-sale/4064-founders-club-drive/).

final judgment of forfeiture with respect to this property on July 16, 2019. *See* FA Doc. 60.

The Receiver has listed the property for sale at \$870,000.<sup>13</sup>

#### **6. The Vardon Terrace Condos in Lakewood Ranch, Florida**

Shortly after his appointment, the Receiver learned that DaCorta and/or Oasis Management had an interest in four condominiums in Lakewood Ranch, Florida (the “**Vardon Terrace Condos**”):

- (1) 16804 Vardon Terrace #307 formerly owned by Vincent Raia;
- (2) 16804 Vardon Terrace #108 owned by 16804 Vardon Terrace #108, LLC;
- (3) 16904 Vardon Terrace #106 owned by 16904 Vardon Terrace #106, LLC; and
- (4) 17006 Vardon Terrace #105 owned by 17006 Vardon Terrace #105, LLC.

On July 18, 2018, defendant DaCorta (through 16804 Vardon Terrace 307, LLC) transferred Condo #307 to Vincent Raia, who managed certain properties for the defendants and relief defendants prior to the Receiver’s appointment. Oasis Management held a \$215,000 balloon mortgage on the property. Mr. Raia’s monthly, interest-only mortgage payment to Oasis Management was \$537.50. The Receiver was collecting the payments and adding them to the Receivership Account, but he obtained a deed in lieu of foreclosure from Mr. Raia. This arrangement avoided unnecessary litigation with Mr. Raia regarding the length and validity of his mortgage. The Receiver recorded the deed and thus now owns the property. He is marketing it for sale at \$210,000 along with the other condominiums.<sup>14</sup>

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<sup>13</sup> *See* [www.oasisreceivership.com/assets-for-sale/7312-desert-ridge-glen/](http://www.oasisreceivership.com/assets-for-sale/7312-desert-ridge-glen/).

<sup>14</sup> *See* <https://floridavisualmarketing.com/16804-Vardon-Terrace>.

Oasis Management is the authorized representative of the limited liability company that owned Condo #108, which was purchased for approximately \$190,000. On February 12, 2020, the Receiver entered into an agreement to sell Condo #108 for \$212,000. The Receiver moved the Court to approve the sale, and the Court granted that motion. *See* Docs. 239, 250. The Receiver closed the sale and recovered net proceeds of \$204,312.38.

Defendant DaCorta was the authorized representative of the limited liability company that owns Condo #106, which was purchased for approximately \$185,000. On June 29, 2020, the Receiver entered into an agreement to sell Condo #106 for \$184,000. On July 24, 2020, the Receiver moved the Court to approve the sale (Doc. 291), and the Court granted that motion (Doc. 303). The Receiver closed the sale and recovered net proceeds of \$177,104.89.

Oasis Management was the authorized representative of the limited liability company that owns Condo #105, which was purchased for approximately \$190,999. The Receiver is not aware of a mortgage on the property. The 2020 tax assessed value of the property is \$151,000. The DOJ obtained a final judgment of forfeiture with respect to this property on July 16, 2019. *See* FA Doc. 60. The property is listed for sale at \$210,000.<sup>15</sup>

#### **7. 6300 Midnight Pass Road, No. 1002, Sarasota, Florida**

The condominium located at 6300 Midnight Pass Road, No. 1002 in Sarasota, Florida (“**Midnight Pass**”) is owned by 6300 Midnight Pass Road, No. 1002, LLC. DaCorta was a principal of that entity until the Receiver’s appointment. The property contains approximately 1,240 square feet, including two bedrooms and two bathrooms. Midnight

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<sup>15</sup> *See* [www.oasisreceivership.com/assets-for-sale/17006-varon-terrace](http://www.oasisreceivership.com/assets-for-sale/17006-varon-terrace).



Pass appears to have been purchased on March 14, 2018 for approximately \$1,000,000. There is no known mortgage on the property. The 2020 tax assessed value of Midnight Pass is \$772,500. The DOJ did not include Midnight Pass in the Forfeiture Action. As such, the Receiver has direct control of the property. *See* Doc. 177 ¶ 19. The property is listed for sale at \$1,085,000.<sup>16</sup> The Receiver has also engaged a property management company to rent the property to short-term guests for approximately \$2,000 per week, and several reservations have been made.

### **8. Defendant Montie's Real Property**

Defendant Montie owns real estate in Hauppauge, New York, valued between \$485,000 (as is) and \$635,000 (repaired), based on a recent "Comparative Market Analysis" obtained by Montie from an appraiser. The property is subject to a mortgage. Montie has expressed a desire to sell the property, and he has negotiated certain parameters with the CFTC and the Receiver. The Receiver had an appraiser visit the property on October 28, 2020 and expects to receive the appraiser's report shortly. The CFTC will approve any sale. The proceeds of the sale will be held in escrow pending the resolution of the CFTC's and/or the Receiver's claims against Montie.

Montie also owns property in Jackson, New Hampshire, which he values at \$1,412,800, based on "local property assessor figures." As of June 15, 2019, the property carried a mortgage of \$845,747. Finally, Montie owns property in Lake Ariel, Pennsylvania, which he values at \$926,700, based on "local property assessor figures." As of August 1, 2019, the property carried a mortgage of \$658,254. As such, Montie's properties carried

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<sup>16</sup> *See* [www.oasisreceivership.com/assets-for-sale/6300-midnight-pass](http://www.oasisreceivership.com/assets-for-sale/6300-midnight-pass).

positive net equity of approximately \$1,211,602 in 2019, according to his sworn financial affidavit. “Montie is responsible for making mortgage, property tax, and insurance payments and for the general upkeep of these residences.” Doc. 177 ¶ 20. As noted above, the Receiver is obtaining an updated appraisal of the property in Hauppauge, New York. The Receiver reserves the right to pursue these properties and any other disclosed (or undisclosed) assets when the circumstances warrant.

## **9. Defendant Haas’s Real Property**

Defendant Haas owns a property in New York, which he estimates to be worth approximately \$448,622. As of June 24, 2019, it had a mortgage in the amount of \$127,397.15. As such, Haas’s property carries positive net equity of approximately \$321,231, according to his sworn financial affidavit. “Haas is responsible for making mortgage, property tax, and insurance payments and for the general upkeep of this residence.” Doc. 177 ¶ 21. The Receiver reserves the right to pursue this property and any other disclosed (or undisclosed) assets when the circumstances warrant.

## **D. Securing Personal Property**

### **1. Vehicles**

On April 18, 2019, FBI agents executed search warrants and seized, among other things, luxury automobiles purchased by certain defendants and relief defendants. The FBI then instituted administrative forfeiture proceedings against the vehicles. On October 11, 2019, the Receiver filed a motion seeking the Court’s approval of his plan to auction the vehicles pursuant to the MOU. Doc. 192. The Court granted the motion on October 29, 2019. Doc 194. Orlando Auto Auction sold the vehicles that were not underwater, which

resulted in a recovery of approximately \$307,714. The Receiver obtained the sale proceeds in January 2020.<sup>17</sup> The Receiver has now sold all forfeited vehicles and collected all related funds. For more information, please see the Receiver's prior interim reports.

## **2. Cash and Precious Metals**

Law enforcement agents also seized cash, gold, and silver from certain defendants or their residences. On November 4, 2019, the Receiver moved the Court to approve a procedure for the sale of the metals, and the Court granted the motion on November 7, 2019. *See* Docs. 197, 200. After obtaining several bids from companies that deal in precious metals, the Receiver sold the gold and silver to International Diamond Center for \$657,382.25. *See* Doc. 205. The Receiver has now sold all forfeited metals and collected all related funds.<sup>18</sup> For more information, please see the Receiver's prior interim reports.

## **3. Other Personal Property**

When the Receiver and his representatives visited certain defendants' residences on April 18, 2019, they observed and photographed potentially valuable items, including art, antiques, collectibles, sports memorabilia, and jewelry. The defendants have been instructed that all such personal property is subject to the asset freeze, and they are not to sell, transfer, or otherwise dispose of anything without the Receiver's authorization. To date, the Receiver

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<sup>17</sup> One of the vehicles (a Porsche) was subject to a lien of approximately \$90,000. Either the Receiver or the USMS will pay this amount from the collected funds. The purchaser of a second vehicle (a Mercedes) was unable to obtain clean title, and the Receiver thus allowed the purchaser to return the vehicle. In October 2020, the Mercedes was resold to a subsequent purchaser, and the Receiver believes the title issues have been resolved. The funds from that sale will be reflected in the Receiver's next interim report.

<sup>18</sup> This does not include certain assets in the possession of defendants Haas and Montie, as disclosed in their financial affidavits.

has identified and/or seized the property listed in **Exhibit C**.<sup>19</sup> He has sold most items as set forth in the exhibit. The Receiver is working with the defendants and their counsel to identify additional property that rightfully belongs to the Receivership Estate.

#### **E. Securing the Receivership Entities' Books and Records**

As explained in prior interim reports, the Receiver and his professionals have taken substantial steps to secure the Receivership Entities' books and records, including computer systems, emails, and other documents. The Receiver has also obtained documents from numerous nonparties under the Consolidated Order or through subpoenas. During this reporting period, the Receiver has obtained documents directly from investors in connection with his demand letters, clawback litigation, and/or the claims process. The Receiver continues to encourage investors who dispute the Receiver's calculations of gains or losses related to the scheme to provide documents substantiating the dispute. This will ultimately conserve resources and avoid unnecessary litigation.

#### **F. Operating or Related Businesses**

In prior interim reports, the Receiver has provided information about three businesses: (1) relief defendant Roar of the Lion; (2) Mirror Innovations, LLC; and (3) Diamond Boa LLC d/b/a Kevin Johnson Reptiles. While some issues still require resolution, the Receiver does not believe any of these businesses have material value to the Receivership Estate.

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<sup>19</sup> Importantly, the values identified in Exhibit C were and are only estimates. Actual recoveries have been and will be subject to market conditions and other factors.

#### IV. Retention of Professionals

The Consolidated Order authorizes the Receiver “[t]o engage and employ persons in his discretion to assist him in carrying out his duties and responsibilities hereunder, including, but not limited to, accountants, attorneys, securities traders, registered representatives, financial or business advisors, liquidating agents, real estate agents, forensic experts, brokers, traders or auctioneers.” Doc. 177 at ¶ 8.F.

On May 30, 2019, the Receiver moved the Court to approve his engagement of the following legal, accounting, and other professionals: (1) Wiand Guerra King P.A. (“**WGK**”), a law firm; (2) KapilaMukamal, LLP (“**KM**”), a forensic accounting firm; (3) PDR CPAs (“**PDR**”), a tax accounting firm; (4) RWJ Group, LLC (“**RWJ**”), an asset management and investigations firm; and (5) E-Hounds, Inc. (“**E-Hounds**”), a technology and computer forensics firm. *See* Doc. 87. On June 6, 2019, the Court granted the Receiver’s motion for approval to retain these professionals. Doc. 98. The Receiver has also retained special counsel to assist with the repatriation of foreign assets: Glenn D. Godfrey & Company LLP in Belize (Doc. 138) and Maples Group in the Cayman Islands (Doc. 187).

On March 5, 2020, the Receiver filed a motion seeking to retain Sallah Astarita & Cox, LLC (the “**Sallah Firm**”) on a contingency fee basis to investigate and pursue claims against Mainstream. Doc. 238. Similarly, on March 20, 2020, the Receiver moved the Court to approve his retention of Sergio C. Godinho as a litigation consultant to assist the Receiver’s and the Sallah Firm’s investigation and prosecution of those claims. Doc. 253. Mainstream opposed both motions, and after related briefing, on April 7, 2020, the Court granted the Receiver’s motions, thereby approving his engagement of the Sallah Firm and

Mr. Godinho. Doc. 261. As explained in Section V.2. below, the Receiver is pursuing claims against Mainstream.

On March 24, 2020, the Receiver moved the Court to approve the engagement of John Waechter and Englander Fischer to assist the Receiver and his primary counsel with clawback litigation. Doc. 285. The Court granted the Receiver's motion on April 13, 2020. Doc. 264. As explained in Section V.1. below, the Receiver is pursuing clawback litigation against numerous defendants.

## **V. Pending and Contemplated Litigation**

The Consolidated Order requires this Sixth Interim Report to contain “a description of liquidated and unliquidated claims held by the Receivership Estate, including the need for forensic and/or investigatory resources; approximate valuations of claims; and anticipated or proposed methods of enforcing such claims (including likelihood of success in (i) reducing the claims to judgment and (ii) collecting such judgments.).” Doc. 177 ¶ 56.E. The following subsections address both asserted and unasserted claims held by the Receivership Estate and certain related litigation.

### **1. Pending and Related Litigation**

The Receiver is not aware of any litigation against Receivership Entities that was pending at the time of his appointment, and the Consolidated Order enjoins the filing of any litigation against Receivership Entities without leave of Court.

#### **a. The Government's Civil Forfeiture Action**

The Forfeiture Action is essentially complete because judgments of forfeiture have been entered against all defendant properties. *See* FA Docs. 60, 63, 65, 67. The Receiver is

now selling those properties pursuant to the MOU. The Receiver understands that the FBI's administrative forfeiture proceeding against certain personal property is also complete.

**b. The Anile Criminal Action**

As noted above, defendant Anile pled guilty to several felony charges regarding the scheme, and the court in the Anile Criminal Action accepted his guilty plea on October 15, 2019. ACA Docs. 19, 27. He is awaiting sentencing in November 2020. The DOJ is also pursuing forfeiture and repatriation of approximately \$2 million through the Anile Criminal Action. *See supra* § III.B.1.

**c. The DaCorta Criminal Action**

As also noted above, defendant DaCorta has been indicted in a separate but related action. DCA Doc. 1 & Ex. A. A copy of the indictment was attached as Exhibit A to the Receiver's Third Interim Report. He is awaiting trial in early 2021.

**d. The Receiver's General Clawback Litigation**

The Court found that entry of the Consolidated Order was necessary and appropriate for the purposes of marshaling and preserving all assets, including in relevant part, assets that "were fraudulently transferred by the Defendants and/or Relief Defendants." Doc. 177 at 2. The Court also authorized the Receiver "to sue for and collect, recover, receive and take into possession all Receivership Property" (*id.* ¶ 8.B.) and "[t]o bring such legal actions based on law or equity in any state, federal, or foreign court as the Receiver deems necessary or appropriate in discharging his duties as Receiver" (*id.* ¶ 8.I.). Similarly, the Court authorized, empowered, and directed the Receiver to "prosecute" actions "of any kind as may

in his discretion, and in consultation with the CFTC’s counsel, be advisable or proper to recover and/or conserve Receivership Property.” *Id.* ¶ 43.

Pursuant to that mandate, the Receiver worked with forensic accountants to perform a cash-in/cash-out analysis of the Receivership Entities. This allowed the Receiver to identify any investor who received more money from a Receivership Entity than he or she contributed to the Receivership Entity. In Ponzi schemes, such amounts are generally referred to as “false profits” because the money transferred to the pertinent investor was not derived from legitimate activities but from other defrauded investors. Receivers in the Eleventh Circuit (and nationwide) have a clear right to recover false profits through fraudulent transfer or “clawback” litigation. *See, e.g., Wiand v. Lee, et al.*, 753 F.3d 1194 (11th Cir. 2014).<sup>20</sup>

On February 28, 2020, the Receiver filed a motion seeking approval of certain pre-suit settlement procedures regarding his fraudulent transfer and unjust enrichment claims against investors who received false profits. Doc. 237. The Court granted that motion on March 16, 2020. Doc. 247. The Receiver then mailed approximately 175 demand letters to potential defendants, offering to waive the Receiver’s entitlement to prejudgment interest and to settle the Receiver’s claims for 90% of the investor’s false profits. Those letters also

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<sup>20</sup> *See also* Doc. 237 § II; *Wiand v. Lee*, 2012 WL 6923664, at \*17 (M.D. Fla. Dec. 13, 2012), *adopted* 2013 WL 247361 (M.D. Fla. Jan. 23, 2013) (“[A]s the Receiver indicates, it is well-settled that a receiver is entitled to recover from winning investors profits above the initial outlay, also known as ‘false profits,’ and an investor in a scheme does not provide reasonably equivalent value for any amounts received from [the] scheme that exceed the investor’s principal investment.”); *Perkins v. Haines*, 661 F.3d 623, 627 (11th Cir. 2011) (“Any transfers over and above the amount of the principal—*i.e.*, for fictitious profits—are not made for ‘value’ because they exceed the scope of the investors’ fraud claim and may be subject to recovery....”).



offered potential defendants the opportunity to dispute the Receiver's calculations. The pre-suit resolution procedures were fruitful in several important ways:

- First and most importantly, the procedures resulted in settlements collectively worth \$246,497.09.
- Second, many investors and/or their counsel took the afforded opportunity to contest the Receiver's calculations by providing documents showing that they did not, in fact, receive false profits or, for example, that the investor was entitled to an equitable setoff because one account received false profits but a related account suffered even greater losses. This conserved resources by avoiding unnecessary litigation.
- Third, in more complicated situations, the Receiver and investors and/or their counsel entered into tolling agreements to afford additional time to exchange documents, reconcile accounts, and engage in negotiations. This process is ongoing.

Given the foregoing, the Receiver believes the pre-suit settlement procedures were productive and successful, but unfortunately, many investors did not take advantage of the afforded opportunity. In preparation for that likely event, on March 24, 2020, the Receiver moved the Court for authority to file clawback litigation. Doc. 258. The Court granted the Receiver's motion on April 13, 2020. Doc. 264. Pursuant to the Consolidated Order and the Court's express authorization, on April 14, 2020, the Receiver filed a clawback complaint against approximately 94 non-settling investors. A copy of the complaint can be found on [the Receiver's website](#) (the "**Clawback Action**").<sup>21</sup>

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<sup>21</sup> The Receiver did not include individuals who received smaller amounts of false profits in the Clawback Action, but importantly, he has not abandoned his claims against those individuals. He will pursue them in a cost-efficient manner and will explore alternative methods of recovery. As such, the Receiver continues to encourage people who received demand letters but were not named in the Clawback Action to reach resolutions with the Receiver.

Since filing the Clawback Action, the Receiver has reached settlements with many defendants. For example, on July 13, 2020, the Receiver moved the Court to approve 10 settlements with 15 defendants in the total amount of \$99,414.39. *See* Doc. 280. The Court granted the Receiver's motion on July 14, 2020. Doc. 281. On August 28, 2020, the Receiver moved the Court to approve an additional 5 settlements with 8 defendants in the total amount of \$109,148.48. *See* Doc. 312. The Court granted the Receiver's motion on August 31, 2020. Doc. 314. The Receiver has dismissed these defendants from the Clawback Action. Other defendants have defaulted, and certain *pro se* defendants are attempting to litigate the Receiver's claims. The chart below summarizes general categories of profiteers and/or defendants and associated figures:

| STATUS   | DEFENDANTS | AMOUNTS        |
|--|------------|----------------|
| Pre-Suit Settlements                             | 10         | \$246,497.09   |
| Post-Suit, Court-Approved Settlements/Dismissals | 23         | \$208,562.87   |
| Post-Suit Settlements Needing Court Approval     | 3          | \$52,165.23    |
| Defaults Entered During Hearing on Oct. 28, 2020 | 41         | \$1,943,785.00 |
| Clerk's Defaults Entered                         | 8          | \$527,926.70   |
| Filed Answer                                     | 8          | \$968,329.16   |
| Served/Pending Response                          | 5          | \$134,850.40   |
| Pending Service                                  | 1          | \$5,804.54     |
| Voluntary Dismissal, Bankruptcy, or Other        | 5          | \$321,174.60   |

Given the extensive opportunities afforded by the Receiver to settle claims, resolve documents discrepancies, or enter into tolling agreements, the Receiver will likely continue to seek the maximum possible recovery from all non-settling defendants.

**e. The Receiver's Litigation Against Montie**

The Receiver sued Raymond P. Montie, III for (like others) the recovery of fraudulent transfers and unjust enrichment but also for breaching his fiduciary duties to Oasis International Group, Ltd. and related entities and for aiding and abetting the criminal breaches of fiduciary duties owed to those entities by Anile and DaCorta (the “**Montie Litigation**”). The Receiver seeks to recover fraudulent transfers in the amount of \$1.7 million that Montie received from the scheme and more than \$50 million in damages based on his tortious conduct. On June 16, 2020, Montie filed a motion to dismiss the Receiver's complaint (ML Doc. 9), and on June 30, 2020, the Receiver filed a notice of his intent to amend the complaint, as a matter of right under the Federal Rules of Civil Procedure (ML Doc. 12). On July 2, 2020, Montie filed a motion seeking to strike the Receiver's notice and to dismiss the Receiver's case with prejudice. ML Doc. 13. During an in-person hearing on July 13, 2020, the judge presiding over the Montie Litigation denied the motion to strike. ML Doc. 22. The judge also denied Montie's motion to dismiss as moot. ML Doc. 23.

On July 7, 2020, the Receiver filed an amended complaint, a copy of which is available on [the Receiver's website](#). On July 27, 2020, Montie filed a second motion to dismiss. ML Doc. 24. The Receiver has opposed that motion and will continue to litigate this action. Trial is scheduled for January 2022. Importantly, neither the CFTC nor the DOJ can assert the claims the Receiver alleged in the Montie Litigation, and given Montie's

ongoing income from a multi-level-marketing company called Ambit Energy and ownership of several properties, the Receiver believes Montie has the resources to satisfy substantial adverse judgments.

## **2. Contemplated Litigation**

In addition to clawback claims, the Receiver might also assert tort claims against brokers, accountants, sales agents, lawyers, and others who aided and abetted the scheme or otherwise knew or should have known of fraudulent activity. The Receiver is reviewing information to determine if any individuals or entities discussed below, among others, have liability in connection with the scheme.

### **a. Contemplated Litigation Against Insiders**

The Receiver is considering litigation against certain OIG insiders, including principles, sales agents, employees, “traders,” and others. On the one hand, the Receiver can assert legal and equitable claims that are independent of and distinct from any claims the government can assert, either through the CFTC, the DOJ, or otherwise. On the other hand, the Receiver seeks to avoid duplicating efforts made (or to be made) by the government to conserve resources and avoid unnecessary litigation. For example, the Receiver likely will not pursue independent litigation against defendant Anile because the DOJ has already obtained a multi-million-dollar criminal forfeiture judgment against him. The Receiver and the government have seized “his” assets, including the house in which he was living (Founders Club), the cars he and his wife were driving, and other personal property. Most of these assets have already been sold. Although defendant DaCorta has not pled guilty and is

awaiting trial, the Receiver believes potential claims against him likely require similar treatment to avoid unnecessary expenditures.

The Receiver has entered into tolling agreements with defendants Haas and Duran (although this case is stayed, and the Consolidated Order contains a tolling provision, the Receiver also obtained tolling agreements in an abundance of caution to preserve his claims). This will afford the parties additional time to resolve criminal, civil, and other matters and to reach agreements, establish liability, and recover assets with minimal need for litigation or at least litigation funded by the Receivership Estate.

**b. Mainstream Fund Services, Inc.**

As explained above in Section IV, the Court authorized the Receiver to retain the Sallah Firm to investigate and pursue multi-million-dollar claims against Mainstream on a contingency fee basis. The Sallah Firm has drafted a complaint, and after initially refusing to do so, Mainstream has entered into a tolling agreement and thereafter an amended tolling agreement. The Receiver and Mainstream mediated their dispute on October 13, 2020, and negotiations are ongoing.

**c. ATC Brokers Ltd.**

The Receiver is also seeking documents from and considering claims against ATC Brokers Ltd., which received approximately \$20 million from the scheme. ATC is a firm that facilitates, among other things, foreign exchange or “forex” trading from offices in California and the United Kingdom. To avoid incurring unnecessary fees and costs, the Receiver has already sought and obtained documents that ATC provided to the CFTC and separately to the DOJ pursuant to certain international treaties. Those productions, however,

are inadequate for the Receiver's purposes. As such, the Receiver served a subpoena for documents on ATC's affiliate in the United States and attempted to take the deposition of David Manoukian, one of ATC's principals as well as a witness and California resident who was deeply involved with the scheme. Instead of cooperating with the Receiver, Manoukian and ATC retained counsel, drafted a motion for a protective order to be filed in California, and threatened to sanction the Receiver's counsel for attempting to pursue discovery in the United States. It became clear that the Receiver would have to litigate with ATC either in this Court, California, the United Kingdom, or some combination thereof.

On July 10, 2020, the Receiver filed a motion for an order to show cause why Manoukian and ATC should not be held in contempt of Court for failing to comply with the Consolidated Order by providing documents to the Receiver. Doc. 278. The Court referred the matter to the presiding Magistrate Judge, who recommended that the Receiver's motion be denied. *See* Doc. 289. The Court adopted the Magistrate Judge's report and recommendation over the Receiver's objection. Doc. 316. As such, the Receiver will be forced to litigate with ATC in California and/or the United Kingdom, and he is currently taking steps toward that end.

**d. Spotex, LLC**

Spotex, LLC ("**Spotex**") created the software that DaCorta allegedly used to conduct trading. It maintained backdoor accounts for OIG through [www.spotex.com](http://www.spotex.com). The Receiver served a subpoena on Spotex, and the company has produced some documents. The Receiver is working with counsel for Spotex to obtain additional documents. Counsel has

advised the Receiver that Spotex never takes possession of investor money and does not have any money belonging to OIG or its investors.

## **VI. Claims Process**

As explained more fully in prior interim reports, the Receiver – with this Court’s approval – has established a claims process through which he intends to distribute the proceeds of the Receivership Estate to creditors, including defrauded investors. The Claim Bar Date (as defined in Doc. 230 – *i.e.*, the deadline for submitting claims to the Receiver) was June 15, 2020. As of that date, investors and other creditors submitted approximately 784 proof of claim forms totaling approximately \$70 million. Anyone who did not submit a proof of claim form by that date is forever barred from participating in a distribution from the Receivership Estate.

The Receiver is currently in the process of analyzing the claim forms and formulating his determinations. After the Receiver completes his analysis, he will present his determinations to the Court and ask the Court to approve them on an interim basis. He will then serve notice of his determinations on the claimants, who will have an opportunity to object to the Receiver’s determinations through specific procedures approved by the Court and consistent with due process requirements. In the Receiver’s experience, most objections can be resolved or settled using such procedures, but if any objections cannot be resolved, they will be presented to the Court for determination. Through this process, the Receiver intends to establish groups or classes of creditors with approved claims that are entitled to receive distributions from the Receivership Estate.

Once the claims process has been completed or substantially completed, the Receiver will evaluate the amount of cash available for distribution and move the Court to approve a first interim distribution to claimants with approved claims. If material claim objections are pending at the time the Receiver determines a distribution is appropriate, he might move the Court to establish reserves for the disputed claims, so they do not impair the Receiver's ability to make a distribution to claimants with undisputed claims. The Receiver anticipates making multiple distributions as assets become available, subject to cost/benefit concerns.

## **VII. The Next Ninety Days**

The Consolidated Order requires this Sixth Interim Report (and all subsequent reports) to contain “[t]he Receiver’s recommendations for a continuation or discontinuation of the [R]eceivership and the reasons for the recommendations.” Doc. 177 ¶ 56.G. At this early stage, the Receiver recommends continuation of the Receivership because he still has (1) more than \$2.5 million to repatriate from the United Kingdom (through the DOJ) and Belize; (2) at least six parcels of real estate to liquidate; (3) additional personal property to liquidate; (4) litigation to bring and/or prosecute, including clawback claims; and (5) a claims process to complete for the distribution of funds.

During the next 90 days, the Receiver will continue to collect and analyze documents from nonparties and other sources. The Receiver is also reviewing information to determine if any other third parties have liability either to the Receivership Estate or investors. The Receiver will continue to attempt to locate funds and other assets and will likely institute additional proceedings to recover assets on behalf of the Receivership Entities. In an effort to more fully understand the conduct at issue and in an attempt to locate more assets, the



Receiver will continue to conduct interviews and/or depositions of parties and third parties who might have knowledge of the fraudulent scheme.

### **CONCLUSION**

Investors and other creditors of the Receivership Entities are encouraged to periodically check the Receiver's website ([www.oasisreceivership.com](http://www.oasisreceivership.com)) for current information concerning this Receivership. The Receiver and his counsel have received an enormous amount of emails and telephone inquiries and have had to expend significant resources to address them. While the Receiver and his staff are available to respond to any inquiries, to minimize those expenses, investors and other creditors are strongly encouraged to consult the Receiver's website before contacting the Receiver or his counsel. Should the website not answer your question, please reach out to us. The Receiver continues to encourage individuals or attorneys representing investors who have information that might be helpful in securing further assets for the Receivership Estate or identifying other potential parties who might have liability to either the Receivership Estate or investors to email ([jrizzo@wiandlaw.com](mailto:jrizzo@wiandlaw.com)) or call Jeffrey Rizzo at 813-347-5100.

Dated this 30th day of October 2020.

Respectfully submitted,

**s/ Burton W. Wiand**

Burton W. Wiand, Receiver

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on October 30, 2020, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system.

**s/ Jared J. Perez**

Jared J. Perez, FBN 0085192

jperez@wiandlaw.com

Lawrence J. Dougherty, FBN 0068637

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# EXHIBIT A

## Standardized Accounting Report Form

Standardized Accounting Report for Oasis Management LLC Receivership  
 Civil Court Docket No. 8:19-cv-00886-VMC-SPF  
 Reporting Period 07/01/2020 to 09/30/2020

|         |   | Details       | Subtotal      | Grand Total      | Notes  |
|---------|---|---------------|---------------|------------------|--|
| Line 1  | <b>Beginning Balance (As of 07/01/2020)</b>       |               |               | \$ 11,411,920.12 |  |
|         | <b>Increases in Fund Balance</b>                  |               |               |                  |  |
| Line 2  | Business Income                                   | \$ 4,588.00   |               |                  | Rental/Mortgage Income                             |
| Line 3  | Cash and Securities                               | 0.00          |               |                  | Cash from Frozen Accts.                            |
| Line 4  | Interest/Dividend Income                          | \$ 11,803.31  |               |                  | Interest Income                                    |
| Line 5  | Asset Liquidation                                 | \$ 164,252.89 |               |                  | Sale of Real Estate/Misc                           |
| Line 6  | Third-Party Litigation Income                     | 134,812.66    |               |                  | Clawback settlements                               |
| Line 7  | Other Miscellaneous                               |               |               |                  |  |
|         | <b>Total Funds Available - Totals Line 1 - 7</b>  |               | \$ 315,456.86 | \$ 11,727,376.98 |  |
|         | <b>Decreases in Fund Balance</b>                  |               |               |                  |  |
| Line 9  | Disbursements to Investors                        |               |               |                  |  |
| Line 10 | Disbursements for Receivership Operations         |               |               |                  |  |
| 10a     | Disbursements to Receiver/Other Professionals     |               |               |                  |  |
| 10b     | Third-Party Litigation Expenses                   |               |               |                  |  |
| 10c     | Asset Expenses                                    | \$ 26,236.17  |               |                  | Condo fees, Insurance, Repairs, Maint, & Utilities |
| 10d     | Tax Payments                                      |               |               |                  | County Sales & Property Tax                        |
|         | <b>Total Disbursements for Receivership Ops.</b>  |               | \$ 26,236.17  |                  |  |
| Line 11 | Disbursements Related to Distribution Expenses    |               |               |                  |  |
| Line 12 | Disbursement to Court/Other                       |               |               |                  |  |
| Line 13 | Other   |               |               |                  |  |
|         | <b>Total Funds Disbursed - Total Lines 9 - 13</b> |               | \$ 26,236.17  | \$ 26,236.17     |  |
| Line 14 | <b>Ending Balance (as of 09/30/2020)</b>          |               |               | \$ 11,701,140.81 |  |

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## Standardized Accounting Report Form

Standardized Accounting Report for Oasis Management LLC Receivership  
 Civil Court Docket No. 8:19-cv-00886-VMC-SPF  
 From Inception to 09/30/2020

|  | Details         | Subtotal         | Grand Total      | Notes                       |
|--|-----------------|------------------|------------------|-----------------------------|
| Line 1 <b>Beginning Balance</b>                        |                 |                  | -                |                             |
| <b>Increases in Fund Balance</b>                       |                 |                  |                  |                             |
| Line 2 Business Income                                 | \$ 41,306.13    |                  |                  | Rental/Mortgage Income      |
| Line 3 Cash and Securities                             | \$ 8,661,433.46 |                  |                  | Cash from Frozen Accts.     |
| Line 4 Interest/Dividend Income                        | \$ 141,734.78   |                  |                  | Interest Income             |
| Line 5 Asset Liquidation                               | \$ 3,745,278.24 |                  |                  | Sale of Real Estate/Misc    |
| Line 6 Third-Party Litigation Income                   | 438,319.67      |                  |                  | Clawback settlements        |
| Line 7 Other Miscellaneous                             | \$ 820.00       |                  |                  | Cash from J. Anile House,   |
| <b>Total Funds Available - Totals Line 1 - 7</b>       |                 | \$ 13,028,892.28 | \$ 13,028,892.28 |                             |
| <b>Decreases in Fund Balance</b>                       |                 |                  |                  |                             |
| Line 9 Disbursements to Investors                      |                 |                  |                  |                             |
| Line 10 Disbursements for Receivership Operations      |                 |                  |                  |                             |
| 10a Disbursements to Receiver/Other Professionals      | \$ 950,888.77   |                  |                  |                             |
| 10b Third-Party Litigation Expenses                    |                 |                  |                  |                             |
| 10c Asset Expenses                                     | \$ 285,828.10   |                  |                  | Condo fees, Insurance,      |
| 10d Tax Payments                                       | \$ 90,034.60    |                  |                  | Repairs, Maint, & Utilities |
| <b>Total Disbursements for Receivership Ops.</b>       |                 | \$ 1,326,751.47  |                  | County Sales & Property Tax |
| Line 11 Disbursements Related to Distribution Expenses |                 |                  |                  |                             |
| Line 12 Disbursement to Court/Other                    | 1,000.00        |                  |                  | Belize Reg. Fee             |
| Line 13 Other  | -               |                  |                  |                             |
| <b>Total Funds Disbursed - Total Lines 9 - 13</b>      |                 | \$ 1,327,751.47  | \$ 1,327,751.47  |                             |
| <b>Line 14 Ending Balance (as of 09/30/2020)</b>       |                 |                  | \$ 11,701,140.81 |                             |

|            |   |   |
|------------|---|---|
| Line<br>15 | Number of Claims  | 784   |
| 15a        | No. of Claims Received This Reporting Period              | 2   |
| 15b        | No. of Claims Received Since Inception of Estate          | 784   |
| Line<br>16 | Number of Claimants/Investors                             | TBD (pending analysis for duplicative claims, etc.) |
| 16a        | No. of Claimants/Investors Paid This Reporting period     | 0   |
| 16b        | No. of Claimants/Investors Paid Since Inception of Estate | 0   |

Receiver:

By:  Burton W. Wiand, Receiver  
Signature Printed Name

Date: 10/30/2020

# EXHIBIT B

| Account Name by Party or Affiliate  | Account | Authorized Signer(s)                     | Bank  | Account Type                    | Status         | Still Frozen | Liquidated  |
|-------------------------------------|---------|--|---|---------------------------------|----------------|--------------|-------------|
| 13318 Lost Key Place, LLC           | *2850   | Michael Dacorta                          | Wells Fargo   | Simple Business Checking        | Liquidated     | \$0.00       | \$490.97    |
| 4064 Founders Club Drive, LLC       | *3975   | Joseph S. Anile II;<br>MaryAnne E. Anile | Wells Fargo   | Business Choice Checking        | Liquidated     | \$0.00       | \$10,383.26 |
| 4064 Founders Club Drive, LLC       | *1807   | Joseph S. Anile II;<br>MaryAnne E. Anile | Wells Fargo   | Business Platinum Savings       | Closed         | \$0.00       | \$0.00      |
| 444 Gulf of Mexico Drive, LLC       | *3967   | Michael Dacorta;<br>Joseph S. Anile II   | Wells Fargo   | Simple Business Checking        | Liquidated     | \$0.00       | \$15,600.10 |
| 4Oaks, LLC                          | *2572   | Joseph S. Anile II;<br>MaryAnne E. Anile | Wells Fargo   | Business Choice Checking        | Liquidated     | \$0.00       | \$30,910.45 |
| 6922 Lacantera Circle, LLC          | *2805   | Michael Dacorta                          | Wells Fargo   | Simple Business Checking        | Liquidated     | \$0.00       | \$37,929.49 |
| Bowling Green Capital Management    | *7485   | Joseph S. Anile II;<br>MaryAnne E. Anile | Capital One   | Small Business Rewards Checking | Liquidated     | \$0.00       | \$6,173.59  |
| Francisco Duran                     | *9152   | Francisco Duran                          | JPMorgan Chase                                      | Total Checking                  | Liquidated     | \$0.00       | \$309.24    |
| Francisco Duran                     | *0568   | Francisco Duran;<br>Lauren K Duran       | JPMorgan Chase                                      | Checking                        | Liquidated     | \$0.00       | \$1,097.04  |
| Francisco Duran                     | *1192   | Francisco Duran                          | JPMorgan Chase                                      | Total Checking                  | Liquidated     | \$0.00       | \$4,174.69  |
| Francisco Duran                     | *8083   | Francisco Duran                          | M&I/BMO Harris                                      | Checking                        | Closed         | \$0.00       | \$0.00      |
| Francisco Duran                     | *9788   | Francisco Duran                          | M&I/BMO Harris                                      | Checking                        | Closed         | \$0.00       | \$0.00      |
| Francisco Duran or Rebecca C. Duran | *2550   | Francisco Duran;<br>Rebecca C. Duran     | SunTrust  | Checking                        | Closed         | \$0.00       | \$0.00      |
| John J. Haas                        | *0245   | John J. Haas                             | TD Bank   | Checking                        | Liquidated     | \$0.00       | \$31,065.79 |
| John J. Haas                        | *7502   | John J. Haas                             | Jovia (f/k/a Nassau Educators Federal Credit Union) | Go Green Checking               | Income Account | TBD          | N/A         |
| John J. Haas                        | *5029   | John J. Haas                             | Jovia (f/k/a Nassau Educators Federal Credit Union) | Go Green Checking               | TBD            | \$4,297.80   | TBD         |
| John J. Haas                        | TBD     | John J. Haas                             | Equity Trust  | IRA                             | TBD            | \$174.66     | \$0.00      |
| John J. Haas;<br>Lillian Haas       | *2105   | John J. Haas                             | TD Bank   | Checking                        | Liquidated     | \$0.00       | \$4,362.80  |



| Account Name by Party or Affiliate  | Account | Authorized Signer(s)                    | Bank                                 | Account Type                 | Status                | Still Frozen   | Liquidated     |
|-------------------------------------|---------|---|--------------------------------------|------------------------------|-----------------------|----------------|----------------|
| John J. Haas;<br>Lillian Haas       | *9201   | John J. Haas                            | TD Bank                              | Savings                      | Liquidated            | \$0.00         | \$1,001.23     |
| John J. Haas, Inc.                  | *2488   | John J. Haas                            | TD Bank                              | TD Business Convenience Plus | Liquidated            | \$0.00         | \$517.83       |
| John J. Haas                        | TBD     | John J. Haas                            | Knights of Columbus Insurance        | Cash Surrender Value         | Frozen                | \$33,068.63    | \$0.00         |
| John J. Haas                        | TBD     | John J. Haas                            | Knights of Columbus Insurance        | Cash Surrender Value         | Frozen                | \$7,260.33     | \$0.00         |
| Joseph S. Anile II                  | *7857   | Joseph S. Anile II                      | Regions                              | Savings                      | Disputed              | \$5,000.75     | \$0.00         |
| Joseph S. Anile II                  | *8241   | Joseph S. Anile II                      | Regions                              | Lifegreen Checking           | Liquidated            | \$0.00         | \$3,123.20     |
| Lagoon Investments, Inc.            | *1522   | Michael Dacorta;<br>Joseph S. Anile II. | Regions                              | Business Checking            | Liquidated            | \$0.00         | \$17,889.07    |
| Mainstream Fund Services, Inc.      | *1174   | Denise DePaola;<br>Michael Nolan        | Citibank                             | Savings                      | Unfrozen by Agreement | \$0.00         | \$0.00         |
| Mainstream Fund Services, Inc.      | *5606   | Denise DePaola;<br>Michael Nolan        | Citibank                             | Checking                     | Unfrozen by Agreement | \$0.00         | \$0.00         |
| Mainstream Fund Services, Inc.      | *0764   | Denise DePaola;<br>Michael Nolan        | Citibank                             | Checking                     | Liquidated            | \$0.00         | \$6,012,397.78 |
| Michael DaCorta                     | *1424   | Michael Dacorta                         | Wells Fargo                          | Everyday Checking            | Liquidated            | \$0.00         | \$751.54       |
| Michael DaCorta                     | *0387   | Michael Dacorta                         | AXA                                  | Annuity Policy               | Terminated<br>7/15/16 | \$0.00         | \$0.00         |
| Michael DaCorta                     | TBD     | Michael Dacorta                         | PNC                                  | TBD                          | TBD                   | \$0.00         | \$0.00         |
| Michael DaCorta;<br>Carolyn DaCorta | *0386   | Michael Dacorta                         | People's United                      | TBD                          | TBD                   | \$0.00         | \$0.00         |
| Oasis Management, LLC               | *9302   | Michael Dacorta                         | Wells Fargo                          | Business Package Checking    | Liquidated            | \$0.00         | \$2,149,654.18 |
| Oasis Management, LLC               | *3887   | Michael Dacorta                         | Wells Fargo                          | Market Rate Savings          | Liquidated            | \$0.00         | \$605.33       |
| Oasis Capital Management S.A.       | *6058   | TBD                                     | British Caribbean Bank International | TBD                          | Closed                | \$0.00         | \$0.00         |
| Oasis Capital Management S.A.       | *1200   | TBD                                     | Belize Bank International, Ltd.      | TBD                          | Closed                | \$0.00         | \$0.00         |
| Oasis Global (Nevis) Ltd.           | *9631   | TBD                                     | Bank of America                      | Busines Checking             | Closed                | \$0.00         | \$0.00         |
| Oasis Global FX Limited             | *4622   | Joseph S. Anile II                      | Choice Bank (Belize)                 | TBD/Liquidator Appointed     | See Report            | \$63,000.00    | \$0.00         |
| Oasis Global FX, S.A.               | *0055   | Joseph S. Anile II                      | Barclays Bank/ATC                    | Closed "Trading" Account     | Frozen in UK          | \$2,005,368.28 | \$0.00         |
| Oasis Global FX, S.A.               | *5663   | Joseph S. Anile II                      | Choice Bank (Belize)                 | TBD                          | Closed                | \$0.00         | \$0.00         |

| Account Name by Party or Affiliate       | Account | Authorized Signer(s)                     | Bank   | Account Type  | Status             | Still Frozen | Liquidated   |
|--|---------|--|--|---|--------------------|--------------|--------------|
| Oasis Global FX, S.A.                    | *6059   | Joseph S. Anile II                       | Heritage Bank                                | Deposit for Broker Activity                               | See Report         | \$500,000    | \$0.00       |
| Raymond P. Montie                        | *1510   | Raymond P. Montie                        | AXA  | 401k Plan   | TBD                | \$140,238.23 | \$0.00       |
| Raymond P. Montie                        | *8414   | Raymond P. Montie                        | Federal Savings Bank;<br>First SeaCoast Bank | Checking  | New Income Account | \$36,162.81  | N/A          |
| Raymond P. Montie                        | *1574   | Raymond P. Montie                        | Fidelity Investments                         | IRA Account   | TBD                | \$5,239.75   | \$0.00       |
| Raymond P. Montie                        | *4500   | Raymond P. Montie                        | Fidelity Investments                         | Investment Account  | Underwater         | -\$24.82     | \$0.00       |
| Raymond P. Montie                        | *2805   | Raymond P. Montie                        | TD Bank                                      | Premier Checking  | Liquidated         | \$0.00       | \$138,508.73 |
| Raymond P. Montie                        | *3802   | Raymond P. Montie                        | TD Bank                                      | Savings   | Frozen             | \$0.00       | \$0.00       |
| Raymond P. Montie                        | *2148   | Raymond P. Montie                        | TD Bank                                      | TD Beyond Checking; Old Income Account; Closed by TD Bank | Closed             | \$0.00       | N/A          |
| Raymond P. Montie;<br>Danielle TerraNova | *3934   | Raymond P. Montie                        | TD Bank                                      | Relationship Checking                                     | Closed             | \$0.00       | \$0.00       |
| RPM 7 LLC                                | *6068   | Raymond P. Montie                        | TD Bank                                      | Business Convenience Plus                                 | Liquidated         | \$0.00       | \$2,395.63   |
| RPM 7 LLC                                | *1952   | Raymond P. Montie                        | TD Bank                                      | Business Convenience Plus                                 | Liquidated         | \$0.00       | \$7,834.46   |
| RPM 7 LLC                                | *6076   | Raymond P. Montie                        | TD Bank                                      | TBD   | Closed             | \$0.00       | \$0.00       |
| RPM 7 LLC                                | *6430   | Raymond P. Montie                        | TD Bank                                      | TBD   | Closed             | \$0.00       | \$0.00       |
| RPM 7 LLC                                | *6638   | Raymond P. Montie                        | TD Bank                                      | TBD   | Closed             | \$0.00       | \$0.00       |
| Diamond BOA LLC                          | *0306   | Raymond P. Montie                        | TD Bank                                      | Business Convenience Plus                                 | Liquidated         | \$0.00       | \$8,130.54   |
| Goose Pond Consulting                    | *9658   | Raymond P. Montie;<br>Danielle TerraNova | NBT Bank                                     | Free Business Checking                                    | TBD                | \$766.76     | \$0.00       |
| Roar of the Lion Fitness, LLC            | *1396   | Michael Dacorta;<br>Andrew Dacorta       | Wells Fargo                                  | Business Choice Checking                                  | Liquidated         | \$0.00       | \$17,704.97  |
| Satellite Holdings Company               | *8808   | John Haas                                | Wells Fargo                                  | Market Rate Savings                                       | Liquidated         | \$0.00       | \$500.42     |
| Satellite Holdings Company               | *5347   | John Haas                                | Wells Fargo                                  | General Operating Checking                                | Liquidated         | \$0.00       | \$127,921.13 |

# EXHIBIT C

| Property  | Units | Estimated Value<br>or Purchase Price | Lien        | Status or Disposition                            | Actual Value<br>or Sale Price |
|---|-------|--------------------------------------|-------------|--|-------------------------------|
| <b>Defendant Anile/4064 Founders Club Drive</b>                     |       |                                      |             |  |                               |
| 2015 Mercedes Benz SLK 350  | 1     | \$28,050.00                          | \$0.00      | Forfeited; Sold; Returned; Resold                | \$23,000.00                   |
| 2016 Mercedes Benz GLE 400  | 1     | \$37,000.00                          | \$0.00      | Forfeited; Sold                                  | \$31,027.50                   |
| 100 Ounce Silver Bars   | 100   | \$150,900.00                         | \$0.00      | Forfeited; Sold; Listed Price is for all Metals  | \$657,382.25                  |
| One Ounce Gold Coins  | 200   | \$255,320.00                         | \$0.00      | Forfeited; Sold; Listed Price is for all Metals  | \$657,382.25                  |
| U.S. Currency   | N/A   | \$62,750.00                          | \$0.00      | Forfeited; In USMS/FBI Custody                   | \$62,750.00                   |
| Quietsource 48KW Generator  | 1     | \$28,017.00                          | \$0.00      | Sold by Receiver                                 | \$12,500.00                   |
| Pool Table  | 1     | TBD                                  | \$0.00      | Receiver Seeking Return from Anile               | TBD                           |
| Piano   | 1     | \$1,000.00                           | \$0.00      | Sold by Receiver                                 | \$1,000.00                    |
| Jewelry   | Misc. | \$60,749.00                          | \$0.00      | Receiver Seeking Return from Anile               | TBD                           |
| Bedroom Set   | 1     | \$1,000.00                           | \$0.00      | Sold by Receiver                                 | \$1,000.00                    |
| Grandfather Clock   | 1     | TBD                                  | \$0.00      | Receiver Seeking Return from Anile               | TBD                           |
| Misc. Household Items and Furniture                                 | 59    | \$6,000.00                           | \$0.00      | Auctioned (Gross Sale Price)                     | \$17,875.00                   |
| <b>Defendant DaCorta/13318 Lost Key Place/6922 Lacantera Circle</b> |       |                                      |             |  |                               |
| 2017 Maserati Ghibli S Q4   | 1     | \$60,800.00                          | \$43,528.88 | Forfeited; Abandoned After Further Investigation | \$0.00                        |
| 2018 Land Rover Range Rover Velar                                   | 1     | \$57,825.00                          | \$0.00      | Forfeited; Sold                                  | \$48,462.00                   |
| 2015 Land Rover Range Rover Evoque                                  | 1     | \$25,100.00                          | \$26,129.29 | Abandoned Due to Lack of Value Given Lien        | \$0.00                        |
| 100 Ounce Silver Bars   | 64    | \$96,576.00                          | \$0.00      | Forfeited; Sold; Listed Price is for all Metals  | \$657,382.25                  |
| \$1.00 Silver One Ounce Coins                                       | 1,500 | \$22,635.00                          | \$0.00      | Forfeited; Sold; Listed Price is for all Metals  | \$657,382.25                  |
| Credit Suisse One Ounce Gold Ingots                                 | 3     | \$3,829.80                           | \$0.00      | Forfeited; Sold; Listed Price is for all Metals  | \$657,382.25                  |
| APMEX.com One Ounce Silver Coins                                    | 5     | \$75.45                              | \$0.00      | Forfeited; Sold; Listed Price is for all Metals  | \$657,382.25                  |
| Lady Liberty \$50 Gold One Ounce Coins                              | 7     | \$8,629.80                           | \$0.00      | Forfeited; Sold; Listed Price is for all Metals  | \$657,382.25                  |
| Lady Liberty \$50 Gold One Ounce Coins                              | 40    | \$48,000.00                          | \$0.00      | Forfeited; Sold; Listed Price is for all Metals  | \$657,382.25                  |
| Lady Liberty \$1.00 Silver One Ounce Coins                          | 120   | \$2,400.00                           | \$0.00      | Forfeited; Sold; Listed Price is for all Metals  | \$657,382.25                  |
| "Bitcoin" One Ounce Gold-Plated Coin                                | 1     | \$1.00                               | \$0.00      | Forfeited; Sold; Listed Price is for all Metals  | \$657,382.25                  |
| U.S. Currency   | N/A   | \$160,000.00                         | \$0.00      | Forfeited; In USMS/FBI Custody                   | \$160,000.00                  |
| Handgun   | 1     | \$517.00                             | \$0.00      | Receiver Seeking Return from DaCorta             | TBD                           |
| Coffee Table  | 1     | \$200.00                             | \$0.00      | Sold by Receiver                                 | \$200.00                      |
| Televisions   | 2     | \$200.00                             | \$0.00      | Sold by Receiver                                 | \$200.00                      |
| Safe  | 1     | \$200.00                             | \$0.00      | Sold by Receiver                                 | \$200.00                      |
| Outdoor Speakers  | 2     | \$150.00                             | \$0.00      | Sold by Receiver                                 | \$150.00                      |
| Pool Table Chairs   | 2     | \$300.00                             | \$0.00      | Sold by Receiver                                 | \$300.00                      |

|                                     |    |             |                                      |            |
|-------------------------------------|----|-------------|--------------------------------------|------------|
| Sauna                               | 1  | TBD         | \$0.00 For Sale by Receiver          | TBD        |
| Quietsource 48KW Generator          | 1  | \$24,969.81 | \$0.00 Not Delivered; Refund Pending | TBD        |
| Misc. Household Items and Furniture | 50 | \$2,000.00  | \$0.00 Auctioned (Gross Sale Price)  | \$1,465.00 |

#### Defendant Duran/7312 Desert Ridge Glen

|  |    |              |   |              |
|--|----|--------------|---|--------------|
| 2018 Porsche 911 C4 Targa              | 1  | \$113,375.00 | \$90,898.75 Forfeited; Sold                           | \$104,902.50 |
| 2018 Mercedes Benz Convertible SL 450R | 1  | \$65,825.00  | \$83,611.29 Abandoned Due to Lack of Value Given Lien | \$0.00       |
| 2019 Land Rover Range Rover Sport      | 1  | \$0.00       | \$0.00 Leased; Not Seized Due to Lack of Value        | \$0.00       |
| Swiss Watch                            | 1  | \$10,900.00  | \$0.00 Receiver Seeking Return from Duran             | TBD          |
| Golf Cart                              | 1  | \$5,500.00   | \$0.00 Sold by Receiver                               | \$4,750.00   |
| Televisions                            | 2  | \$200.00     | \$0.00 Sold by Receiver                               | \$200.00     |
| Misc. Household Items and Furniture    | 28 | \$1,000.00   | \$0.00 Auctioned (Gross Sale Price)                   | \$2,160.00   |

#### Defendant Montie

|                                  |        |             |   |     |
|----------------------------------|--------|-------------|---|-----|
| 1996 Mercedes Benz 450SL         | 1      | \$2,167.00  | \$0.00 Disclosed in 8/30/19 Financial Affidavit                                     | TBD |
| 2016 Toyota 4Runner              | 1      | \$22,885.00 | \$12,180.85 Disclosed in 8/30/19 Financial Affidavit                                | TBD |
| 2009 South Bay Pontoon Boat      | 1      | \$11,590.00 | \$0.00 Disclosed in 8/30/19 Financial Affidavit                                     | TBD |
| Furniture Located in PA House    | Misc.  | TBD         | \$0.00 Disclosed in 8/30/19 Financial Affidavit                                     | TBD |
| Furniture Located in NH House    | Misc.  | TBD         | \$0.00 Disclosed in 8/30/19 Financial Affidavit                                     | TBD |
| Furniture Located in NY House    | Misc.  | TBD         | \$0.00 Disclosed in 8/30/19 Financial Affidavit                                     | TBD |
| Standard Oil Company, Inc. Stock | 60,606 | TBD         | \$0.00 Disclosed in 8/30/19 Financial Affidavit;<br>Purchased for \$100,000 in 2015 | TBD |
| Ounces of Silver                 | 990    | \$17,087.00 | \$0.00 Disclosed in 8/30/19 Financial Affidavit                                     | TBD |
| Firearms                         | 19     | \$8,290.00  | \$0.00 Disclosed in 8/30/19 Financial Affidavit                                     | TBD |

#### Defendant Haas

|                                     |       |             |   |     |
|-------------------------------------|-------|-------------|---|-----|
| 2012 Mercedes Benz GLK 350 (black)  | 1     | \$3,500.00  | \$0.00 Disclosed in 6/24/19 Financial Affidavit | TBD |
| 2012 Mercedes Benz GLK 350 (silver) | 1     | \$10,068.00 | \$0.00 Disclosed in 6/24/19 Financial Affidavit | TBD |
| 1966 Ford LTD (gold)                | 1     | \$2,500.00  | \$0.00 Disclosed in 6/24/19 Financial Affidavit | TBD |
| 1966 Ford LTD (green)               | 1     | \$500.00    | \$0.00 Disclosed in 6/24/19 Financial Affidavit | TBD |
| 1959 GMC 100 Truck                  | 1     | \$6,000.00  | \$0.00 Disclosed in 6/24/19 Financial Affidavit | TBD |
| 2014 Ford Escape                    | 1     | \$12,000.00 | \$0.00 Disclosed in 6/24/19 Financial Affidavit | TBD |
| 2013 Horton Trailer                 | 1     | \$1,000.00  | \$0.00 Disclosed in 6/24/19 Financial Affidavit | TBD |
| Household Furniture                 | Misc. | TBD         | \$0.00 Disclosed in 6/24/19 Financial Affidavit | TBD |
| Auto Parts                          | Misc. | \$1,000.00  | \$0.00 Disclosed in 6/24/19 Financial Affidavit | TBD |

**Relief Defendant 4Oaks, LLC (Anile)**

|                           |   |              |                        |              |
|---------------------------|---|--------------|------------------------|--------------|
| 2015 Ferrari California T | 1 | \$174,300.00 | \$0.00 Forfeited; Sold | \$100,470.00 |
|---------------------------|---|--------------|------------------------|--------------|

**Relief Defendant Roar of the Lion Fitness, LLC**

|                                  |        |     |                             |     |
|----------------------------------|--------|-----|-----------------------------|-----|
| Nutritional Supplement Capsules  | 11,247 | TBD | \$0.00 For Sale By Receiver | TBD |
| Promotional Yoga Mats and Hats   | 357    | TBD | \$0.00 For Sale By Receiver | TBD |
| Nutritional Protein Powder       | 1805   | TBD | \$0.00 For Sale By Receiver | TBD |
| Nutritional "Pre-Workout" Powder | 876    | TBD | \$0.00 For Sale By Receiver | TBD |
| Nutritional Creatine Powder      | 861    | TBD | \$0.00 For Sale By Receiver | TBD |

# **EXHIBIT 3**

**Wiand Guerra King P.A.**

5505 West Gray Street

Tampa, FL 33609

Telephone: 813-347-5100

Facsimile: 813-347-5198

Federal Tax ID # 27-0937962

Burton W. Wiand

**Attention: Burton W. Wiand**

Wiand Guerra King, P.A.

5505 W. Gray Street

Tampa, FL 33609

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RE: CFTC Oasis Receivership - Receiver

Travel is half rate outside of 20 miles.

For Professional Services Rendered Through September 30, 2020

**SERVICES**

| Date      | TKPR              | Description of Services   | Hours | Amount   |
|-----------|-------------------|---|-------|----------|
| ASDIS     | Asset Disposition |   |       |          |
| 7/1/2020  | BWW               | Communicate with J. Rizzo regarding offers to purchase Lost Key property (.1); communicate with J. Rizzo regarding listing agreement addendum (.1); communicate with J. Rizzo, J. Perez and R. Jernigan regarding status of 4058 Founders Club property (.1). | 0.3   | \$108.00 |
| 7/2/2020  | BWW               | Communicate with J. Rizzo and R. Jernigan regarding receipt of escrow deposit from buyer for Vardon Terrace Unit #106 (.1); communicate with listing agent and J. Rizzo regarding terms of purchase and sale agreement for Lost Key property (.1).            | 0.2   | \$72.00  |
| 7/3/2020  | BWW               | Negotiate sale of Lost Key property (1.0); various emails with L. Sullivan, R. Jernigan, and J. Rizzo (1.4).  | 2.4   | \$864.00 |
| 7/9/2020  | BWW               | Communicate with J. Rizzo and R. Jernigan regarding contract addendum and inspection contingency release for Vardon Terrace Unit #106 (.1).   | 0.1   | \$36.00  |
| 7/10/2020 | BWW               | Communicate with J. Rizzo, R. Jernigan, J. Perez and listing agent regarding title commitment for Vardon Terrace Unit #106 (.1).  | 0.1   | \$36.00  |



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**SERVICES**

| <b>Date</b>  | <b>TKPR</b>              | <b>Description of Services</b>  | <b>Hours</b> | <b>Amount</b> |
|--------------|--------------------------|---|--------------|---------------|
| <b>ASDIS</b> | <b>Asset Disposition</b> |   |              |               |
| 7/15/2020    | BWW                      | Communicate with J. Rizzo and R. Jernigan regarding exterminator's invoice and inspection results for Lost Key property (.1); meeting with R. Jernigan regarding offers on properties and discussed issues regarding inspections (1.1).   | 1.2          | \$432.00      |
| 7/16/2020    | BWW                      | Attention to offers on Founders Club lot (.4).  | 0.4          | \$144.00      |
| 7/17/2020    | BWW                      | Communications with L. Sullivan on property sales and evaluation of offers (.5); review vacant land purchase proposal (.2); review Lost Key property inspection report (.2); continue negotiation of sale of Founders Club vacant lot and emails with L. Sullivan (.3); communication with J. Rizzo and R. Jernigan regarding suggested counter-offer for 4058 Founders Club property (.1). | 1.3          | \$468.00      |
| 7/20/2020    | BWW                      | Communicate with J. Rizzo and R. Jernigan regarding potential buyer's counter-offer to purchase Founders Club lot (.1); review and respond to new offer on Founders Club property (.2).   | 0.3          | \$108.00      |
| 7/21/2020    | BWW                      | Communicate with J. Rizzo and J. Perez regarding motion to approve sale of Lost Key property (.1); review emails from L. Sullivan regarding sale of Vardon Terrace Unit #106 (.2).  | 0.3          | \$108.00      |
| 7/22/2020    | BWW                      | Communicate with J. Rizzo regarding sold Mercedes and approval of sale (.2); attention to closing of Vardon Terrace Unit #106 (.2).   | 0.4          | \$144.00      |
| 7/23/2020    | BWW                      | Continue negotiation on Founders Club contract (.3).  | 0.3          | \$108.00      |
| 7/27/2020    | BWW                      | Review email from attorney C. Johnson regarding Founders Club (.2).   | 0.2          | \$72.00       |
| 7/28/2020    | BWW                      | Continue negotiation on Founders Club lot and communications with L. Sullivan regarding same (.2).  | 0.2          | \$72.00       |
| 7/29/2020    | BWW                      | Communication with J. Rizzo, R. Jernigan and legal team regarding Orlando Auto Auction (.1); review appraisals for motion to approve sale of Lost Key property (.2).  | 0.3          | \$108.00      |
| 7/30/2020    | BWW                      | Communication with J. Rizzo, listing agent, and J. Perez regarding status of filing motion to approve sale of Lost Key property (.1).   | 0.1          | \$36.00       |
| 8/1/2020     | BWW                      | Negotiations regarding sale of 4058 Founders Club lot (.8).   | 0.8          | \$288.00      |
| 8/2/2020     | BWW                      | Communications with R. Jernigan regarding clearing of furniture and assets from Lost Key property (.4).   | 0.4          | \$144.00      |
| 8/3/2020     | BWW                      | Review and sign affidavit relating to survey on Lost Key property (.2).   | 0.2          | \$72.00       |

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**SERVICES**

| <b>Date</b>  | <b>TKPR</b>              | <b>Description of Services</b>  | <b>Hours</b> | <b>Amount</b> |
|--------------|--------------------------|---|--------------|---------------|
| <b>ASDIS</b> | <b>Asset Disposition</b> |   |              |               |
| 8/4/2020     | BWW                      | Communicate with J. Rizzo regarding execution of loan rider related to Lost Key property (.1); communicate with J. Rizzo, Orlando Auto Auction, and DOJ regarding release of lien for vehicle (.2); review and execute addendum to Lost Key contract (.2).  | 0.5          | \$180.00      |
| 8/7/2020     | BWW                      | Communicate with J. Rizzo, DOJ, and Orlando Auto Auction regarding status of vehicle lien and next steps (.2).  | 0.2          | \$72.00       |
| 8/10/2020    | BWW                      | Review Court's order approving sale of Vardon Terrace Unit #106 (.1).   | 0.1          | \$36.00       |
| 8/11/2020    | BWW                      | Communicate with J. Rizzo, DOJ, and Orlando Auto Auction regarding return of vehicle and storage, return of sale proceeds and amount of lien (.2).  | 0.2          | \$72.00       |
| 8/12/2020    | BWW                      | Communicate with J. Rizzo regarding return of vehicle sale proceeds and re-auctioning vehicle (.1).   | 0.1          | \$36.00       |
| 8/17/2020    | BWW                      | Communicate with J. Rizzo regarding return of vehicle sale proceeds and re-auctioning vehicle and DMV form to reissue title (.1); communicate with J. Rizzo and DOJ regarding pay off of Porsche Financial lien on vehicle (.1).  | 0.2          | \$72.00       |
| 8/19/2020    | BWW                      | Communicate with J. Rizzo regarding status of Vardon Terrace Unit #106 closing (.1).  | 0.1          | \$36.00       |
| 8/21/2020    | BWW                      | Communicate with J. Rizzo regarding orders approving sales and next steps (.1); communicate with S. Nebesky regarding remission of asset sale proceeds (.2); exchange correspondence with J. Perez and closing agent regarding orders approving property sales (.2); prepare email to J. Rizzo, B. Price, R. Jernigan and J. Perez regarding necessity for updated accounting on expenses of sold properties and letter to U.S. Marshals service on unsold properties (.2); communications with J. Rizzo and J. Perez and review of excel spreadsheet (.3). | 1.0          | \$360.00      |
| 8/24/2020    | BWW                      | Communicate with J. Rizzo, listing agent, closing agent, and legal team regarding obtaining certified copies of orders approving sale of Lost Key property and Vardon Terrace Unit #106 (.1); conference call with J. Rizzo, J. Perez, and PDR regarding sold assets and transferring funds to U.S. Marshals Service (.5); work on arrangements for appraisal of Founders Club property (1.0).  | 1.6          | \$576.00      |
| 8/25/2020    | BWW                      | Communicate with J. Rizzo regarding status of retitling Mercedes and related correspondence from U.S. Marshals Service (.1).  | 0.1          | \$36.00       |
| 8/27/2020    | BWW                      | Communicate with J. Rizzo, closing agent, listing agent, and J. Perez regarding status of Lost Key property closing, buyer's loan denial and next steps (.2).   | 0.2          | \$72.00       |

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**SERVICES**

| <b>Date</b>  | <b>TKPR</b>              | <b>Description of Services</b>  | <b>Hours</b> | <b>Amount</b> |
|--------------|--------------------------|---|--------------|---------------|
| <b>ASDIS</b> | <b>Asset Disposition</b> |   |              |               |
| 8/28/2020    | BWW                      | Communicate with J. Rizzo regarding purchase agreement terms, return of escrow and contract cancellation for Lost Key property (.1).  | 0.1          | \$36.00       |
| 8/31/2020    | BWW                      | Communicate with J. Rizzo regarding Lost Key property (.1); work on arranging appraisal for Founders Club property (.2).  | 0.3          | \$108.00      |
| 9/1/2020     | BWW                      | Communicate with J. Rizzo regarding status of cancellation of Lost Key sale agreement and return of escrow (.1).  | 0.1          | \$36.00       |
| 9/2/2020     | BWW                      | Evaluate pricing on all remaining properties for sale and communications with L. Sullivan regarding same (1.0); review and sign Vardon Terrace closing documents (.8); communications with J. Rizzo regarding same (.2); communicate with J. Rizzo, DOJ and U.S. Marshals Service regarding status of Mercedes Benz title (.1).   | 2.1          | \$756.00      |
| 9/3/2020     | BWW                      | Review and sign amendment to listing agreements for Desert Ridge and Founders Club properties reducing asking prices (.2); work on closing documents for Vardon Terrace Unit #106 (1.0); work with L. Sullivan on changing listing prices (.3); telephone conference with M. Bernet regarding 4064 Founders Club property (.3).   | 1.8          | \$648.00      |
| 9/4/2020     | BWW                      | Communicate with J. Rizzo and Orlando Auto Auction regarding status of Mercedes Benz title (.1); communicate with J. Rizzo and PDR regarding asset sale information and updated remission spreadsheet (.1).   | 0.2          | \$72.00       |
| 9/9/2020     | BWW                      | Communicate with C. Johnson, J. Perez, and M. McKinley regarding sale price for Founders Club property (.2); communicate with J. Rizzo regarding agreement to release escrow funds for Lost Key property (.1); communicate with J. Rizzo and J. Perez regarding filing motion to vacate order authorizing sale of Lost Key (.1); communicate with J. Rizzo and closing agent regarding property tax proration related to Vardon Terrace Unit #106 (.3); communicate with J. Rizzo and DOJ regarding remission of proceeds of asset sale funds (.2). | 0.9          | \$324.00      |
| 9/10/2020    | BWW                      | Communicate with J. Rizzo regarding tax proration related to Vardon Terrace Unit #106 (.2); conference call with J. Rizzo and DOJ regarding remission of proceeds of asset sale funds (.2).   | 0.4          | \$144.00      |
| 9/16/2020    | BWW                      | Communicate with closing agent and J. Rizzo regarding Vardon Terrace Unit #106 and tax proration issue (.2).  | 0.2          | \$72.00       |

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**SERVICES**

| Date                            | TKPR              | Description of Services  | Hours        | Amount            |
|---------------------------------|-------------------|--|--------------|-------------------|
| ASDIS                           | Asset Disposition |  |              |                   |
| 9/21/2020                       | BWW               | Communicate with closing agent and J. Rizzo regarding status of Vardon Terrace Unit #106 tax proration issue (.1); communicate with Orlando Auto Auction and J. Rizzo regarding status of Mercedes vehicle title and re-auctioning same (.1); communicate with legal team regarding status of remitting asset sale proceeds to U.S. Marshals Service (.2). | 0.4          | \$144.00          |
| 9/22/2020                       | BWW               | Conference call with closing agent and J. Rizzo regarding tax proration for Vardon Terrace Unit #106 (.4).   | 0.4          | \$144.00          |
| 9/25/2020                       | BWW               | Communicate with J. Rizzo regarding status of remission of funds to U.S. Marshals Service (.1).  | 0.1          | \$36.00           |
| 9/28/2020                       | BWW               | Work with L. Sullivan and J. Rizzo on new offer on Vardon Terrace Unit #105 (1.0); work with L. Sullivan and J. Rizzo on new offer on Lost Key property (.4); exchange emails regarding pricing and provision of prior inspection report (.4).   | 1.8          | \$648.00          |
| 9/29/2020                       | BWW               | Review motion to vacate order approving sale of Lost Key property (.3); attend to matters regarding offers on Vardon Terrace and Lost Key properties (.5); attend to tax matters on Desert Ridge property (.5).  | 1.3          | \$468.00          |
| 9/29/2020                       | BWW               | Review matters on sale of R. Montie house (.4).  | 0.4          | \$144.00          |
| 9/30/2020                       | BWW               | Review and negotiate offer on Vardon Terrace Unit #307 (.4); review tax lien matter on Desert Ridge property (.2); emails with lien holder and counsel (.2); review sale of R. Montie property (.2); continue negotiation of sale of Vardon Terrace Unit #307 (.3).  | 1.3          | \$468.00          |
| <b>Total: Asset Disposition</b> |                   |  | <b>25.60</b> | <b>\$9,216.00</b> |

| ASSET     | Asset Analysis and Recovery |   |     |          |
|-----------|-----------------------------|---|-----|----------|
| 7/7/2020  | BWW                         | Telephone conference with J. Sallah regarding settlement negotiations (.5); telephone conference with J. Cohen regarding Mainstream negotiations (.4); telephone conference with J. Sallah regarding possible mediation (.3); review correspondence and records from Edward Jones (.3). | 1.5 | \$540.00 |
| 7/8/2020  | BWW                         | Telephone conference with L. Dougherty regarding status (.1).   | 0.1 | \$36.00  |
| 7/10/2020 | BWW                         | Prepare email to J. Curran regarding scheduling a virtual interview with J. Paniagua (.2); telephone conference with E. Feld (.1); telephone conference with J. Sallah regarding tolling agreement with Mainstream (.5).  | 0.8 | \$288.00 |
| 7/13/2020 | BWW                         | Communicate with L. Dougherty regarding status update (.6).   | 0.6 | \$216.00 |

October 30, 2020

Client: 025305

Matter: 001921

Invoice #: 18749

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**SERVICES**

| <b>Date</b>  | <b>TKPR</b>                        | <b>Description of Services</b>   | <b>Hours</b> | <b>Amount</b> |
|--------------|------------------------------------|--|--------------|---------------|
| <b>ASSET</b> | <b>Asset Analysis and Recovery</b> |  |              |               |
| 7/14/2020    | BWW                                | Telephone conference with L. Dougherty regarding ATC Brokers (.3).   | 0.3          | \$108.00      |
| 7/15/2020    | BWW                                | Review emails from J. Sallah regarding mediation (.2).   | 0.2          | \$72.00       |
| 7/16/2020    | BWW                                | Telephone conference with L. Dougherty regarding J. Anile (.1).  | 0.1          | \$36.00       |
| 7/20/2020    | BWW                                | Telephone conference with L. Dougherty regarding reply to D. Manoukian opposition (.2); exchange emails regarding D. Manoukian (.5); communications with attorney J. Curran regarding interview with J. Paniagua (.3); review documents for interview with J. Paniagua (1.5).                        | 2.5          | \$900.00      |
| 7/21/2020    | BWW                                | Telephone call with L. Dougherty regarding ATC Brokers (.3); review records in preparation for J. Paniagua interview (.2); telephone conference with R. Rohr regarding access to records and passwords (.1); review motion for leave to file reply to response of D. Manoukian and ATC Brokers (.5). | 1.1          | \$396.00      |
| 7/22/2020    | BWW                                | Prepare documents for J. Paniagua interview (1.2).   | 1.2          | \$432.00      |
| 7/23/2020    | BWW                                | Prepare for and participate in telephone interview with J. Paniagua (1.5); communications with R. Bedke regarding interview with J. Paniagua (.2).   | 1.7          | \$612.00      |
| 7/29/2020    | BWW                                | Telephone conference with L. Dougherty (.6).   | 0.6          | \$216.00      |
| 7/30/2020    | BWW                                | Communications with L. Dougherty regarding filing of sur-reply (.4).   | 0.4          | \$144.00      |
| 7/31/2020    | BWW                                | Review email from R. Marchiony regarding resolution (.1).  | 0.1          | \$36.00       |
| 8/3/2020     | BWW                                | Telephone conference with J. Sallah regarding mediation with Mainstream (.2); review matters from Citibank regarding CitiFX account for Oasis (.2); communicate with K. Phelps regarding ATC Brokers (.2).   | 0.6          | \$216.00      |
| 8/4/2020     | BWW                                | Review and revise D. Manoukian sur-reply (.5).   | 0.5          | \$180.00      |
| 8/5/2020     | BWW                                | Communicate with J. Rizzo and R. Bedke regarding Spotex records (.1); confer with L. Dougherty and J. Perez regarding oral argument (.1).  | 0.2          | \$72.00       |
| 8/6/2020     | BWW                                | Communicate with J. Rizzo, S. Batsch and FBI regarding Spotex records and analysis of same (.2).   | 0.2          | \$72.00       |
| 8/10/2020    | BWW                                | Communicate with J. Rizzo regarding M. DaCorta's laptop (.1).  | 0.1          | \$36.00       |
| 8/11/2020    | BWW                                | Communicate with J. Rizzo regarding documentation required by IFSC to release funds (.1).  | 0.1          | \$36.00       |
| 8/19/2020    | BWW                                | Telephone call with K. Phelps regarding ATC Brokers (.2).  | 0.2          | \$72.00       |

October 30, 2020

Client: 025305

Matter: 001921

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**SERVICES**

| <b>Date</b>                               | <b>TKPR</b>                        | <b>Description of Services</b>  | <b>Hours</b> | <b>Amount</b>     |
|---|------------------------------------|---|--------------|-------------------|
| <b>ASSET</b>                              | <b>Asset Analysis and Recovery</b> |   |              |                   |
| 8/21/2020                                 | BWW                                | Telephone call with R. Bedke regarding evidence matter (.2).  | 0.2          | \$72.00           |
| 8/25/2020                                 | BWW                                | Communication with R. Bedke regarding Apple laptop (.1); telephone calls with B. Templeton (.2).  | 0.3          | \$108.00          |
| 8/26/2020                                 | BWW                                | Meet with B. Templeton regarding Apple computer (1.0); telephone calls and emails with E-Hounds (.5).   | 1.5          | \$540.00          |
| 8/28/2020                                 | BWW                                | Communications with K. Phelps regarding ATC Brokers (.2).   | 0.2          | \$72.00           |
| 9/2/2020                                  | BWW                                | Communicate with J. Rizzo and J. Perez regarding status of recovery of Belize funds (.1).   | 0.1          | \$36.00           |
| 9/3/2020                                  | BWW                                | Exchange emails with R. Bedke regarding forensic data (.3).   | 0.3          | \$108.00          |
| 9/9/2020                                  | BWW                                | Communicate with J. Rizzo, J. Perez and E. Feld regarding status of recovery of Belize funds (.1).  | 0.1          | \$36.00           |
| 9/18/2020                                 | BWW                                | Communications with R. Jernigan regarding insurance renewal for Lost Key property (.2).   | 0.2          | \$72.00           |
| 9/21/2020                                 | BWW                                | Conference call with legal team regarding status and tasks (1.1).   | 1.1          | \$396.00          |
| 9/28/2020                                 | BWW                                | Review and provide comments on objection to report and recommendation (.8); telephone call with L. Dougherty regarding same (.1); communicate with J. Rizzo regarding status of recovery of funds from Belize (.1). | 1.0          | \$360.00          |
| 9/30/2020                                 | BWW                                | Communications with L. Dougherty regarding Spotex (.1).   | 0.1          | \$36.00           |
| <b>Total: Asset Analysis and Recovery</b> |                                    |   | <b>18.20</b> | <b>\$6,552.00</b> |
| <b>BUSIN</b>                              | <b>Business Operations</b>         |   |              |                   |
| 7/13/2020                                 | BWW                                | Communicate with J. Rizzo regarding returned check from Extra Space Storage (.1).   | 0.1          | \$36.00           |
| 7/15/2020                                 | BWW                                | Review and sign operations checks (1.3).  | 1.3          | \$468.00          |
| 7/16/2020                                 | BWW                                | Communicate with J. Rizzo, R. Jernigan, and team regarding payment of 2017 taxes on Desert Ridge property (.1).   | 0.1          | \$36.00           |
| 7/17/2020                                 | BWW                                | Communicate with J. Rizzo regarding GoDaddy domain renewals (.2).   | 0.2          | \$72.00           |
| 7/20/2020                                 | BWW                                | Review checks for operation expenses (.3).  | 0.3          | \$108.00          |
| 7/24/2020                                 | BWW                                | Communications with M. Lockwood regarding Englander Fischer billing rates (.2).   | 0.2          | \$72.00           |
| 7/30/2020                                 | BWW                                | Prepare correspondence regarding Roar of the Lion Fitness (.1).   | 0.1          | \$36.00           |

October 30, 2020

Client: 025305

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**SERVICES**

| <b>Date</b>                       | <b>TKPR</b>                | <b>Description of Services</b>  | <b>Hours</b> | <b>Amount</b>     |
|-----------------------------------|----------------------------|---|--------------|-------------------|
| <b>BUSIN</b>                      | <b>Business Operations</b> |   |              |                   |
| 8/1/2020                          | BWW                        | Review and authorize checks (.2).   | 0.2          | \$72.00           |
| 8/3/2020                          | BWW                        | Communicate with J. Rizzo regarding renewal of GoDaddy domain and related invoice (.1); communicate with J. Rizzo regarding Amazon invoice (.1).                          | 0.2          | \$72.00           |
| 8/20/2020                         | BWW                        | Review list of checks for approval for operations (.2).   | 0.2          | \$72.00           |
| 8/24/2020                         | BWW                        | Communicate with J. Rizzo, PDR, R. Jernigan, and J. Perez regarding ServisFirst Bank chargeback related to August 2020 mortgage payment for 55th Ave. West property (.1). | 0.1          | \$36.00           |
| 9/10/2020                         | BWW                        | Communicate with J. Rizzo, Receiver and J. Perez regarding insurance renewal on Lost Key property and expirations on other Receivership properties (.1).                  | 0.1          | \$36.00           |
| 9/17/2020                         | BWW                        | Communications with R. Jernigan regarding insurance renewals (.2); review and sign insurance documents (.2).  | 0.4          | \$144.00          |
| 9/22/2020                         | BWW                        | Review and sign additional insurance documents received from R. Jernigan (.2).  | 0.2          | \$72.00           |
| <b>Total: Business Operations</b> |                            |   | <b>3.70</b>  | <b>\$1,332.00</b> |

**CASE Case Administration**

|                                   |     |  |             |                 |
|-----------------------------------|-----|--|-------------|-----------------|
| 7/30/2020                         | BWW | Review and approve Interim Report (1.0).                               | 1.0         | \$360.00        |
| 8/21/2020                         | BWW | Communicate with J. Rizzo and J. Perez regarding website updates (.1). | 0.1         | \$36.00         |
| 9/17/2020                         | BWW | Communications with legal team regarding M.P. (.2).                    | 0.2         | \$72.00         |
| <b>Total: Case Administration</b> |     |  | <b>1.30</b> | <b>\$468.00</b> |

**CLAIM Claims Administration and Objections**

|           |     |  |     |          |
|-----------|-----|--|-----|----------|
| 7/6/2020  | BWW | Communicate with L. Dougherty regarding B. Winters letter (.1).  | 0.1 | \$36.00  |
| 7/7/2020  | BWW | Communications with L. Dougherty and M. Lockwood regarding letter to B. Winters (.3).                                  | 0.3 | \$108.00 |
| 8/7/2020  | BWW | Communicate with L. Dougherty regarding B. Winters (.2).   | 0.2 | \$72.00  |
| 8/17/2020 | BWW | Communicate with M. Gura regarding claim forms submitted by B. Winters (.2).   | 0.2 | \$72.00  |
| 8/20/2020 | BWW | Review letter to B. Winters and provide comments (.5).   | 0.5 | \$180.00 |
| 8/21/2020 | BWW | Telephone conference with L. Dougherty concerning B. Winters letter (.1); review and revise letter to B. Winters (.8). | 0.9 | \$324.00 |



October 30, 2020

Client: 025305

Matter: 001921

Invoice #: 18749

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**SERVICES**

| <b>Date</b>  | <b>TKPR</b>   | <b>Description of Services</b>  | <b>Hours</b>       | <b>Amount</b>      |
|--|---------------|---|--------------------|--------------------|
| <b>CLAIM</b>                                       | <b>Claims</b> | <b>Administration and Objections</b>  |                    |                    |
| 9/1/2020   | BWW           | Review B. Winters submission (.1); telephone conference with L. Dougherty regarding same (.3).  | 0.4                | \$144.00           |
| 9/2/2020   | BWW           | Communications with M. Gura regarding R.N. (.1).  | 0.1                | \$36.00            |
| 9/8/2020   | BWW           | Review and provide comments to letter to B. Winters (.3).   | 0.3                | \$108.00           |
| 9/10/2020  | BWW           | Conference with L. Dougherty regarding draft letter to investors regarding B. Winters (.1).   | 0.1                | \$36.00            |
| 9/11/2020  | BWW           | Telephone call with L. Dougherty regarding letter to investors (.1); telephone call with M. Lockwood regarding claims submitted by B. Winters and letter to investors (.4). | 0.5                | \$180.00           |
| 9/13/2020  | BWW           | Prepare correspondence to A. Stephens regarding status of letter to investors (.1).   | 0.1                | \$36.00            |
| 9/14/2020  | BWW           | Confer with L. Dougherty regarding letter to investors (.1); revise letter (.4).  | 0.5                | \$180.00           |
| <b>Total: Claims Administration and Objections</b> |               |   | <b>4.20</b>        | <b>\$1,512.00</b>  |
| <b>Total Professional Service:</b>                 |               |   | <b>53.0</b>        | <b>\$19,080.00</b> |
| Total Services                                     |               |   | \$19,080.00        |                    |
| Total Current Charges                              |               |   | \$19,080.00        |                    |
| Previous Balance                                   |               |   | \$27,612.00        |                    |
| Less Retainer Applied                              |               |   | (\$27,612.00)      |                    |
| <b>PAY THIS AMOUNT</b>                             |               |   | <b>\$19,080.00</b> |                    |



October 30, 2020

Client: 025305

Matter: 001921

Invoice #: 18749

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**TASK RECAP****Services**

| <u>Project No.</u> | <u>Hours</u> | <u>Amount</u>      |
|--------------------|--------------|--------------------|
| ASDIS - ASDIS      | 25.60        | \$9,216.00         |
| ASSET - ASSET      | 18.20        | \$6,552.00         |
| BUSIN - BUSIN      | 3.70         | \$1,332.00         |
| CASE - CASE        | 1.30         | \$468.00           |
| CLAIM - CLAIM      | 4.20         | \$1,512.00         |
|                    | <u>53.00</u> | <u>\$19,080.00</u> |

**Disbursements**

| <u>Project No.</u> | <u>Amount</u> |
|--------------------|---------------|
|                    | \$0.00        |
|                    | \$0.00        |
|                    | \$0.00        |
|                    | \$0.00        |
|                    | \$0.00        |
|                    | <u>\$0.00</u> |

**BREAKDOWN BY PERSON**

| <u>Person</u>       | <u>Project No.</u> | <u>Hours</u> | <u>Amount</u>      |
|---------------------|--------------------|--------------|--------------------|
| BWW Burton W. Wiand | ASDIS - ASDIS      | 25.60        | \$9,216.00         |
| BWW Burton W. Wiand | ASSET - ASSET      | 18.20        | \$6,552.00         |
| BWW Burton W. Wiand | BUSIN - BUSIN      | 3.70         | \$1,332.00         |
| BWW Burton W. Wiand | CASE - CASE        | 1.30         | \$468.00           |
| BWW Burton W. Wiand | CLAIM - CLAIM      | 4.20         | \$1,512.00         |
|                     |                    | <u>53.00</u> | <u>\$19,080.00</u> |

# **EXHIBIT 4**

**Wiand Guerra King P.A.**

5505 West Gray Street

Tampa, FL 33609

Telephone: 813-347-5100

Facsimile: 813-347-5198

Federal Tax ID # 27-0937962

Burton W. Wiand

**Attention: Burton W. Wiand**

Wiand Guerra King, P.A.

5505 W. Gray Street

Tampa, FL 33609

October 30, 2020

Client: 025305

Matter: 002096

Invoice #: 18751

Page: 1

RE: Receiver – Recovery from Investors

For Professional Services Rendered Through September 30, 2020

**SERVICES**

| Date      | TKPR                        | Description of Services  | Hours | Amount   |
|-----------|-----------------------------|--|-------|----------|
| ASSET     | Asset Analysis and Recovery |  |       |          |
| 7/7/2020  | BWW                         | Review and sign E. McMahon settlement agreement and telephone conference with L. Dougherty regarding same (.1).                | 0.1   | \$36.00  |
| 7/9/2020  | BWW                         | Telephone conference with J. Waechter regarding clawback settlement (.2).  | 0.2   | \$72.00  |
| 7/10/2020 | BWW                         | Telephone conferences with J. Waechter regarding Chamblis settlement (.2); review information from forensic accountants (1.0). | 1.2   | \$432.00 |
| 7/17/2020 | BWW                         | Review numerous default motions (.2).  | 0.2   | \$72.00  |
| 7/20/2020 | BWW                         | Communications with B. McConnell regarding clawback matter (.3).   | 0.3   | \$108.00 |
| 7/24/2020 | BWW                         | Communications with B. McConnell regarding Cardiello settlement and execution of agreement (.3).                               | 0.3   | \$108.00 |
| 7/27/2020 | BWW                         | Attend to and execute G. and S. Davis settlement agreements (.2); review T. Lacy settlement negotiations status (.2).          | 0.4   | \$144.00 |

October 30, 2020

Client: 025305

Matter: 002096

Invoice #: 18751

Page: 2

**SERVICES**

| <b>Date</b>  | <b>TKPR</b>                        | <b>Description of Services</b>   | <b>Hours</b> | <b>Amount</b> |
|--------------|------------------------------------|--|--------------|---------------|
| <b>ASSET</b> | <b>Asset Analysis and Recovery</b> |  |              |               |
| 7/28/2020    | BWW                                | Telephone conference with L. Dougherty and legal team regarding clawback defendants (1.2); review matters submitted by B. Winters and investigate his bar status (.4); communications with J. Waechter and B. McConnell regarding the form of affidavits for default judgments (.3); review several affidavits (.7). | 2.6          | \$936.00      |
| 7/31/2020    | BWW                                | Telephone conference with J. Perez (.1).   | 0.1          | \$36.00       |
| 8/4/2020     | BWW                                | Review settlement agreement for T. Lacy (.1); communicate with B. McConnell regarding same (.3).   | 0.4          | \$144.00      |
| 8/5/2020     | BWW                                | Review affidavits for motion for default (.2); communication with B. McConnell (.1).   | 0.3          | \$108.00      |
| 8/7/2020     | BWW                                | Correspondence with J. Perez and Englander Fischer regarding calculation of pre-judgment interest (.2).  | 0.2          | \$72.00       |
| 8/10/2020    | BWW                                | Communicate with J. Rizzo regarding execution of affidavits in support of motion for default judgment (.1).  | 0.1          | \$36.00       |
| 8/14/2020    | BWW                                | Telephone conference with L. Dougherty, J. Perez, J. Waechter, and B. McConnell regarding strategy concerning status hearing before Judge Covington (.8).  | 0.8          | \$288.00      |
| 8/17/2020    | BWW                                | Communicate with L. Dougherty regarding next steps regarding B. Winters (.2); prepare for and attend status conference with Court regarding clawback action (2.3).   | 2.5          | \$900.00      |
| 8/19/2020    | BWW                                | Review and execute numerous declarations for default judgment motions (.4).  | 0.4          | \$144.00      |
| 8/20/2020    | BWW                                | Review numerous filings for entry of default judgment (.5).  | 0.5          | \$180.00      |
| 8/22/2020    | BWW                                | Communicate with L. Dougherty regarding B. Winters letter (.1).  | 0.1          | \$36.00       |
| 8/24/2020    | BWW                                | Prepare and revise unauthorized practice of law complaint regarding B. Winters (1.0); prepare email to Florida Bar submitting complaint (.2).  | 1.2          | \$432.00      |
| 8/27/2020    | BWW                                | Review Magistrate Judge's order on default judgments (.2); communications with B. McConnell and J. Perez regarding same (.8).  | 1.0          | \$360.00      |
| 8/28/2020    | BWW                                | Telephone conference with J. Perez, J. Waechter, L. Dougherty, and B. McConnell regarding tasks (.7).  | 0.7          | \$252.00      |
| 8/28/2020    | BWW                                | Communications with J. Perez and B. McConnell regarding Florida Bar complaint (.3).  | 0.3          | \$108.00      |
| 9/2/2020     | BWW                                | Finalize letter to Indiana Supreme Court for B. Winters (.2).  | 0.2          | \$72.00       |

October 30, 2020

Client: 025305

Matter: 002096

Invoice #: 18751

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**SERVICES**

| <b>Date</b>                               | <b>TKPR</b>                        | <b>Description of Services</b>  | <b>Hours</b> | <b>Amount</b>     |
|---|------------------------------------|---|--------------|-------------------|
| <b>ASSET</b>                              | <b>Asset Analysis and Recovery</b> |   |              |                   |
| 9/21/2020                                 | BWW                                | Exchange correspondence with outside counsel related to clawback case status and scheduling meeting to discuss same (.1); conference call with legal team and outside counsel regarding status of clawback settlements and litigation (.5). | 0.6          | \$216.00          |
| <b>Total: Asset Analysis and Recovery</b> |                                    |   | <b>14.70</b> | <b>\$5,292.00</b> |
| <b>Total Professional Service:</b>        |                                    |   | <b>14.7</b>  | <b>\$5,292.00</b> |
| Total Services                            |                                    |   | \$5,292.00   |                   |
| Total Current Charges                     |                                    |   |              | \$5,292.00        |
| Previous Balance                          |                                    |   |              | \$288.00          |
| <i>Less Retainer Applied</i>              |                                    |   |              | <i>(\$288.00)</i> |
| <b>PAY THIS AMOUNT</b>                    |                                    |   |              | <b>\$5,292.00</b> |

October 30, 2020

Client: 025305

Matter: 002096

Invoice #: 18751

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**TASK RECAP****Services**

| <u>Project No.</u> | <u>Hours</u> | <u>Amount</u> |
|--------------------|--------------|---------------|
| ASSET - ASSET      | 14.70        | \$5,292.00    |
|                    | 14.70        | \$5,292.00    |

**Disbursements**

| <u>Project No.</u> | <u>Amount</u> |
|--------------------|---------------|
|                    | \$0.00        |
|                    | \$0.00        |

**BREAKDOWN BY PERSON****Person**

BWW Burton W. Wiand

| <u>Project No.</u> | <u>Hours</u> | <u>Amount</u> |
|--------------------|--------------|---------------|
| ASSET - ASSET      | 14.70        | \$5,292.00    |
|                    | 14.70        | \$5,292.00    |

# **EXHIBIT 5**

**Wiand Guerra King P.A.**

5505 West Gray Street

Tampa, FL 33609

Telephone: 813-347-5100

Facsimile: 813-347-5198

Federal Tax ID # 27-0937962

Burton W. Wiand

**Attention: Burton W. Wiand**

Wiand Guerra King, P.A.

5505 W. Gray Street

Tampa, FL 33609

October 30, 2020

Client: 025305

Matter: 002097

Invoice #: 18748

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RE: Receiver – Raymond Montie, III.

For Professional Services Rendered Through September 30, 2020

**SERVICES**

| Date                                      | TKPR                               | Description of Services   | Hours       | Amount            |
|---|------------------------------------|---|-------------|-------------------|
| <b>ASSET</b>                              | <b>Asset Analysis and Recovery</b> |   |             |                   |
| 7/14/2020                                 | BWW                                | Telephone conference with H.R. regarding R. Montie information and clawback (.5); telephone conference with L. Dougherty regarding R. Montie motion (.2). | 0.7         | \$252.00          |
| 7/16/2020                                 | BWW                                | Prepare for and attend hearing before Judge Barber (3.0).   | 3.0         | \$1,080.00        |
| 8/20/2020                                 | BWW                                | Review emails from L. Dougherty and J. Perez regarding call from R. Montie's lawyer (.3).   | 0.3         | \$108.00          |
| 8/21/2020                                 | BWW                                | Telephone conference with L. Dougherty regarding negotiations with counsel for R. Montie (.1).  | 0.1         | \$36.00           |
| 9/15/2020                                 | BWW                                | Communications with L. Dougherty regarding status (.1).   | 0.1         | \$36.00           |
| <b>Total: Asset Analysis and Recovery</b> |                                    |   | <b>4.20</b> | <b>\$1,512.00</b> |
| <b>Total Professional Service:</b>        |                                    |   | <b>4.2</b>  | <b>\$1,512.00</b> |
| Total Services                            |                                    |   | \$1,512.00  |                   |
| Total Current Charges                     |                                    |   |             | \$1,512.00        |
| <b>PAY THIS AMOUNT</b>                    |                                    |   |             | <b>\$1,512.00</b> |



# **EXHIBIT 6**

**Categorization and Summary of All Costs Incurred by  
Wiand Guerra King P.A.**

| <b>Receivership</b>            |                    |
|--------------------------------|--------------------|
| <b>Expense Type</b>            | <b>Amount</b>      |
| Photocopies (712 Pages)        | \$ 106.80          |
| Online Research                | \$ 1,877.15        |
| Delivery Services / Messengers | \$ 225.94          |
| Telephone                      | \$ 123.94          |
| Court Fees                     | \$ 37.00           |
| Other                          | \$ 942.00          |
| <b>SUBTOTAL</b>                | <b>\$ 3,312.83</b> |

| <b>Litigation Against Raymond P. Montie</b> |                 |
|---|-----------------|
| <b>Expense Type</b>                         | <b>Amount</b>   |
| Photocopies (319 Pages)                     | \$ 47.85        |
| <b>SUBTOTAL</b>                             | <b>\$ 47.85</b> |

**TOTAL** **\$ 3,360.68**

# **EXHIBIT 7**



5 5 0 5 W . G R A Y S T R E E T | T A M P A , F L 3 3 6 0 9 | P H O N E : 8 1 3 . 3 4 7 . 5 1 0 0

**EXHIBIT B**

| <b>FIRM MEMBERS</b>       | <b>STANDARD RATES</b> | <b>DISCOUNTED RATE</b> |
|---------------------------|-----------------------|------------------------|
| Burton Wiand (Sr. Member) | \$500                 | \$360                  |
| Members                   | \$315-\$475           | \$320                  |
| Associates                | \$235-\$290           | \$240                  |
| Paralegals                | \$165-\$170           | \$135                  |

We carry malpractice (\$5 million) as well as fidelity and general liability coverage.

# **EXHIBIT 8**

**Wiand Guerra King P.A.**

5505 West Gray Street

Tampa, FL 33609

Telephone: 813-347-5100

Facsimile: 813-347-5198

Federal Tax ID # 27-0937962

Burton W. Wiand

**Attention: Burton W. Wiand**

Wiand Guerra King, P.A.

5505 W. Gray Street

Tampa, FL 33609

November 16, 2020

Client: 025305

Matter: 001922

Invoice #: 18841

Page: 1

RE: CFTC Oasis Receivership - Legal Team

Travel is half rate outside of 20 miles.

For Professional Services Rendered Through September 30, 2020

**SERVICES**

| Date     | TKPR              | Description of Services   | Hours | Amount   |
|----------|-------------------|---|-------|----------|
| ASDIS    | Asset Disposition |   |       |          |
| 7/1/2020 | JR                | Review correspondence between listing agent and Receiver regarding offers and counter-offers to purchase Lost Key property (.2); review correspondence from listing agent with addendum to listing agreement (.1); communicate with Receiver regarding listing agreement addendum (.1); prepare purchase and sale agreement for Lost Key property (.6); communicate with listing agent regarding buyer's loan approval status for Vardon Terrace Unit #106 (.1); communicate with Receiver, J. Perez and R. Jernigan regarding status of 4058 Founders Club property (.1).  | 1.2   | \$162.00 |
| 7/2/2020 | JR                | Communicate with listing agent regarding purchase and sale agreement for Lost Key property (.1); review correspondence between R. Jernigan and listing agent for Lost Key regarding sale of property and removal of contents not included in sale (.1); telephone conference with listing agent regarding terms of sale of Lost Key property and other requirements (.2); review correspondence from closing agent regarding receipt of escrow deposit from buyer for Vardon Terrace Unit #106 (.1); communicate with Receiver and R. Jernigan regarding receipt of escrow deposit from buyer for Vardon Terrace Unit #106 (.1); communicate with listing agent and Receiver regarding terms of purchase and sale agreement for Lost Key property (.1). | 0.7   | \$94.50  |

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**SERVICES**

| <b>Date</b>  | <b>TKPR</b>              | <b>Description of Services</b>   | <b>Hours</b> | <b>Amount</b> |
|--------------|--------------------------|--|--------------|---------------|
| <b>ASDIS</b> | <b>Asset Disposition</b> |  |              |               |
| 7/6/2020     | JR                       | Review correspondence from Receiver with executed purchase and sale agreement for Lost Key property (.1); communicate with listing agent regarding purchase and sale agreement for Lost Key property (.1); prepare correspondence to closing agent regarding same (.1); prepare correspondence to U.S. Marshals Service regarding executing consent to purchase and sale agreement for Lost Key property (.1); prepare correspondence to listing agent regarding status of U.S. Marshals' execution of consent page of purchase and sale agreement and payment for termite inspection (.1); review correspondence from listing agent regarding termite inspection invoices related to Lost Key property (.1); review correspondence from listing agent regarding buyer's loan pre-approval correspondence from lender (.1); review correspondence and executed consent to Lost Key property purchase and sale agreement (.1); communicate with listing agent and closing agent regarding executed consent to Lost Key property purchase and sale agreement (.1); research and review of E-Hounds platform for survey of Lost Key property per communication with listing agent (.5); prepare correspondence to counsel regarding survey of Lost Key property (.1). | 1.5          | \$202.50      |
| 7/7/2020     | JR                       | Review correspondence from R. Jernigan regarding title issues related to sale of vehicles (.1); review correspondence between listing agent and closing agent regarding survey for Lost Key property (.1); telephone call to potential purchaser regarding sale of Vardon Terrace condominium (.1); prepare correspondence to R. Jernigan and legal team regarding sale of vehicle per review of order granting related motion, vehicle lien information and prior communications with FBI regarding same (.2); communicate with potential purchaser for Vardon Terrace condominium (.1); review correspondence from closing agent regarding receipt of buyer's escrow deposit for Lost Key property (.1).   | 0.7          | \$94.50       |

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**SERVICES**

| <b>Date</b>  | <b>TKPR</b>              | <b>Description of Services</b>   | <b>Hours</b> | <b>Amount</b> |
|--------------|--------------------------|--|--------------|---------------|
| <b>ASDIS</b> | <b>Asset Disposition</b> |  |              |               |
| 7/8/2020     | JR                       | Review correspondence from listing agent regarding receipt of escrow deposit and status of buyer's inspection (.1); review correspondence from listing agent regarding buyer's completed inspection of Vardon Terrace Unit #106 (.1); prepare correspondence to listing agent, R. Jernigan, Receiver and J. Perez regarding status of Vardon Terrace Unit #106 transaction, preparation of motion to approve sale and broker price opinions (.1); review correspondence from listing agent regarding potential purchaser for 4058 Founders Club property and survey of same (.1); review case materials for survey of 4058 Founders Club property (.2); review correspondence from R. Jernigan regarding status of release of SunTrust's lien on sold vehicle (.1); review correspondence from listing agent regarding buyer's release of inspection contingency for Vardon Terrace Unit #106 (.1); communicate with closing agent regarding status of Vardon Terrace Unit #106 transaction (.1); prepare motion to approve sale, publication notice, and proposed order related to Vardon Terrace Unit #106 (.5). | 1.4          | \$189.00      |
| 7/9/2020     | JR                       | Review correspondence from listing agent with contract addendum and inspection contingency release for Vardon Terrace Unit #106 (.1); communicate with Receiver and R. Jernigan regarding same (.1); communicate with listing agent regarding status of Vardon Terrace Unit #106 buyer's loan approval (.1).   | 0.3          | \$40.50       |
| 7/10/2020    | JR                       | Review correspondence and title commitment for Vardon Terrace Unit #106 from closing agent (.2); communicate with closing agent regarding title commitment, unpaid taxes and court filings needed for recording related to Vardon Terrace Unit #106 (.1); communicate with Receiver, R. Jernigan, J. Perez and listing agent regarding title commitment for Vardon Terrace Unit #106 (.1); communicate with closing agent regarding forfeiture order for Vardon Terrace Unit #106 (.1).  | 0.5          | \$67.50       |
| 7/13/2020    | JJP                      | Review and revise motion to sell Vardon Terrace Unit #106 (1.2); circulate draft motion to CFTC and counsel for the United States pursuant to local rule 3.01(g) (.3).   | 1.5          | \$480.00      |
| 7/13/2020    | RMM                      | Communicate with J. Perez regarding phone call from property mortgage holder (.2); review documents regarding Founders Club property and return C. Johnson's phone call (.5).  | 0.7          | \$168.00      |
| 7/13/2020    | JR                       | Review correspondence from listing agent regarding buyer's loan status and waiver of appraisal (.1); communicate with J. Perez regarding motion to approve sale of Vardon Terrace Unit #106 (.1); communicate with J. Perez regarding status of Lost Key transaction (.1).   | 0.3          | \$40.50       |



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**SERVICES**

| <b>Date</b>  | <b>TKPR</b>              | <b>Description of Services</b>  | <b>Hours</b> | <b>Amount</b> |
|--------------|--------------------------|---|--------------|---------------|
| <b>ASDIS</b> | <b>Asset Disposition</b> |   |              |               |
| 7/14/2020    | RMM                      | Communicate with C. Johnson and J. Perez regarding mortgage on Founder's Club property (.2).  | 0.2          | \$48.00       |
| 7/14/2020    | JR                       | Communicate with listing agent regarding status of buyer's loan approval and status of motion to approve sale (.1).   | 0.1          | \$13.50       |
| 7/14/2020    | LD                       | Review correspondence from United States concerning property sale (.1).   | 0.1          | \$32.00       |
| 7/15/2020    | JR                       | Review correspondence and invoice from Hughes Exterminators regarding Lost Key property (.1); communicate with listing agent, Receiver and R. Jernigan regarding Hughes Exterminator's invoice and results of inspection (.1).  | 0.2          | \$27.00       |
| 7/16/2020    | JR                       | Review offer to purchase 4058 Founders Club property and related correspondence from listing agent (.1); review correspondence from Receiver regarding counter-offer for 4058 Founders Club property (.1).  | 0.2          | \$27.00       |
| 7/17/2020    | JR                       | Review buyer's counter-offer to purchase 4058 Founders Club property and related correspondence from listing agent (.1); review documentation related to purchase and assessed value of 4058 Founders Club property (.1); communicate with Receiver and R. Jernigan regarding suggested counter-offer based upon research and review of value information of 4058 Founders Club property (.1); receipt and review of correspondence from listing agent and inspection report for Lost Key property (.1); communicate with listing agent regarding status of buyer's loan approval for Vardon Terrace Unit #106 (.1); review correspondence from listing agent regarding buyer's withdrawal of offer to purchase 4058 Founders Club property (.1). | 0.6          | \$81.00       |
| 7/20/2020    | JR                       | Communicate with Receiver and R. Jernigan regarding potential buyer's counter-offer to purchase 4058 Founders Club property (.1); review correspondence from listing agent regarding buyer's final offer to purchase 4058 Founders Club property (.1).  | 0.2          | \$27.00       |

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**SERVICES**

| <b>Date</b>  | <b>TKPR</b>              | <b>Description of Services</b>   | <b>Hours</b> | <b>Amount</b> |
|--------------|--------------------------|--|--------------|---------------|
| <b>ASDIS</b> | <b>Asset Disposition</b> |  |              |               |
| 7/21/2020    | JR                       | Prepare correspondence to closing agent regarding status of buyer's loan approval for Vardon Terrace Unit #106 (.1); communicate with closing agent regarding status of buyer's loan approval and closing on Vardon Terrace Unit #106 (.1); review correspondence from listing agent regarding status of buyer's loan approval for Vardon Terrace Unit #106 (.1); communicate with legal team regarding status of sale and closing for Vardon Terrace Unit #106 (.1); prepare motion to approve sale of Lost Key property, proposed order and notice (.7); communicate with J. Perez and Receiver regarding motion to approve sale of Lost Key property (.1); communicate with PDR regarding carrying costs related to Lost Key property needed for motion to approve sale (.1). | 1.3          | \$175.50      |
| 7/22/2020    | JJP                      | Communicate with team regarding motion to sell Vardon Terrace Unit #106 and publication process (.4).  | 0.4          | \$128.00      |
| 7/22/2020    | JR                       | Review correspondence from E. Feld related to auction companies inquiry about titling of sold Mercedes (.1); communicate with Receiver regarding titling of Mercedes due to SunTrust lien (.1); communicate with R. Jernigan regarding inventory from properties (.1); communicate with Orlando Auction regarding titling issue related to sold Mercedes (.2); review correspondence from listing agent regarding buyer's loan commitment confirmation for Vardon Terrace Unit #106 (.1); communicate with listing agent, Receiver, legal team and closing agent regarding buyer's loan commitment confirmation and status of filing motion to approve sale (.1); communicate with legal team regarding publication of notice of sale of Vardon Terrace Unit #106 (.1).          | 0.8          | \$108.00      |
| 7/23/2020    | MG                       | Communicate with the Sarasota Herald-Tribune regarding notice of sale of Vardon Terrace Unit #106 (.3).  | 0.3          | \$40.50       |
| 7/24/2020    | JJP                      | Revise, finalize, and file motion to sell Vardon Terrace Unit #106 and begin publication process (1.1).  | 1.1          | \$352.00      |
| 7/24/2020    | JR                       | Review correspondence from listing agent regarding buyer's completion of inspection and release of contingency for Lost Key property (.1); prepare correspondence to listing agent and legal team regarding buyer's completion of inspection, filing motion to approve and obtaining broker price opinions for Lost Key property (.1); communicate with A. Stephens regarding inquiry from potential purchaser for Vardon Terrace Unit #106 (.1); communicate with listing agent regarding invoices for broker price opinions (.1); communicate with listing agent and closing agent regarding filing of motion to approve sale of Vardon Terrace Unit #106 (.1).  | 0.5          | \$67.50       |

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| <b>Date</b>  | <b>TKPR</b>              | <b>Description of Services</b>   | <b>Hours</b> | <b>Amount</b> |
|--------------|--------------------------|--|--------------|---------------|
| <b>ASDIS</b> | <b>Asset Disposition</b> |  |              |               |
| 7/27/2020    | RMM                      | Review correspondence from C. Johnson regarding request to reduce listing price for 4064 Founders Club property (.1).  | 0.1          | \$24.00       |
| 7/27/2020    | JR                       | Communicate with listing agent regarding status of appraisal of Lost Key property and obtaining broker price opinions needed for motion to approve sale (.1); review correspondence from counsel for mortgagee of 4064 Founders Club property regarding status of marketing efforts (.1).  | 0.2          | \$27.00       |
| 7/28/2020    | JJP                      | Review and revise notice of publication for Vardon Terrace Condo #106 (.3).  | 0.3          | \$96.00       |
| 7/28/2020    | JR                       | Review correspondence from M. Gura regarding proof of publication of notice of sale for Vardon Terrace Unit #106 (.1); prepare notice of publication regarding same (.2); review correspondence and broker price opinions related to Lost Key property (.1); communicate with listing agent regarding status of offer to purchase 4058 Founders Club property Club property (.1).  | 0.5          | \$67.50       |
| 7/29/2020    | JR                       | Communicate with Orlando Auction Company regarding status of lien payoff for vehicle (.2); communicate with Receiver, legal team and R. Jernigan regarding communications with Orlando Auction Company regarding vehicle titling issues (.1); review correspondence and declaration from U.S. Marshals Service regarding auctioned vehicle, resolving title issues and petition from SunTrust (.1).  | 0.4          | \$54.00       |
| 7/30/2020    | JR                       | Review correspondence from listing agent regarding appraisal and buyer's loan commitment for Lost Key property (.1); communicate with Receiver, listing agent and J. Perez regarding status of filing motion to approve sale of Lost Key property (.1); review correspondence from FBI/Asset Forfeiture regarding status of resolution of SunTrust vehicle lien (.1); communicate with J. Perez and M. Gura regarding publication of notice of sale for Lost Key property (.1); review correspondence from listing agent regarding offer to purchase 4058 Founders Club property (.1). | 0.5          | \$67.50       |
| 7/31/2020    | JJP                      | Review and revise motion to sell Lost Key property, including exhibits (2.5); begin publication process and direct team regarding same (.3); begin local rule 3.01(g) process (.2).  | 3.0          | \$960.00      |

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| <b>Date</b>  | <b>TKPR</b>              | <b>Description of Services</b>  | <b>Hours</b> | <b>Amount</b> |
|--------------|--------------------------|---|--------------|---------------|
| <b>ASDIS</b> | <b>Asset Disposition</b> |   |              |               |
| 7/31/2020    | JR                       | Communicate with J. Perez and M. Gura regarding filing of motion to approve sale and publication of notice of sale of Lost Key property (.1); communicate with listing agent regarding payment of termite inspection invoice for Lost Key property (.1); communicate with closing agent regarding status of Lost Key property transaction (.1); communicate with Receiver regarding responding to offer to purchase 4058 Founders Club property (.1).   | 0.4          | \$54.00       |
| 7/31/2020    | MG                       | Coordinate with team and the Sarasota Herald-Tribune regarding publishing the notice of sale for Lost Key property (.6).  | 0.6          | \$81.00       |
| 8/3/2020     | JJP                      | Revise, finalize, and file notice regarding Vardon Terrace Condo #106 (.3); continue local rule 3.01(g) process regarding sale of Lost Key property (.2); revise, finalize, and file motion to approve sale of Lost Key property (.7).  | 1.2          | \$384.00      |
| 8/3/2020     | JR                       | Review correspondence from listing agent and Receiver regarding offer to purchase 4058 Founders Club property (.1); prepare correspondence to listing agent and Receiver regarding offer to purchase 4058 Founders Club property and preparation of purchase and sale agreement (.1); communicate with J. Perez regarding status of filing motion to approve sale of Lost Key property (.1); communicate with closing agent regarding status of closing Lost Key and Vardon Terrace Unit #106 transactions (.1); prepare purchase and sale agreement for 4058 Founders Club property (.8); communicate with listing agent regarding purchase and sale agreement for 4058 Founders Club property (.1); communicate with listing agent regarding status of closing Vardon Terrace Unit #106 (.1). | 1.4          | \$189.00      |
| 8/4/2020     | JR                       | Review correspondence from listing agent and closing agent regarding filing of motion to approve sale of Lost Key property (.1); communicate with Receiver regarding execution of loan rider related to Lost Key property (.1); communicate with listing agent and Receiver regarding contract addendum for loan on Lost Key property (.1); communicate with Receiver, Orlando Auction Company and DOJ regarding release of lien for vehicle (.2); review correspondence between counsel for Porsche Financial and E. Feld regarding lien payoff (.1).  | 0.6          | \$81.00       |

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**SERVICES**

| <b>Date</b>  | <b>TKPR</b>              | <b>Description of Services</b>  | <b>Hours</b> | <b>Amount</b> |
|--------------|--------------------------|---|--------------|---------------|
| <b>ASDIS</b> | <b>Asset Disposition</b> |   |              |               |
| 8/5/2020     | JR                       | Communicate with listing agent regarding status of buyers' execution of purchase and sale agreement for 4058 Founders Club property (.1); communicate with DOJ, Receiver and Orlando Auction regarding status of release of vehicle lien and next steps (.2); prepare motion to approve sale of 4058 Founders Club property, notice of sale and proposed order (.7); communicate with listing agent regarding obtaining broker price opinions for 4058 Founder Club property (.1).  | 1.1          | \$148.50      |
| 8/6/2020     | JR                       | Communicate with listing agent regarding status of buyers' execution of purchase and sale agreement for 4058 Founders Club property (.1); communicate with PDR regarding costs and expenses related to 4058 Founders Club property (.1); receipt and review of executed purchase and sale agreement related to 4058 Founders Club property (.1); communicate with W. Newbold at U.S. Marshals service regarding execution of consent to purchase and sale agreement for 4058 Founders Club property (.1).                                       | 0.4          | \$54.00       |
| 8/7/2020     | JJP                      | Revise, finalize, and file notice regarding sale of Lost Key property (.2).   | 0.2          | \$64.00       |
| 8/7/2020     | JR                       | Communicate with DOJ, Receiver and Orlando Auction regarding status of release of vehicle lien and next steps (.2); communicate with closing agent and listing agent regarding fully executed purchase and sale agreement for 4058 Founders Club property (.1); communicate with listing agent regarding timing of obtaining broker price opinions for 4058 Founders Club property (.1).  | 0.4          | \$54.00       |
| 8/10/2020    | JJP                      | Revise, finalize, and file second notice regarding sale of Vardon Terrace Condo #106 (.3).  | 0.3          | \$96.00       |
| 8/10/2020    | JR                       | Review correspondence from buyers' agent and seller's listing agent regarding proof of buyers' funds for cash purchase of 4058 Founders Club property (.1); communicate with J. Perez and R. Jernigan regarding status of Vardon Terrace Unit #106 and filing of notice regarding no bona fide offer (.1); receipt and review of Court's order approving sale of Vardon Terrace Unit #106 (.1); communicate with closing agent, listing agent, Receiver and legal team regarding Court's order approving sale of Vardon Terrace Unit #106 (.1). | 0.4          | \$54.00       |

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| <b>Date</b>  | <b>TKPR</b>              | <b>Description of Services</b>   | <b>Hours</b> | <b>Amount</b> |
|--------------|--------------------------|--|--------------|---------------|
| <b>ASDIS</b> | <b>Asset Disposition</b> |  |              |               |
| 8/11/2020    | JR                       | Communicate with A. Wilson regarding obtaining certified copy of Court order approving sale of Vardon Terrace Unit #106 for closing (.1); review correspondence from R. Jernigan regarding miscellaneous assets removed from Lost Key property (.1); communicate with Receiver, DOJ and Orlando Auction regarding return of vehicle and storage, return of sale proceeds and amount of Truist lien (.2).   | 0.4          | \$54.00       |
| 8/12/2020    | JR                       | Review correspondence from FBI regarding Truist vehicle lien (.1); communicate with Receiver regarding return of vehicle sale proceeds and re-auctioning vehicle (.1); communicate with Orlando Auction Company regarding re-auctioning vehicle (.1).  | 0.3          | \$40.50       |
| 8/14/2020    | JJP                      | Communicate with team regarding title issues and need to edit or revise proposed orders regarding property sales (.4).   | 0.4          | \$128.00      |
| 8/17/2020    | JR                       | Communicate with Receiver regarding return of vehicle sale proceeds and re-auctioning vehicle and DMV form to reissue title (.1); communicate with Orlando Auction Company regarding re-auctioning vehicle and DMV form to reissue title (.1); review correspondence from Porsche Financial regarding lien payoff (.1); communicate with DOJ and Receiver regarding payoff of Porsche Financial lien on vehicle (.1); prepare correspondence to ServisFirst Bank requesting wire to return net sale proceeds related to Mercedes (.1); communicate with PDR regarding return of net sale proceeds from sale of Mercedes (.1); communicate with closing agent and J. Perez regarding status of revised orders related to Vardon Terrace Unit #106 and Lost Key property (.1). | 0.7          | \$94.50       |
| 8/18/2020    | RMM                      | Review motion to direct Receiver regarding sale of 4064 Founders Club property (.2).   | 0.2          | \$48.00       |
| 8/19/2020    | JJP                      | Draft motion to amend Vardon Terrace Unit #106 order approving sale (.5); revise second notice regarding the Lost Key property and an updated proposed order (.5); communicate with team and title counsel regarding same (.2).  | 1.2          | \$384.00      |
| 8/19/2020    | JR                       | Communicate with Receiver regarding status of Vardon Terrace Unit #106 closing (.1); review correspondence from listing agent regarding status of Vardon Terrace Unit #106 closing (.1).   | 0.2          | \$27.00       |
| 8/20/2020    | JJP                      | Communicate with team regarding title issues and need to edit or revise proposed orders regarding property sales (.4).   | 0.4          | \$128.00      |

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| Date      | TKPR              | Description of Services   | Hours | Amount   |
|-----------|-------------------|---|-------|----------|
| ASDIS     | Asset Disposition |   |       |          |
| 8/21/2020 | JJP               | Revise, finalize, and file motion to amend order approving the sale of Vardon Terrace Condo #106 (1.3); revise, finalize, and file notice regarding sale of Lost Key property (.3).   | 1.6   | \$512.00 |
| 8/21/2020 | JJP               | Communicate with team regarding remission of forfeited funds and sale proceeds to the USMS (.3).  | 0.3   | \$96.00  |
| 8/21/2020 | JR                | Review correspondence between closing agent, J. Perez and Receiver regarding revised orders approving sale of Vardon Terrace Unit #106 and Lost Key property and status of closing (.2); review orders approving sales of same (.1); communicate with Receiver regarding orders approving sales and next steps (.1); review correspondence between S. Nebesky and Receiver regarding remission of asset sale proceeds (.2); update spreadsheets of net proceeds of asset sales and Receiver expenses (.3); communicate with PDR regarding remission of sale proceeds to U.S. Marshals Service (.1). | 1.0   | \$135.00 |
| 8/22/2020 | JJP               | Draft opposition to motion to require Receiver to lower sales price on Founders Club property (2.1).  | 2.1   | \$672.00 |
| 8/22/2020 | LD                | Review draft opposition concerning motion to direct Receiver regarding 4064 Founders Club property sale (.2).   | 0.2   | \$64.00  |
| 8/24/2020 | JJP               | Communicate with team regarding closing of sale of Vardon Terrace Condo #106 (.5).  | 0.5   | \$160.00 |
| 8/24/2020 | JJP               | Revise opposition to motion to require Receiver to lower sales price on Founders Club property and send to CFTC and DOJ (1.4).  | 1.4   | \$448.00 |



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| <b>Date</b>  | <b>TKPR</b>              | <b>Description of Services</b>  | <b>Hours</b> | <b>Amount</b> |
|--------------|--------------------------|---|--------------|---------------|
| <b>ASDIS</b> | <b>Asset Disposition</b> |   |              |               |
| 8/24/2020    | JR                       | Communicate with Orlando Auto Auction regarding status of issuance of title for Mercedes (.1); review correspondence from listing agent regarding status of closing of Vardon Terrace Unit #106 (.1); communicate with listing agent, closing agent, Receiver and legal team regarding obtaining certified copies of orders approving sale of Lost Key property and Vardon Terrace Unit #106 (.1); review correspondence from closing agent regarding status of closing and closing date for Vardon Terrace Unit #106 (.1); review correspondence from listing agent regarding communications with lender for Vardon Terrace Unit #106 about closing (.1); review correspondence from J. Perez to ServisFirst Bank regarding issuance of money orders (.1); review correspondence from J. Perez to listing agent for 4064 Founders Club property regarding MLS listing and website link (.1); review correspondence from J. Perez regarding response to motion filed by mortgagee requesting price reduction of 4064 Founders Club property (.1); review past market analysis of 4064 Founders Club property (.1); review proposed response to motion requesting price reduction (.1); communicate with R. Jernigan regarding remaining assets (.1); review correspondence and list of assets to be sold (.1); update master spreadsheet with assets to be sold (.1); conference call with Receiver, J. Perez and PDR regarding sold assets and transferring funds to U.S. Marshals Service (.5); retrieve asset sale documentation per request of Receiver and PDR (.2). | 2.0          | \$270.00      |
| 8/25/2020    | JJP                      | Revise, finalize, and file opposition to motion to require Receiver to lower sales price on Founders Club property (1.2).   | 1.2          | \$384.00      |
| 8/25/2020    | JR                       | Review correspondence from DOJ and U.S. Marshals Service regarding status of retitling Mercedes (.1); communicate with Receiver regarding status of retitling Mercedes and related correspondence from U.S. Marshals Service (.1); communicate with Orlando Auto Auction regarding status of retitling Mercedes (.1).   | 0.3          | \$40.50       |
| 8/25/2020    | LD                       | Review correspondence from United States concerning motion on 4064 Founders Club property (.1).   | 0.1          | \$32.00       |
| 8/26/2020    | RMM                      | Review Receiver's opposition to the motion to direct Receiver regarding sale of 4064 Founders Club property (.2).   | 0.2          | \$48.00       |



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**SERVICES**

| <b>Date</b>  | <b>TKPR</b>              | <b>Description of Services</b>  | <b>Hours</b> | <b>Amount</b> |
|--------------|--------------------------|---|--------------|---------------|
| <b>ASDIS</b> | <b>Asset Disposition</b> |   |              |               |
| 8/26/2020    | JR                       | Review correspondence from PDR with spreadsheets of property expenses related to sales (.2); update list of sold assets and remission information for U.S. Marshals Service (.1); review correspondence from listing agent regarding status of obtaining certified copies of orders approving sale of Vardon Terrace Unit #106 and Lost Key property (.1); communicate with closing agent regarding status of closing documents for same (.1).  | 0.5          | \$67.50       |
| 8/27/2020    | JR                       | Communicate with closing agent, listing agent, Receiver and J. Perez regarding status of Lost Key property closing, buyer's loan denial and next steps (.2).  | 0.2          | \$27.00       |
| 8/28/2020    | JR                       | Review correspondence from listing agent regarding cancellation form for Lost Key property (.1); communicate with Receiver regarding purchase agreement terms, return of escrow and contract cancellation for Lost Key property (.1); communicate with listing agent regarding status of closing of Vardon Terrace Unit #106 (.1).  | 0.3          | \$40.50       |
| 8/31/2020    | JR                       | Communicate with closing agent and listing agent regarding status of closing Vardon Terrace Unit #106 (.2); communicate with Receiver regarding status of cancellation of contract and return of escrow deposit for Lost Key property (.1).   | 0.3          | \$40.50       |
| 9/1/2020     | JJP                      | Communicate with title company and others regarding closing of Vardon Terrace Unit #106 (.3).   | 0.3          | \$96.00       |
| 9/1/2020     | JR                       | Communicate with Receiver regarding status of cancellation of Lost Key property sale agreement and return of escrow (.1).   | 0.1          | \$13.50       |
| 9/2/2020     | JJP                      | Communicate with title company and others regarding closing of Vardon Terrace Unit #106 (.3); communicate with government and team regarding tax issues on various properties (.4).   | 0.7          | \$224.00      |
| 9/2/2020     | JR                       | Communicate with closing agent, listing agent, Receiver and legal team regarding closing documents and logistics related to Vardon Terrace Unit #106 (1.5); review marketing analysis from listing agent regarding various properties (.2); review correspondence from listing agent regarding MLS for Lost Key property and status of return of cancellation form and escrow (.1); review correspondence from closing agent regarding cancellation of Lost Key property transaction and return of escrow (.1); revise spreadsheet of remission amounts to U.S. Marshals Service per request of Receiver (.2); communicate with Orlando Auto Auction regarding status of Mercedes Benz title (.1); communicate with Receiver, DOJ and U.S. Marshals Service regarding status of Mercedes Benz title (.1). | 2.3          | \$310.50      |

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| <b>Date</b>  | <b>TKPR</b>              | <b>Description of Services</b>   | <b>Hours</b> | <b>Amount</b> |
|--------------|--------------------------|--|--------------|---------------|
| <b>ASDIS</b> | <b>Asset Disposition</b> |  |              |               |
| 9/3/2020     | JJP                      | Communicate with team regarding tax issues on various properties (.2).   | 0.2          | \$64.00       |
| 9/3/2020     | JR                       | Communicate with closing agent, listing agent, Receiver and legal team regarding closing documents and logistics related to Vardon Terrace Unit #106 (1.3); review correspondence and marketing analysis regarding Desert Ridge and 4064 Founders Club property and price reduction forms (.1); revise spreadsheet of remission amounts to U.S. Marshals Service per request of Receiver (.1); communicate with Orlando Auto Auction regarding status of Mercedes Benz title (.1).   | 1.6          | \$216.00      |
| 9/4/2020     | JR                       | Communicate with closing agent regarding closing documents and logistics related to Vardon Terrace Unit #106 closing (.2); communicate with Receiver and Orlando Auto Auction regarding status of Mercedes Benz title (.1); update asset sale and remission spreadsheet (.2); communicate with Receiver and PDR regarding asset sale information and updated remission spreadsheet (.1); communicate with closing agent regarding Vardon Terrace Unit #106 closing and wire of sale proceeds (.1); review correspondence from listing agent regarding return of escrow deposit on Lost Key property (.1).  | 0.8          | \$108.00      |
| 9/8/2020     | JR                       | Review correspondence from U.S. Marshals Service regarding status of issuance of title for Mercedes (.1); communicate with Orlando Auto Auction regarding status of Mercedes title (.1); review correspondence from listing agent regarding responding to buyer's request to return escrow deposit on Lost Key property (.1).  | 0.3          | \$40.50       |
| 9/9/2020     | RMM                      | Communicate with C. Johnson, J. Perez, and Receiver regarding sale price for 4064 Founders Club property (.2); review docket regarding the status of filings related to sale price of 4064 Founders Club property (.2).  | 0.4          | \$96.00       |
| 9/9/2020     | JR                       | Communicate with U.S. Marshals Service and Orlando Auto Auction regarding status of Mercedes title (.1); communicate with listing agent, closing agent, Receiver and J. Perez regarding agreement to release escrow funds for Lost Key property (.1); communicate with Receiver and J. Perez regarding filing motion to vacate order authorizing sale of Lost Key property (.1); communicate with PDR regarding wire deposit of forfeited escrow on Lost Key property (.1); communicate with Receiver and closing agent regarding property tax proration related to Vardon Terrace Unit #106 (.3); communicate with Receiver and DOJ regarding remission of proceeds of asset sale funds (.2). | 0.9          | \$121.50      |

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| <b>Date</b>  | <b>TKPR</b>              | <b>Description of Services</b>  | <b>Hours</b> | <b>Amount</b> |
|--------------|--------------------------|---|--------------|---------------|
| <b>ASDIS</b> | <b>Asset Disposition</b> |   |              |               |
| 9/10/2020    | JR                       | Review correspondence from closing agent regarding tax proration on Vardon Terrace Unit #106 (.1); communicate with Receiver regarding tax proration related to Vardon Terrace Unit #106 (.2); review documentation related to closing charges and taxes for same (.2); conference call with Receiver and DOJ regarding remission of proceeds of asset sale funds (.2).                         | 0.7          | \$94.50       |
| 9/14/2020    | RMM                      | Review order denying motion regarding sale of 4064 Founders Club property (.1).   | 0.1          | \$24.00       |
| 9/14/2020    | JR                       | Review Court's order on denying motion to direct the Receiver to lower the listing price of 4064 Founders Club property (.1).   | 0.1          | \$13.50       |
| 9/15/2020    | JR                       | Communicate with U.S. Marshals Service regarding status of Mercedes vehicle title (.1); communicate with Orlando Auto Auction regarding status of Mercedes vehicle title (.1); communicate with closing agent regarding status of Vardon Terrace Unit #106 tax issue resolution (.1); review correspondence from DOJ regarding communications with Florida DMV regarding titling Mercedes (.1). | 0.4          | \$54.00       |
| 9/16/2020    | JR                       | Communicate with closing agent and Receiver regarding Vardon Terrace Unit #106 and tax proration issue (.2); communicate with Orlando Auto Auction regarding status of Mercedes title (.1).   | 0.3          | \$40.50       |
| 9/17/2020    | JJP                      | Draft motion to vacate order approving sale of Lost Key property due to buyers' tax issue (1.0); communicate with CFTC regarding same (.2); communicate with CFTC and team regarding potential sale of property belonging to defendant Montie (.3).   | 1.5          | \$480.00      |
| 9/17/2020    | JR                       | Review draft motion to vacate order approving sale of Lost Key property (.1); communicate with listing agent regarding potential purchaser for Lost Key property and potential tax proration at closing per review of property related records and 2020 trim notice (.2).   | 0.3          | \$40.50       |
| 9/18/2020    | JR                       | Communicate with counsel for Porsche Financial and U.S. Marshals Service regarding status of remission of asset sale proceeds and loan payoff (.2); review correspondence between J. Perez and CFTC counsel regarding motion to vacate order granting sale of Lost Key property (.1); prepare correspondence to CFTC counsel regarding buyer's inability to close Lost Key transaction (.1).    | 0.4          | \$54.00       |

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| <b>Date</b>  | <b>TKPR</b>              | <b>Description of Services</b>   | <b>Hours</b> | <b>Amount</b> |
|--------------|--------------------------|--|--------------|---------------|
| <b>ASDIS</b> | <b>Asset Disposition</b> |  |              |               |
| 9/21/2020    | JR                       | Communicate with closing agent and Receiver regarding status of Vardon Terrace Unit #106 tax proration issue (.1); communicate with Orlando Auto Auction and Receiver regarding status of Mercedes vehicle title and re-auctioning same (.1); communicate with U.S. Marshals Service regarding status of Mercedes vehicle title (.1); communicate with Receiver and legal team regarding status of remitting asset sale proceeds to U.S. Marshals Service (.2).  | 0.5          | \$67.50       |
| 9/22/2020    | JR                       | Review correspondence from listing agent regarding status of marketing efforts and showings (.1); conference call with closing agent and Receiver regarding tax proration for Vardon Terrace Unit #106 (.4); prepare correspondence to Receiver and J. Perez regarding wiring asset sale proceeds and related sale documentation to U.S. Marshals Service (.2).  | 0.7          | \$94.50       |
| 9/25/2020    | JR                       | Communicate with Receiver regarding status of remission of funds to U.S. Marshals Service (.1); communicate with U.S. Marshals Service and Orlando Auto Auction regarding status of re-sale of Mercedes and title issues (.1).   | 0.2          | \$27.00       |
| 9/28/2020    | JR                       | Review offer to purchase Lost Key property and related correspondence from listing agent (.1); review offer to purchase Vardon Terrace Unit #307 and related correspondence from listing agent (.1); communicate with Receiver regarding offers to purchase Lost Key property and Vardon Terrace Unit #307 (.1); review correspondence from listing agent regarding buyer's response to Receiver's counter-offer on Vardon Terrace Unit #307 (.1); review correspondence from listing agent regarding conveyance of Receiver's counter-offer for Lost Key property and buyer's concerns related to condition of property (.1); communicate with listing agent regarding providing prior inspection report for Lost Key property to potential purchaser per request of Receiver (.1); prepare blank template purchase and sale agreement for potential purchaser of Lost Key property per request of listing agent (.2); communicate with Receiver regarding status of remission of funds from asset sales to U.S. Marshals Service (.1). | 0.9          | \$121.50      |
| 9/29/2020    | JJP                      | Revise, finalize, and file motion to vacate order approving sale of Lost Key property (.5).  | 0.5          | \$160.00      |
| 9/29/2020    | AS                       | Telephone call with Manatee County property and tax office regarding Desert Ridge property (.7); email exchange with Receiver and legal team regarding same (.3); perform research on tax lien, tax deed sale and property records (1.6).  | 2.6          | \$351.00      |

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|---------------------------------|------------------------------------|---|--------------|--------------------|
| <b>ASDIS</b>                    | <b>Asset Disposition</b>           |   |              |                    |
| 9/29/2020                       | JR                                 | Review correspondence from J. Perez regarding motion to vacate order approving sale of Lost Key property (.1); review correspondence between listing agent and Receiver regarding buyer's response to Receiver's counter-offer to purchase Lost Key property (.1); review correspondence from listing agent regarding offer to purchaser Vardon Terrace Unit #307 (.1); communicate with Receiver, DOJ and LienBase regarding status of sale of Desert Ridge property and disposition of tax lien per research and review of property related documentation (.5). | 0.8          | \$108.00           |
| 9/30/2020                       | JR                                 | Review correspondence from listing agent regarding providing counter-offer to purchaser on Vardon Terrace Unit #307 (.1); communicate with Receiver and listing agent regarding counter-offer on same (.1); review endorsed order granting motion to vacate sale of Lost Key (.1); communicate with Receiver and listing agent regarding Receiver's counter-offer on Vardon Terrace Unit #307 (.1).   | 0.4          | \$54.00            |
| <b>Total: Asset Disposition</b> |                                    |   | <b>60.80</b> | <b>\$12,237.00</b> |
| <b>ASSET</b>                    | <b>Asset Analysis and Recovery</b> |   |              |                    |
| 7/1/2020                        | JJP                                | Complete first draft of motion to approve numerous clawback settlements and circulate to CFTC pursuant to local rule 3.01(g) (3.5).   | 3.5          | \$1,120.00         |
| 7/1/2020                        | LD                                 | Review correspondence from Ford Sumner law firm regarding legal services for Oasis Global FX Ltd. (.2); review ATC Brokers emails in database (1.2); review past case filings of Receiver (.8); revise motion for order for ATC Brokers to show cause why it should not be held in contempt (2.2).  | 4.4          | \$1,408.00         |
| 7/2/2020                        | JJP                                | Review correspondence regarding potential claims against Mainstream and communications regarding legal issues (.3).   | 0.3          | \$96.00            |
| 7/4/2020                        | LD                                 | Review draft Mainstream complaint (.4); confer with J. Perez regarding legal analysis (.2).   | 0.6          | \$192.00           |
| 7/5/2020                        | LD                                 | Review correspondence with counsel for ATC Brokers and identify exhibits (.7); revise motion for ATC Brokers and D. Manoukian to show cause why they should not be held in contempt for failure to produce records (2.2); revise motion for approval of engagement of U.K counsel M. Handley (.6); confer with J. Perez regarding ATC Brokers and M. Handley motions (.2).  | 3.7          | \$1,184.00         |
| 7/6/2020                        | JJP                                | Communicate with CFTC and team regarding motion to approve clawback settlements (.2).   | 0.2          | \$64.00            |
| 7/7/2020                        | JJP                                | Communicate with L. Dockerty and CFTC regarding order to show cause against ATC (.2).   | 0.2          | \$64.00            |

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|--------------|------------------------------------|--|--------------|---------------|
| <b>ASSET</b> | <b>Asset Analysis and Recovery</b> |  |              |               |
| 7/7/2020     | LD                                 | Revise motion for order to ATC Brokers UK and D. Manoukian to show cause (.4); confer with counsel for CFTC concerning order to show cause against ATC Brokers and D. Manoukian (.2); confer with Department of Justice concerning order to show cause against ATC Brokers and D. Manoukian (.2); telephone conference with counsel for ATC Brokers and D. Manoukian concerning motion (.1); exchange messages with counsel for ATC Brokers regarding motion for order to show cause (.3). | 1.2          | \$384.00      |
| 7/8/2020     | JJP                                | Review draft correspondence to ATC and communicate with L. Dockerty regarding same (.2).   | 0.2          | \$64.00       |
| 7/8/2020     | JR                                 | Review correspondence from J. Haas and related correspondence from A. Stephens regarding production of monthly financial report and documentation (.1).  | 0.1          | \$13.50       |
| 7/8/2020     | LD                                 | Call counsel for ATC Brokers (.1); update Receiver concerning status (.1); telephone conference with counsel for ATC Brokers (.1); provide counsel for ATC Brokers copy of motion for order to show cause (.1); review correspondence from J. Haas (.1); review case law on service of amended complaint against R. Montie (.5); confer with counsel for CFTC (.1); revise motion for order to show cause (.5); draft and send email to counsel for ATC Brokers UK (.3).                   | 1.8          | \$576.00      |
| 7/9/2020     | JJP                                | Review edits to ATC motion and communicate with L. Dockerty regarding same (.2).   | 0.2          | \$64.00       |
| 7/9/2020     | JR                                 | Review correspondence and monthly account documentation from R. Montie (.2); prepare correspondence to Citi regarding status of request of records (.1).   | 0.3          | \$40.50       |
| 7/9/2020     | LD                                 | Telephone call with U.K. counsel for ATC Brokers (.2); confer with U.K. counsel regarding motion and Receivership order (.2); confer with United States regarding position on motion (.1); review correspondence from attorneys for United States regarding motion (.2); revise motion for order to show cause (.5); confer with J. Perez regarding motion (.1); confer with counsel for United States concerning motion for order to show cause (.2).                                     | 1.5          | \$480.00      |
| 7/10/2020    | LD                                 | Telephone conference with London counsel for ATC Brokers (.2); review arrangements for interview of J. Paniagua (.1); confer with counsel for ATC Brokers (.2); confer with J. Perez regarding motion for order to show cause (.1); revise order to show cause (.4); revise motion for order to show cause (3.8); direct filing of motion (.1); review notice filed by D. Manoukian and update team (.1); draft argument outline (.4).   | 5.4          | \$1,728.00    |



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|--------------|------------------------------------|---|-------|------------|
| <b>ASSET</b> | <b>Asset Analysis and Recovery</b> |   |       |            |
| 7/11/2020    | LD                                 | Make notes for argument outline for order for ATC Brokers to show cause (.4).   | 0.4   | \$128.00   |
| 7/12/2020    | LD                                 | Review M. Sims correspondence (.1); research law on the court's jurisdiction over ATC Brokers UK (.6); revise outline of argument in support of motion for order for ATC Brokers and D. Manoukian to show cause (.4); calendar preparation of request for reply to ATC Brokers opposition (.1).                                     | 1.2   | \$384.00   |
| 7/13/2020    | JJP                                | Revise, finalize, and file first motion for approval of numerous clawback settlements in enforcement enforcement action (1.3).  | 1.3   | \$416.00   |
| 7/13/2020    | JR                                 | Review Receiver's motion for order to show cause against D. Manoukian and ATC Brokers (.1); review notice filed by D. Manoukian in response to motion for order to show cause (.1).   | 0.2   | \$27.00    |
| 7/13/2020    | LD                                 | Research jurisdictional law for ATC Brokers motion (.6); revise argument outline for ATC Brokers motion (.3); summarize advice to Receiver on ATC Brokers response and reply (.6).  | 1.5   | \$480.00   |
| 7/14/2020    | JJP                                | Telephone conference with L. Dougherty and J. Sallah regarding information needed from J. Anile and issues relating to Mainstream, including related correspondence (1.0).  | 1.0   | \$320.00   |
| 7/14/2020    | LD                                 | Telephone conference with Receiver regarding ATC Brokers motion (.3); make notes for follow-up tasks on ATC Brokers motion (.2); review case notes and next tasks (1.3); draft and send correspondence to J. Sallah regarding ATC Brokers motion (.3); telephone conference with J. Sallah concerning J. Anile and Mainstream (.5). | 2.6   | \$832.00   |
| 7/15/2020    | LD                                 | Confer with J. Sallah regarding interview of J. Anile (.1); review memorandum from Receiver concerning J. Anile (.4); draft topics for J. Anile declaration (1.4); review notes and emails concerning ATC Brokers (.7); confer with J. Sallah regarding call with J. Anile (.1); revise notes for declaration of J. Anile (.6).     | 3.3   | \$1,056.00 |
| 7/16/2020    | JR                                 | Review USA's motion to extend stay of all civil proceedings (.1).   | 0.1   | \$13.50    |
| 7/16/2020    | LD                                 | Revise notes for J. Anile affidavit (.3); call Receiver regarding J. Anile (.1); review United States' motion for extension of stay (.2); research J. Anile files (.3); update J. Sallah regarding interview with J. Anile (.1); review notes in preparation for interview with J. Anile (1.6).                                     | 2.6   | \$832.00   |
| 7/17/2020    | JJP                                | Review draft affidavit for J. Anile (.4); participate in telephonic interview of J. Anile (1.0).  | 1.4   | \$448.00   |

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|--------------|------------------------------------|---|--------------|---------------|
| <b>ASSET</b> | <b>Asset Analysis and Recovery</b> |   |              |               |
| 7/17/2020    | JR                                 | Prepare correspondence to DOJ with case-related documents per request of Receiver (.1); review correspondence from outside counsel regarding proof of claim forms for litigation purposes (.1); review Court's order staying case (.1).   | 0.3          | \$40.50       |
| 7/17/2020    | LD                                 | Prepare for call with J. Sallah and J. Anile (.5); review emails between J. Anile and D. Manoukian in E-Hounds platform (1.6); telephone conference with J. Anile (2.1); confer with counsel for Spotex (.1); review and mark up notes of interview with J. Anile (.6); review J. Anile draft declaration (1.1); begin analyzing D. Manoukian opposition to order to show cause (.6).   | 6.6          | \$2,112.00    |
| 7/18/2020    | LD                                 | Analyze opposition filed by D. Manoukian to motion for order to show cause (2.2); draft and revise motion for leave to file reply (2.4).  | 4.6          | \$1,472.00    |
| 7/19/2020    | LD                                 | Analyze opposition of D. Manoukian to motion for order to show cause (3.5); draft and revise motion for leave to file reply to opposition (2.4); draft and revise reply (2.2).  | 8.1          | \$2,592.00    |
| 7/20/2020    | JJP                                | Review draft motion for leave to reply regarding ATC Brokers (.3).  | 0.3          | \$96.00       |
| 7/20/2020    | JR                                 | Review D. Manoukian response to order to show cause (.1).   | 0.1          | \$13.50       |
| 7/20/2020    | LD                                 | Analyze opposition of D. Manoukian to motion for order to show cause (.8); draft and revise motion for leave to file reply to opposition (.7); draft and revise reply (1.6); analyze ATC Brokers documents provided by Receiver (.7); further revise reply (.4); confer with team regarding motion (.2); telephone call with Receiver concerning reply (.2); confer with counsel for D. Manoukian concerning motion for leave (.1); confer with counsel for CFTC concerning motion for leave (.1); confer with counsel for ATC Brokers concerning motion for leave (.1); confer with counsel for United States of America concerning motion for leave (.1); compare versions of motion for leave (.3); revise motion for leave (.8); review notes from Receiver and list of upcoming tasks for proposed reply (.6). | 6.7          | \$2,144.00    |
| 7/21/2020    | JJP                                | Review motion for leave to reply to opposition filed by ATC and communicate with team regarding same (.7).  | 0.7          | \$224.00      |
| 7/21/2020    | JR                                 | Review correspondence from DOJ discovery liaison regarding transfer of case-related files (.1).   | 0.1          | \$13.50       |



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|--------------|------------------------------------|---|--------------|---------------|
| <b>ASSET</b> | <b>Asset Analysis and Recovery</b> |   |              |               |
| 7/21/2020    | LD                                 | Review correspondence regarding J. Anile (.1); call and email counsel for ATC Brokers concerning motion for leave (.1); summarize ATC Brokers research for Receiver (.4); telephone conference with Receiver regarding same (.3); revise motion for leave to file reply to opposition (3.0); review draft declaration of J. Anile (.4); revise draft reply to opposition of D. Manoukian (1.6); telephone conference with Receiver concerning motion for leave (.1); confer with J. Perez regarding motion for leave (.2); further revise motion (.4); direct filing and service of reply (.1). | 6.7          | \$2,144.00    |
| 7/22/2020    | JJP                                | Review Mainstream filing in opposition to extension of stay (.2).   | 0.2          | \$64.00       |
| 7/22/2020    | JR                                 | Review Mainstream's response in opposition to motion to extend stay (.1); review D. Manoukian's response to Receiver's reply to opposition to motion for order to show cause (.1); review correspondence from counsel for J. Haas and documentation supporting monthly expenses (.2).   | 0.4          | \$54.00       |
| 7/22/2020    | LD                                 | Review D. Manoukian opposition to Receiver's motion for leave to file reply (.2); review notes of interview with J. Anile (1.4); review J. Anile draft declaration (1.1); outline areas of interest for interview with J. Paniagua (.8); review large volume of emails in preparation for interview of J. Paniagua (2.1).   | 5.6          | \$1,792.00    |
| 7/23/2020    | LD                                 | Review emails in preparation for interview of J. Paniagua (.8); telephone conference with Receiver, J. Paniagua, and J. Paniagua's counsel (1.0); revise J. Paniagua draft declaration (1.8); review notes of J. Paniagua interview (1.1); review emails explained by J. Paniagua (.4); revise J. Paniagua draft declaration (.9).  | 6.0          | \$1,920.00    |
| 7/24/2020    | LD                                 | Review order on extension of stay (.1); review order referring order to show cause and motion for leave to file reply to magistrate judge (.1); review case notes and next tasks on ATC Brokers document requests (.6); review notes and next tasks on Spotex document requests (.4).   | 1.2          | \$384.00      |
| 7/26/2020    | LD                                 | Revise and draft declaration of J. Paniagua (2.3); review J. Paniagua emails (1.1).   | 3.4          | \$1,088.00    |
| 7/27/2020    | JR                                 | Review correspondence from J. Perez regarding sending proof of claim forms to outside counsel to assist with preparing litigation (.1); review correspondence between J. Perez and E. Feld regarding recovery of funds from Belize (.1); receipt and review of correspondence from J. Perez regarding documentation from non-party Ford Sumner and transfer same to system (.1); review correspondence between J. Perez and DOJ regarding status of repatriation of funds from United Kingdom (.1).   | 0.4          | \$54.00       |

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| <b>Date</b>  | <b>TKPR</b>                        | <b>Description of Services</b>   | <b>Hours</b> | <b>Amount</b> |
|--------------|------------------------------------|--|--------------|---------------|
| <b>ASSET</b> | <b>Asset Analysis and Recovery</b> |  |              |               |
| 7/27/2020    | LD                                 | Review endorsed order granting leave for reply (.1); review summary of law on Receiver's jurisdiction (.2); revise and draft reply to D. Manoukian's opposition to motion to show cause (6.2).   | 6.5          | \$2,080.00    |
| 7/28/2020    | AS                                 | Email exchange with J. Rizzo and A. Wilson regarding inventory of Ford Sumner documents (.2).  | 0.2          | \$27.00       |
| 7/28/2020    | JR                                 | Communicate with A. Wilson and A. Stephens regarding documentation from non-party Ford Sumner (.1); review Manatee and Sarasota County property assessor information related to remaining properties (.2); update master spreadsheet with information from Manatee and Sarasota County property assessors related to remaining properties (.2).  | 0.5          | \$67.50       |
| 7/28/2020    | LD                                 | Draft and revise reply to D. Manoukian opposition to Receiver's motion to show cause (8.7); review correspondence concerning J. Paniagua (.1); revise J. Anile declaration (.5); revise J. Paniagua declaration (.5).  | 9.8          | \$3,136.00    |
| 7/29/2020    | LD                                 | Telephone conference with Receiver (.6); revise J. Paniagua declaration (.7); revise J. Anile declaration (.5); confer with counsel for J. Paniagua (.1); confer with counsel regarding J. Anile (.1); revise reply (5.4); confer with J. Perez regarding exhibit to reply (.1).   | 7.5          | \$2,400.00    |
| 7/30/2020    | LD                                 | Revise and draft reply to D. Manoukian opposition to Receiver's motion to show cause (8.1); review draft motion for extension of time (.1); review draft J. Anile declaration (.3); review draft J. Paniagua declaration (.4); confer multiple times with J. Sallah (.3); telephone conference with counsel for J. Paniagua (.2); review revised draft motion for extension of time (.2); review exhibits (.6); file and serve reply (.2). | 10.4         | \$3,328.00    |
| 7/31/2020    | JJP                                | Communicate with team and outside counsel regarding potential claims and documents needed to evaluate claims (.6).   | 0.6          | \$192.00      |
| 7/31/2020    | JR                                 | Communicate with D. Burnette and A. Wilson regarding Bank of America invoice (.1); review correspondence from M. Gura and J. Perez regarding providing proof of claim forms to outside counsel for potential litigation (.1).  | 0.2          | \$27.00       |
| 7/31/2020    | MG                                 | Review and compile claim forms received to date for K. Phelps to review (.8).  | 0.8          | \$108.00      |
| 8/3/2020     | JR                                 | Review correspondence between J. Sanchez at Citi and Receiver regarding Oasis CitiFX accounts (.1).  | 0.1          | \$13.50       |
| 8/4/2020     | LD                                 | Analyze sur-reply of D. Manoukian (.3); review case law cited by sur-reply (.4); summarize advice to Receiver concerning sur-reply (.2).   | 0.9          | \$288.00      |

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|--------------|------------------------------------|--|--------------|---------------|
| <b>ASSET</b> | <b>Asset Analysis and Recovery</b> |  |              |               |
| 8/5/2020     | JR                                 | Communicate with Receiver and R. Bedke regarding Spotex records (.1).  | 0.1          | \$13.50       |
| 8/5/2020     | LD                                 | Draft notes for oral argument on order for ATC Brokers to show cause (.3); confer with Receiver and J. Perez about oral argument (.1); review correspondence from M. DaCorta and summarize advice (.1); review case notes and next steps (.7).     | 1.2          | \$384.00      |
| 8/6/2020     | JJP                                | Review and revise memorandum regarding analysis of trading records and circulate to Receiver and team (.6).  | 0.6          | \$192.00      |
| 8/6/2020     | JR                                 | Communicate with S. Batsch at FBI and Receiver regarding Spotex records and analysis of same (.2); review R. Montie monthly financial disclosure documentation (.2); review E-Hounds database (.4).  | 0.8          | \$108.00      |
| 8/10/2020    | JR                                 | Research regarding M. DaCorta's new address and owner of same (.2); communicate with Receiver and legal team regarding new address and owner of property (.1); communicate with Receiver regarding request for images of M. DaCorta's laptop (.1). | 0.4          | \$54.00       |
| 8/11/2020    | JR                                 | Review correspondence from G. Godfrey and E. Feld regarding documentation required by IFSC to release funds (.1); communicate with Receiver regarding documentation required by IFSC to release funds (.1).  | 0.2          | \$27.00       |
| 8/17/2020    | LD                                 | Confer with counsel for Spotex (.1).   | 0.1          | \$32.00       |
| 8/18/2020    | JR                                 | Review correspondence and monthly expense documentation from J. Haas counsel (.2).   | 0.2          | \$27.00       |
| 8/18/2020    | LD                                 | Review checks and correspondence from E. Halley and summarize advice for J. Rizzo (.1).  | 0.1          | \$32.00       |
| 8/19/2020    | LD                                 | Review case notes and list of next tasks (.4).   | 0.4          | \$128.00      |
| 8/24/2020    | JR                                 | Review USA's status report (.1).   | 0.1          | \$13.50       |
| 8/24/2020    | LD                                 | Review report of intervenor United States (.1).  | 0.1          | \$32.00       |
| 8/26/2020    | JJP                                | Draft second motion to approve clawback settlements and circulate to team for comments (1.4).  | 1.4          | \$448.00      |
| 8/28/2020    | JJP                                | Revise, finalize, and file second motion for approval of clawback settlements and circulate to CFTC per local rule 3.01(g) (1.9).  | 1.9          | \$608.00      |
| 8/28/2020    | LD                                 | Research motion for order for ATC Brokers to show cause, responses, and exhibits, and summarize for Receiver (.2).   | 0.2          | \$64.00       |
| 9/2/2020     | JR                                 | Communicate with Receiver and J. Perez regarding status of recovery of Belize funds (.1).  | 0.1          | \$13.50       |
| 9/3/2020     | JR                                 | Review E-Hounds platform for documentation and information related to assets (.5).   | 0.5          | \$67.50       |

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| <b>Date</b>  | <b>TKPR</b>                        | <b>Description of Services</b>   | <b>Hours</b> | <b>Amount</b> |
|--------------|------------------------------------|--|--------------|---------------|
| <b>ASSET</b> | <b>Asset Analysis and Recovery</b> |  |              |               |
| 9/4/2020     | JR                                 | Review correspondence from counsel for R. Montie and monthly financial documentation (.1).   | 0.1          | \$13.50       |
| 9/4/2020     | LD                                 | Revise letter to Spotex concerning document production (1.8); revise list of search terms (.4); analyze subpoena previously served on Spotex (.6); analyze prior correspondence between Receiver and counsel for Spotex (.6); review and revise draft confidentiality agreement provided by counsel for Spotex (1.1); review past agreements approved by Receiver (.4); confer with J. Perez concerning letter to Spotex (.1). | 5.0          | \$1,600.00    |
| 9/9/2020     | RMM                                | Review Receiver's motion for an order to show cause (.1).  | 0.1          | \$24.00       |
| 9/9/2020     | JR                                 | Communicate with Receiver, J. Perez and E. Feld regarding status of recovery of Belize funds (.1).   | 0.1          | \$13.50       |
| 9/10/2020    | JJP                                | Review draft letter to Spotex regarding document production (.2); review draft confidentiality agreement with Spotex (.3); correspond with L. Dougherty regarding Spotex (.1).   | 0.6          | \$192.00      |
| 9/10/2020    | LD                                 | Review correspondence from J. Perez concerning letter to Spotex counsel and draft confidentiality agreement (.1); revise confidentiality agreement (.2); revise letter to Spotex counsel (.1); confer with counsel for Spotex (.1); direct mailing of letter to Spotex (.1).   | 0.6          | \$192.00      |
| 9/14/2020    | JR                                 | Review Magistrate's report and recommendation related to Receiver's motion for an order for D. Manoukian and ATC Brokers to show cause (.1).   | 0.1          | \$13.50       |
| 9/14/2020    | LD                                 | Schedule follow-ups on Spotex document requests (.1); analyze Magistrate Judge's report and recommendation on motion for order for ATC Brokers to show cause (1.7); review notice of rescheduling of sentencing of J. Anile (.1); review Consolidated Receivership Order and summarize advice for Receiver on next steps (1.2).  | 3.1          | \$992.00      |
| 9/15/2020    | RMM                                | Review report and recommendation regarding motion for an order for D. Manoukian to show cause (.7); communicate with J. Perez regarding dismissal due to lack of prosecution (.3); research legal standard for dismissal due to lack of prosecution (2.2).   | 3.2          | \$768.00      |
| 9/16/2020    | JR                                 | Communicate with E. Feld regarding status of recovery of Belize money (.1).  | 0.1          | \$13.50       |
| 9/17/2020    | LD                                 | Call counsel for Spotex concerning document requests (.1).   | 0.1          | \$32.00       |
| 9/18/2020    | EF                                 | Review correspondence from Belize lawyers regarding procedures for winding down OIG as trading company and return of trading deposit (.2).   | 0.2          | \$48.00       |

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| Date         | TKPR                               | Description of Services   | Hours | Amount     |
|--------------|------------------------------------|---|-------|------------|
| <b>ASSET</b> | <b>Asset Analysis and Recovery</b> |   |       |            |
| 9/18/2020    | JR                                 | Communicate with E. Feld regarding status of recovery of funds from Belize (.1).  | 0.1   | \$13.50    |
| 9/18/2020    | LD                                 | Return call from counsel for Spotex (.1); telephone call with counsel for Spotex concerning document production (.1); write note to file and calendar reminder for next call (.1).                        | 0.3   | \$96.00    |
| 9/21/2020    | EF                                 | Attend case planning and strategy meeting between Receiver and legal team (1.1).  | 1.1   | \$264.00   |
| 9/21/2020    | JR                                 | Review E-Hounds platform for asset related documentation (.4); conference with Receiver and legal team regarding status and tasks (1.1); review correspondence from Receiver related to case status (.1). | 1.6   | \$216.00   |
| 9/21/2020    | LD                                 | Attend status meeting with Receiver and legal team (1.1).   | 1.1   | \$352.00   |
| 9/21/2020    | MML                                | Attend portion of team meeting with Receiver regarding status and tasks (1.0).  | 1.0   | \$240.00   |
| 9/22/2020    | JR                                 | Communicate with E. Feld regarding recovery of funds from Belize and next steps (.1); review E-Hounds document platform for asset related materials (.5).   | 0.6   | \$81.00    |
| 9/23/2020    | EF                                 | Review ATC Brokers documents in preparation for sending to outside litigation counsel (2.8).  | 2.8   | \$672.00   |
| 9/23/2020    | JR                                 | Review correspondence between Receiver and S. Batsch at IRS regarding investor inquires and funds potentially in accounts in England (.1).  | 0.1   | \$13.50    |
| 9/23/2020    | LD                                 | Update E. Feld concerning J. Paniagua research and interview materials including extensive email collection (.5); review and summarize legal research on California forum and update E. Feld (.3).        | 0.8   | \$256.00   |
| 9/24/2020    | LD                                 | Begin drafting objection to Magistrate Judge's report and recommendation on motion for ATC Brokers to show cause and review of documents for same (2.2).  | 2.2   | \$704.00   |
| 9/25/2020    | JJP                                | Review and update tolling agreement chart, including analysis of how to address tolled claims (2.9).  | 2.9   | \$928.00   |
| 9/25/2020    | JR                                 | Review E-Hounds database for asset related documents (.3).  | 0.3   | \$40.50    |
| 9/25/2020    | LD                                 | Confer with counsel for Spotex concerning status of document production (.2); update spreadsheet on tolling agreements after reviewing case records (.4).   | 0.6   | \$192.00   |
| 9/27/2020    | LD                                 | Analyze report and recommendation on Receiver's motion for order to show cause (.8); revise objection to same (2.1); review case filings for objection (.6).  | 3.5   | \$1,120.00 |
| 9/28/2020    | JJP                                | Review and revise objection to report and recommendation regarding obtaining documents from ATC (.7).   | 0.7   | \$224.00   |

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| Date                                      | TKPR                               | Description of Services  | Hours         | Amount             |
|---|------------------------------------|--|---------------|--------------------|
| <b>ASSET</b>                              | <b>Asset Analysis and Recovery</b> |  |               |                    |
| 9/28/2020                                 | JR                                 | Communicate with Receiver regarding status of recovery of funds form Belize (.1).  | 0.1           | \$13.50            |
| 9/28/2020                                 | LD                                 | Draft and revise Receiver's objection to Magistrate Judge's report and recommendation on motion for order for ATC Brokers and D. Manoukian to show cause (4.3); confer with J. Perez concerning objection (.1); review Receiver's revisions to objection (.2); telephone conference with Receiver concerning his revisions to objection (.1); review previous case filings (2.7); research rules and case law on rights of Receiver to records (2.5); revise objection and finalize for filing (.7). | 10.6          | \$3,392.00         |
| 9/29/2020                                 | JJP                                | Revise tolling agreement chart and analyze further investigation/action needed (.4); draft email to team regarding tolling agreements and next steps (.2).   | 0.6           | \$192.00           |
| 9/29/2020                                 | RMM                                | Review correspondence and attachments from J. Perez regarding tolling agreements (.2).   | 0.2           | \$48.00            |
| 9/29/2020                                 | JR                                 | Prepare correspondence to T. Bakas with Forex trading documentation per request of E. Feld and review correspondence from E. Feld to T. Bakas (.1).  | 0.1           | \$13.50            |
| 9/30/2020                                 | LD                                 | Advise Receiver concerning Spotex (.1); review update on tolling agreements (.1); review motion to vacate order (.1).  | 0.3           | \$96.00            |
| <b>Total: Asset Analysis and Recovery</b> |                                    |  | <b>181.40</b> | <b>\$55,602.50</b> |
| <b>BUSIN</b>                              | <b>Business Operations</b>         |  |               |                    |
| 7/1/2020                                  | JR                                 | Communicate with D. Burnette regarding GoDaddy renewal invoice (.1); communicate with B. Price at PDR regarding IRS filings (.1).  | 0.2           | \$27.00            |
| 7/2/2020                                  | JR                                 | Review account balances (.1); update account ledger (.1).  | 0.2           | \$27.00            |
| 7/6/2020                                  | JR                                 | Review correspondence from R. Jernigan regarding invoices and issued checks (.1); update account ledger with check and payment information (.1); review correspondence from R. Jernigan regarding ExtraSpace Storage invoice payment (.1); review correspondence from R. Jernigan regarding repairs to Midnight Pass rental unit and purchase of new appliances (.1); communicate with legal team and PDR regarding deposit (.1).  | 0.5           | \$67.50            |
| 7/8/2020                                  | JR                                 | Receipt and review of mortgage payment from 1605 55th Avenue West (.1); communicate with PDR and legal team regarding deposit of mortgage payment (.1); update account ledger (.1).  | 0.3           | \$40.50            |



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| <b>Date</b>  | <b>TKPR</b>                | <b>Description of Services</b>  | <b>Hours</b> | <b>Amount</b> |
|--------------|----------------------------|---|--------------|---------------|
| <b>BUSIN</b> | <b>Business Operations</b> |   |              |               |
| 7/9/2020     | JR                         | Update account ledger (.1); receipt and review of June 2020 ServisFirst Bank account statements (.1); communicate with PDR regarding June 2020 ServisFirst Bank account statements (.1).  | 0.3          | \$40.50       |
| 7/10/2020    | JR                         | Review online bank account balances and transactions (.1).  | 0.1          | \$13.50       |
| 7/13/2020    | JR                         | Review correspondence from GoDaddy regarding domain renewal (.1); review billing notice from Shopify (.1); communicate with Receiver and D. Burnette regarding GoDaddy domain renewal and Shopify billing notice (.1); review online account balances and confirm deposits (.1); review correspondence from R. Jernigan regarding invoices and issued checks (.1); update account ledger (.1); review notice and returned check from Extra Space Storage (.1); communicate with Receiver, R. Jernigan and PDR regarding returned check from Extra Space Storage (.1).   | 0.8          | \$108.00      |
| 7/14/2020    | JR                         | Review correspondence from PDR regarding ordering checks (.1); update account ledger (.1).  | 0.2          | \$27.00       |
| 7/15/2020    | JR                         | Communicate with R. Jernigan regarding invoices to be paid (.1).  | 0.1          | \$13.50       |
| 7/16/2020    | JR                         | Review correspondence from R. Jernigan and Crystal Sands Owners' Association notice regarding payment of rental revenue (.1); review online accounts to confirm deposit from Crystal Sands Owners' Association (.1); update account ledger (.1); review correspondence between R. Jernigan and Receiver regarding status of operations (.1); review correspondence from A. Stephens regarding notification from Manatee County regarding 2017 taxes on 7312 Desert Glen Ridge property (.1); communicate with Receiver, R. Jernigan and legal team regarding payment of 2017 taxes on 7312 Desert Glen property (.1). | 0.6          | \$81.00       |
| 7/16/2020    | JR                         | Review correspondence from Kapila Mukamal regarding June 2020 invoice (.1).   | 0.1          | \$13.50       |
| 7/17/2020    | JR                         | Review GoDaddy invoice and notice regarding domain renewals (.1); communicate with Receiver and D. Burnette regarding GoDaddy domain renewals (.1).   | 0.2          | \$27.00       |
| 7/20/2020    | JR                         | Review correspondence from R. Jernigan regarding invoices to be paid and issued checks (.1); update account ledger (.1); review GoDaddy domain renewal (.1); communicate with D. Burnette and Receiver regarding GoDaddy domain renewals (.1); review correspondence from R. Jernigan regarding maintenance issues at Lost Key property (.1); review online bank account balances and transactions (.1).  | 0.6          | \$81.00       |

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| <b>Date</b>  | <b>TKPR</b>                | <b>Description of Services</b>   | <b>Hours</b> | <b>Amount</b> |
|--------------|----------------------------|--|--------------|---------------|
| <b>BUSIN</b> | <b>Business Operations</b> |  |              |               |
| 7/21/2020    | JR                         | Review online bank account deposits and transactions (.1).   | 0.1          | \$13.50       |
| 7/22/2020    | JR                         | Review online accounts to confirm deposits (.1).   | 0.1          | \$13.50       |
| 7/27/2020    | JR                         | Review correspondence from R. Jernigan regarding notice from Florida Power and Light related to deposit credit for account to Lost Key property (.1); review online account balances and transactions (.1).  | 0.2          | \$27.00       |
| 7/29/2020    | JR                         | Review bank account balances and transactions (.1).  | 0.1          | \$13.50       |
| 7/30/2020    | JR                         | Review correspondence from Receiver regarding Roar of the Lion Fitness website (.1); review account balances (.1).   | 0.2          | \$27.00       |
| 8/3/2020     | JR                         | Review correspondence from R. Jernigan regarding invoices to be paid and issued checks (.1); update account ledger (.1); review correspondence and invoice from GoDaddy regarding domain renewal (.1); communicate with Receiver and D. Burnette regarding renewal of GoDaddy domain and related invoice (.1); review Amazon invoice (.1); communicate with Receiver and D. Burnette regarding Amazon invoice (.1); review online account balances and transactions (.1); update account ledger (.1); communicate with PDR regarding payment of invoices (.1). | 0.9          | \$121.50      |
| 8/4/2020     | JR                         | Retrieve ServisFirst Bank account statements for July 2020 (.1); communicate with PDR regarding ServisFirst Bank July 2020 account statements (.1).  | 0.2          | \$27.00       |
| 8/5/2020     | JR                         | Review online bank account balances and transactions (.1).   | 0.1          | \$13.50       |
| 8/7/2020     | JR                         | Communicate with E-Hounds regarding Roar of the Lion Fitness website (.2).   | 0.2          | \$27.00       |
| 8/11/2020    | JR                         | Communicate with R. Jernigan regarding status of interest payment for 55th Ave West mortgage (.1).   | 0.1          | \$13.50       |
| 8/17/2020    | JR                         | Review online account balances and transactions (.1); communicate with R. Jernigan regarding status of mortgage payment (.1).  | 0.2          | \$27.00       |
| 8/21/2020    | JR                         | Review correspondence from R. Jernigan regarding invoices to be paid and issued checks (.1); update account ledger (.1); review bank balances and transactions (.1).   | 0.3          | \$40.50       |
| 8/24/2020    | JR                         | Review online bank account balances and transactions (.1); communicate with Receiver, PDR, R. Jernigan and J. Perez regarding ServisFirst Bank charge back related to August 2020 mortgage payment on 55th Ave West property (.1).   | 0.2          | \$27.00       |
| 8/28/2020    | JR                         | Review online account balances and transactions (.1); communicate with R. Jernigan regarding bounced mortgage payment from mortgagor for 55th Ave West property (.1).  | 0.2          | \$27.00       |



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| <b>Date</b>  | <b>TKPR</b>                | <b>Description of Services</b>   | <b>Hours</b> | <b>Amount</b> |
|--------------|----------------------------|--|--------------|---------------|
| <b>BUSIN</b> | <b>Business Operations</b> |  |              |               |
| 8/31/2020    | JR                         | Communicate with legal team regarding previously paid invoices (.2); review correspondence from R. Jernigan regarding invoices and issuance of checks (.1); communicate with B. Nguyen regarding returned check and undeliverable notice (.1); update account ledger (.1).   | 0.5          | \$67.50       |
| 9/1/2020     | JR                         | Receipt and review of rental and deposit notice regarding Midnight Pass Unit #1002 and related correspondence from R. Jernigan (.1); review online account balances (.1); update account ledger (.1).  | 0.3          | \$40.50       |
| 9/4/2020     | JR                         | Review online account balances (.1).   | 0.1          | \$13.50       |
| 9/8/2020     | JR                         | Review correspondence from R. Jernigan regarding invoices to be paid (.1); review online account balances (.1); update account ledger (.1); communicate with legal team and PDR regarding deposit (.1); receipt and review of August 2020 ServisFirst Bank account statements (.1); communicate with PDR regarding August 2020 ServisFirst Bank account statements (.1). | 0.6          | \$81.00       |
| 9/9/2020     | JR                         | Review correspondence and wire notice from ServisFirst Bank (.1); update account ledger (.1).  | 0.2          | \$27.00       |
| 9/10/2020    | JR                         | Communicate with R. Jernigan, Receiver and J. Perez regarding insurance renewal on Lost Key property and expirations on other Receivership properties (.1); review online account balances (.1); update account ledger (.1); review correspondence from expert and invoice (.1).   | 0.4          | \$54.00       |
| 9/14/2020    | JR                         | Review online account balances (.1); update account ledger (.1); review correspondence from Crystal Sands regarding deposit of Midnight Pass rental proceeds (.1).   | 0.3          | \$40.50       |
| 9/15/2020    | JR                         | Review correspondence from Crystal Sands and R. Jernigan regarding deposit of Midnight Pass rental proceeds (.1) review online account balances and transactions (.1); update account ledger (.1); communicate with PDR regarding account balances (.1); prepare correspondence to ServisFirst Bank requesting wire transfer (.2).                                       | 0.6          | \$81.00       |
| 9/16/2020    | JR                         | Review mortgage payment on 55th Avenue West property (.1); communicate with D. Marrero and PDR regarding depositing checks (.1); update account ledger (.1).   | 0.3          | \$40.50       |
| 9/17/2020    | JR                         | Review online bank account balances and transactions (.1).   | 0.1          | \$13.50       |
| 9/18/2020    | JR                         | Update account ledger per review of online account balances and transactions (.1); review correspondence from R. Jernigan and Receiver regarding insurance renewal for Lost Key property (.1).   | 0.2          | \$27.00       |

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**SERVICES**

| <b>Date</b>                       | <b>TKPR</b>                | <b>Description of Services</b>   | <b>Hours</b> | <b>Amount</b>     |
|-----------------------------------|----------------------------|--|--------------|-------------------|
| <b>BUSIN</b>                      | <b>Business Operations</b> |  |              |                   |
| 9/22/2020                         | JR                         | Prepare correspondence to ServisFirst Bank requesting wire remitting asset sale proceeds to U.S. Marshals Service (.3).  | 0.3          | \$40.50           |
| 9/23/2020                         | JR                         | Communicate with Receiver regarding movement of funds to pay Court ordered fees (.1); communicate with PDR regarding prior fee payments (.2).  | 0.2          | \$27.00           |
| 9/24/2020                         | JR                         | Communicate with Receiver and M. Lockwood regarding payment of approved fees (.2); communicate with D. Marrero regarding depositing check (.1); update account ledger (.1).  | 0.4          | \$54.00           |
| 9/28/2020                         | JR                         | Review correspondence from R. Jernigan regarding invoices and checks to be issued (.1); updated account ledger (.2); communicate with R. Jernigan regarding invoices and issued checks (.1); communicate with R. Jernigan regarding maintenance issues needed at Lost Key property (.1); update account ledger (.1).   | 0.6          | \$81.00           |
| 9/29/2020                         | JR                         | Review correspondence between Receiver and DOJ regarding tax lien on Desert Ridge property (.1); review correspondence from R. Jernigan regarding insurance renewal for 4064 Founders Club property (.1).  | 0.2          | \$27.00           |
| 9/30/2020                         | JR                         | Communicate with Receiver and R. Jernigan regarding insurance renewal form for 4064 Founders Club property (.1); review correspondence from R. Jernigan and listing agent regarding pool maintenance issues at Desert Ridge property (.1); review correspondence between J. Perez and vendor regarding payment of invoices (.1); prepare correspondence to ServisFrist Bank requesting wire transfer of funds to pay approved invoices (.2); review online accounts (.1); update account ledgers (.1); communicate with Receiver and legal team regarding receipt, review and delivery of M. DaCorta mail (.1); review correspondence from Receiver to C. DaCorta regarding mail (.1). | 0.9          | \$121.50          |
| <b>Total: Business Operations</b> |                            |  | <b>13.50</b> | <b>\$1,822.50</b> |
| <b>CASE</b>                       | <b>Case Administration</b> |  |              |                   |
| 7/2/2020                          | MML                        | Exchange correspondence with PDR regarding accounting report (.1); exchange correspondence with J. Perez and L. Dougherty regarding same (.1).   | 0.2          | \$48.00           |
| 7/6/2020                          | JR                         | Review correspondence from M. Lockwood regarding E-Hounds invoices (.1); prepare response to M. Lockwood regarding E-Hounds invoices (.1); review correspondence from Ktek regarding MailChimp account (.1).   | 0.3          | \$40.50           |
| 7/8/2020                          | JR                         | Review second quarter reports from PDR (.1).   | 0.1          | \$13.50           |

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| Date      | TKPR                | Description of Services   | Hours | Amount     |
|-----------|---------------------|---|-------|------------|
| CASE      | Case Administration |   |       |            |
| 7/8/2020  | MML                 | Exchange correspondence with S. O'Brien regarding accounting report (.1); receipt and initial review of report (.1).  | 0.2   | \$48.00    |
| 7/16/2020 | AS                  | Email exchange with investor, legal team and Manatee County Tax Collector (.8).   | 0.8   | \$108.00   |
| 7/17/2020 | JR                  | Review correspondence between A. Stephens and Ktek regarding website contact form issues (.1).  | 0.1   | \$13.50    |
| 7/24/2020 | AS                  | Email exchange with investor and J. Rizzo regarding sale of property (.3).  | 0.3   | \$40.50    |
| 7/24/2020 | JR                  | Communicate with Ktek and A. Stephens regarding website updates (.1).   | 0.1   | \$13.50    |
| 7/27/2020 | JJP                 | Draft Fifth Interim Report (3.5).   | 3.5   | \$1,120.00 |
| 7/27/2020 | JR                  | Communicate with Ktek and A. Stephens regarding website updates (.1).   | 0.1   | \$13.50    |
| 7/27/2020 | LD                  | Revise updates on ATC Brokers and Spotex document collection for interim report (.4).   | 0.4   | \$128.00   |
| 7/27/2020 | MML                 | Review draft of claims portion for interim report (.2).   | 0.2   | \$48.00    |
| 7/28/2020 | JJP                 | Draft Fifth Interim Report (4.0).   | 4.0   | \$1,280.00 |
| 7/28/2020 | JR                  | Review draft interim report (.3); communicate with J. Perez regarding information needed for interim report (.1).   | 0.4   | \$54.00    |
| 7/28/2020 | MG                  | Review and compile the total number of claims received to date for the interim report (3.2).  | 3.2   | \$432.00   |
| 7/28/2020 | MML                 | Telephone calls with M. Gura regarding calculating claims information for interim report (.2); exchange correspondence with J. Perez regarding same (.1); review correspondence from M. Gura regarding information for interim report (.1). | 0.4   | \$96.00    |
| 7/30/2020 | JJP                 | Revise, finalize, and file Fifth Interim Report, including exhibits (5.3).  | 5.3   | \$1,696.00 |
| 7/30/2020 | LD                  | Review draft Fifth Interim Report (.4).   | 0.4   | \$128.00   |
| 7/30/2020 | MML                 | Review draft interim report (.2); telephone call with M. Gura regarding same (.1).  | 0.3   | \$72.00    |
| 7/31/2020 | AS                  | Review of Fifth Interim Report and forward to R. During for placement on Receivership website (.5).   | 0.5   | \$67.50    |
| 7/31/2020 | MG                  | Review interim report (.7).   | 0.7   | \$94.50    |
| 8/3/2020  | JR                  | Communicate with Ktek regarding website updates (.1).   | 0.1   | \$13.50    |
| 8/5/2020  | JR                  | Communicate with Ktek regarding website updates (.1).   | 0.1   | \$13.50    |
| 8/7/2020  | JR                  | Communicate with Ktek regarding website updates (.1).   | 0.1   | \$13.50    |

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| Date      | TKPR                | Description of Services   | Hours | Amount   |
|-----------|---------------------|---|-------|----------|
| CASE      | Case Administration |   |       |          |
| 8/10/2020 | JR                  | Communicate with Ktek regarding website updates (.1).   | 0.1   | \$13.50  |
| 8/19/2020 | MG                  | Communicate with J. Rizzo regarding Ktek (.1).  | 0.1   | \$13.50  |
| 8/21/2020 | JR                  | Communicate with Receiver and J. Perez regarding website updates (.1).  | 0.1   | \$13.50  |
| 8/24/2020 | JR                  | Communicate with Ktek regarding updates to website with filings related to sale of properties and revised announcements (.1); prepare website updates (.2).   | 0.3   | \$40.50  |
| 8/25/2020 | AS                  | Exchange emails with J. Rizzo, L. Sullivan and R. During regarding update to MLS property links on website (.6).  | 0.6   | \$81.00  |
| 8/26/2020 | JR                  | Communicate with Ktek regarding website updates (.1).   | 0.1   | \$13.50  |
| 8/27/2020 | AS                  | Review Court documents and pleadings index and compile documents for updating website (1.3).  | 1.3   | \$175.50 |
| 8/27/2020 | JR                  | Communicate with Ktek and A. Stephens regarding website updates (.1).   | 0.1   | \$13.50  |
| 8/28/2020 | MML                 | Exchange correspondence with J. Perez regarding accounting report (.1).   | 0.1   | \$24.00  |
| 9/1/2020  | MML                 | Communications with J. Perez regarding fund accounting report (.1).   | 0.1   | \$24.00  |
| 9/2/2020  | AS                  | Review new court documents and email exchange with R. During regarding website updates (.6); email exchange with A. Wilson regarding taxing authority documents for website (.2).   | 0.8   | \$108.00 |
| 9/2/2020  | MML                 | Prepare correspondence to S. O'Brien regarding fund accounting reports (.1).  | 0.1   | \$24.00  |
| 9/4/2020  | JR                  | Communicate with Ktek regarding website updates (.1).   | 0.1   | \$13.50  |
| 9/8/2020  | AS                  | Review email from L. Dougherty regarding B. Winters complaint (.2); review complaint and forward to R. During for website update (.6).  | 0.8   | \$108.00 |
| 9/8/2020  | JR                  | Communicate with Ktek regarding website updates (.1).   | 0.1   | \$13.50  |
| 9/14/2020 | AS                  | Review investor letter regarding B. Winters and communicate with R. During, legal team and Receiver regarding same (1.7); review recent court documents and communicate with R. During via telephone and email for updating Receivership website (1.1). | 2.8   | \$378.00 |
| 9/15/2020 | AS                  | Review investor emails following website update and forward to Receiver and legal team for review (.7); exchange emails with investors regarding same (.3).   | 1.0   | \$135.00 |

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**SERVICES**

| Date                              | TKPR                | Description of Services  | Hours        | Amount            |
|-----------------------------------|---------------------|--|--------------|-------------------|
| CASE                              | Case Administration |  |              |                   |
| 9/16/2020                         | AS                  | Email exchange with investor and M. Gura (.4); email exchange and telephone call with M. Gura and R. During regarding updated MailChimp spreadsheet and implementation of same (.6). | 1.0          | \$135.00          |
| 9/16/2020                         | MML                 | Review correspondence regarding MailChimp (.1).  | 0.1          | \$24.00           |
| 9/17/2020                         | AS                  | Telephone call with K. Donlon and L. Dougherty regarding M.P. (.1); email exchange with Receiver and legal team regarding same (.7); review investor claim form (.2).                | 1.0          | \$135.00          |
| 9/17/2020                         | MG                  | Review correspondence from an investor (.3); communicate with A. Stephens regarding that investor (.3).  | 0.6          | \$81.00           |
| 9/17/2020                         | LD                  | Review emails from M.P. (.1); telephone conference with A. Stephens concerning M.P. (.1); research M.P. (.2); summarize status and advice for Receiver (.1).                         | 0.5          | \$160.00          |
| 9/18/2020                         | AS                  | Exchange emails with two investors regarding case updates (.3).  | 0.3          | \$40.50           |
| 9/30/2020                         | JR                  | Communicate with Ktek regarding website updates (.1).  | 0.1          | \$13.50           |
| <b>Total: Case Administration</b> |                     |  | <b>34.00</b> | <b>\$7,377.00</b> |

**CLAIM Claims Administration and Objections**

|          |     |  |     |          |
|----------|-----|--|-----|----------|
| 7/1/2020 | MG  | Communicate with an investor regarding the status of the Receivership (.2); review letter to B. Winters regarding altered proof of claim forms (.3); communicate with three investors regarding their proof of claim forms (.3). | 0.8 | \$108.00 |
| 7/1/2020 | MML | Telephone call with M. Gura regarding claims questions and organization of claim related documents (.8); review proof of claim form for J.H. (.1); advise M. Gura regarding response to claimant's inquiry regarding same (.1).  | 1.0 | \$240.00 |
| 7/2/2020 | MG  | Communicate with an investor regarding amending his proof of claim form (.2).  | 0.2 | \$27.00  |
| 7/3/2020 | JJP | Review correspondence from claimant JJN/C.N. and circulate to claims team (.2).  | 0.2 | \$64.00  |
| 7/3/2020 | MML | Review communication from D.N. (.1).   | 0.1 | \$24.00  |
| 7/5/2020 | LD  | Review current draft of letter to B. Winters (.2); confer with M. Lockwood regarding letter to B. Winters (.1).  | 0.3 | \$96.00  |
| 7/5/2020 | MML | Exchange correspondence with L. Dougherty regarding B. Winters (.1).   | 0.1 | \$24.00  |
| 7/6/2020 | AS  | Review email from investor and discuss same with M. Gura (.2).   | 0.2 | \$27.00  |
| 7/6/2020 | MG  | Communicate with an investor regarding the status of his claim (.2).   | 0.2 | \$27.00  |

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| <b>Date</b>  | <b>TKPR</b>   | <b>Description of Services</b>   | <b>Hours</b> | <b>Amount</b> |
|--------------|---------------|--|--------------|---------------|
| <b>CLAIM</b> | <b>Claims</b> | <b>Administration and Objections</b>   |              |               |
| 7/6/2020     | LD            | Revise letter to B. Winters (.4); confer with M. Lockwood regarding revised B. Winters letter (.1); update Receiver concerning letter to B. Winters (.1).  | 0.6          | \$192.00      |
| 7/6/2020     | MML           | Review communication from L. Dougherty to Receiver regarding letter to B. Winters (.1); revise letter (.2); communications with L. Dougherty regarding same (.1); receipt and review of correspondence from J. Perez regarding solicitation of claims (.1); review and analyze master claims spreadsheet for same (.2); prepare correspondence to J. Perez regarding analysis (.1); review communication with M.N. regarding claim forms (.1). | 0.9          | \$216.00      |
| 7/7/2020     | MG            | Communicate with three investors regarding the status of the Receivership (.4); prepare folders of investors who submitted claim forms for last names A-L (3.5).   | 3.9          | \$526.50      |
| 7/7/2020     | LD            | Confer with M. Lockwood regarding letter to B. Winters (.2); confer with Receiver regarding letter to B. Winters (.1); direct mailing of letter to B. Winters (.1).  | 0.4          | \$128.00      |
| 7/7/2020     | MML           | Communication with M. Gura regarding inquiry from M.R. (.1).   | 0.1          | \$24.00       |
| 7/8/2020     | MG            | Prepare folders of investors who submitted claim forms for last names M-Z (4.3); update master spreadsheet for representation by B. Winters per his letter (1.2).  | 5.5          | \$742.50      |
| 7/8/2020     | MML           | Prepare correspondence with documents to R. Weiss regarding New Horizon claims (.3); communications with R. Weiss regarding same (.3); prepare correspondence to J. Perez regarding FBI questionnaire review (.2).   | 0.8          | \$192.00      |
| 7/9/2020     | MG            | Communicate with four investors regarding the status of the Receivership (.6); review claim form for missing pages (.2); update investor folders with FBI victim statements from part 1 of CD 1 (3.5).   | 4.3          | \$580.50      |
| 7/9/2020     | MML           | Exchange correspondence with R. Weiss regarding L.C. and A.C. claims (.2); communications with M. Gura regarding L.C. proof of claim form (.1); exchange correspondence with R. Weiss regarding analysis of New Horizon claims (.1).   | 0.4          | \$96.00       |
| 7/10/2020    | AS            | Receive and review email from investor and discuss same with M. Gura (.3).   | 0.3          | \$40.50       |
| 7/10/2020    | MG            | Communicate with four investors regarding the status of the Receivership (.5).   | 0.5          | \$67.50       |
| 7/11/2020    | LD            | Direct calendaring of response deadline for B. Winters to provide documents (.1).  | 0.1          | \$32.00       |
| 7/12/2020    | MML           | Communications with L. Dougherty regarding letter to B. Winters (.1).  | 0.1          | \$24.00       |



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| <b>Date</b>  | <b>TKPR</b>   | <b>Description of Services</b>   | <b>Hours</b> | <b>Amount</b> |
|--------------|---------------|--|--------------|---------------|
| <b>CLAIM</b> | <b>Claims</b> | <b>Administration and Objections</b>   |              |               |
| 7/13/2020    | JR            | Review correspondence from L. Dougherty to B. Winters requesting information related to proof of claims submitted for various investors (.1).  | 0.1          | \$13.50       |
| 7/13/2020    | MG            | Update investor folders with FBI victim statements from batch 2 of CD 1 and Box 2 A-D (5.8).   | 5.8          | \$783.00      |
| 7/13/2020    | MML           | Receipt and review of correspondence from Receiver regarding rising tide (.1).   | 0.1          | \$24.00       |
| 7/14/2020    | MG            | Update investor folders with FBI victim statements from CD 2 Box 2 E-Z and Boxes 3-5 (5.5).  | 5.5          | \$742.50      |
| 7/14/2020    | MML           | Communications with R. Weiss regarding call to discuss New Horizon analysis (.1).  | 0.1          | \$24.00       |
| 7/15/2020    | MG            | Review amount of total claims received to date (.2).   | 0.2          | \$27.00       |
| 7/15/2020    | MML           | Communications with J. Perez and M. Gura regarding claims (.1).  | 0.1          | \$24.00       |
| 7/16/2020    | MG            | Communicate with an investor regarding the status of the Receivership (.1).  | 0.1          | \$13.50       |
| 7/16/2020    | MML           | Review analysis of New Horizon claims from R. Weiss (.3); telephone call with R. Weiss regarding same (.4); review breakdown of fund analysis (.2).  | 0.9          | \$216.00      |
| 7/20/2020    | MG            | Communicate with an investor regarding the status of the Receivership (.3).  | 0.3          | \$40.50       |
| 7/20/2020    | LD            | Summarize law on possible unauthorized practice of law by B. Winters (.4).   | 0.4          | \$128.00      |
| 7/21/2020    | MG            | Continue review by alphabetizing claim forms submitted by B. Winters on some investors behalf (1.8).   | 1.8          | \$243.00      |
| 7/21/2020    | LD            | Review correspondence regarding B. Winters (.1).   | 0.1          | \$32.00       |
| 7/27/2020    | MG            | Communicate with M. Lockwood regarding status of review of claim forms and tasks to be completed (.9).   | 0.9          | \$121.50      |
| 7/27/2020    | MML           | Review and analysis of eight proof of claim forms and update master claims spreadsheet for same (1.0); review correspondence regarding claims forms and Ambit (.1); prepare correspondence to R. Weiss regarding B.S. (.1); prepare correspondence to R. Weiss regarding J.B. (.1); prepare correspondence to R. Weiss regarding M.C. (.1); communications with J. Perez regarding claims information (.1); telephone call with M. Gura regarding same (.5); prepare correspondence to J. Perez outlining claims tasks and requesting additional information (.5). | 2.5          | \$600.00      |
| 7/28/2020    | MG            | Review claim amounts from the submitted proof of claim forms and update matter claims spreadsheet with same (4.8).   | 4.8          | \$648.00      |

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| <b>Date</b>  | <b>TKPR</b>   | <b>Description of Services</b>   | <b>Hours</b> | <b>Amount</b> |
|--------------|---------------|--|--------------|---------------|
| <b>CLAIM</b> | <b>Claims</b> | <b>Administration and Objections</b>   |              |               |
| 7/28/2020    | LD            | Update M. Lockwood regarding communications from B. Winters (.1).  | 0.1          | \$32.00       |
| 7/28/2020    | MML           | Telephone call with M. Gura regarding claim amounts (.3); review and analysis of 15 proof of claim forms including reconciliation with bank records (1.8); review updated analysis for New Horizon claims (.3); telephone call with R. Weiss regarding same (.3); review correspondence from R. Weiss regarding M.C. (.1); review correspondence from R. Weiss regarding J.B. (.1); update master claims spreadsheet for information obtained from Kapila Mukamal (.2); review K-1 for M.C. (.1); exchange correspondence with L. Dougherty regarding B. Winters (.1); telephone calls with M. Gura regarding certain claims (.4); review FBI statement for J.D. regarding New Horizon (.1). | 3.8          | \$912.00      |
| 7/29/2020    | MG            | Continue review of claim amounts from the submitted proof of claim forms and update master claims spreadsheet for same (9.5).  | 9.5          | \$1,282.50    |
| 7/29/2020    | MML           | Exchange correspondence with M. Gura regarding claims submitted by B. Winters (.2); exchange correspondence regarding R.M. and review additional scanned pages of proof of claim form (.2); telephone conference with M. Gura to review claim amount analysis (.5); review and analysis of two proof of claim forms (.3); review and analyze claim amounts for all claims (1.5); prepare correspondence with additional questions regarding claim amounts (.2).  | 2.9          | \$696.00      |
| 7/30/2020    | MG            | Continue review of claim amounts from the submitted proof of claim forms and update master claims spreadsheet for same (3.8); analyze number of investors based on new information (1.0); communicate with two investors regarding the status of the Receivership (.3).  | 5.1          | \$688.50      |
| 7/30/2020    | MML           | Telephone call with M. Gura regarding claims analysis (.2); review correspondence regarding same and analysis (.2); communications with J. Perez regarding claim forms and Ambit (.2); telephone call with M. Gura regarding same (.2).  | 0.8          | \$192.00      |
| 7/31/2020    | MG            | Review and update the master chart of claims received (1.2).   | 1.2          | \$162.00      |
| 7/31/2020    | LD            | Review B. Winters letters (.2).  | 0.2          | \$64.00       |
| 7/31/2020    | MML           | Review correspondence from B. Winters (.1).  | 0.1          | \$24.00       |
| 8/3/2020     | MG            | Review and update the master claims spreadsheet received with new information from the claim forms (4.7).  | 4.7          | \$634.50      |
| 8/4/2020     | MG            | Continue to review and update the master claims spreadsheet received with new information from the claim forms (2.2).  | 2.2          | \$297.00      |



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| <b>Date</b>  | <b>TKPR</b>   | <b>Description of Services</b>  | <b>Hours</b> | <b>Amount</b> |
|--------------|---------------|---|--------------|---------------|
| <b>CLAIM</b> | <b>Claims</b> | <b>Administration and Objections</b>  |              |               |
| 8/5/2020     | MG            | Continue to review and update the master claims spreadsheet received with new information from the claim forms (1.8).   | 1.8          | \$243.00      |
| 8/6/2020     | MG            | Continue to review and update the master claims spreadsheet received with new information from the claim forms (4.2).   | 4.2          | \$567.00      |
| 8/7/2020     | JR            | Review correspondence from outside counsel, Receiver and L. Dougherty regarding investor power of attorney forms (.1).  | 0.1          | \$13.50       |
| 8/7/2020     | MG            | Initial review of the power of attorney forms from B. Winters (.5).   | 0.5          | \$67.50       |
| 8/7/2020     | MG            | Continue to review and update the master claims spreadsheet received with new information from the claim forms (2.8).   | 2.8          | \$378.00      |
| 8/7/2020     | LD            | Analyze power of attorney submitted by B. Winters (.3); summarize advice to Receiver concerning power of attorney (.2); call clerk's office concerning attorney admissions (.1); summarize advice to Receiver concerning unauthorized practice of law (.2).   | 0.8          | \$256.00      |
| 8/7/2020     | MML           | Review communications with legal team regarding power of attorney forms from B. Winters (.2); review power of attorney form (.2); review letter from B. Winters regarding claim submissions (.2).   | 0.6          | \$144.00      |
| 8/10/2020    | MG            | Review of the letter from B. Winters addressing our concerns about the claim forms he submitted (.2).   | 0.2          | \$27.00       |
| 8/10/2020    | MML           | Review and analysis of 15 proof of claims forms and related documents (1.8); update master claims spreadsheet for same (.3); telephone call with M. Gura regarding claims (.3).   | 2.4          | \$576.00      |
| 8/13/2020    | MG            | Review hard-copy files from B. Winters with last names A-G for completeness (6.2).  | 6.2          | \$837.00      |
| 8/14/2020    | MML           | Review and analysis of 17 proof of claim forms and attached documents and comparison to bank reconciliation where needed (2.5); update master claims spreadsheet for same (.5); exchange correspondence with R. Weiss regarding C.N. (.1); review analysis from Kapila Mukamal regarding same (.2). | 3.3          | \$792.00      |
| 8/17/2020    | MG            | Communicate with the Receiver regarding the claim forms submitted by B. Winters (.2); communicate with M. Lockwood regarding status of claim forms review (.5); communicate with A. Wilson regarding the power of attorney forms from B. Winters and filing of case documents (.6).                 | 1.3          | \$175.50      |

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| <b>Date</b>  | <b>TKPR</b>   | <b>Description of Services</b>   | <b>Hours</b> | <b>Amount</b> |
|--------------|---------------|--|--------------|---------------|
| <b>CLAIM</b> | <b>Claims</b> | <b>Administration and Objections</b>   |              |               |
| 8/17/2020    | MML           | Review and analysis of nine proof of claim forms (.9); update master claims spreadsheet for same (.3).   | 1.2          | \$288.00      |
| 8/18/2020    | MML           | Review and analysis of 11 proof of claim forms and attached documents and comparison to bank reconciliation where needed (1.4); update master claims spreadsheet for same (.3); research regarding investor M.K. (.2); exchange correspondence with J. Perez regarding review of FBI questionnaires (.1); review correspondence from R. Weiss regarding A.J. (.1).   | 2.1          | \$504.00      |
| 8/19/2020    | MG            | Review hard-copy claim forms submitted by B. Winters to ensure complete forms are saved electronically for last names A-L (3.6); communicate with M. Lockwood regarding review of claim forms by K. Paulson (.4).  | 4.0          | \$540.00      |
| 8/19/2020    | LD            | Assemble notes and documents for reply correspondence with B. Winters (.5).  | 0.5          | \$160.00      |
| 8/19/2020    | MML           | Review and analysis of three proof of claim forms submitted by B. Winters (.8); review related FBI questionnaires for same (.3); telephone conference with M. Gura regarding analysis and tracking of claims submitted by B. Winters (.4); prepare additional spreadsheet for master claims spreadsheet for tracking various amounts identified for claims submitted by B. Winters (.5); update same (.3); exchange correspondence with K. Paulson regarding review of claims (.1).  | 2.4          | \$576.00      |
| 8/20/2020    | MG            | Review response letter to B. Winters (.7); compilation of FBI questionnaires and proof of claim forms for review by K. Paulson (.5). review hard-copy claim forms submitted by B. Winters to ensure complete forms are saved electronically for last names M-Z (2.5).  | 3.7          | \$499.50      |
| 8/20/2020    | LD            | Draft and revise letter to B. Winters responding to his last letter (3.5); review and summarize law and rules on unauthorized practice of law (1.6); review papers filed by ostensibly pro se defendants (1.7); review notes from Receiver on B. Winters response (.2); review notes of comments by Judge Covington on unauthorized practice of law (.5); analyze B. Winters power of attorney form (.3); analyze proof of claim forms submitted by B. Winters (.7); telephone conference with M. Lockwood concerning letter to B. Winters (.3). | 8.8          | \$2,816.00    |

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| <b>Date</b>  | <b>TKPR</b>                                 | <b>Description of Services</b>   | <b>Hours</b> | <b>Amount</b> |
|--------------|---|--|--------------|---------------|
| <b>CLAIM</b> | <b>Claims Administration and Objections</b> |  |              |               |
| 8/20/2020    | MML   | Telephone call with M. Gura regarding review of B. Winters' claims (.2); telephone conference with K. Paulson regarding detailed review of B. Winter's claims and FBI questionnaires and populating data on related claims spreadsheet for review of same (1.4); telephone call with M. Gura regarding providing K. Paulson with necessary documents to begin review (.3); review correspondence between M. Gura and L. Dougherty regarding B. Winters' claims (.1); review draft letter to B. Winters regarding claims issues (.2); communications with L. Dougherty regarding same (.2); telephone call with L. Dougherty regarding letter and claims issues (.3). | 2.7          | \$648.00      |
| 8/21/2020    | RMM   | Review correspondence from L. Dougherty addressed to B. Winters regarding his proposed modified claims forms and the unlicensed practice of law (.2).  | 0.2          | \$48.00       |
| 8/21/2020    | MG  | Initial review of the claim forms submitted by B. Winters for Florida residents (.7); review power attorney forms for investors that B. Winters says he represents per B. McConnell (.8); continue review and organization of power attorney forms from B. Winters (.9); continue review of proof of claim forms for updated contact and claim information for last names J-M (3.5).   | 5.9          | \$796.50      |
| 8/21/2020    | LD  | Revise letter to B. Winters concerning issues with proof of claim forms he has submitted and possible issue of unauthorized practice of law (1.7); telephone conference with Receiver concerning edits to letter (.1); confer with Englander Fisher team concerning letter (.1); communicate with B. McConnell concerning letter (.2); revise letter to B. Winters (1.7); analyze court docket and voluminous court filings to document potential unauthorized practice of law by B. Winters (2.7); telephone call with M. Gura (.1); review emails from team concerning letter (.2); direct mailing of letter (.1).   | 6.9          | \$2,208.00    |
| 8/21/2020    | MML   | Communications with M. Gura regarding documents for K. Paulson's review (.1); prepare correspondence to K. Paulson regarding same (.1); review revised letter to B. Winters and related correspondence (.2).   | 0.4          | \$96.00       |
| 8/23/2020    | LD  | Update M. Lockwood regarding B. Winters (.1).  | 0.1          | \$32.00       |
| 8/24/2020    | MG  | Continue review of proof of claim forms for updated contact and claim information for last names N-R (5.4).  | 5.4          | \$729.00      |
| 8/25/2020    | MG  | Continue review of proof of claim forms for updated contact and claim information for last names R-T (4.5).  | 4.5          | \$607.50      |
| 8/26/2020    | MG  | Communicate with an investor regarding the status of the Receivership (.1).  | 0.1          | \$13.50       |

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| <b>Date</b>  | <b>TKPR</b>   | <b>Description of Services</b>   | <b>Hours</b> | <b>Amount</b> |
|--------------|---------------|--|--------------|---------------|
| <b>CLAIM</b> | <b>Claims</b> | <b>Administration and Objections</b>   |              |               |
| 8/26/2020    | MG            | Continue review of proof of claim forms for updated contact and claim information for last names T-Z (3.8).  | 3.8          | \$513.00      |
| 8/26/2020    | LD            | Direct follow-up regarding 8/21/2020 letter to B. Winters (.1).  | 0.1          | \$32.00       |
| 8/26/2020    | MML           | Review and analysis of ten proof of claim forms (.9); update master claims spreadsheet for same (.2); review communications regarding M.R. (.1).   | 1.2          | \$288.00      |
| 8/27/2020    | MG            | Final review and compilation of information related to investors who are associated with B. Winters and reside in Florida (.5).  | 0.5          | \$67.50       |
| 8/27/2020    | MG            | Revise master claims spreadsheet to capture related claims for last names A-H (3.7).   | 3.7          | \$499.50      |
| 8/27/2020    | MML           | Telephone call with M. Gura regarding processing claims and updating master claims spreadsheet (.2).   | 0.2          | \$48.00       |
| 8/28/2020    | MG            | Revise master claims spreadsheet to capture related claims for last names I-Z (3.8).   | 3.8          | \$513.00      |
| 8/28/2020    | MML           | Review and analysis of eleven proof of claim forms and attached documents (1.0); update master claims spreadsheet for same (.3).   | 1.3          | \$312.00      |
| 9/1/2020     | JR            | Communicate with M. Lockwood regarding investor account balance information (.1).  | 0.1          | \$13.50       |
| 9/1/2020     | KAP           | Call with M. Lockwood regarding method for entering information from proof of claim forms into claims spreadsheet (.5); review and analyze proof of claim forms and FBI statement forms and enter relevant information into claims spreadsheet (3.1).  | 3.6          | \$486.00      |
| 9/1/2020     | MG            | Communicate with an investor regarding the claims process (.1).  | 0.1          | \$13.50       |
| 9/1/2020     | LD            | Review correspondence from B. Winters concerning claims (.3); review rules of professional conduct (.1); summarize advice for team (.1); direct A. Baker to compare versions of B. Winters letters (.1); confer with Receiver concerning B. Winters letter and next steps (.3); review case filing (.4); review past correspondence with B. Winters (.4); draft and revise letter to investors concerning B. Winters (1.2); update team regarding next steps (.1). | 3.0          | \$960.00      |

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| <b>Date</b>  | <b>TKPR</b>                                 | <b>Description of Services</b>   | <b>Hours</b> | <b>Amount</b> |
|--------------|---|--|--------------|---------------|
| <b>CLAIM</b> | <b>Claims Administration and Objections</b> |  |              |               |
| 9/1/2020     | MML   | Review correspondence from B. Winters (.1); exchange correspondence with L. Dougherty regarding same (.1); communications with M. Gura regarding review of claims (.2); telephone call with K. Paulson regarding review of certain claims submitted by B. Winters (.5); review call from investor (.1); exchange correspondence with M. Gura regarding same (.1); review and analysis of eight proof of claim forms including analysis of investments and withdrawals as identified on bank reconciliation and New Horizon analysis (1.3); update master claims spreadsheet regarding same (.3); exchange correspondence with R. Weiss regarding C.M. (.2); prepare correspondence to J. Perez regarding C.M. (.1); review inquiry from K. Paulson regarding A.A. claims and proof of claim forms for same (.2); respond to K. Paulson regarding same (.1); review inquiry from K. Paulson regarding R.A. claim (.1); review proof of claim form and FBI statements for R.A. (.2); prepare response to inquiry (.1); exchange correspondence with K. Paulson regarding follow-up questions for same (.1); exchange correspondence with M. Gura regarding A. and M.M. (.1). | 3.9          | \$936.00      |
| 9/2/2020     | MG  | Communicate with M. Lockwood regarding claims tasks (.6).  | 0.6          | \$81.00       |
| 9/2/2020     | MML   | Review correspondence to investors regarding B. Winters (.1); telephone call with M. Gura regarding claims (.2); exchange correspondence with J. Rizzo regarding investor "balances" prior to Receivership (.2); review documents submitted by A.M. in support of amounts claimed in proof of claim form (.2); analysis of A.M.'s claimed amounts as compared to bank reconciliation (.3); exchange correspondence with R. Weiss regarding additional questions to complete analysis (.2); update master claims spreadsheet for same (.1); review and analysis of two additional proof of claim forms (.3); update master claims spreadsheet for same (.2); review communications between M. Gura and Receiver regarding R.N (.1); telephone call with M. Gura regarding same (.1).  | 2.0          | \$480.00      |
| 9/3/2020     | JR  | Communicate with M. Lockwood regarding investor account balance information (.2).  | 0.2          | \$27.00       |
| 9/3/2020     | MG  | Communicate with an investor regarding the claims process (.1).  | 0.3          | \$40.50       |
| 9/3/2020     | MML   | Exchange correspondence with J. Rizzo and E. Feld regarding historical information for investors (.1).   | 0.1          | \$24.00       |
| 9/4/2020     | KAP   | Review and analyze proof of claim forms and FBI statement forms and enter relevant information into claims spreadsheet (4.8).  | 4.8          | \$648.00      |

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| <b>Date</b>  | <b>TKPR</b>   | <b>Description of Services</b>  | <b>Hours</b> | <b>Amount</b> |
|--------------|---------------|---|--------------|---------------|
| <b>CLAIM</b> | <b>Claims</b> | <b>Administration and Objections</b>  |              |               |
| 9/4/2020     | MML           | Exchange correspondence with K. Paulson regarding claims review (.1).   | 0.1          | \$24.00       |
| 9/8/2020     | RMM           | Review correspondence from L. Dougherty to investors regarding B. Winters (.2).   | 0.2          | \$48.00       |
| 9/8/2020     | JR            | Review draft correspondence to investors regarding B. Winters and related correspondence from Receiver and L. Dougherty (.2).   | 0.2          | \$27.00       |
| 9/8/2020     | KAP           | Review and analyze proof of claim forms and FBI statement forms and enter relevant information into claims spreadsheet (3.0).   | 3.0          | \$405.00      |
| 9/8/2020     | MG            | Communicate with Ktek regarding online registrations for claims review (.3); communicate with an investor regarding her claim form (.1).  | 0.4          | \$54.00       |
| 9/8/2020     | LD            | Confer with J. Perez and M. Lockwood concerning letter to B. Winters (.1); revise letter to B. Winters (.2); review case records (.3); confer with Englander Fischer team concerning letter to B. Winters (.1); review correspondence from Indiana Supreme Court concerning B. Winters (.1).    | 0.8          | \$256.00      |
| 9/8/2020     | MML           | Exchange correspondence with K. Paulson regarding claims review (.1); review draft letter to B. Winters (.1); review comments from Receiver regarding same (.1); initial review of spreadsheet from K. Paulson (.1); review communications with R. During regarding website registrations (.1). | 0.5          | \$120.00      |
| 9/9/2020     | JR            | Review materials from State of Indiana regarding B. Winters and related correspondence from Receiver (.1).  | 0.1          | \$13.50       |
| 9/9/2020     | MG            | Communicate with an investor regarding the status of the Receivership (.3); revise the master spreadsheet to capture false profits for possible offset with other claims (1.2); revise the spreadsheet to capture related accounts that were submitted by B. Winters (.8).                      | 2.3          | \$310.50      |
| 9/10/2020    | JJP           | Analyze proof of claim forms highlighted by review team (1.0).  | 1.0          | \$320.00      |
| 9/10/2020    | JR            | Review investor's proof of claim form and investor's description of detailed history of his investment and related correspondence from J. Perez and M. Lockwood (.1).   | 0.1          | \$13.50       |
| 9/10/2020    | MG            | Continue reconciliation of claim forms received with master spreadsheet (3.8); communicate with an investor regarding the status of the Receivership (.1).  | 3.9          | \$526.50      |
| 9/10/2020    | LD            | Confer with Receiver concerning draft letter to investors regarding B. Winters (.1); revise B. Winters letter (.2); direct preparation and dissemination of Receiver's letter to investors concerning B. Winters (.2).  | 0.5          | \$160.00      |

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| <b>Date</b>  | <b>TKPR</b>   | <b>Description of Services</b>  | <b>Hours</b> | <b>Amount</b> |
|--------------|---------------|---|--------------|---------------|
| <b>CLAIM</b> | <b>Claims</b> | <b>Administration and Objections</b>  |              |               |
| 9/11/2020    | JR            | Review correspondence from L. Dougherty with final draft of letter to be sent to investors regarding B. Winters (.1); communicate with D. Burnette and A. Stephens regarding letter to investors (.1).  | 0.2          | \$27.00       |
| 9/11/2020    | KAP           | Call with M. Lockwood regarding letter to B. Winters (.3).  | 0.3          | \$40.50       |
| 9/11/2020    | LD            | Confer with D. Burnette regarding letter to B. Winters (.1); revise letter to B. Winters (.1); telephone conference with Receiver concerning letter (.1); telephone conference with M. Lockwood concerning letter (.1); review C. Marks claim form (.1).  | 0.5          | \$160.00      |
| 9/11/2020    | MML           | Review letter to investors regarding B. Winters' claims (.2); communications with L. Dougherty regarding same (.2); telephone call with Receiver regarding same (.4); revise letter to investors (1.0); exchange correspondence with E. Feld regarding obtaining investor information from Spotex (.2); review Spotex portal for same (.3); further communications with E. Feld regarding information available (.1); telephone call with K. Paulson regarding analysis of B. Winters' claims to date (.3); review spreadsheet from K. Paulson regarding same (.2); exchange correspondence with M. Gura regarding letter (.1). | 3.0          | \$720.00      |
| 9/12/2020    | MG            | Review revised letter to investors regarding B. Winters (.3); telephone calls with M. Lockwood regarding same (.3).   | 0.6          | \$81.00       |
| 9/12/2020    | MML           | Review and analysis of 21 claims submitted by B. Winters (1.3); research Spotex database (.7); create spreadsheet for analysis of claims and Spotex information and conduct further analyses (1.5); telephone calls with M. Gura regarding correspondence to investors regarding B. Winters (.3); prepare correspondence to Receiver regarding letter and summary of analyses (.4).   | 4.2          | \$1,008.00    |
| 9/13/2020    | MML           | Review correspondence between Receiver and A. Stephens regarding letter to investors (.1); prepare correspondence to A. Stephens regarding same (.1).   | 0.2          | \$48.00       |
| 9/14/2020    | MG            | Review revised letter to investors regarding B. Winters (.2); communications with M. Lockwood regarding same (.2).  | 0.4          | \$54.00       |
| 9/14/2020    | LD            | Analyze M. Lockwood revisions to B. Winters letter along with spreadsheet analysis of claims provided (.3); revise letter to investors concerning B. Winters (.2); confer with Receiver, M. Lockwood, and A. Stephens concerning letter (.1); review voicemail from investor M.R. concerning B. Winters (.1).   | 0.7          | \$224.00      |



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| <b>Date</b>  | <b>TKPR</b>   | <b>Description of Services</b>  | <b>Hours</b> | <b>Amount</b> |
|--------------|---------------|---|--------------|---------------|
| <b>CLAIM</b> | <b>Claims</b> | <b>Administration and Objections</b>  |              |               |
| 9/14/2020    | MML           | Review Receiver's revisions to letter regarding B. Winters (.2); communications with M. Gura and L. Dougherty regarding same (.2); telephone call with A. Stephens regarding posting of letter (.1); review further revised letter (.1).                | 0.6          | \$144.00      |
| 9/15/2020    | MG            | Communicate with two investors regarding the status of the Receivership (.2).   | 0.2          | \$27.00       |
| 9/15/2020    | MML           | Review communications from claimants regarding letter to investors (.1); review claimant inquiry regarding proof of claim form and response to same (.1).   | 0.2          | \$48.00       |
| 9/16/2020    | MG            | Initial review of recently received late claim forms (.4).  | 0.4          | \$54.00       |
| 9/16/2020    | MML           | Exchange correspondence with R. Weiss regarding pre-Receivership investor information (.1).   | 0.1          | \$24.00       |
| 9/17/2020    | JR            | Communicate with A. Stephens regarding communications from investor (.1).   | 0.1          | \$13.50       |
| 9/17/2020    | MG            | Communicate with D. Marrero regarding documents that need to be re-scanned (.2).  | 0.2          | \$27.00       |
| 9/17/2020    | LD            | Research investigation of unlicensed practice of law in Indiana (.2); confer with M. Lockwood and M. Gura concerning B. Winters (.1).   | 0.3          | \$96.00       |
| 9/17/2020    | MML           | Review communications regarding investor responses to B. Winters' letter (.1); review inquiry from L. Dougherty regarding B. Winters' claimants (.1).   | 0.2          | \$48.00       |
| 9/18/2020    | MG            | Review claim forms submitted by B. Winters for Indiana residents (.5).  | 0.5          | \$67.50       |
| 9/18/2020    | MML           | Review and analysis of nine proof of claim forms and comparison to bank reconciliation as needed (.8); prepare correspondence to R. Weiss regarding M.M. (.1).  | 0.9          | \$216.00      |
| 9/21/2020    | JR            | Review correspondence from Receiver regarding communications with investor regarding recent letter from Receiver and solicitations by B. Winters (.1).  | 0.1          | \$13.50       |
| 9/21/2020    | KAP           | Review and analyze proof of claim forms and FBI statement forms and enter relevant information into claims spreadsheet (4.3); telephone call with M. Lockwood regarding assessment of time required to complete review of B. Winters' claim forms (.2). | 4.5          | \$607.50      |



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| <b>Date</b>  | <b>TKPR</b>                                 | <b>Description of Services</b>   | <b>Hours</b> | <b>Amount</b> |
|--------------|---|--|--------------|---------------|
| <b>CLAIM</b> | <b>Claims Administration and Objections</b> |  |              |               |
| 9/21/2020    | MML   | Review and analyze 38 proof of claim forms, compare to bank reconciliation where needed, and update master claims spreadsheet for analysis (3.9); telephone call with K. Paulson regarding review of B. Winters' claims (.2); prepare additional claim forms and documents for review by K. Paulson (.2); exchange correspondence regarding same (.2); communications with J. Perez regarding New Horizon (.1).  | 4.6          | \$1,104.00    |
| 9/22/2020    | KAP   | Review and analyze proof of claim forms and FBI statement forms and enter relevant information into claims spreadsheet (4.5).  | 4.5          | \$607.50      |
| 9/22/2020    | MG  | Communicate with an investor regarding the status of the Receivership (.1); compile additional documents to send to K. Paulson for review (.8); review questions that arose during K. Paulson's earlier review of records (.6); communicate with M. Lockwood regarding outstanding tasks related to the review of claim forms (.5).  | 2.0          | \$270.00      |
| 9/22/2020    | MML   | Review and analyze 39 proof of claim forms, compare to bank reconciliation where needed, and update master claims spreadsheet for analysis (3.8); telephone call with M. Gura regarding claims review (.5); exchange emails with K. Paulson regarding certain claims (.2); prepare correspondence to R. Weiss regarding N.R. (.1); exchange correspondence with M. Gura regarding N.R. (.1); review response from Kapila Mukamal regarding M.M. and analyze attached documents (.2); prepare response to R. Weiss regarding same (.1); update master claims spreadsheet for same (.1); communications with M. Gura and K. Paulson regarding claims for review (.2); review response and spreadsheet from R. Weiss regarding D.O. (.2); review missing claim page for D.O. (.1); update master claims spreadsheet for same and response from R. Weiss (.1); prepare email to R. Weiss regarding same (.1); exchange correspondence with R. Weiss regarding N.R. (.1). | 5.9          | \$1,416.00    |
| 9/23/2020    | KAP   | Review and analyze proof of claim forms and FBI statement forms and enter relevant information into claims spreadsheet (7.2).  | 7.2          | \$972.00      |
| 9/23/2020    | MG  | Communicate with an investor regarding the status of the Receivership (.1); communicate with K. Paulson regarding certain B. Winters claimants (.4); update master spreadsheet with a new address for a claimant (.1); communicate with M. Lockwood regarding continued review of forms submitted by B. Winters (.4).  | 1.0          | \$135.00      |
| 9/23/2020    | MML   | Telephone call with M. Gura regarding claims review (.4).  | 0.4          | \$96.00       |

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| <b>Date</b>  | <b>TKPR</b>   | <b>Description of Services</b>   | <b>Hours</b> | <b>Amount</b> |
|--------------|---------------|--|--------------|---------------|
| <b>CLAIM</b> | <b>Claims</b> | <b>Administration and Objections</b>   |              |               |
| 9/24/2020    | KAP           | Review and analyze proof of claim forms and FBI statement forms and enter relevant information into claims spreadsheet (4.7).  | 4.7          | \$634.50      |
| 9/24/2020    | MG            | Communicate with M. Lockwood regarding the process to review claims submitted by B. Winters (.8); initial review of same (1.8.).   | 2.6          | \$351.00      |
| 9/24/2020    | LD            | Review information concerning B. Winters attached to claim form and confer with M. Lockwood regarding same (.3).   | 0.3          | \$96.00       |
| 9/24/2020    | MML           | Review and analysis of 28 proof of claim forms, comparison to bank reconciliation and FBI questionnaires where needed, and update master spreadsheet for same (3.3); exchange correspondence with R. Weiss regarding M.S. (.2); exchange correspondence with L. Dougherty regarding B. Winters information discovered with claim form (.2); exchange correspondence with L. Dougherty regarding R. Montie information discovered with claim form (.1); telephone calls with M. Gura to direct her regarding review of B. Winters' claims (.8).   | 4.6          | \$1,104.00    |
| 9/25/2020    | RMM           | Review claim status of P.A. (.3).  | 0.3          | \$72.00       |
| 9/25/2020    | KAP           | Review and analyze proof of claim forms and FBI statement forms and enter relevant information into claims spreadsheet (5.1).  | 5.1          | \$688.50      |
| 9/25/2020    | MG            | Review claims submitted by B. Winters and FBI statement forms and update B. Winters claims spreadsheet for same (5.1).   | 5.1          | \$688.50      |
| 9/25/2020    | LD            | Confer with M. Lockwood concerning K. Crowley (.1); confer with M. Lockwood and J. Perez concerning claims (.2).   | 0.3          | \$96.00       |
| 9/25/2020    | MML           | Review and analysis of 13 proof of claim forms including comparison to bank reconciliation, investor documents, and FBI statements (1.8); exchange correspondence with team and Receiver regarding B. Winters (.1); exchange correspondence with J. Perez and L. Dougherty regarding claims filed by claimants with false profits (.2); exchange correspondence with R. Weiss regarding D.C. (.2); review analysis of D.C.'s investments and payments (.2); exchange correspondence with R. Weiss regarding J.B. (.1); review Kapila Mukamal's analysis of same (.1); exchange correspondence with K. Paulson regarding claims questions (.2). | 2.9          | \$696.00      |
| 9/27/2020    | KAP           | Review and analyze proof of claim forms and FBI statement forms and enter relevant information into claims spreadsheet (2.0).  | 2.0          | \$270.00      |

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| <b>Date</b>  | <b>TKPR</b>         | <b>Description of Services</b>  | <b>Hours</b>  | <b>Amount</b>      |
|--|---------------------|---|---------------|--------------------|
| <b>CLAIM</b>                                       | <b>Claims</b>       | <b>Administration and Objections</b>  |               |                    |
| 9/28/2020  | KAP                 | Review and analyze proof of claim forms and FBI statement forms and enter relevant information into claims spreadsheet (6.3).   | 6.3           | \$850.50           |
| 9/28/2020  | MG                  | Review claims submitted by B. Winters and FBI statements and update claims spreadsheet for same (6.5).  | 6.5           | \$877.50           |
| 9/29/2020  | MG                  | Review claims submitted by B. Winters and FBI statements and update claims spreadsheet for same (6.2).  | 6.2           | \$837.00           |
| 9/29/2020  | LD                  | Confer with M. Lockwood concerning B. Winters (.1).   | 0.1           | \$32.00            |
| 9/29/2020  | MML                 | Review and analysis of claims submitted by B. Winters and update master claims spreadsheet for same (2.0); exchange correspondence with L. Dougherty regarding B. Winters (.1); review communication from L. Dougherty to Englander Fischer regarding B. Winters (.1); prepare response to same (.1); review correspondence regarding tolling agreements as it relates to claims process and update claims spreadsheet for same (.1). | 2.4           | \$576.00           |
| 9/30/2020  | KAP                 | Review and analyze proof of claim forms and FBI statement forms and enter relevant information into claims spreadsheet (1.4).   | 1.4           | \$189.00           |
| 9/30/2020  | MML                 | Review and analysis of claims submitted by B. Winters and update master claims spreadsheet for same (2.5); exchange correspondence with R. Weiss regarding A.A. (.2); exchange correspondence with R. Weiss regarding a different claimant with the initials A.A. (.2).   | 2.9           | \$696.00           |
| <b>Total: Claims Administration and Objections</b> |                     |   | <b>292.50</b> | <b>\$52,166.00</b> |
| <b>WFEE</b>  | <b>Work on Fees</b> | <b>Motions</b>  |               |                    |
| 7/1/2020   | MML                 | NO CHARGE: Review revised prebills for May (1.0); continue review of third party invoices (.3); communications with A. Wilson regarding fees (.2).  | 1.5           | \$0.00             |
| 7/2/2020   | MML                 | NO CHARGE: Receipt and initial review of June invoice from RWJ (.1); exchange correspondence with M. Gura regarding time entries (.1); review further revised prebill for April (.6); prepare correspondence to J. Perez regarding same (.1).   | 0.9           | \$0.00             |
| 7/3/2020   | MML                 | NO CHARGE: Review revised prebills (1.0).   | 1.0           | \$0.00             |
| 7/5/2020   | MML                 | NO CHARGE: Exchange correspondence with J. Rizzo regarding E-Hounds invoice (.1).   | 0.1           | \$0.00             |

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| <b>Date</b> | <b>TKPR</b>                 | <b>Description of Services</b>  | <b>Hours</b> | <b>Amount</b> |
|-------------|-----------------------------|---|--------------|---------------|
| <b>WFEE</b> | <b>Work on Fees Motions</b> |   |              |               |
| 7/6/2020    | MML                         | NO CHARGE: Receipt and review of invoices from RWJ (.4); update third party spreadsheet for same (.1); exchange correspondence with R. Jernigan regarding invoices (.2); receipt and review of revised June invoice (.1); communications with B. Nguyen regarding prebills (.2); review Englander Fischer invoices (.4); prepare summary of analysis of same to J. Perez (.3); review correspondence from J. Perez and J. Sallah regarding S. Godhino bills (.1); communications regarding prebills for litigation matters (.1); exchange correspondence with A. Sharp regarding April bill (.1); review E-Hounds invoices and update spreadsheet for same (.3); review Kapila Mukamal invoices and update spreadsheet for same (.3); review PDR invoices and update spreadsheet for same (.2). | 2.8          | \$0.00        |
| 7/7/2020    | MML                         | NO CHARGE: Review communications with P. Rengstl regarding S. Godhino's invoices (.1); communications with PDR regarding June invoice (.1); communications with D. Burnette regarding Receiver's June invoice (.1).   | 0.3          | \$0.00        |
| 7/13/2020   | EF                          | NO CHARGE: Correspondence with Belize and Cayman Islands counsel regarding invoices for fees application (.2).  | 0.2          | \$0.00        |
| 7/13/2020   | MML                         | NO CHARGE: Review Receiver's prebill (.2); communications with D. Burnette regarding time entries (.2); communications with E. Feld regarding Maples and G. Godfrey invoices (.1); communications with B. Nguyen regarding Receiver's invoice (.1).   | 0.6          | \$0.00        |
| 7/14/2020   | JR                          | NO CHARGE: Communicate with M. Lockwood regarding invoices from expert (.1).  | 0.1          | \$0.00        |
| 7/14/2020   | MML                         | NO CHARGE: Exchange correspondence with J. Rizzo regarding Kapila Mukamal June invoice (.1); exchange correspondence with Kapila Mukamal regarding June invoice (.1); exchange correspondence with D. Burnette regarding time entries for Receiver (.1); exchange correspondence with E-Hounds regarding June invoice (.1); receipt and review of June invoice (.1); exchange correspondence with B. Nguyen regarding prebills (.1); review and revise team prebill for June (1.5).   | 2.1          | \$0.00        |
| 7/15/2020   | MML                         | NO CHARGE: Review revised prebill for June (1.0); communications with B. Nguyen regarding same (.2).  | 1.2          | \$0.00        |
| 7/16/2020   | MML                         | NO CHARGE: Review revised prebills (1.0); review team bills for related matters (1.0); communications with B. Nguyen regarding revisions (.2).  | 2.2          | \$0.00        |
| 7/17/2020   | MML                         | NO CHARGE: Review Receiver's prebill for April through June (2.2).  | 2.2          | \$0.00        |

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|-------------|-----------------------------|---|--------------|---------------|
| <b>WFEE</b> | <b>Work on Fees Motions</b> |   |              |               |
| 7/20/2020   | MML                         | NO CHARGE: draft motion for fees (.8); work on exhibits (.7); exchange correspondence with A. Wilson regarding Receiver's invoice (.1); exchange emails with J. Perez regarding fees motion (.2); review email from J. Perez to Englander Fischer regarding invoices (.1); exchange emails with Englander Fischer regarding same (.1).  | 2.0          | \$0.00        |
| 7/21/2020   | MML                         | NO CHARGE: Review Englander Fischer invoices in preparation for conference call (.3); conference call with B. McConnell regarding invoices (.3); prepare email to B. McConnell regarding invoices (.1); follow-up call with B. McConnell regarding same (.2); exchange correspondence with J. Perez regarding Englander Fischer invoices (.1).  | 1.0          | \$0.00        |
| 7/22/2020   | MML                         | NO CHARGE: Review revised prebills for Receiver and work on same (2.0); review revised invoices from Englander Fischer (.2); communications with B. McConnell regarding same (.2); review further revised prebills (.5); communications with B. Nguyen regarding same (.2); review further revised and additional invoices from Englander Fischer (.5); prepare analysis of timekeepers (.5); prepare correspondence to Englander Fischer regarding additional information needed (.2).   | 4.1          | \$0.00        |
| 7/23/2020   | JJP                         | NO CHARGE: Work on fee motion and invoices (3.7).   | 3.7          | \$0.00        |
| 7/23/2020   | MML                         | NO CHARGE: Exchange correspondence with B. Nguyen regarding Receiver's invoices (.2); review revisions to same (.2); prepare correspondence to J. Perez regarding Receiver's invoice and motion for fees (.1); review correspondence from B. Winiecke regarding billing rates (.1); communications with B. McConnell regarding revised invoices (.2); review revised invoices (.5); communications with E. Feld regarding Maples Group and G. Godfrey invoices (.2); continue work on Englander Fischer's invoices and summary (1.3); exchange correspondence with J. Perez regarding same (.2); continue drafting motion for fees (1.0). | 4.0          | \$0.00        |
| 7/24/2020   | MML                         | NO CHARGE: Work on motion for fees (3.0); prepare correspondence to J. Perez regarding draft motion (.2).   | 3.2          | \$0.00        |
| 7/29/2020   | MML                         | NO CHARGE: Exchange correspondence with Receiver regarding Englander Fischer (.2); review engagement letter and related documents (.2).   | 0.4          | \$0.00        |
| 7/30/2020   | MML                         | NO CHARGE: Exchange correspondence with A. Wilson regarding G. Godfrey (.1); revise correspondence to same (.2); receipt and initial review of invoice from G. Godfrey (.1).  | 0.4          | \$0.00        |
| 7/31/2020   | MML                         | NO CHARGE: Prepare correspondence to J. Waechter regarding invoices (.2); exchange correspondence with J. Waechter regarding invoices (.2).   | 0.4          | \$0.00        |

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|-------------|-----------------------------|---|--------------|---------------|
| <b>WFEE</b> | <b>Work on Fees Motions</b> |   |              |               |
| 8/1/2020    | MML                         | NO CHARGE: Exchange correspondence with Receiver regarding Englander Fischer (.1).  | 0.1          | \$0.00        |
| 8/4/2020    | MML                         | NO CHARGE: Receipt and review of July invoice from E-Hounds (.1).   | 0.1          | \$0.00        |
| 8/5/2020    | JJP                         | NO CHARGE: Draft motion for extension of time to file fee application and begin local rule 3.01(g) process (1.3); continue review of invoices (2.8).  | 4.1          | \$0.00        |
| 8/6/2020    | JJP                         | NO CHARGE: Revise, finalize, and file motion for extension of time to file fee application (.5).  | 0.5          | \$0.00        |
| 8/10/2020   | MML                         | NO CHARGE: Review motion to extend deadline to file fees motion (.1); review revised invoices from Englander Fischer (.5); exchange emails with J. Waechter regarding invoices (.1); telephone call with J. Waechter regarding same (.1); telephone call with Receiver regarding proposed new rates (.1); prepare email to J. Waechter confirming same (.1).  | 1.0          | \$0.00        |
| 8/12/2020   | MML                         | NO CHARGE: Review and analysis of revised invoices from Englander Fischer and summary spreadsheet (.7); revise summary spreadsheet (.3); prepare correspondence to J. Waechter regarding same (.2); exchange emails with J. Waechter regarding further revisions (.2); telephone call with J. Waechter (.2); review further revised invoices (.3); exchange correspondence with J. Perez regarding fees motion and exhibits (.1); review G. Godfrey invoice (.1); revise motion for fees and exhibits (.4). | 2.5          | \$0.00        |
| 8/13/2020   | JJP                         | NO CHARGE: Review and revise invoices (3.8).  | 3.8          | \$0.00        |
| 8/13/2020   | MML                         | NO CHARGE: Exchange correspondence with J. Perez regarding fees motion (.1); exchange correspondence with A. Wilson regarding exhibits (.1).  | 0.2          | \$0.00        |
| 8/14/2020   | MML                         | NO CHARGE: Receipt and review of July invoice from Kapila Mukamal (.1); communications with J. Perez regarding fees motion (.1); review edits to prebills (.2); communications with A. Wilson regarding exhibits to fees motion (.1); receipt and review of July invoice from PDR (.1).   | 0.6          | \$0.00        |
| 8/17/2020   | MML                         | NO CHARGE: Communications with A. Wilson regarding motion for fees (.3); review and rename invoices for exhibits (.2); review communication from J. Perez regarding prebills (.1).  | 0.6          | \$0.00        |
| 8/18/2020   | MML                         | NO CHARGE: Exchange correspondence with A. Wilson regarding prebills (.1); review new prebills for additional time (.1); communications with J. Perez regarding same (.1).  | 0.3          | \$0.00        |
| 8/19/2020   | JJP                         | NO CHARGE: Review and revise invoices (2.5).  | 2.5          | \$0.00        |



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| <b>Date</b> | <b>TKPR</b>                 | <b>Description of Services</b>   | <b>Hours</b> | <b>Amount</b> |
|-------------|-----------------------------|--|--------------|---------------|
| <b>WFEE</b> | <b>Work on Fees Motions</b> |  |              |               |
| 8/20/2020   | JJP                         | NO CHARGE: Finalize certain invoices and send to CFTC for review (2.2).  | 2.2          | \$0.00        |
| 8/24/2020   | JJP                         | NO CHARGE: Finalize first draft of motion for fees and prepare to send to CFTC for review (2.7).   | 2.7          | \$0.00        |
| 8/24/2020   | MML                         | NO CHARGE: Review final bills for Receiver and WGK (.3); revise motion for fees (.8); communications with B. Nguyen regarding further revisions for bills (.2); review revised final bills (.2); prepare categorization of costs (.2); prepare proposed order (.2); prepare correspondence to J. Perez and A. Wilson regarding revised motion and exhibits (.1). | 2.0          | \$0.00        |
| 8/25/2020   | JJP                         | NO CHARGE: Revise first draft of motion for fees (1.0).  | 1.0          | \$0.00        |
| 8/26/2020   | JJP                         | NO CHARGE: Revise first draft of motion for fees (1.0).  | 1.0          | \$0.00        |
| 8/26/2020   | MML                         | NO CHARGE: Review communications regarding finalizing motion for fees (.1).  | 0.1          | \$0.00        |
| 8/27/2020   | JJP                         | NO CHARGE: Finalize motion for fees and begin local rule 3.01(g) process (2.5).  | 2.5          | \$0.00        |
| 8/27/2020   | MML                         | NO CHARGE: Review comments from J. Perez regarding motion for fees (.2); review and revise exhibits for same (1.0); review and revise motion (.5); telephone call with A. Wilson regarding exhibits and motion (.2); exchange correspondence with J. Perez regarding same (.1); prepare email to team regarding time entry for July (.1).                        | 2.1          | \$0.00        |
| 8/28/2020   | JJP                         | NO CHARGE: Revise, finalize, and file motion for fees (1.5).   | 1.5          | \$0.00        |
| 8/28/2020   | MML                         | NO CHARGE: Exchange correspondence with J. Perez regarding E-Hounds (.1); exchange correspondence with E-Hounds regarding platforms (.1); exchange correspondence with B. Nguyen regarding prebills (.1).  | 0.3          | \$0.00        |
| 8/31/2020   | MML                         | NO CHARGE: Exchange correspondence with J. Rizzo and B. Nguyen regarding payment of G. Godfrey invoice (.2); communication with E. Feld regarding same (.1); receipt and review of notice of filing motion for fees (.1).  | 0.4          | \$0.00        |
| 9/1/2020    | MML                         | NO CHARGE: Exchange correspondence with D. Burnette regarding Receiver's time entries for July (.2); review E-Hounds invoice for August (.1); exchange correspondence with A. Sharp regarding invoices (.1).   | 0.4          | \$0.00        |
| 9/4/2020    | MML                         | NO CHARGE: Exchange correspondence with D. Burnette regarding Receiver's August time entry (.1).   | 0.1          | \$0.00        |
| 9/7/2020    | MML                         | NO CHARGE: Exchange correspondence regarding Receiver's time entries (.1).   | 0.1          | \$0.00        |

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**SERVICES**

| <b>Date</b> | <b>TKPR</b>                 | <b>Description of Services</b>  | <b>Hours</b> | <b>Amount</b> |
|-------------|-----------------------------|---|--------------|---------------|
| <b>WFEE</b> | <b>Work on Fees Motions</b> |   |              |               |
| 9/8/2020    | MML                         | NO CHARGE: Review and revise July prebills (2.0); exchange correspondence with M. McKinley regarding certain time entries (.2); communications with A. Wilson regarding prebills (.2); review communications regarding K. Paulson (.1); prepare email to team regarding billing (.1).   | 2.6          | \$0.00        |
| 9/9/2020    | JR                          | NO CHARGE: Communicate with legal team regarding payment to G. Godfrey in anticipation of approval of fees motion (.1).   | 0.1          | \$0.00        |
| 9/10/2020   | JJP                         | NO CHARGE: Review and analyze opposition to motion for fees filed by defendant Montie and discuss need to reply (.6); draft email to counsel regarding inaccuracies in opposition (.3); begin outline of draft motion for leave to reply (.5).  | 1.4          | \$0.00        |
| 9/10/2020   | RMM                         | NO CHARGE: Review response in opposition to motion for attorney's fees (.5).  | 0.5          | \$0.00        |
| 9/10/2020   | JR                          | NO CHARGE: Review R. Montie's response to motion for fees and related correspondence from J. Perez and L. Dougherty (.1).   | 0.1          | \$0.00        |
| 9/10/2020   | LD                          | NO CHARGE: Analyze R. Montie opposition to Receiver's interim fee application (.2).   | 0.2          | \$0.00        |
| 9/10/2020   | MML                         | NO CHARGE: Receipt and review of opposition to motion for fees by R. Montie (.1); review communications among team regarding same (.2); research amount set forth in motion per request of J. Perez (.3); prepare correspondence regarding same (.1).   | 0.7          | \$0.00        |
| 9/11/2020   | JJP                         | NO CHARGE: Communicate with counsel for defendant Montie, CFTC, Receiver, and others regarding opposition to motion for fees (1.0).   | 1.0          | \$0.00        |
| 9/14/2020   | JR                          | NO CHARGE: Review order granting motion to award fees (.1); communicate with J. Perez regarding order granting motion to award fees (.1); review correspondence between J. Perez and vendor regarding order granting motion to award fees and payment of invoice (.1).  | 0.3          | \$0.00        |
| 9/14/2020   | MML                         | NO CHARGE: Exchange correspondence with A. Wilson regarding prebills (.1); receipt and review of order granting motion for fees (.1).   | 0.2          | \$0.00        |
| 9/15/2020   | MML                         | NO CHARGE: Exchange correspondence with A. Wilson regarding invoices for G. Godfrey and Maples (.1); exchange correspondence with R. Jernigan regarding RWJ invoices for July and August (.1); exchange correspondence with J. Perez regarding S. Godinho invoices (.1); review correspondence from S. Godinho regarding invoices and payment of fees (.1); compile additional third party invoices for July and August (.2). | 0.6          | \$0.00        |



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**SERVICES**

| Date                               | TKPR                        | Description of Services  | Hours        | Amount              |
|------------------------------------|-----------------------------|--|--------------|---------------------|
| <b>WFEE</b>                        | <b>Work on Fees Motions</b> |  |              |                     |
| 9/16/2020                          | MML                         | NO CHARGE: Review communications with S. Godinho regarding invoices and payment (.1); update third party spreadsheet for same (.1); research and gather third party invoices (.5); communications with R. Jernigan regarding invoices (.2); communications with A. Wilson regarding invoices (.1). | 1.0          | \$0.00              |
| 9/17/2020                          | MML                         | NO CHARGE: Review August prebills for Oasis (1.8); exchange correspondence with A. Wilson regarding same (.2); exchange correspondence with Englander Fischer regarding billing question (.2).   | 2.2          | \$0.00              |
| 9/18/2020                          | MML                         | NO CHARGE: Review revised prebills for July and further revise (2.2).  | 2.2          | \$0.00              |
| 9/21/2020                          | MML                         | NO CHARGE: Review correspondence to G. Godfrey regarding invoices (.1); review correspondence to Maples Group regarding invoices (.1).   | 0.2          | \$0.00              |
| 9/22/2020                          | MML                         | NO CHARGE: Review email from G. Godfrey regarding invoice request (.1).  | 0.1          | \$0.00              |
| 9/23/2020                          | MML                         | NO CHARGE: Review revised July prebills (1.0); exchange correspondence with A. Wilson regarding August time (.1); prepare correspondence to team regarding September time entry (.1); review revised August prebills (1.0).  | 2.2          | \$0.00              |
| 9/24/2020                          | MML                         | NO CHARGE: Exchange correspondence with J. Waechter regarding payment of fees (.1); exchange correspondence with J. Rizzo regarding same (.1); exchange correspondence with J. Rizzo regarding G. Godfrey (.1).  | 0.3          | \$0.00              |
| 9/29/2020                          | MML                         | NO CHARGE: Review time entries from K. Paulson and correspondence regarding same (.1); review revised prebills for August (.5); prepare correspondence to A. Wilson regarding same (.1); review correspondence from G. Godfrey regarding invoices (.1).  | 0.8          | \$0.00              |
| 9/30/2020                          | MML                         | NO CHARGE: Review communications regarding payment of fees to third parties (.1); review revised prebills (.1); communications with A. Wilson regarding same (.1); prepare correspondence to J. Perez regarding July and August prebills (.1).   | 0.4          | \$0.00              |
| <b>Total: Work on Fees Motions</b> |                             |  | <b>84.20</b> | <b>\$0.00</b>       |
| <b>Total Professional Service:</b> |                             |  | 666.4        | <b>\$129,205.00</b> |

**DISBURSEMENTS**

| Date | Description of Disbursements | Amount |
|------|------------------------------|--------|
|------|------------------------------|--------|

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**DISBURSEMENTS**

| <b>Date</b> | <b>Description of Disbursements</b>  | <b>Amount</b> |
|-------------|--|---------------|
| <b>E101</b> | <b>Photocopies</b>   |               |
| 9/30/2020   | Photocopies @ .15 each (712 @ \$0.15)  | \$106.80      |
| <b>E105</b> | <b>Telephone</b>   |               |
| 7/14/2020   | Level 3 Communications, LLC- Conference Call Charges- Conference call  | \$4.58        |
| 7/17/2020   | Level 3 Communications, LLC- Conference Call Charges- Conference call  | \$24.34       |
| 7/23/2020   | Level 3 Communications, LLC- Conference Call Charges- Conference call  | \$28.34       |
| 8/24/2020   | Conference Call Charges  | \$9.44        |
| 9/8/2020    | Conference Call Charges  | \$5.30        |
| 9/14/2020   | Conference Call Charges  | \$0.78        |
| 9/21/2020   | Conference Call Charges  | \$41.81       |
| 9/22/2020   | Conference Call Charges  | \$9.35        |
| <b>E106</b> | <b>On Line Research</b>  |               |
| 7/1/2020    | PACER printing costs for month of April 1, 2020 to June 30, 2020 (709 @ \$0.10)                                  | \$70.90       |
| 9/28/2020   | Westlaw  | \$1,806.25    |
| <b>E107</b> | <b>Del. Services/Messengers</b>  |               |
| 7/8/2020    | FedEx to Brent Allan Winters   | \$31.86       |
| 8/14/2020   | FedEx to Clerk, US District Court  | \$19.46       |
| 8/18/2020   | FedEx to Beatriz McConnell, Englander & Fischer  | \$19.51       |
| 8/21/2020   | FedEx to Brent Allen Winters   | \$32.01       |
| 8/25/2020   | FedEx to Clerk of Court, USDC, Middle District of FL   | \$19.51       |
| 8/28/2020   | FedEx to Pamlyn Taylor, Najmy Thompson, P.L.   | \$19.51       |
| 9/3/2020    | FedEx to Clerk, Supreme Court, State of Indiana  | \$30.69       |
| 9/9/2020    | FedEx to Michael DaCorta   | \$21.38       |
| 9/11/2020   | FedEx to Fox Rothschild LLP  | \$32.01       |
| <b>E112</b> | <b>Court Fees</b>  |               |
| 8/12/2020   | Clerk of the Court- Clerk of Court- Certified copy of Order approving sale of 16904 Vardon Terrace #106 Property | \$12.00       |

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**DISBURSEMENTS**

| <b>Date</b>                  | <b>Description of Disbursements</b>  | <b>Amount</b>         |
|------------------------------|--|-----------------------|
| <b>E112</b>                  | <b>Court Fees</b>  |                       |
| 8/24/2020                    | Clerk, U.S. District Court- Clerk of Court- Certified Copies of Orders approving Sale of: 16904 Vardon Ter. #106 13318 Lost Key Place \$12 per | \$25.00               |
| <b>E124</b>                  | <b>Other</b>   |                       |
| 7/1/2020                     | K. Tek Systems, Inc.- Miscellaneous- Business web site   | \$50.00               |
| 7/18/2020                    | Burton Wiand- Miscellaneous- GoDaddy - Oasis Global Domain   | \$28.16               |
| 7/23/2020                    | American Express- Miscellaneous- Sarasota Herald - Notice of Publication   | \$33.75               |
| 8/1/2020                     | K. Tek Systems, Inc.- Miscellaneous- Business website hosting  | \$50.00               |
| 8/1/2020                     | K. Tek Systems, Inc.- Miscellaneous- Monthly services work order   | \$75.00               |
| 8/1/2020                     | Burton Wiand- Miscellaneous- Go Daddy - Oasis Business Hosting   | \$29.99               |
| 8/3/2020                     | Burton Wiand- Miscellaneous- Amazon Web Services - Oasis Web Services  | \$257.60              |
| 9/1/2020                     | K. Tek Systems, Inc.- Miscellaneous- Business web site   | \$50.00               |
| 9/1/2020                     | K. Tek Systems, Inc.- Miscellaneous- Monthly service work order  | \$262.50              |
| 9/11/2020                    | American Express- Court Reporter Charges- Transcript from Howard W. Jones  | \$105.00              |
| <b>Total Disbursements</b>   |  | <b>\$3,312.83</b>     |
| Total Services               |  | \$129,205.00          |
| Total Disbursements          |  | \$3,312.83            |
| Total Current Charges        |  | \$132,517.83          |
| Previous Balance             |  | \$229,721.45          |
| <i>Less Retainer Applied</i> |  | <i>(\$229,721.45)</i> |
| <b>PAY THIS AMOUNT</b>       |  | <b>\$132,517.83</b>   |

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**TASK RECAP****Services**

| <u>Project No.</u> | <u>Hours</u>  | <u>Amount</u>       |
|--------------------|---------------|---------------------|
| ASDIS - ASDIS      | 60.80         | \$12,237.00         |
| ASSET - ASSET      | 181.40        | \$55,602.50         |
| BUSIN - BUSIN      | 13.50         | \$1,822.50          |
| CASE - CASE        | 34.00         | \$7,377.00          |
| CLAIM - CLAIM      | 292.50        | \$52,166.00         |
| WFEE - WFEE        | 84.20         | \$0.00              |
|                    | <u>666.40</u> | <u>\$129,205.00</u> |

**Disbursements**

| <u>Project No.</u>       | <u>Amount</u>     |
|--------------------------|-------------------|
| Photocopies              | \$106.80          |
| Telephone                | \$123.94          |
| On Line Research         | \$1,877.15        |
| Del. Services/Messengers | \$225.94          |
| Court Fees               | \$37.00           |
| Other                    | \$942.00          |
|                          | <u>\$3,312.83</u> |

**BREAKDOWN BY PERSON**

| <u>Person</u>           | <u>Project No.</u> | <u>Hours</u> | <u>Amount</u> |
|-------------------------|--------------------|--------------|---------------|
| JJP Jared J. Perez      | ASDIS - ASDIS      | 20.30        | \$6,496.00    |
| JJP Jared J. Perez      | ASSET - ASSET      | 18.80        | \$6,016.00    |
| JJP Jared J. Perez      | CASE - CASE        | 12.80        | \$4,096.00    |
| JJP Jared J. Perez      | CLAIM - CLAIM      | 1.20         | \$384.00      |
| JJP Jared J. Perez      | WFEE - WFEE        | 27.90        | \$0.00        |
| EF Eric Feld            | ASSET - ASSET      | 4.10         | \$984.00      |
| EF Eric Feld            | WFEE - WFEE        | 0.20         | \$0.00        |
| RMM Max McKinley        | ASDIS - ASDIS      | 1.90         | \$456.00      |
| RMM Max McKinley        | ASSET - ASSET      | 3.50         | \$840.00      |
| RMM Max McKinley        | CLAIM - CLAIM      | 0.70         | \$168.00      |
| RMM Max McKinley        | WFEE - WFEE        | 0.50         | \$0.00        |
| MG Mary Gura            | ASDIS - ASDIS      | 0.90         | \$121.50      |
| MG Mary Gura            | ASSET - ASSET      | 0.80         | \$108.00      |
| MG Mary Gura            | CASE - CASE        | 4.60         | \$621.00      |
| MG Mary Gura            | CLAIM - CLAIM      | 143.20       | \$19,332.00   |
| KAP Kimberly A. Paulson | CLAIM - CLAIM      | 47.40        | \$6,399.00    |

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**BREAKDOWN BY PERSON**

| <u>Person</u>         | <u>Project No.</u> | <u>Hours</u>  | <u>Amount</u>       |
|-----------------------|--------------------|---------------|---------------------|
| JR Jeffrey Rizzo      | ASDIS - ASDIS      | 34.70         | \$4,684.50          |
| JR Jeffrey Rizzo      | ASSET - ASSET      | 8.50          | \$1,147.50          |
| JR Jeffrey Rizzo      | BUSIN - BUSIN      | 13.50         | \$1,822.50          |
| JR Jeffrey Rizzo      | CASE - CASE        | 2.40          | \$324.00            |
| JR Jeffrey Rizzo      | CLAIM - CLAIM      | 1.30          | \$175.50            |
| JR Jeffrey Rizzo      | WFEE - WFEE        | 0.60          | \$0.00              |
| AS Amanda Stephens    | ASDIS - ASDIS      | 2.60          | \$351.00            |
| AS Amanda Stephens    | ASSET - ASSET      | 0.20          | \$27.00             |
| AS Amanda Stephens    | CASE - CASE        | 11.20         | \$1,512.00          |
| AS Amanda Stephens    | CLAIM - CLAIM      | 0.50          | \$67.50             |
| LD Larry J. Dougherty | ASDIS - ASDIS      | 0.40          | \$128.00            |
| LD Larry J. Dougherty | ASSET - ASSET      | 144.50        | \$46,240.00         |
| LD Larry J. Dougherty | CASE - CASE        | 1.30          | \$416.00            |
| LD Larry J. Dougherty | CLAIM - CLAIM      | 25.90         | \$8,288.00          |
| LD Larry J. Dougherty | WFEE - WFEE        | 0.20          | \$0.00              |
| MML Maya M. Lockwood  | ASSET - ASSET      | 1.00          | \$240.00            |
| MML Maya M. Lockwood  | CASE - CASE        | 1.70          | \$408.00            |
| MML Maya M. Lockwood  | CLAIM - CLAIM      | 72.30         | \$17,352.00         |
| MML Maya M. Lockwood  | WFEE - WFEE        | 54.80         | \$0.00              |
|                       |                    | <u>666.40</u> | <u>\$129,205.00</u> |

# **EXHIBIT 9**

**Wiand Guerra King P.A.**

5505 West Gray Street

Tampa, FL 33609

Telephone: 813-347-5100

Facsimile: 813-347-5198

Federal Tax ID # 27-0937962

Burton W. Wiand

**Attention: Burton W. Wiand**

Wiand Guerra King, P.A.

5505 W. Gray Street

Tampa, FL 33609

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RE: Oasis Legal Team – Recovery from Investors

For Professional Services Rendered Through September 30, 2020

**SERVICES**

| Date     | TKPR                        | Description of Services  | Hours | Amount   |
|----------|-----------------------------|--|-------|----------|
| ASSET    | Asset Analysis and Recovery |  |       |          |
| 7/1/2020 | JJP                         | Review correspondence from New Zealand law firm (.2); correspondence with team regarding certificate of interested persons (.2).   | 0.4   | \$128.00 |
| 7/1/2020 | JR                          | Communicate with L. Dougherty regarding receipt of clawback settlement checks (.1); review motion to approve settlements and related correspondence from J. Perez (.1).  | 0.2   | \$27.00  |
| 7/1/2020 | MG                          | Review and update master spreadsheet with communication regarding clawback defendants (.4).  | 0.4   | \$54.00  |
| 7/1/2020 | LD                          | Confer with team regarding E. Halley installment payment (.1); review Receiver's draft motion for court approval of clawback settlements (.1).   | 0.2   | \$64.00  |
| 7/2/2020 | JR                          | Review online accounts to confirm clawback settlement deposit (.1); update clawback settlement spreadsheet (.1); communicate with PDR regarding clawback settlement payments and payment plans (.1).   | 0.3   | \$40.50  |
| 7/2/2020 | MG                          | Research for contact information on two clawback defendants (.8).  | 0.8   | \$108.00 |
| 7/2/2020 | LD                          | Confer with B. McConnell regarding acceptance of service (.1); revise waiver of service form (.3); telephone conference with counsel for E. McMahon (.1); review E. McMahon records and confer with her counsel (.2); review case notes and next steps (.4). | 1.1   | \$352.00 |

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**SERVICES**

| <b>Date</b>  | <b>TKPR</b>                        | <b>Description of Services</b>   | <b>Hours</b> | <b>Amount</b> |
|--------------|------------------------------------|--|--------------|---------------|
| <b>ASSET</b> | <b>Asset Analysis and Recovery</b> |  |              |               |
| 7/4/2020     | LD                                 | Review D. Nicolaou correspondence (.1).  | 0.1          | \$32.00       |
| 7/6/2020     | JR                                 | Review clawback settlement check (.1); update clawback settlement spreadsheet (.1); communicate with PDR regarding clawback settlement payment and deposit (.1).   | 0.3          | \$40.50       |
| 7/6/2020     | LD                                 | Research status of filing and update B. McConnell (.2); review E. McMahon case records (.3); revise E. McMahon settlement agreement (.3); confer with Receiver regarding E. McMahon settlement proposal (.1).  | 0.9          | \$288.00      |
| 7/7/2020     | JJP                                | Communicate with team regarding certain clawback defendants and potential settlements (.5).  | 0.5          | \$160.00      |
| 7/7/2020     | JR                                 | Communicate with N. Cook regarding status of clawback settlement payment per review of related correspondence (.1); update clawback settlement spreadsheet (.1); review correspondence from L. Dougherty, J. Perez and Receiver regarding settlement with clawback investor (.1); communicate with M. Gura and J. Perez regarding locating service addresses for clawback defendants (.1). | 0.4          | \$54.00       |
| 7/7/2020     | MG                                 | Communicate with E-Hounds regarding access to the review platform for Englander Fischer (.2).  | 0.2          | \$27.00       |
| 7/7/2020     | LD                                 | Telephone conference with Receiver regarding E. McMahon settlement (.1); confer with counsel for E. McMahon regarding proposed settlement (.1).  | 0.2          | \$64.00       |
| 7/8/2020     | JJP                                | Communicate with clawback team regarding service of certain investors and obtaining Clerk's defaults against other investors (.4).   | 0.4          | \$128.00      |
| 7/8/2020     | JR                                 | Review online accounts to confirm deposit of clawback settlement check (.1); update clawback settlement spreadsheet (.1).  | 0.2          | \$27.00       |
| 7/8/2020     | MG                                 | Update master clawback spreadsheet to show investors who are represented by B. Winters per his letter (1.4).   | 1.4          | \$189.00      |
| 7/8/2020     | LD                                 | Update B. McConnell regarding status of settlement with E. McMahon (.1); review requirements for certificates of interested persons and discovery plan conferences and summarize results (.2).   | 0.3          | \$96.00       |
| 7/9/2020     | JJP                                | Communicate with clawback team regarding settlements and obtaining Clerk's defaults against investors, including identification of former templates and research (.4).   | 0.4          | \$128.00      |
| 7/9/2020     | JR                                 | Review clawback settlement check (.1); update clawback settlement spreadsheet (.1); communicate with D. Marrero and PDR regarding depositing clawback settlement check (.1).   | 0.3          | \$40.50       |



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**SERVICES**

| <b>Date</b>  | <b>TKPR</b>                        | <b>Description of Services</b>   | <b>Hours</b> | <b>Amount</b> |
|--------------|------------------------------------|--|--------------|---------------|
| <b>ASSET</b> | <b>Asset Analysis and Recovery</b> |  |              |               |
| 7/9/2020     | LD                                 | Confer with B. McConnell concerning T. Laci (.1); analyze judge's order on service (.2); draft correspondence to counsel for T. Laci regarding motion for extension of time (.2); review correspondence from counsel for T. Laci (.1); confer with team regarding response to counsel for T. Laci (.1); analyze sample default motions (.2). | 0.9          | \$288.00      |
| 7/10/2020    | JJP                                | Review correspondence from counsel for defendant E. McMahon (.1); communicate with team regarding new counsel and likelihood of settlement (.2).   | 0.3          | \$96.00       |
| 7/10/2020    | JR                                 | Review correspondence from L. Dougherty regarding status of clawback settlement (.1).  | 0.1          | \$13.50       |
| 7/10/2020    | MG                                 | Update the demand spreadsheet with information from recent communications (.4); communicate with T. Dillon regarding contact information for someone who received false profits (.3).  | 0.7          | \$94.50       |
| 7/10/2020    | LD                                 | Review correspondence on returns of service (.2); review and respond to email from counsel for E. McMahon (.2); set up appointment for phone conference with counsel for E. McMahon (.1).  | 0.5          | \$160.00      |
| 7/13/2020    | JJP                                | Review correspondence from defendant (.1).   | 0.1          | \$32.00       |
| 7/13/2020    | JR                                 | Review correspondence from J. Perez regarding status of clawback settlements and filing motion to approve (.1).  | 0.1          | \$13.50       |
| 7/13/2020    | LD                                 | Review current draft of motion to approve clawback settlements (.2); telephone conference with R. Kunjbehari regarding settlements on behalf of Plana LLC and Glidant LLC (.3); make notes of R. Kunjbehari call (.1).   | 0.6          | \$192.00      |
| 7/14/2020    | JJP                                | Communicate with team regarding settlement agreement (.1).   | 0.1          | \$32.00       |
| 7/14/2020    | JR                                 | Update clawback settlement spreadsheet with deposit information (.1); review order granting motion to approve clawback settlements (.1).   | 0.2          | \$27.00       |
| 7/14/2020    | LD                                 | Telephone conference with K. Fendrick concerning E. McMahon (.6); draft, revise, and send settlement agreement for Glidant, LLC (.4); draft, revise, and send settlement agreement for Plana LLC (.4).   | 1.4          | \$448.00      |
| 7/15/2020    | JJP                                | Communicate with team regarding settlements and preparation of documents, including certificate of interested persons and corporate disclosure statement (.8).   | 0.8          | \$256.00      |
| 7/15/2020    | JR                                 | Review correspondence from J. Perez regarding receipt of clawback settlement payment (.1); communicate with D. Marrero and PDR regarding depositing clawback settlement payment (.1); update clawback settlement spreadsheet (.1).   | 0.3          | \$40.50       |

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**SERVICES**

| <b>Date</b>  | <b>TKPR</b>                        | <b>Description of Services</b>   | <b>Hours</b> | <b>Amount</b> |
|--------------|------------------------------------|--|--------------|---------------|
| <b>ASSET</b> | <b>Asset Analysis and Recovery</b> |  |              |               |
| 7/15/2020    | LD                                 | Update team regarding conference with counsel for E. McMahon (.2); summarize latest negotiations with counsel for E. McMahon for the team (.3); review A. Procopio correspondence (.1).  | 0.6          | \$192.00      |
| 7/16/2020    | JR                                 | Review notice of voluntary dismissal of various defendants (.1).   | 0.1          | \$13.50       |
| 7/16/2020    | LD                                 | Review correspondence from E. Harris (.1); research past correspondence with and notes from conferences with E. Harris (.3); summarize E. Harris legal position for the team (.2); review notices of clerk's defaults (.1); review multiple filings of returns of service (.2).  | 0.9          | \$288.00      |
| 7/17/2020    | LD                                 | Review defaults entered in Wiand v. Arduini (.1).  | 0.1          | \$32.00       |
| 7/20/2020    | JR                                 | Communicate with legal team regarding past due clawback settlement payments (.1).  | 0.1          | \$13.50       |
| 7/20/2020    | LD                                 | Confer with counsel for E. McMahon about waiver of service (.1); confer with N. Patterson regarding payment (.1); review correspondence on defaulted Arduini defendants (.1).  | 0.3          | \$96.00       |
| 7/21/2020    | RMM                                | Communicate with J. Rizzo and R. Granger regarding repayment of settlement agreements (.2).  | 0.2          | \$48.00       |
| 7/21/2020    | JR                                 | Review correspondence from L. Dougherty to investor regarding past due clawback settlement payment (.1); review correspondence from M. McKinley to investor regarding past due clawback settlement payment (.1); review correspondence from clawback investor and M. McKinley regarding status of past due clawback settlement payment (.1); review answers and filings by clawback defendants (.1).     | 0.4          | \$54.00       |
| 7/21/2020    | LD                                 | Review correspondence from counsel for E. McMahon regarding accepting service (.1); review defendants' motions to quash referred to magistrate judge (.2); telephone conference with B. McConnell (.1).  | 0.4          | \$128.00      |
| 7/22/2020    | JJP                                | Communicate with team regarding settlements and jurisdictional filings (.6).   | 0.6          | \$192.00      |
| 7/22/2020    | JR                                 | Review correspondence from investor regarding past due clawback settlement payments (.1); prepare correspondence to L. Dougherty regarding past due and future payments by clawback investor (.2); communicate with D. Marrero regarding deposited clawback settlement check (.1); review correspondence from L. Dougherty regarding communications with clawback investor regarding false profits (.1). | 0.5          | \$67.50       |
| 7/22/2020    | MG                                 | Continue research on contact information for clawback defendants per Englander Fischer request (5.5).  | 5.5          | \$742.50      |

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| <b>Date</b>  | <b>TKPR</b>                        | <b>Description of Services</b>  | <b>Hours</b> | <b>Amount</b> |
|--------------|------------------------------------|---|--------------|---------------|
| <b>ASSET</b> | <b>Asset Analysis and Recovery</b> |   |              |               |
| 7/22/2020    | LD                                 | Telephone conference with M. Rubel (.2); review payment history of N. Patterson (.1); review N. Patterson payments with J. Rizzo (.1); confer with N. Patterson about remaining payments (.1); review filed returns of service (.2); analyze O. Attia answer (.2); research service on M. Rubel (.1); telephone conference with M. Rubel (.1); summarize calls with M. Rubel in note to file (.2).  | 1.3          | \$416.00      |
| 7/23/2020    | JJP                                | Communicate with team regarding settlements and jurisdictional filings (.5).  | 0.5          | \$160.00      |
| 7/23/2020    | LD                                 | Review message from J. Waechter (.1); summarize research on G. Melick for J. Waechter (.3); review D. Lipinczyk filing (.3); review local rule and law on appearance of corporation (.1); call M. Obay, D. Lipinczyk, and F. Nagel (.1); summarize call status for team (.1); review E. Halley checks (.1).   | 1.1          | \$352.00      |
| 7/24/2020    | JJP                                | Communicate with team regarding settlements and jurisdictional filings (.5).  | 0.5          | \$160.00      |
| 7/24/2020    | JR                                 | Review correspondence from investor and outside counsel regarding clawback settlement payments (.1); communicate with D. Marrero regarding deposited clawback settlement check (.1); update clawback settlements spreadsheet (.2).  | 0.4          | \$54.00       |
| 7/24/2020    | LD                                 | Confer with Englander Fisher team regarding filings by pro se defendants (.5); review pro se filings and relevant case law regarding jurisdiction (.5); call E. Halley regarding settlement checks (.1).  | 1.1          | \$352.00      |
| 7/27/2020    | JJP                                | Identify relevant law and communicate with team regarding motions filed by clawback defendants and related issues (1.2).  | 1.2          | \$384.00      |
| 7/27/2020    | JR                                 | Communicate with L. Dougherty regarding status of communications with clawback settlement investor regarding checks (.1); review correspondence from J. Perez and settlement agreement related to clawback investor (.1); update clawback settlement spreadsheet (.1).  | 0.3          | \$40.50       |
| 7/27/2020    | MG                                 | Update master tracking spreadsheet and e-folders for clawbacks with communications from two investors (.4).   | 0.4          | \$54.00       |
| 7/27/2020    | LD                                 | Review executed G. Davis settlement agreement (.1); take telephone call from E. Halley regarding second settlement installment check (.1); review correspondence from counsel for T. Laci and analysis by team (.4); review strategy regarding pro se motions and summarize advice (.3); confer with counsel for E. McMahon (.1); analyze documents of E. McMahon provided by counsel (.3); review B. Dalia bankruptcy discharge (.1); review E. Harris response to complaint (.1). | 1.5          | \$480.00      |

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|--------------|------------------------------------|---|--------------|---------------|
| <b>ASSET</b> | <b>Asset Analysis and Recovery</b> |   |              |               |
| 7/28/2020    | JR                                 | Communicate with J. Perez regarding clawback settlement spreadsheet (.1).   | 0.1          | \$13.50       |
| 7/28/2020    | LD                                 | Review filed notices of motions for default against clawback defendants (.1); telephone conference with Receiver and legal team regarding clawback defendants (1.2); confer with J. Waechter and B. McConnell regarding B. Winters (.1).  | 1.4          | \$448.00      |
| 7/29/2020    | JR                                 | Communicate with B. McConnell regarding clawback investor address and contact information needed for default affidavits (.2); research database for clawback investor addresses, birth dates, social security numbers and contact information (.7).   | 0.9          | \$121.50      |
| 7/29/2020    | LD                                 | Review entries of default against clawback defendants (.1); confer with B. McConnell regarding A. Hennessey (.2).   | 0.3          | \$96.00       |
| 7/30/2020    | JJP                                | Review and revise motion for extension of time and for status conference (.9).  | 0.9          | \$288.00      |
| 7/30/2020    | JR                                 | Review online account balances to confirm deposit of clawback settlement payments (.1); update clawback settlement spreadsheet (.1); review correspondence from J. Waechter regarding clawback investor information needed for default affidavits (.2); research database for clawback investor birth dates and social security numbers (.4). | 0.8          | \$108.00      |
| 7/31/2020    | JJP                                | Communicate with team regarding motion for extension of time and for status conference (.4); research defendants and associates (.6).   | 1.0          | \$320.00      |
| 7/31/2020    | JR                                 | Review online account balances to confirm deposit of clawback settlement payments (.1); update clawback settlement spreadsheet (.1); communicate with L. Dougherty regarding non-payment from clawback investor (.1).   | 0.3          | \$40.50       |
| 7/31/2020    | LD                                 | Confer with N. Patterson concerning payments (.1); review correspondence from clawback defendants (.4); review supplemental 3.01(g) notice in clawback case (.1).   | 0.6          | \$192.00      |
| 8/3/2020     | JJP                                | Communicate with team regarding motion for extension of time and for status conference (.3).  | 0.3          | \$96.00       |

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|--------------|------------------------------------|---|--------------|---------------|
| <b>ASSET</b> | <b>Asset Analysis and Recovery</b> |   |              |               |
| 8/3/2020     | LD                                 | Confer with counsel for E. McMahon regarding acceptance of service and update team (.1); review draft opposition to pro se motions (.3); review order granting extension to respond to pro se motions and notice of status conference (.1); review power of attorney and non-disclosure agreement authored by B. Winters (.3); direct archiving of original declaration of J. Paniagua (.1); review N. Patterson payment, confer with him regarding same, and direct follow-up concerning balance (.1); confer with J. Perez regarding B. Winters (.2). | 1.2          | \$384.00      |
| 8/4/2020     | JJP                                | Communicate with team and counsel for certain defendants regarding settlements and receipt of settlement payments (.4).   | 0.4          | \$128.00      |
| 8/4/2020     | JR                                 | Review correspondence from outside counsel and J. Perez regarding receipt of executed settlement agreement and payment from clawback investor (.1); update clawback settlement spreadsheet (.1).  | 0.2          | \$27.00       |
| 8/5/2020     | LD                                 | Review court entry of defaults (.1).  | 0.1          | \$32.00       |
| 8/6/2020     | JJP                                | Communicate with Receiver and team regarding pre-judgment interest on default judgments (.2).   | 0.2          | \$64.00       |
| 8/6/2020     | JR                                 | Review online accounts to confirm deposit of clawback investor payment (.1); update clawback settlement spreadsheet (.1); review correspondence from outside counsel regarding communications with clawback investor (.1).  | 0.3          | \$40.50       |
| 8/6/2020     | MG                                 | Communicate with an investor regarding the clawback lawsuit (.1).   | 0.1          | \$13.50       |
| 8/7/2020     | JJP                                | Identify research regarding pre-judgment interest on default judgments and fraudulent transfer claims and circulate to clawback team (.7).  | 0.7          | \$224.00      |
| 8/7/2020     | JR                                 | Review correspondence from outside counsel, J. Perez and Receiver regarding calculation of pre-judgment interest (.1).  | 0.1          | \$13.50       |
| 8/7/2020     | LD                                 | Review M. Cardiello settlement (.1); telephone call with R. Kunjbehari regarding Gildant and Plana negotiations (.1); draft note to file concerning status of Glidant and Plana negotiations (.1).  | 0.3          | \$96.00       |
| 8/8/2020     | JR                                 | Review correspondence from L. Dougherty regarding communications with B. Winters and power of attorney forms and supporting financial documentation (.1).   | 0.1          | \$13.50       |

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| <b>Date</b>  | <b>TKPR</b>                        | <b>Description of Services</b>  | <b>Hours</b> | <b>Amount</b> |
|--------------|------------------------------------|---|--------------|---------------|
| <b>ASSET</b> | <b>Asset Analysis and Recovery</b> |   |              |               |
| 8/10/2020    | JR                                 | Review correspondence from outside counsel and Receiver and related affidavits in support of motion for default judgment (.1); communicate with Receiver regarding execution of affidavits in support of motion for default judgment (.1); review bank account to confirm clawback settlement deposits (.1); update clawback settlement spreadsheet (.1).   | 0.4          | \$54.00       |
| 8/10/2020    | LD                                 | Analyze draft omnibus response to motions to quash and provide edits to same (.5).  | 0.5          | \$160.00      |
| 8/11/2020    | LD                                 | Revise draft omnibus response to pro se motions (.3); review multiple court notices of filing of motions for defaults (.2).   | 0.5          | \$160.00      |
| 8/12/2020    | JJP                                | Review, revise, and add additional legal analysis to opposition to numerous defendants' motion to quash (2.5).  | 2.5          | \$800.00      |
| 8/12/2020    | MG                                 | Update the master clawback spreadsheet with recent communications (.2).   | 0.2          | \$27.00       |
| 8/14/2020    | LD                                 | Telephone conference with Receiver, J. Perez, J. Waechter, and B. McConnell to provide advice and strategy concerning status hearing before Judge Covington (.8); review and assemble material on purported lawyer G. Melick (.4); confer with J. Rizzo concerning G. Melick (.1).  | 1.3          | \$416.00      |
| 8/16/2020    | LD                                 | Review and summarize documents for Receiver concerning B. Winters in preparation for hearing (1.4).   | 1.4          | \$448.00      |
| 8/17/2020    | JR                                 | Review correspondence between clawback investor and L. Dougherty regarding payments (.1); review correspondence and documentation related to hearing on Receiver's motions to quash summons and object to jurisdiction and materials related to B. Winters and G. Melick (.2); communicate with D. Marrero regarding depositing clawback settlement checks (.1); update clawback settlement spreadsheet (.1); review correspondence from Indiana Supreme Court regarding B. Winters (.1).                                 | 0.6          | \$81.00       |
| 8/17/2020    | LD                                 | Review filing of supplemental authority in advance of hearing (.2); advise Receiver concerning audio recording of telephone call concerning legal campaign (.1); analyze comments of Judge Covington regarding possible unauthorized practice of law by B. Winters (.3); advise Receiver concerning next steps on B. Winters (.2); update J. Perez on hearing and next steps concerning B. Winters (.3); draft and revise letter to B. Winters (.5); review report of Indiana Supreme Court on status of B. Winters (.1). | 1.7          | \$544.00      |
| 8/18/2020    | RMM                                | Review Receiver's notice regarding settlement and service related to remaining defendants (.2).   | 0.2          | \$48.00       |

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| <b>ASSET</b> | <b>Asset Analysis and Recovery</b> |  |       |          |
| 8/18/2020    | JR                                 | Review online accounts to confirm deposit of clawback settlement payments (.1); update clawback settlement spreadsheet (.1).   | 0.2   | \$27.00  |
| 8/19/2020    | JR                                 | Review correspondence from L. Dougherty regarding communication with clawback investors (.1); communicate with D. Marrero and PDR regarding depositing clawback settlement check (.1); update clawback settlement spreadsheet (.1); communicate with outside counsel regarding settlement document (.1).               | 0.4   | \$54.00  |
| 8/19/2020    | LD                                 | Analyze litigation status of clawback defendant G. Corcoran (.1); return call from G. Corcoran and interview him (.4); summarize notes of call with G. Corcoran and update team (.2).  | 0.7   | \$224.00 |
| 8/21/2020    | JJP                                | Communicate with team regarding service of certain defendants and possibility of amending complaint or seeking alternative service methods (.2).   | 0.2   | \$64.00  |
| 8/21/2020    | JR                                 | Review correspondence from L. Dougherty regarding proposed response letter to B. Winters (.1); review online bank accounts to confirm clawback settlement deposits (.1); update clawback settlement spreadsheet (.1); communicate with outside counsel regarding deposited and cleared clawback settlement check (.1). | 0.4   | \$54.00  |
| 8/21/2020    | LD                                 | Summarize advice on defaulted defendants in connection with filing amended complaint after reviewing amended complaint (.3); summarize advice on substituted service (.1).   | 0.4   | \$128.00 |
| 8/22/2020    | LD                                 | Review and respond to correspondence from N. Patterson regarding payments (.1); revise draft bar complaint concerning B. Winters (.5); advise Receiver concerning letter (.1).   | 0.7   | \$224.00 |
| 8/24/2020    | JR                                 | Review correspondence and clawback settlement check from investor (.1); update clawback settlement spreadsheet (.1); communicate with D. Marrero and PDR regarding depositing clawback settlement check (.1).  | 0.3   | \$40.50  |
| 8/24/2020    | LD                                 | Research whether filing of amended complaint nullifies previously entered default (.4); review and summarize rules on defaulted defendants (.2).   | 0.6   | \$192.00 |
| 8/25/2020    | RMM                                | Review order denying motion for default judgment without prejudice (.1).   | 0.1   | \$24.00  |
| 8/25/2020    | JR                                 | Review correspondence and clawback settlement check from investor (.1); update clawback settlement spreadsheet (.1); communicate with D. Marrero and PDR regarding depositing clawback settlement check (.1).  | 0.3   | \$40.50  |



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|--------------|------------------------------------|---|--------------|---------------|
| <b>ASSET</b> | <b>Asset Analysis and Recovery</b> |   |              |               |
| 8/25/2020    | LD                                 | Research and summarize additional case law concerning service on defaulted defendants (.3); review order denying motions for default judgment (.1); review correspondence from N. Patterson regarding settlement payments and direct follow-up (.1); revise motion to extend time to serve defendants after reviewing case docket (.3). | 0.8          | \$256.00      |
| 8/26/2020    | JJP                                | Review and analyze magistrate judge's opinion denying motions for entry of default judgments (.2); identify and circulate legal briefing and issues to address the Receiver's right to recovery and the elements of the Receiver's claims (2.2); communicate with team and Receiver regarding default judgment motions (.4).            | 2.8          | \$896.00      |
| 8/26/2020    | JR                                 | Communicate with PDR regarding clawback settlement checks (.1); communicate with J. Perez regarding clawback investor check deposit and status (.1).  | 0.2          | \$27.00       |
| 8/26/2020    | LD                                 | Research procedure on proving default and prepare summary of same (.4).   | 0.4          | \$128.00      |
| 8/27/2020    | LD                                 | Review revised motion for default judgments (.2); review case law and local rules on obtaining default judgments (.2).  | 0.4          | \$128.00      |
| 8/28/2020    | JJP                                | Identify and circulate legal research and briefs regarding potential of service by publication (1.1).   | 1.1          | \$352.00      |
| 8/28/2020    | JR                                 | Review online bank accounts to confirm clawback settlement deposits (.1); update clawback settlement spreadsheet (.1); review correspondence from J. Perez regarding briefing on service by publication (.1); communicate with J. Perez regarding status of clawback settlement payments (.1).  | 0.4          | \$54.00       |
| 8/28/2020    | LD                                 | Telephone conference with Receiver, J. Perez, J. Waechter, and B. McConnell regarding tasks relating to unserved defendants, motions for default judgment against other defendants, and B. Winters (.7).  | 0.7          | \$224.00      |
| 8/28/2020    | LD                                 | Review list of tolling agreements and compare with case notes (.2); review M. Chambless settlement agreement (.1).  | 0.3          | \$96.00       |
| 8/31/2020    | JR                                 | Review second motion to approve clawback settlements (.1).  | 0.1          | \$13.50       |
| 8/31/2020    | LD                                 | Review final bar complaint concerning unauthorized practice of law by B. Winters (.1).  | 0.1          | \$32.00       |
| 9/1/2020     | JR                                 | Review correspondence from B. Winters in response to Receiver's letter and related correspondence from L. Dougherty (.1).   | 0.1          | \$13.50       |
| 9/1/2020     | MG                                 | Update the clawback spreadsheet with recent information (.2).   | 0.2          | \$27.00       |



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| Date         | TKPR                               | Description of Services  | Hours | Amount   |
|--------------|------------------------------------|--|-------|----------|
| <b>ASSET</b> | <b>Asset Analysis and Recovery</b> |  |       |          |
| 9/1/2020     | LD                                 | Review filings of additional joinders to already-denied motion to quash (.1).  | 0.1   | \$32.00  |
| 9/2/2020     | JR                                 | Review correspondence from outside counsel and J. Perez regarding receipt of wrong payee on clawback settlement check and proceedure to remedy same (.2); communicate with PDR regarding status of depositing clawback settlement checks (.1).   | 0.3   | \$40.50  |
| 9/2/2020     | LD                                 | Review correspondence on Cardiello settlement (.1); review draft response to K. Crowley motion to quash (.2); review draft motion for default judgment (.2); confer with team about finding private investigators for defendants who have been difficult to serve (.1).  | 0.6   | \$192.00 |
| 9/8/2020     | JR                                 | Review replacement clawback settlement check (.1); update clawback settlement spreadsheet (.1).  | 0.2   | \$27.00  |
| 9/9/2020     | RMM                                | Review notice of filing and complaint against B. Winters (.5); review motion to quash service of process and Receiver's response (.1).   | 0.6   | \$144.00 |
| 9/9/2020     | JR                                 | Communicate with outside counsel regarding cleared clawback settlement check (.1).   | 0.1   | \$13.50  |
| 9/10/2020    | JR                                 | Review accounts to confirm deposit of clawback settlement payment (.1); update clawback settlement spreadsheet (.1).   | 0.2   | \$27.00  |
| 9/10/2020    | LD                                 | Review correspondence from A. Gangi concerning need for private investigators (.1); call and email retired federal agent for referral (.1); telephone conference with retired agent regarding referrals to investigators close to unserved defendants in Maryland and North Carolina (.3).   | 0.5   | \$160.00 |
| 9/14/2020    | JR                                 | Communicate with D. Marrero and PDR regarding expected clawback settlement checks and depositing same (.1); update clawback settlement spreadsheet (.1); review correspondence from L. Dougherty regarding locating clawback defendant and related correspondence from outside counsel and investigator (.1); communicate with D. Marrero regarding depositing additional clawback settlement checks (.1). | 0.4   | \$54.00  |
| 9/14/2020    | LD                                 | Telephone conference with private investigator in Baltimore area (.2); telephone conference with private investigator in Charlotte, North Carolina (.2); send follow-up emails to private investigators (.1); send follow-up emails to Englander Fischer concerning private investigators (.1).  | 0.6   | \$192.00 |
| 9/15/2020    | LD                                 | Per request from Receiver, review filings by A. Johnston and summarize advice (.5); confer concerning discovery (.2).  | 0.7   | \$224.00 |
| 9/16/2020    | JR                                 | Communicate with outside counsel regarding status of clawback settlement check clearing bank (.1).   | 0.1   | \$13.50  |

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| Date         | TKPR                               | Description of Services   | Hours | Amount   |
|--------------|------------------------------------|---|-------|----------|
| <b>ASSET</b> | <b>Asset Analysis and Recovery</b> |   |       |          |
| 9/16/2020    | LD                                 | Review reports on location of defendant D. Terranova (.2); confer with B. McConnell concerning D. Terranova (.1); confer with retired agent for private investigator referral (.1); confer with B. McConnell concerning certificate of interested persons (.1); confer with J. Perez concerning certificate of interested persons (.1).   | 0.6   | \$192.00 |
| 9/17/2020    | JR                                 | Communicate with outside counsel regarding status of receipt of clawback settlement check (.1).   | 0.1   | \$13.50  |
| 9/17/2020    | LD                                 | Telephone conference with retired agent to locate private investigators near reported residence of D. Terranova (.3).   | 0.3   | \$96.00  |
| 9/18/2020    | JR                                 | Review online bank account to confirm deposit of clawback settlement checks (.1); update clawback settlement spreadsheet (.1).  | 0.2   | \$27.00  |
| 9/18/2020    | LD                                 | Telephone call with private investigator concerning service on D. Terranova (.1); confer with J. Perez and B. McConnell concerning certificate of interested persons (.1); telephone call with private investigator in New Jersey concerning service (.1); confer with investigator in Maryland concerning service (.1); update A. Gangi concerning referrals to investigator in Maryland (.1). | 0.5   | \$160.00 |
| 9/21/2020    | JJP                                | Review motion raising jurisdictional issues filed by defendant A. Johnston and communicate with team regarding same (.5).   | 0.5   | \$160.00 |
| 9/21/2020    | JR                                 | Review correspondence from Receiver and outside counsel related to clawback case status and scheduling meeting to discuss same (.1); conference call with Receiver, legal team and outside counsel regarding status of clawback settlements and litigation (.5).  | 0.6   | \$81.00  |
| 9/21/2020    | LD                                 | Call private investigator in New Jersey concerning service on D. Terranova (.1); confer with Receiver, J. Perez, and Englander Fischer team concerning status of clawback litigation, role of B. Winters, litigation strategy and next steps (.5); review revised argument in support of motion to dismiss by A. Johnston and confer with team regarding same (.2).                             | 0.8   | \$256.00 |
| 9/21/2020    | MML                                | Review spreadsheet regarding status of clawbacks (.1).  | 0.1   | \$24.00  |
| 9/22/2020    | JJP                                | Identify legal research and prior briefs addressing jurisdictional issues raised in motion filed by defendant A. Johnston and communicate with team regarding same (1.4).   | 1.4   | \$448.00 |
| 9/22/2020    | JR                                 | Communicate with legal team regarding status of receipt of clawback settlement check from investor (.1).  | 0.1   | \$13.50  |

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| <b>Date</b>  | <b>TKPR</b>                        | <b>Description of Services</b>  | <b>Hours</b> | <b>Amount</b> |
|--------------|------------------------------------|---|--------------|---------------|
| <b>ASSET</b> | <b>Asset Analysis and Recovery</b> |   |              |               |
| 9/22/2020    | LD                                 | Telephone call with New Jersey investigator concerning service on D. Terranova (.1); review correspondence on service of D. Wilkerson (.1); review notices of entry of default (.1); review and respond to correspondence concerning T. Procopio payment (.1).  | 0.4          | \$128.00      |
| 9/23/2020    | JR                                 | Communicate with legal team regarding status of receipt of clawback settlement check from investor (.1); review correspondence from L. Dougherty to investigator and outside counsel regarding service of clawback investor (.1).   | 0.2          | \$27.00       |
| 9/23/2020    | LD                                 | Review correspondence from New Zealand law firm (.1); review notices of filing applications for clerk's defaults (.1); summarize status of service efforts on clawback defendants in North Carolina, Maryland, and New Jersey (.1); call New Jersey investigator S. Bojekian concerning service on D. Terranova (.1); telephone conference with S. Bojekian and prepare follow-up email to him (.2); update Englander Fischer team on service of D. Terranova (.1). | 0.7          | \$224.00      |
| 9/24/2020    | JR                                 | Review settlement check and agreement from clawback investor (.1); communicate with outside counsel and legal team regarding receipt of clawback settlement check and depositing same (.1); update clawback settlement spreadsheet (.1); review correspondence from outside counsel and Receiver regarding documents from Ford Sumner (.1).   | 0.4          | \$54.00       |
| 9/24/2020    | LD                                 | Review pro se defendants' motions to dismiss (.2); review notice of filing motions and notice of clerk's entry of defaults (.2).  | 0.4          | \$128.00      |
| 9/25/2020    | JR                                 | Review correspondence from outside counsel regarding status of settlement check (.1); communicate with outside counsel and Receiver regarding documents from Ford Sumner (.1).  | 0.2          | \$27.00       |
| 9/25/2020    | LD                                 | Confer with co-counsel concerning case management conference with opposing counsel (.1).  | 0.1          | \$32.00       |
| 9/26/2020    | LD                                 | Review Receiver's opposition to A. Johnston's second/successive motion to dismiss (.2); review amended omnibus motion for default (.2).   | 0.4          | \$128.00      |
| 9/28/2020    | JR                                 | Review correspondence from outside counsel and D. Marrero regarding status of settlement check (.1); communicate with outside counsel regarding receipt of clawback settlement checks (.1); communicate with D. Marrero regarding depositing clawback settlement checks (.1); update clawback settlement spreadsheet (.1).  | 0.4          | \$54.00       |
| 9/28/2020    | LD                                 | Confer with B. McConnell concerning case management conference (.1).  | 0.1          | \$32.00       |

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| <b>Date</b>                               | <b>TKPR</b> | <b>Description of Services</b>  | <b>Hours</b>       | <b>Amount</b>      |
|---|-------------|---|--------------------|--------------------|
| <b>ASSET</b>                              |             | <b>Asset Analysis and Recovery</b>  |                    |                    |
| 9/29/2020                                 | LD          | Confer with B. McConnell, J. Waechter, and J. Perez concerning B. Winters (.2). | 0.2                | \$64.00            |
| <b>Total: Asset Analysis and Recovery</b> |             |   | <b>77.70</b>       | <b>\$20,365.00</b> |
| <b>Total Professional Service:</b>        |             |   | <b>77.7</b>        | <b>\$20,365.00</b> |
| Total Services                            |             |   | \$20,365.00        |                    |
| Total Current Charges                     |             |   | \$20,365.00        |                    |
| Previous Balance                          |             |   | \$16,926.00        |                    |
| <i>Less Retainer Applied</i>              |             |   | (\$16,926.00)      |                    |
| <b>PAY THIS AMOUNT</b>                    |             |   | <b>\$20,365.00</b> |                    |

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**TASK RECAP****Services**

| <u>Project No.</u> | <u>Hours</u> | <u>Amount</u>      |
|--------------------|--------------|--------------------|
| ASSET - ASSET      | 77.70        | \$20,365.00        |
|                    | <u>77.70</u> | <u>\$20,365.00</u> |

**Disbursements**

| <u>Project No.</u> | <u>Amount</u> |
|--------------------|---------------|
|                    | \$0.00        |
|                    | <u>\$0.00</u> |

**BREAKDOWN BY PERSON**

| <u>Person</u>         | <u>Project No.</u> | <u>Hours</u> | <u>Amount</u>      |
|-----------------------|--------------------|--------------|--------------------|
| JJP Jared J. Perez    | ASSET - ASSET      | 17.80        | \$5,696.00         |
| RMM Max McKinley      | ASSET - ASSET      | 1.10         | \$264.00           |
| MG Mary Gura          | ASSET - ASSET      | 9.90         | \$1,336.50         |
| JR Jeffrey Rizzo      | ASSET - ASSET      | 13.90        | \$1,876.50         |
| LD Larry J. Dougherty | ASSET - ASSET      | 34.90        | \$11,168.00        |
| MML Maya M. Lockwood  | ASSET - ASSET      | 0.10         | \$24.00            |
|                       |                    | <u>77.70</u> | <u>\$20,365.00</u> |

# **EXHIBIT 10**

**Wiand Guerra King P.A.**

5505 West Gray Street

Tampa, FL 33609

Telephone: 813-347-5100

Facsimile: 813-347-5198

Federal Tax ID # 27-0937962

Burton W. Wiand

**Attention: Burton W. Wiand**

Wiand Guerra King, P.A.

5505 W. Gray Street

Tampa, FL 33609

November 16, 2020

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RE: Oasis Legal Team – Raymond Montie, III.

For Professional Services Rendered Through September 30, 2020

**SERVICES**

| Date     | TKPR                        | Description of Services  | Hours | Amount     |
|----------|-----------------------------|--|-------|------------|
| ASSET    | Asset Analysis and Recovery |  |       |            |
| 7/1/2020 | JJP                         | Correspondence with counsel for R. Montie and team regarding proposed motion to strike Receiver's notice of intent to file amended complaint (.4); correspondence with defendant's counsel regarding service of process and follow-up correspondence with legal team (.2).                                     | 0.6   | \$192.00   |
| 7/1/2020 | RMM                         | Research possible claims against R. Montie and communicate with J. Perez regarding the same (3.9).   | 3.9   | \$936.00   |
| 7/1/2020 | LD                          | Review correspondence from counsel for R. Montie (.2); research R. Montie's waiver of process and service of process defenses and summarize results (.2).  | 0.4   | \$128.00   |
| 7/2/2020 | JJP                         | Communicate with team regarding waiver of service of process and preparation of necessary documents (.3); communicate with team regarding the defendant's notice of intent to strike and conduct and review related research (.7); begin draft of amended complaint, including related factual research (5.3). | 6.3   | \$2,016.00 |
| 7/2/2020 | RMM                         | Research possible causes of action against R. Montie (1.4).  | 1.4   | \$336.00   |
| 7/2/2020 | LD                          | Analyze R. Montie's motion to strike and summarize advice (.4); summarize advice for J. Perez on next steps regarding R. Montie (.3); confer with J. Perez concerning service on R. Montie (.2); direct request for summons (.1).  | 1.0   | \$320.00   |

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**SERVICES**

| <b>Date</b>  | <b>TKPR</b>                        | <b>Description of Services</b>  | <b>Hours</b> | <b>Amount</b> |
|--------------|------------------------------------|---|--------------|---------------|
| <b>ASSET</b> | <b>Asset Analysis and Recovery</b> |   |              |               |
| 7/3/2020     | JJP                                | Review research regarding additional potential claims against defendant and direct team regarding additional research (.5); continue to draft amended complaint (4.9).  | 5.4          | \$1,728.00    |
| 7/3/2020     | RMM                                | Research potential claims against R. Montie and communicate with J. Perez regarding the same (2.6).   | 2.6          | \$624.00      |
| 7/4/2020     | LD                                 | Research procedure on waiver of service and acceptance of service (.4); revise acceptance of service form for R. Montie (.2).   | 0.6          | \$192.00      |
| 7/6/2020     | JJP                                | Continue to draft amended complaint, including related legal and factual research (4.8).  | 4.8          | \$1,536.00    |
| 7/6/2020     | RMM                                | Research Federal Rules of Civil Procedure 9(b) and applicability to breach of fiduciary duty claims, and communicate with J. Perez regarding the same (3.0); review amended complaint against R. Montie and correspondence from J. Perez regarding the same (.2).   | 3.2          | \$768.00      |
| 7/6/2020     | LD                                 | Confer with J. Perez regarding amended complaint against R. Montie (.1); revise R. Montie acceptance of service after reviewing approved form (.3); confer with J. Perez regarding acceptance of service (.1); confer with counsel for R. Montie regarding summons and acceptance of service of same (.2); review service deadline on R. Montie and make notes for team (.2); analyze draft of amended complaint against R. Montie and summarize comments and proposed edits (2.1). | 3.0          | \$960.00      |
| 7/7/2020     | JJP                                | Revise, finalize, and file amended complaint (7.9); review waiver of service filed by defendant (.2).   | 8.1          | \$2,592.00    |
| 7/8/2020     | LD                                 | Review case law on service of amended complaint against R. Montie (.5); review requirements for certificates of interested persons and discovery plan conferences and summarize results (.2).   | 0.7          | \$224.00      |
| 7/10/2020    | LD                                 | Review upcoming deadline in R. Montie case and confer with team (.1).   | 0.1          | \$32.00       |
| 7/13/2020    | JJP                                | Review order setting defendant's motion to strike for hearing and discuss strategy and implications with Receiver and team (.5); communicate with M. McKinley regarding research needed for opposition to motion to strike (.2); communicate with team regarding preparation of certificate of interested persons and corporate disclosure statement (.4); communicate with L. Dougherty regarding research and deadlines for filing various documents (.2).                        | 1.3          | \$416.00      |



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**SERVICES**

| <b>Date</b>  | <b>TKPR</b>                        | <b>Description of Services</b>   | <b>Hours</b> | <b>Amount</b> |
|--------------|------------------------------------|--|--------------|---------------|
| <b>ASSET</b> | <b>Asset Analysis and Recovery</b> |  |              |               |
| 7/13/2020    | RMM                                | Communicate with J. Perez regarding research assignment pertaining to timeline to respond to motions to dismiss and file amended complaint (.2); research timeline to file amended complaint (1.7); review R. Montie's motion to dismiss, notice of intent to file amended complaint, and motion to strike (.7). | 2.6          | \$624.00      |
| 7/13/2020    | LD                                 | Review notice of hearing in R. Montie case (.1); analyze status of R. Montie case in light of relevant rules and summarize advice (.3); draft and revise response in opposition to R. Montie motion to strike (1.3); research hearing guidelines for Judge Barber and summarize for team (.2).                   | 1.9          | \$608.00      |
| 7/14/2020    | JJP                                | Draft opposition to defendant's motion to strike, including review of related research and rules (5.5).  | 5.5          | \$1,760.00    |
| 7/14/2020    | RMM                                | Research timeline to file amended complaint and communicate with J. Perez regarding the same (1.0).  | 1.0          | \$240.00      |
| 7/14/2020    | LD                                 | Telephone conference with Receiver regarding R. Montie motion (.2); revise opposition to R. Montie motion to strike (.7); summarize advice on opposition for J. Perez (.2).  | 1.1          | \$352.00      |
| 7/15/2020    | JJP                                | Draft certificate of interested persons and corporate disclosure statement and circulate for comments (1.2); revise, finalize, and file opposition to motion to strike (3.9); prepare for hearing on motion to strike, including communications with Receiver and team (1.9).                                    | 7.0          | \$2,240.00    |
| 7/15/2020    | RMM                                | Research timeline to file amended complaint (.9); research related to Receiver's opposition to R. Montie's motion to strike (2.5).   | 3.4          | \$816.00      |
| 7/15/2020    | LD                                 | Review status of drafting of certificate of interested persons (.2); summarize advice concerning appearance at hearing on R. Montie motion to strike (.2); review draft certificate of interested persons and summarize advice (.2).   | 0.6          | \$192.00      |
| 7/16/2020    | JJP                                | Prepare for and attend hearing on motion to strike (3.5).  | 3.5          | \$1,120.00    |
| 7/16/2020    | RMM                                | Communicate with J. Perez regarding hearing on motion to strike notice of intent to file amended complaint (.1).   | 0.1          | \$24.00       |
| 7/16/2020    | JR                                 | Review Receiver's response to R. Montie's motion to strike and certificate of interested persons (.1).   | 0.1          | \$13.50       |
| 7/16/2020    | LD                                 | Prepare for hearing in federal court (.6); attend hearing on R. Montie's motion to strike notice of filing amended complaint (2.0).  | 2.6          | \$832.00      |
| 7/27/2020    | LD                                 | Review R. Montie motion to dismiss amended complaint (.5).   | 0.5          | \$160.00      |

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**SERVICES**

| <b>Date</b>  | <b>TKPR</b>                        | <b>Description of Services</b>  | <b>Hours</b> | <b>Amount</b> |
|--------------|------------------------------------|---|--------------|---------------|
| <b>ASSET</b> | <b>Asset Analysis and Recovery</b> |   |              |               |
| 7/31/2020    | LD                                 | Telephone conference with counsel for R. Montie concerning D. Montie-Terranova (.4); update team regarding D. Montie-Terranova (.1).  | 0.5          | \$160.00      |
| 8/6/2020     | JJP                                | Revise, finalize, and file motion for extension of time to respond to defendant's motion to dismiss (.2).   | 0.2          | \$64.00       |
| 8/6/2020     | LD                                 | Review order granting extension of time to respond to R. Montie's motion to dismiss complaint (.1); review notes of telephone call from M. Rubel (.1); review order granting extension of time (.1).  | 0.3          | \$96.00       |
| 8/12/2020    | JJP                                | Begin draft of opposition to defendant's motion to dismiss amended complaint (2.0).   | 2.0          | \$640.00      |
| 8/12/2020    | LD                                 | Summarize advice concerning response to R. Montie's motion to dismiss Receiver's amended complaint (.2).  | 0.2          | \$64.00       |
| 8/14/2020    | JJP                                | Continue draft of opposition to defendant's motion to dismiss amended complaint, including related legal research (2.0).  | 2.0          | \$640.00      |
| 8/16/2020    | JJP                                | Continue draft of opposition to defendant's motion to dismiss amended complaint, including related legal research (2.0).  | 2.0          | \$640.00      |
| 8/17/2020    | JJP                                | Research, draft, revise, finalize, and file opposition to R. Montie's motion to dismiss (10.6).   | 10.6         | \$3,392.00    |
| 8/17/2020    | RMM                                | Research motion to dismiss and communicate with J. Perez regarding the same (3.0).  | 3.0          | \$720.00      |
| 8/17/2020    | LD                                 | Analyze and revise draft of opposition to R. Montie's motion to dismiss amended complaint (1.6).  | 1.6          | \$512.00      |
| 8/18/2020    | RMM                                | Review response in opposition to R. Montie's motion to dismiss (.8).  | 0.8          | \$192.00      |
| 8/20/2020    | JJP                                | Communicate with team and Receiver regarding the defendant's request to file a reply in further support of his motion to dismiss (.2).  | 0.2          | \$64.00       |
| 8/20/2020    | LD                                 | Take telephone call from counsel for R. Montie concerning leave for reply and settlement (.6); summarize call from counsel for R. Montie and advice for Receiver (.2).  | 0.8          | \$256.00      |
| 8/21/2020    | LD                                 | Review offer of fall 2020 civil jury trial with date certain from Judge Barber and summarize advice for team (.2); telephone conference with Receiver concerning negotiations with counsel for R. Montie (.1); call counsel for R. Montie (.1); email counsel for R. Montie concerning 3.01(g) conference on motion for leave to reply and settlement (.1). | 0.5          | \$160.00      |

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**SERVICES**

| Date         | TKPR                               | Description of Services  | Hours | Amount     |
|--------------|------------------------------------|--|-------|------------|
| <b>ASSET</b> | <b>Asset Analysis and Recovery</b> |  |       |            |
| 8/25/2020    | LD                                 | Review R. Montie's motion for leave to file reply to Receiver's opposition to motion to dismiss amended complaint (.2).  | 0.2   | \$64.00    |
| 8/31/2020    | LD                                 | Review endorsed order denying R. Montie's motion for leave to file reply to Receiver's opposition to R. Montie's motion to dismiss Receiver's amended complaint (.1).  | 0.1   | \$32.00    |
| 9/4/2020     | LD                                 | Direct follow-up on meet and confer deadline (.1).   | 0.1   | \$32.00    |
| 9/15/2020    | JJP                                | Review Court's orders regarding case management conferences and reports, including template (.4); communicate with team and opposing counsel regarding case management conference (.4); research rules and caselaw regarding lack of prosecution (.3).   | 1.1   | \$352.00   |
| 9/15/2020    | LD                                 | Confer with J. Perez concerning case management order (.1); review order to show cause concerning case management order (.1); review local rules on track two cases (.5); review past case filings (.6); review case docket (.3); draft and revise proposed case management order (1.6); advise Receiver and J. Perez concerning status (.1).  | 3.3   | \$1,056.00 |
| 9/16/2020    | LD                                 | Confer with J. Waechter and J. Perez concerning Rule 26(f) conference (.1).  | 0.1   | \$32.00    |
| 9/17/2020    | JJP                                | Draft motion to conduct case management meeting via Zoom (.3).   | 0.3   | \$96.00    |
| 9/17/2020    | RMM                                | Review transcript of hearing held on 07/16/2020 (.2).  | 0.2   | \$48.00    |
| 9/17/2020    | LD                                 | Review and propose addition to agreed motion to conduct case management conference by Zoom after reviewing Judge Barber's standing order for civil cases during COVID pandemic (.2); confer with J. Perez concerning next steps in case management conference (.1); review correspondence concerning R. Montie's proposal to sell real estate (.1); review as-filed motion for Zoom hearing and endorsed order granting same (.1). | 0.5   | \$160.00   |
| 9/18/2020    | LD                                 | Confer with J. Perez concerning discovery (.1).  | 0.1   | \$32.00    |
| 9/21/2020    | JJP                                | Review and revise draft case management report, including communications with team and counsel for defendant Montie (1.7); research and draft response to court's order to show cause regarding case management report (4.8); review documentation relevant to real estate owned by defendant Montie and communicate with team regarding same (.2).  | 6.7   | \$2,144.00 |

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**SERVICES**

| Date                                      | TKPR | Description of Services   | Hours         | Amount             |
|---|------|---|---------------|--------------------|
| ASSET                                     |      | Asset Analysis and Recovery   |               |                    |
| 9/21/2020                                 | LD   | Telephone conference with J. Perez concerning case management conference with counsel for R. Montie, litigation strategy, and next steps (.2); advise Receiver and confer with J. Perez and J. Waechter regarding same (.3); review draft of response for order to show cause and summarize advice (.3).  | 0.8           | \$256.00           |
| 9/22/2020                                 | JJP  | Review case management report and communicate with counsel for defendant Montie regarding same (.3); revise, finalize, and file response to court's order to show cause regarding case management report report (1.2).  | 1.5           | \$480.00           |
| 9/22/2020                                 | JR   | Review correspondence from J. Perez regarding R. Montie house and sale of same (.1).  | 0.1           | \$13.50            |
| 9/22/2020                                 | LD   | Review correspondence with opposing counsel concerning case management report (.1); analyze R. Montie certificate of interested persons (.2); revise case management report to reflect opposing counsel's trial calendar after reviewing case files and correspondence (1.1); Zoom conference with opposing counsel (.5); review revised case management report (.1). | 2.0           | \$640.00           |
| 9/23/2020                                 | RMM  | Review Receiver's response to order to show cause (.2).   | 0.2           | \$48.00            |
| 9/23/2020                                 | JR   | Review Receiver's response to Court's order to show cause regarding case management report (.1).  | 0.1           | \$13.50            |
| 9/24/2020                                 | JJP  | Finalize and file case management report (.3).  | 0.3           | \$96.00            |
| 9/24/2020                                 | LD   | Review correspondence from opposing counsel concerning case management report and confer with J. Perez regarding same (.1); review final draft of report and summarize advice for J. Perez concerning same (.2); confer with J. Perez and M. Lockwood concerning R. Montie (.2).  | 0.5           | \$160.00           |
| 9/26/2020                                 | LD   | Review endorsed order discharging order to show cause (.1).   | 0.1           | \$32.00            |
| 9/29/2020                                 | JR   | Review correspondence from J. Perez regarding sale of R. Montie New York house (.1).  | 0.1           | \$13.50            |
| <b>Total: Asset Analysis and Recovery</b> |      |   | <b>116.40</b> | <b>\$35,382.00</b> |
| <b>Total Professional Service:</b>        |      |   | <b>116.4</b>  | <b>\$35,382.00</b> |

**DISBURSEMENTS**

| Date | Description of Disbursements | Amount |
|------|------------------------------|--------|
|------|------------------------------|--------|

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**DISBURSEMENTS**

| <b>Date</b> | <b>Description of Disbursements</b>   | <b>Amount</b>       |
|-------------|---------------------------------------|---------------------|
| <b>E101</b> | <b>Photocopies</b>                    |                     |
| 7/16/2020   | Photocopies @ .15 each (319 @ \$0.15) | \$47.85             |
|             | <b>Total Disbursements</b>            | <b>\$47.85</b>      |
|             | Total Services                        | \$35,382.00         |
|             | Total Disbursements                   | \$47.85             |
|             | Total Current Charges                 | \$35,429.85         |
|             | Previous Balance                      | \$2,141.50          |
|             | <i>Less Retainer Applied</i>          | <i>(\$2,141.50)</i> |
|             | <b>PAY THIS AMOUNT</b>                | <b>\$35,429.85</b>  |

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**TASK RECAP****Services**

| <u>Project No.</u> | <u>Hours</u>  | <u>Amount</u>      |
|--------------------|---------------|--------------------|
| ASSET - ASSET      | 116.40        | \$35,382.00        |
|                    | <u>116.40</u> | <u>\$35,382.00</u> |

**Disbursements**

| <u>Project No.</u> | <u>Amount</u>  |
|--------------------|----------------|
| Photocopies        | \$47.85        |
|                    | <u>\$47.85</u> |

**BREAKDOWN BY PERSON**

| <u>Person</u>              | <u>Project No.</u> | <u>Hours</u>  | <u>Amount</u>      |
|----------------------------|--------------------|---------------|--------------------|
| JJP      Jared J. Perez    | ASSET - ASSET      | 69.40         | \$22,208.00        |
| RMM      Max McKinley      | ASSET - ASSET      | 22.40         | \$5,376.00         |
| JR      Jeffrey Rizzo      | ASSET - ASSET      | 0.40          | \$54.00            |
| LD      Larry J. Dougherty | ASSET - ASSET      | 24.20         | \$7,744.00         |
|                            |                    | <u>116.40</u> | <u>\$35,382.00</u> |

# **EXHIBIT 11**

Invoice No. 70643  
 John Waechter as Counsel  
 Burton W. Wiand v. Chris Arduini, et al.



Invoice Date: August 17, 2020

**FEES**

| <b>Date</b> | <b>Staff</b> | <b>Description</b>   | <b>Hours</b> | <b>Amount</b> |
|-------------|--------------|--|--------------|---------------|
| 07/01/2020  | JWW          | Review and respond to various emails. Review Motion to Approve Clawback Settlements.   | 0.50         | \$167.50      |
| 07/01/2020  | BM           | Review correspondence from Ford Sumner; correspondence with client re: same; correspondence with Anthony Centone, counsel for Cardiello defendants; note file.                   | 0.60         | \$201.00      |
| 07/02/2020  | BM           | Directives re: returns of service; note file.  | 0.30         | \$100.50      |
| 07/06/2020  | BM           | Correspondence with Sabrina Dahlia and attorney Dougherty.   | 0.20         | \$67.00       |
| 07/07/2020  | TD           | Revise Acceptance of Service of Process re: Martinis.  | 0.10         | \$15.00       |
| 07/07/2020  | JWW          | Follow up on outstanding settlement agreements and other pending issues.   | 0.50         | \$167.50      |
| 07/07/2020  | BM           | Correspondence with attorney Perez and client re: Ford Sumner defendant; directives re: service; correspondence with client re: Martini defendants.                              | 0.50         | \$167.50      |
| 07/08/2020  | JK           | Legal research re: good cause for motion for extension of time and discretion to grant motion. Drafted legal memorandum portion of motion for extension of time.                 | 1.80         | \$405.00      |
| 07/08/2020  | BM           | Draft and edit motion to extend time to effect service; correspondence with Wiand's office; directives re: service issues; review correspondence re: service; note file.         | 1.70         | \$569.50      |
| 07/09/2020  | JWW          | Phone conferences and email communications w/ defendants Chambless and Sims re settlement terms.   | 1.25         | \$418.75      |
| 07/09/2020  | JWW          | Phone conference and email communications w/ Receiver re settlement terms for defendant Chambless; treatment of foreign currency exchange losses.                                | 0.50         | \$167.50      |
| 07/09/2020  | BM           | Correspondence with attorney Perez re: motions for default; edit and finalize motion for extension of time to effect service; directives re: same; correspondence re: Tami Lacy. | 1.20         | \$402.00      |
| 07/10/2020  | BM           | Review court's order re: motion to extend service deadline.  | 0.20         | \$67.00       |
| 07/10/2020  | JWW          | Phone conferences and email communications w/ Receiver and forensic accountant re foreign exchange   | 0.75         | \$251.25      |



Invoice No. 70643  
 John Waechter as Counsel  
 Burton W. Wiand v. Chris Arduini, et al.



Invoice Date: August 17, 2020

|            |     |  |      |          |
|------------|-----|--|------|----------|
|            |     | charges for defendant Chambliss. Review bank statements and accountant summary.  |      |          |
| 07/10/2020 | JWW | Draft Settlement Agreement for defendant Sims; email to Ms. Sims.  | 0.75 | \$251.25 |
| 07/10/2020 | BM  | Draft and edit motions for clerks default and default judgment; draft accompanying affidavits; directives re: affidavits and additional defaulted parties.   | 2.50 | \$837.50 |
| 07/13/2020 | BM  | Correspondence with Jono Cole re: Sumner claim and request for documents related to Oasis Global FX; research Ann Hennessy   | 1.10 | \$368.50 |
| 07/14/2020 | JWW | IOC w/ BSM and AG re status of dismissals for defendants w/ settlement agreements.   | 0.25 | \$83.75  |
| 07/14/2020 | BM  | Correspondence re: defendant Attia; review service updates; directives re: clerk defaults; correspondence with client re: dismissals; IOC with attorneys Waechter and Gangi.   | 2.70 | \$904.50 |
| 07/14/2020 | AG  | IOC with BSM and JWW re: status update and strategy moving forward; Review and analyze service issues.   | 0.60 | \$135.00 |
| 07/15/2020 | BM  | Research and directives re: unserved defendants.   | 1.40 | \$469.00 |
| 07/15/2020 | BM  | Correspondence with Defendant Sabrina Dalia re: dismissal; correspondence with co-counsel re: defendant Elizabeth McMahon; directives re: dismissal; correspondence with co-counsel re: Hennessey.                           | 0.70 | \$234.50 |
| 07/15/2020 | JWW | Review and comment on draft Certificate of Interested Persons. Research address information for missing defendant addresses; email communications w/ forensic CPA re addresses and SSNs.                                     | 1.50 | \$502.50 |
| 07/15/2020 | AG  | Continue review and analyze subpoena issues; Legal research re: service of defendant using alias.  | 0.90 | \$202.50 |
| 07/16/2020 | JWW | Review various emails re court filings.  | 0.25 | \$83.75  |
| 07/16/2020 | BM  | Review letter from defendant Elmore Runee Harris; correspondence with co-counsel re: same; review additional documentation related to defendant Harris; review court's order re: dismissals; directives re: service of same. | 0.70 | \$234.50 |
| 07/16/2020 | AG  | Continue legal research re: alias Defendant; create outline for unserved Defendants.   | 2.30 | \$517.50 |
| 07/17/2020 | BM  | Draft and edit motion for default judgment and affidavit; directives re: service issues.   | 2.50 | \$837.50 |
| 07/17/2020 | JWW | Review various emails re court filings. Email to co-counsel re private investigator.   | 0.25 | \$83.75  |

Invoice No. 70643  
 John Waechter as Counsel  
 Burton W. Wiand v. Chris Arduini, et al.



Invoice Date: August 17, 2020

|            |     |  |      |            |
|------------|-----|--|------|------------|
| 07/17/2020 | AG  | Phone calls with potential private investigators re: service of process issues; Continue outline for potential Pl.   | 0.90 | \$202.50   |
| 07/20/2020 | BM  | Correspondence with defendant Davis; multiple correspondence with client; edit and finalize default judgment motions and affidavits; review motions filed by pro se defendants; review client database re: McMahon; directives re: motion to correct party name. | 3.80 | \$1,273.00 |
| 07/20/2020 | AG  | Phone calls with potential private investigators; Edit service of process issues outline; IOC wit BSM re: motion to correct defendant name.  | 2.80 | \$630.00   |
| 07/21/2020 | BM  | Multiple correspondence with defendant Silvia Davis and client; correspondence with Wiand's office re: motion to correct misnomer; draft Davis Settlement Agreement.   | 1.10 | \$368.50   |
| 07/21/2020 | AG  | Review legal research re: ability to serve secretary of state; Multiple email correspondence re: unserved defendants.  | 0.60 | \$135.00   |
| 07/21/2020 | BM  | Review and analysis of multiple pro se filings (0.60); correspondence with client re: same (0.20); draft and edit outline re: motions to quash summons and object to jurisdiction (0.60).  | 1.40 | \$469.00   |
| 07/22/2020 | JWW | Review and respond to various emails from defendants and co-counsel (1.2). Review notifications re court filings (.3). Phone conference and email communications w/ co-counsel and Margaret Sims re Settlement Agreement (.75).                                  | 2.25 | \$753.75   |
| 07/22/2020 | BM  | Correspondence with Defendant Silvia Davis re: settlement; draft and edit settlement agreement with 6 mo. payment plan; correspondence with defendant Ford Sumner and client.  | 0.70 | \$234.50   |
| 07/22/2020 | JWW | Phone conference and email communications w/ counsel for defendant Matthew Leach.  | 0.35 | \$117.25   |
| 07/22/2020 | JWW | IOC w/ BSM, AG and TD re status of serving defendants, settlements, defaults, outstanding issues to discuss w/ Receiver and related matters.   | 0.80 | \$268.00   |
| 07/22/2020 | AG  | IOC with BSM, JWW, and TD re: status update and strategy moving forward.   | 0.80 | \$180.00   |
| 07/22/2020 | BM  | Attend meeting with attorneys Waechter and Gangi re: strategy and future action.   | 0.80 | \$268.00   |
| 07/22/2020 | BM  | Correspondence with attorney Perez (0.40); directives re: service issues (0.20); review Fuchsman motion  | 1.50 | \$502.50   |

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|            |     |  |      |          |
|------------|-----|--|------|----------|
|            |     | (0.20); correspondence re: pro se filings and future action (0.40); evaluate and organize status of remaining defendants (0.30)  |      |          |
| 07/22/2020 | TD  | IOC with attorneys to discuss status, strategy, and pending tasks.   | 0.80 | \$120.00 |
| 07/22/2020 | AG  | Update unserved defendants chart with new identifying information.   | 0.40 | \$90.00  |
| 07/22/2020 | TD  | Prepare NOS of Track Two (Doc 7) to OC Schriels - re Martinis.   | 0.20 | \$30.00  |
| 07/23/2020 | JWW | Review Motion by Special Appearance to Quash Summons filed by defendant Tim Hunte dba KATT Distribution. Phone conference w/ defendant.  | 0.40 | \$134.00 |
| 07/23/2020 | JWW | Review Motion by Special Appearance to Quash Summons filed by defendant Alan Johnston.   | 0.20 | \$67.00  |
| 07/23/2020 | JWW | Review Motion by Special Appearance to Quash Summons filed by defendant Chad Hicks.  | 0.20 | \$67.00  |
| 07/23/2020 | BM  | Draft and edit outline re; status of all defendants; correspondence with attorney Perez.   | 1.10 | \$368.50 |
| 07/23/2020 | BM  | Correspondence with attorney Waechter re: Tim Hunte.   | 0.20 | \$67.00  |
| 07/23/2020 | BM  | Draft and edit motions for clerk's default re: Daidones, Charles, Puccio, McClare, and Rubel; directives re: same.   | 1.20 | \$402.00 |
| 07/23/2020 | BM  | Edit Motion for Default Judgment re: Morgan Albright F/K/A Sherry Barry and affidavit to address name change.  | 0.30 | \$100.50 |
| 07/24/2020 | AF  | Preparation of Notice of Service of Related Case Order and Track 2 to Pro-Se Defendants  | 2.00 | \$300.00 |
| 07/24/2020 | JWW | Phone conference w/ defendant Charles Huckabee. Calculate amortization schedule and draft Settlement Agreement w/ 12-month payment plan; email to Mr. Huckabee.  | 1.00 | \$335.00 |
| 07/24/2020 | JWW | Review Motion by Special Appearance to Quash Summons filed by defendants Henry and Anna Fuksman.   | 0.20 | \$67.00  |
| 07/24/2020 | JWW | Review distributions to defendant Zhuo Xu. Email communications w/ forensic accountant re additional information to be used in locating defendant for service of process. Review response and email attachments. | 0.50 | \$167.50 |
| 07/24/2020 | JWW | Review correspondence and documents received from defendant Morgan Albright a/k/a Sherry Berry.  | 0.30 | \$100.50 |

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|            |     |   |      |            |
|------------|-----|---|------|------------|
| 07/24/2020 | JWW | Listen to recording of Justin McKee soliciting support from defendants to retain Attorney Brent Winters for a group representation.                     | 0.75 | \$251.25   |
| 07/24/2020 | BM  | Draft and edit Omnibus response in opposition to Motions to Quash Summons and Object to Jurisdiction by 16 pro se defendants.                           | 4.10 | \$1,373.50 |
| 07/24/2020 | TD  | Prepare NOF pro se Answer of Elmore Runee Harris.   | 0.10 | \$15.00    |
| 07/27/2020 | JWW | Review emails re status of service of process for defendants, settlement agreements and various court filings.  | 0.75 | \$251.25   |
| 07/27/2020 | BM  | Correspondence re: Tami Lacy; correspondence with Silvia Davis; note file re: Sims settlement.  | 0.30 | \$100.50   |
| 07/27/2020 | AG  | Review correspondence from T. Lacy's counsel re: settlement offer; Phone call with T. Lacy counsel re: same; Review T. Lacy's MOET.                     | 0.40 | \$90.00    |
| 07/27/2020 | BM  | Draft and edit Omnibus response in opposition to Pro Se Defendants Motions to Quash and Objection to Personal Jurisdiction.                             | 3.50 | \$1,172.50 |
| 07/27/2020 | AG  | Phone call with M. Duenas re: settlement discussions.   | 0.10 | \$22.50    |
| 07/27/2020 | AG  | Review case file and status update on Defendants 29-56.   | 1.20 | \$270.00   |
| 07/27/2020 | BM  | Correspondence with counsel for the Cardiellos.   | 0.10 | \$33.50    |
| 07/28/2020 | JWW | Meeting w/ BSM to review open items and prepare for call w/ Receiver and co-counsel.  | 1.00 | \$335.00   |
| 07/28/2020 | JWW | Phone conference w/ Receiver and co-counsel re status of service of process, motions to quash, settlement negotiations and proposed or pending motions. | 1.20 | \$402.00   |
| 07/28/2020 | BM  | Conference call with client and co-counsel re: strategy and future action.  | 1.20 | \$402.00   |
| 07/28/2020 | JWW | Review distribution history for defendant Mary McClare (deceased). Email communications w/ CPA re payee on distributions subsequent to date of death.   | 0.20 | \$67.00    |
| 07/28/2020 | BM  | Draft and edit motion for clerk's default re: Renner and Marshall; directives re: same.   | 0.30 | \$100.50   |
| 07/28/2020 | BM  | Preparation for client conference call; prepare status update and outline for call.   | 3.20 | \$1,072.00 |
| 07/28/2020 | AG  | Review and update of service of process issues.   | 0.40 | \$90.00    |
| 07/29/2020 | JWW | Review Answer filed by defendant Kantor.  | 0.20 | \$67.00    |

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|------------|-----|--|------|----------|
| 07/29/2020 | JWW | Email communications w/ CPA re checks paid to deceased defendant McClare. Review copies of checks.   | 0.20 | \$67.00  |
| 07/29/2020 | JWW | Draft settlement proposal for defendant Chambless.   | 0.30 | \$100.50 |
| 07/29/2020 | JWW | Draft Motion for Default Judgment and Affidavit for defendant Marshall.  | 0.75 | \$251.25 |
| 07/29/2020 | BM  | Correspondence with counsel for Cardiello; correspondence with client re: same.  | 0.20 | \$67.00  |
| 07/29/2020 | BM  | Correspondence with attorney Dougherty re: Anne Hennessey; research re: Bacon military status; prepare documents in support of Affidavit in support of Bacon default judgment motion; correspondence with client re: same.   | 1.30 | \$435.50 |
| 07/29/2020 | JWW | Review Motions to Quash filed by multiple defendants.  | 1.00 | \$335.00 |
| 07/29/2020 | JWW | Draft Motion for Default Judgment and supporting affidavit against defendant Puccio.   | 0.60 | \$201.00 |
| 07/29/2020 | BM  | Research re: Barry military status; prepare documents in support of Affidavit in support of Barry/Albright default judgment motion; correspondence with client re: same.   | 0.20 | \$67.00  |
| 07/29/2020 | BM  | Draft and edit motion for default judgment and affidavits re: Joseph and Cushawn Charles; prepare affidavit supporting documents and research Corcoran military status; correspondence with client re: same.   | 1.10 | \$368.50 |
| 07/29/2020 | JWW | Draft Motion for Default Judgment and supporting affidavit against defendant Renner.   | 0.60 | \$201.00 |
| 07/29/2020 | BM  | Research military status related to Duenas and Garbellano; prepare documents supporting affidavits in support of Motions for Default Judgment; correspondence with client re: same.  | 0.70 | \$234.50 |
| 07/29/2020 | BM  | Research military status of Defendant Huckabee; finalize affidavit and motion for default judgment; prepare supporting documentation and provide to client.  | 0.80 | \$268.00 |
| 07/29/2020 | BM  | Research and directives re: Monahan; finalize Monahan affidavit and motion for default judgment; prepare documents in support of affidavit re: Monahan; prepare documents in support of Rubel default judgment affidavit; draft and edit motion for default judgment and affidavit re: Rubel; correspondence with client re: same. | 0.90 | \$301.50 |

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|            |     |   |       |             |
|------------|-----|---|-------|-------------|
| 07/29/2020 | BM  | Review clerk's defaults entered; directives re: same; draft and edit Daidone motions for default and accompanying affidavit; prepare supporting documentation for affidavit; correspondence with client re: same.                                     | 0.90  | \$301.50    |
| 07/29/2020 | BM  | Draft and edit motion for extension of time and request for status conference re: pro se defendants; directives re: same.   | 0.70  | \$234.50    |
| 07/30/2020 | JWW | Email communications and research re service of process on defendant Zhou Xu.   | 0.40  | \$134.00    |
| 07/30/2020 | JWW | Email communications and phone calls to defendants w/ Motions to Quash re extension of time to file response; status conference.  | 0.75  | \$251.25    |
| 07/30/2020 | BM  | Draft and edit motion for extension of time and for status conference (0.80); directives re: conferring with pro se defendants and counsel of record (0.20); directives re: legal research re: service issue (0.2).                                   | 1.20  | \$402.00    |
| 07/30/2020 | BM  | Correspondence with attorney Perez re: legal argument in support of motion for extension of time and request for status conference; edit and finalize same; directives re: motion.  | 1.20  | \$402.00    |
| 07/30/2020 | JK  | Legal research re: substitute service of process on NY resident   | 0.60  | \$135.00    |
| 07/31/2020 | BM  | Correspondence with attorney Perez; correspondence with counsel for Kantors re: motion; directives re: same.  | 0.30  | \$100.50    |
| 07/31/2020 | JWW | Review and forward to co-counsel multiple emails from pro se defendants objecting to motion for extension of time to respond to motions to quash.   | 0.40  | \$134.00    |
| 07/31/2020 | AG  | Multiple email correspondence with counsel for T. Lacy and client re: settlement discussions (.6); Phone calls with T. Lacy's counsel re: same (.5); Review calculations for T. Lacy settlement offer (.5); Draft T. Lacy settlement agreement. (.8). | 2.40  | \$540.00    |
| 07/31/2020 | JWW | Phone conference w/ Chris Chambliss re settlement negotiations.   | 0.40  | \$134.00    |
| 07/31/2020 | AG  | Email correspondence with Lacy's attorney re: counteroffer.   | 0.30  | \$67.50     |
| 07/31/2020 | BM  | Draft and edit response to all pro se motions to quash and objection to jurisdiction.   | 2.30  | \$770.50    |
| Total Fees |     |   | 94.80 | \$29,351.00 |

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**EXPENSES**

| Date       | Qty. | Description                         | Each     | Amount   |
|------------|------|-------------------------------------|----------|----------|
| 05/01/2020 | 1    | Postage                             | \$31.39  | \$31.39  |
| 07/31/2020 | 16   | Postage                             | \$4.81   | \$42.45  |
| 07/16/2020 | 1    | SOP Anna Fuksman                    | \$173.85 | \$173.85 |
| 07/10/2020 | 1    | SOP Betsy Doolin                    | \$319.10 | \$319.10 |
| 07/21/2020 | 1    | SOP Carmine Vona                    | \$173.85 | \$173.85 |
| 07/07/2020 | 1    | SOP Chad Hicks                      | \$163.85 | \$163.85 |
| 07/09/2020 | 1    | SOP Elmore Runee Harris             | \$133.85 | \$133.85 |
| 07/28/2020 | 1    | SOP Gregory Davis                   | \$173.85 | \$173.85 |
| 07/16/2020 | 1    | SOP Henry Fuksman                   | \$163.85 | \$163.85 |
| 07/10/2020 | 1    | SOP Impulse Ventures, Inc.          | \$113.85 | \$113.85 |
| 07/10/2020 | 1    | SOP James Jackson                   | \$133.85 | \$133.85 |
| 07/10/2020 | 1    | SOP Jay Renner                      | \$173.85 | \$173.85 |
| 07/20/2020 | 1    | SOP Kerrigan Management, Inc.       | \$228.85 | \$228.85 |
| 07/21/2020 | 1    | SOP Kevin Kerrigan                  | \$228.85 | \$228.85 |
| 07/10/2020 | 1    | SOP Kim Clark                       | \$133.85 | \$133.85 |
| 07/15/2020 | 1    | SOP Life's Elements, Inc.           | \$369.10 | \$369.10 |
| 07/24/2020 | 1    | SOP Louis Cardiello                 | \$173.85 | \$173.85 |
| 07/16/2020 | 1    | SOP Lynne LaVecchia                 | \$173.85 | \$173.85 |
| 07/07/2020 | 1    | SOP - Margaret Sims                 | \$233.85 | \$233.85 |
| 07/16/2020 | 1    | SOP Maria Cardiello                 | \$163.85 | \$163.85 |
| 07/22/2020 | 1    | SOP Mary McClare                    | \$358.85 | \$358.85 |
| 07/16/2020 | 1    | SOP Matthew Leach                   | \$173.85 | \$173.85 |
| 07/21/2020 | 1    | SOP Rocco Garbellano                | \$173.85 | \$173.85 |
| 07/10/2020 | 1    | SOP Ron Clark                       | \$113.85 | \$113.85 |
| 07/28/2020 | 1    | SOP Silvia Davis                    | \$173.85 | \$173.85 |
| 07/16/2020 | 1    | SOP Tami Lacy                       | \$173.85 | \$173.85 |
| 07/10/2020 | 1    | SOP Tim Hunte dba Katt Distribution | \$123.85 | \$123.85 |
| 07/10/2020 | 1    | SOP Timothy Hunte                   | \$123.85 | \$123.85 |
| 07/16/2020 | 1    | SOP Wayne Lynch                     | \$173.85 | \$173.85 |

**Total Expenses** **\$5,093.29**

|                                |                    |
|--------------------------------|--------------------|
| <b>Total Fees and Expenses</b> | <b>\$34,444.29</b> |
| Previous Balance               | \$42,113.61        |
| Payments Received              | \$0.00             |



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**Balance Now Due**

**\$76,557.90**

**\$76,557.90 TOTAL LEGAL SERVICES**



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Invoice Date: September 01, 2020

**FEES**

| <b>Date</b> | <b>Staff</b> | <b>Description</b>   | <b>Hours</b> | <b>Amount</b> |
|-------------|--------------|--|--------------|---------------|
| 08/03/2020  | AG           | Review all clerk's defaults and update all status of all served defendants; Begin drafting remaining motions for final judgment after default.   | 1.80         | \$405.00      |
| 08/03/2020  | JWW          | Review draft of Plaintiffs' Omnibus Response in Opposition to Motions to Quash Summons and Object to Jurisdiction.                               | 0.30         | \$100.50      |
| 08/03/2020  | BM           | Draft and edit omnibus response in opposition to motions to quash and objection to jurisdiction; correspondence with co-counsel re: same.        | 2.30         | \$770.50      |
| 08/03/2020  | BM           | Review NDA and Power of attorney re: Brent Winters; review court's order on motion for extension of time and request for status conference.      | 0.30         | \$100.50      |
| 08/03/2020  | AG           | Draft settlement agreement re: T. Lacy; Email correspondence with opposing counsel re: same.   | 0.60         | \$135.00      |
| 08/03/2020  | AG           | Draft waiver re: E. McMahon; Email correspondence with opposing counsel re: same.  | 0.40         | \$90.00       |
| 08/04/2020  | BM           | Correspondence with client and co-counsel re: order.   | 0.20         | \$67.00       |
| 08/04/2020  | JWW          | Email communications w/ defendant Chambless. Draft Settlement Agreement; email to defendant.   | 0.50         | \$167.50      |
| 08/04/2020  | JWW          | Phone conference w/ paralegal; email communications w/ Mary Magee, counsel for the estate of Mary McClare.                                       | 0.40         | \$134.00      |
| 08/04/2020  | BM           | Draft and edit motions for clerk's default re: Ron and Kim Clark; directives re: same.   | 0.30         | \$100.50      |
| 08/04/2020  | BM           | Draft and edit motion for clerk's default re: Impulse Ventures; directives re: same.   | 0.30         | \$100.50      |
| 08/04/2020  | BM           | Draft and edit motion for clerk's defaults re: Joseph and Lynne LaVecchia; directives re: same.  | 0.30         | \$100.50      |
| 08/04/2020  | BM           | Review court filings and update status of remaining defendants; review correspondence re: service issues; note file and case management outline. | 1.60         | \$536.00      |
| 08/04/2020  | AG           | Review opposing counsel's proposed edits re: T. Lacy settlement agreement; Email correspondence with receiver re: same.                          | 0.80         | \$180.00      |
| 08/04/2020  | BM           | Correspondence with attorney Waechter re: Chambless defendants and negotiations.   | 0.10         | \$33.50       |

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|            |     |   |      |          |
|------------|-----|---|------|----------|
| 08/04/2020 | BM  | Correspondence with client re: Lacy settlement; directives re: same.  | 0.20 | \$67.00  |
| 08/04/2020 | BM  | Draft and edit motion for clerk's default re: Wayne Lynch; directives re: same.   | 0.20 | \$67.00  |
| 08/04/2020 | AG  | Review and analyze status of unserved defendants.   | 0.40 | \$90.00  |
| 08/05/2020 | BM  | Correspondence with attorney, Mary Magee re: deceased Mary McClare.   | 0.20 | \$67.00  |
| 08/05/2020 | AG  | IOC with BSM re: strategy meeting and tasks moving forward.   | 0.40 | \$90.00  |
| 08/05/2020 | BM  | IOC with attorney Gangi re: strategy and future action.   | 0.40 | \$134.00 |
| 08/05/2020 | BM  | Directives re: Ford Sumner.   | 0.20 | \$67.00  |
| 08/05/2020 | BM  | Correspondence re: Matthew Leach; draft and edit motion for clerk's default; directives re: same.   | 0.20 | \$67.00  |
| 08/05/2020 | BM  | Draft and edit motions for final default judgment and affidavit in support re: Ron and Kim Clark; correspondence with client re: affidavit.   | 0.50 | \$167.50 |
| 08/05/2020 | AG  | Phone call with T. Lacy's counsel re: settlement agreement; Edit settlement agreement; Email correspondence to client re: same.   | 0.50 | \$112.50 |
| 08/05/2020 | BM  | Draft and edit motion for default judgment and affidavit for Impulse Ventures; correspondence with client re: same.   | 0.70 | \$234.50 |
| 08/05/2020 | BM  | Review Martinis' Notice of Pendency of related cases.   | 0.20 | \$67.00  |
| 08/05/2020 | BM  | IOC with attorney Gangi re: response in opposition to Plaintiffs' MSJ on Counts I, II and XVII of Complaint; review and analysis of Plaintiff's MSJ; draft and edit response to same.                   | 1.50 | \$502.50 |
| 08/06/2020 | JWW | Phone conference w/ defendant Michael Rubel re settlement terms; inability to pay.  | 0.50 | \$167.50 |
| 08/06/2020 | JWW | Phone conference and email communications w/ defendant Puccio's son and daughter-in-law re evidence of distributions, status of case and alternatives to proceed. Email to CPA requesting check copies. | 0.50 | \$167.50 |
| 08/06/2020 | JWW | Email communications w/ Ford Sumner / New Zealand re documents and communications w/ Oasis Global FX Limited.   | 0.20 | \$67.00  |
| 08/06/2020 | JWW | Draft Motion for Default Judgment and supporting affidavit for Kathryn McClare.   | 0.50 | \$167.50 |
| 08/06/2020 | AG  | Status update on remaining unserved defendants and strategy moving forward.   | 0.40 | \$90.00  |

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|            |     |  |      |            |
|------------|-----|--|------|------------|
| 08/06/2020 | BM  | Correspondence with attorney Waechter re: Leach default; directives re: same.  | 0.20 | \$67.00    |
| 08/07/2020 | JWW | Phone conference and email communications w/ Receiver re pre-judgment interest. Prepare calculations of pre-judgment interest for 21 defaulted defendants. Review Motion for Default Judgment and Receiver's supporting affidavit for inclusion of pre-judgment interest.  | 4.80 | \$1,608.00 |
| 08/07/2020 | BM  | IOC with attorney Waechter re: prejudgment interest and default motions (0.20); edit and revise motions for final default judgment re: Bacon (0.30); Barry (0.30); Charles (0.30); Corcoran (0.30); Clark (0.30); Daidone (0.30); Duenas (0.30); Garbellano (0.30); Huckabee (0.30); Impulse Ventures (0.30); Jackson (0.30); LaVecchia (0.30); Marshall (0.30); McClare (0.30); Monahan (0.30); Puccio (0.30); Renner (0.30); and Rubel (0.30). | 5.60 | \$1,876.00 |
| 08/07/2020 | JWW | Draft Motion for Default Judgment and supporting affidavit for defendant Leach.  | 0.50 | \$167.50   |
| 08/07/2020 | BM  | Correspondence with client.  | 0.20 | \$67.00    |
| 08/10/2020 | JWW | Draft Motion for Default Judgment and supporting affidavit for defendant Lynch.  | 0.50 | \$167.50   |
| 08/10/2020 | JWW | Draft Motion for Clerk's Default.  | 0.30 | \$100.50   |
| 08/10/2020 | BM  | Correspondence with Silvia Davis.  | 0.20 | \$67.00    |
| 08/10/2020 | BM  | Correspondence with co-counsel re: omnibus response; edit motions for default judgment.  | 0.90 | \$301.50   |
| 08/11/2020 | BM  | Directives re: Status conference and notice to pro se defendants.  | 0.20 | \$67.00    |
| 08/11/2020 | JWW | Phone conference w/ Andrea Comacho, counsel for Joseph and Lynne LaVecchia re investment of funds in Oasis.  | 0.25 | \$83.75    |
| 08/11/2020 | TD  | Received CMC Zoom information from JA, prepared emails and attached Notice of Hearing to defendants or their counsel.  | 0.80 | \$120.00   |
| 08/11/2020 | BM  | Draft and edit omnibus response; correspondence with co-counsel re: same.  | 1.90 | \$636.50   |
| 08/11/2020 | TD  | Created Amended COS for Bacon Motion for Default Judgment.   | 0.10 | \$15.00    |
| 08/11/2020 | BM  | Draft and edit motions for clerk's default re: Charuk, M. Chambless, and L. Chambless; Directives re: same.  | 0.40 | \$134.00   |
| 08/11/2020 | AG  | Email correspondence with T. Lacy's counsel re: settlement agreement.  | 0.20 | \$45.00    |

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|            |     |   |      |          |
|------------|-----|---|------|----------|
| 08/12/2020 | BM  | Correspondence with co-counsel and client re: omnibus response; edit and finalize response; directives re: same.                        | 1.40 | \$469.00 |
| 08/13/2020 | BM  | Correspondence re: def. Doolin  | 0.20 | \$67.00  |
| 08/13/2020 | BM  | Correspondence with client re: Chambless; note file; review status of unserved defendants; directives re: motions for default judgment. | 0.40 | \$134.00 |
| 08/13/2020 | BM  | Edit McClare motion for default judgment to address prejudgment interest.   | 0.40 | \$134.00 |
| 08/13/2020 | AG  | Email correspondence with client re: follow up on Lacy settlement agreement.  | 0.20 | \$45.00  |
| 08/14/2020 | JWW | Meeting w/ BSM to prepare for conference call w/ Receiver.  | 0.50 | \$167.50 |
| 08/14/2020 | JWW | Conference call w/ Receiver to review status; prepare for status hearing on 8/17.   | 0.80 | \$268.00 |
| 08/14/2020 | AG  | Review status update on remaining unserved defendants and strategy going forward; Review chart outlining all outstanding claims.        | 0.40 | \$90.00  |
| 08/14/2020 | BM  | IOC with attorney Waechter to prepare for client call and strategy meeting in preparation of hearing.                                   | 0.50 | \$167.50 |
| 08/14/2020 | AG  | Review all recent filings.  | 0.40 | \$90.00  |
| 08/14/2020 | JWW | Prepare spreadsheet summarizing status of claims for all defendants.  | 0.70 | \$234.50 |
| 08/14/2020 | BM  | Conference call with client and co-counsel.   | 0.80 | \$268.00 |
| 08/14/2020 | BM  | Review Alan Johnson Motion; correspondence with client re: same.  | 0.30 | \$100.50 |
| 08/14/2020 | BM  | Directives re: service issues.  | 0.20 | \$67.00  |
| 08/14/2020 | BM  | Review and update case status list; directives re: service issues.  | 0.70 | \$234.50 |
| 08/14/2020 | BM  | Edit outstanding motions for default judgment to include legal authority re: prejudgment interest.                                      | 0.90 | \$301.50 |
| 08/15/2020 | BM  | Correspondence with client and co-counsel.  | 0.20 | \$67.00  |
| 08/16/2020 | BM  | Correspondence with client.   | 0.20 | \$67.00  |
| 08/17/2020 | BM  | Attend status conference and argue in opposition to motions to quash.   | 1.50 | \$502.50 |
| 08/17/2020 | JWW | Draft Motions for Default Judgment and supporting affidavits for defendants Vona and Wood; email to Receiver.                           | 1.20 | \$402.00 |
| 08/17/2020 | BM  | Correspondence with client re: hearing and notice re: settlement and status.  | 0.30 | \$100.50 |

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|            |     |   |      |            |
|------------|-----|---|------|------------|
| 08/17/2020 | BM  | Preparation for status conference; draft and edit supplement to motion; directives re: same.  | 3.10 | \$1,038.50 |
| 08/17/2020 | JWW | Virtual hearing for status conference. Draft Motions for Clerk's Default for defendants Ford Sumner and Xu.   | 1.50 | \$502.50   |
| 08/17/2020 | TD  | T/C with Covington's Deputy regarding process for soundbyte to be presented at status conference this afternoon, relay summary to BSM.  | 0.20 | \$30.00    |
| 08/17/2020 | JWW | Calculate pre-judgment interest, draft motion for judicial default and supporting affidavit; email to Receiver.   | 0.75 | \$251.25   |
| 08/17/2020 | BM  | Draft and edit notice re: settlement and service of remaining defendants; directives re: defaults and dismissal in compliance with court's order to show cause.   | 1.40 | \$469.00   |
| 08/17/2020 | BM  | Correspondence with client re: Lacy settlement agreement.   | 0.20 | \$67.00    |
| 08/18/2020 | BM  | Correspondence re: Lacy settlement; directives re: same.  | 0.20 | \$67.00    |
| 08/18/2020 | JWW | Draft Motions for Default Judgment, supporting affidavits and calculate pre-judgment interest for defendants Ford Sumner and Zhuo Xu.   | 1.25 | \$418.75   |
| 08/18/2020 | AG  | Email correspondence with T. Lacy counsel re: fully executed agreement.   | 0.20 | \$45.00    |
| 08/18/2020 | JWW | Phone conference w/ Bill Burke, counsel for Stefania Wood re default judgment.  | 0.25 | \$83.75    |
| 08/18/2020 | BM  | Correspondence with client re: affidavits in support of motions for default judgment; directives re: legal research re: declaration v. affidavit re: rule 55(b)(1); revise motions to indicate clerk's default judgment pursuant to Rule 55(b)(1); directives re: same. | 1.30 | \$435.50   |
| 08/18/2020 | BM  | Directives re: service issues and Def. Wilkerson.   | 0.20 | \$67.00    |
| 08/18/2020 | BM  | Draft and edit notice of voluntary dismissal of Sims and Benedetto Dalia; directives re: same; update pending matter chart; directives re: outstanding motions for default judgment.  | 1.40 | \$469.00   |
| 08/18/2020 | BM  | Edit and revise affidavits as declarations and edit corresponding motions accordingly related to Xu, Charuk, Ford Sumner, Leach, and Wood; correspondence with client re: same.   | 0.90 | \$301.50   |
| 08/18/2020 | JK  | Legal research re: affidavit or other document for motion for default. Legal research re: substitute service at private mailbox.  | 1.10 | \$247.50   |

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|------------|-----|---|------|----------|
| 08/18/2020 | BM  | Review additional orders entered by the court re: status conference.  | 0.20 | \$67.00  |
| 08/19/2020 | BM  | Correspondence re: Tami Lacy settlement.  | 0.20 | \$67.00  |
| 08/19/2020 | AG  | Draft motion for extension of time to serve remaining defendants.   | 1.50 | \$337.50 |
| 08/19/2020 | JWW | Review emails re defendant Corcoran. Phone conference w/ Mr. Corcoran re investments, distributions and calculation of false profits for his account. Email communications w/ forensic accountant requesting documents.                                 | 0.50 | \$167.50 |
| 08/19/2020 | BM  | IOC with attorney Gangi re: motion to extend time to execute service; directives re: probate issue related to Mary McClare.   | 0.30 | \$100.50 |
| 08/19/2020 | AG  | IOC with BSM re: motion for extension of time and strategy.   | 0.30 | \$67.50  |
| 08/19/2020 | AG  | Email correspondence with Defendant E. Harris.  | 0.10 | \$22.50  |
| 08/19/2020 | AG  | Legal research re: time for creditor to serve an estate in NY; Discussions with attorneys BSM and JWW re: same.   | 0.60 | \$135.00 |
| 08/19/2020 | BM  | Correspondence with client; directives re: motions for default judgment re: Leach, Vona, Wood, Charuk, Xu, and Sumner.  | 0.60 | \$201.00 |
| 08/19/2020 | AG  | Phone call with Defendant J. Puccio's daughter.   | 0.10 | \$22.50  |
| 08/19/2020 | BM  | Review and note file re: case management and pending defendants.  | 0.40 | \$134.00 |
| 08/20/2020 | AG  | Draft First Amended Complaint; IOC with JWE re: consent for leave to amend to defendants.   | 2.30 | \$517.50 |
| 08/20/2020 | JWW | Phone conference w/ defendant Wayne Lynch re status of lawsuit and related matters.   | 0.50 | \$167.50 |
| 08/20/2020 | JWW | Inquire by phone of defendants w/ phone numbers but no email address if they object to Motion for Leave to Amend.   | 0.50 | \$167.50 |
| 08/20/2020 | AG  | Continue motion for extension of time; Draft detailed summary of all service attempts made on remaining unserved defendants for the Court.  | 1.70 | \$382.50 |
| 08/20/2020 | BM  | Review order referring motions for default judgment to magistrate and other court filings (0.20); IOC with attorney Gangi re: service issues and amended complaint and correspondence with client re: same (0.50); update defendant status chart (0.2). | 0.90 | \$301.50 |

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|            |     |  |      |          |
|------------|-----|--|------|----------|
| 08/20/2020 | AG  | Phone call with client re: issues with remaining unserved defendants and motion for leave to amend; IOC with BSM re: same.                         | 0.50 | \$112.50 |
| 08/20/2020 | BM  | Draft and edit Florida Bar Complaint letter re: Brent Winters.   | 2.30 | \$770.50 |
| 08/21/2020 | JWW | Phone conferences w/ defendants Albright (aka Barry) and Rubel to advise of plaintiff's intent to file amended complaint and ask if they objected. | 0.25 | \$83.75  |
| 08/21/2020 | JWW | Review and respond to email and attachment re correspondence to Brent Winters.   | 0.25 | \$83.75  |
| 08/21/2020 | AG  | Continue drafting first amended complaint; Email correspondence with counsel re: same.   | 1.70 | \$382.50 |
| 08/21/2020 | BM  | Correspondence re: amended complaint and motion for extension of time to execute service.  | 0.20 | \$67.00  |
| 08/21/2020 | BM  | Review Motion to Quash filed by Kayla Crowley; directives re: same (0.30); draft UPL complaint to Florida Bar re: Winters (2.5)                    | 2.80 | \$938.00 |
| 08/21/2020 | AG  | Continue drafting motion for extension of time to effect service.  | 1.80 | \$405.00 |
| 08/21/2020 | BM  | Review and edit client letter to Winters re: claims process and unauthorized practice of law; correspondence with co-counsel re: same              | 0.50 | \$167.50 |
| 08/21/2020 | BM  | Review orders referring motions for default judgment to magistrate; note file chart re: status of all remaining defendants.                        | 0.30 | \$100.50 |
| 08/21/2020 | AG  | Review K. Crowley's motion to quash.   | 0.10 | \$22.50  |
| 08/21/2020 | BM  | Correspondence with client re complaint; edit and finalize; directives re: same.   | 0.80 | \$268.00 |
| 08/21/2020 | JK  | Legal research re: service of process in New Hampshire.  | 0.40 | \$90.00  |
| 08/22/2020 | AG  | Continue drafting and editing MOET (.8); Review letter re: B. Winters (.3).  | 1.10 | \$247.50 |
| 08/24/2020 | AG  | Continue edits to motion for extension of time re: inclusion of K. Crowley; Review service attempts re: same.                                      | 1.80 | \$405.00 |
| 08/24/2020 | BM  | Directives re: investor information.   | 0.20 | \$67.00  |
| 08/24/2020 | AG  | Finalize letter to B. Winters.   | 0.20 | \$45.00  |
| 08/24/2020 | JWW | Phone conference w/ Bill Burke, counsel for Stefania Wood re promissory notes on which distributions were being paid.                              | 0.25 | \$83.75  |



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|------------|-----|---|------|------------|
| 08/24/2020 | BM  | Correspondence with client; directives re: exhibits to complaint; correspondence with co-counsel re: amended complaint.                                       | 0.90 | \$301.50   |
| 08/24/2020 | AG  | Legal research re: whether clerk's default prevents defendant from answering an amended complaint.  | 1.10 | \$247.50   |
| 08/24/2020 | AG  | Multiple email correspondence with all counsel re: effect of amended complaint on defaulted defendants.   | 0.30 | \$67.50    |
| 08/25/2020 | JWW | Phone conference w/ Defendant Rubel re settlement terms and related matters.  | 0.50 | \$167.50   |
| 08/25/2020 | JWW | Phone conference and email communications w/ defendants Monahan. Draft Settlement Agreement; email to defendants.   | 1.00 | \$335.00   |
| 08/25/2020 | AG  | Email correspondence re: T. Lacy settlement check.  | 0.20 | \$45.00    |
| 08/25/2020 | AG  | Review Order denying without prejudice motions for default judgment.  | 0.20 | \$45.00    |
| 08/25/2020 | AG  | Edit first amended complaint; Draft motion for leave to amend complaint.  | 2.60 | \$585.00   |
| 08/25/2020 | TD  | Prepare letter to Greg Corcoran with copies of checks; per JWW.   | 0.10 | \$15.00    |
| 08/25/2020 | AG  | Legal research re: motion to permit substitute service.   | 2.10 | \$472.50   |
| 08/25/2020 | BM  | Correspondence with attorney Gangi re: motion to extend time for service; review order re: motions for default judgment.                                      | 0.60 | \$201.00   |
| 08/25/2020 | AG  | Phone call with BSM re: substitute service and amended pleadings research.  | 0.30 | \$67.50    |
| 08/26/2020 | BM  | Review pro se filings and joinders docketed by court.   | 0.20 | \$67.00    |
| 08/26/2020 | BM  | Draft and edit template for amended motions for default judgment and related declarations; correspondence with co-counsel re: same.                           | 3.90 | \$1,306.50 |
| 08/26/2020 | AG  | Edit, finalize, and file Second Motion to Extend Time to Effect Service.  | 1.50 | \$337.50   |
| 08/26/2020 | JWW | Email communications w/ forensic accountant re checks paid to defendant Corcoran. Review check copies and reconcile to Exhibit to Complaint. Email to client. | 0.50 | \$167.50   |
| 08/26/2020 | JWW | Email communications w/ defendant Monahan re settlement agreement.  | 0.20 | \$67.00    |
| 08/26/2020 | AG  | Review Amended Motion for Final Judgment After Default.   | 0.30 | \$67.50    |
| 08/27/2020 | BM  | Correspondence with co-counsel; review motion to approve settlements.   | 0.20 | \$67.00    |



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|            |     |   |      |          |
|------------|-----|---|------|----------|
| 08/27/2020 | BM  | Draft and edit Amended Motion for Default Judgment; correspondence with co-counsel re: same.  | 2.80 | \$938.00 |
| 08/27/2020 | BM  | Review court's order re: motion for extension of time to execute service and order vacating clerk's default re: Corcoran.   | 0.10 | \$33.50  |
| 08/27/2020 | BM  | Wiand - Legal research re: response to Crowley's motion to quash service; draft and edit response; correspondence with process server; note file.                                     | 1.40 | \$469.00 |
| 08/27/2020 | BM  | Correspondence with client; draft and edit notice of filing complaint re: unlicensed practice of law.   | 0.50 | \$167.50 |
| 08/27/2020 | BM  | Review correspondence from client; correspondence with Davis re: fully executed settlement agreement.   | 0.20 | \$67.00  |
| 08/28/2020 | AG  | Review proposed orders and develop strategy for serving remaining defendants.   | 0.10 | \$22.50  |
| 08/28/2020 | JWW | IOC / BSM; Phone conference w/ BSM and Jared Perez re: status meeting w/ Receiver, defendants not yet served, amending complaint, outstanding tolling agreements and related matters. | 0.60 | \$201.00 |
| 08/28/2020 | JWW | Draft Motions for Clerk's Default for Commonwealth Network Marketing Corp and Crichlow Computer Concepts.   | 0.60 | \$201.00 |
| 08/28/2020 | AG  | Review G. Corcoran letter.  | 0.10 | \$22.50  |
| 08/28/2020 | BM  | Review letter from Corcoran; correspondence with co-counsel re: Chambless settlement.   | 0.20 | \$67.00  |
| 08/28/2020 | BM  | IOC with attorney Waechter; call with attorney Perez.   | 0.60 | \$201.00 |
| 08/28/2020 | AG  | Email correspondence re: motion to approve settlement.  | 0.20 | \$45.00  |
| 08/28/2020 | JWW | Conference call w/ legal team to update on status of pending matters.   | 0.70 | \$234.50 |
| 08/28/2020 | TD  | Review and draft summary of status of service attempts, provide to summary to attorneys in prep of meeting.   | 0.75 | \$112.50 |
| 08/28/2020 | BM  | Review service updates and note file; directives re: defaults and future action.  | 0.40 | \$134.00 |
| 08/28/2020 | BM  | Call with client and co-counsel re: case status and future action.  | 0.70 | \$234.50 |
| 08/28/2020 | AG  | Phone call with client re: strategy meeting; IOC with BSM and JWW re: same.   | 0.80 | \$180.00 |
| 08/28/2020 | BM  | Draft and edit response to motion to quash; directives re: same.  | 0.90 | \$301.50 |
| 08/29/2020 | AG  | Review and finalize notice of filing.   | 0.40 | \$90.00  |
| 08/30/2020 | BM  | Directives re: notice of filing.  | 0.20 | \$67.00  |

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|            |     |  |        |             |
|------------|-----|--|--------|-------------|
| 08/31/2020 | JWW | Phone conference w/ defendant Betsy Doolin re "false profits" calculation. Email communications w/ CPAs to request check copies. | 0.30   | \$100.50    |
| Total Fees |     |  | 116.50 | \$35,124.75 |

**EXPENSES**

| Date       | Qty. | Description                        | Each     | Amount   |
|------------|------|------------------------------------|----------|----------|
| 08/11/2020 | 2    | Postage                            | \$14.94  | \$29.88  |
| 08/18/2020 | 1    | Service Of Process Michael DeYoung | \$151.30 | \$151.30 |
| 08/04/2020 | 1    | SOP Ann Barton                     | \$205.25 | \$205.25 |
| 07/31/2020 | 1    | SOP Anne Hennessey                 | \$529.10 | \$529.10 |
| 08/04/2020 | 1    | SOP Elizabeth McMahon              | \$101.85 | \$101.85 |

|                       |  |            |
|-----------------------|--|------------|
| <b>Total Expenses</b> |  | \$1,017.38 |
|-----------------------|--|------------|

|                                |                     |
|--------------------------------|---------------------|
| <b>Total Fees and Expenses</b> | <b>\$36,142.13</b>  |
| Previous Balance               | \$76,557.90         |
| Payments Received              | \$0.00              |
| <b>Balance Now Due</b>         | <b>\$112,700.03</b> |

**\$112,700.03 TOTAL LEGAL SERVICES**

Invoice No. 71589  
 John Waechter as Counsel  
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Invoice Date: October 02, 2020

**FEES**

| <b>Date</b> | <b>Staff</b> | <b>Description</b>  | <b>Hours</b> | <b>Amount</b> |
|-------------|--------------|---|--------------|---------------|
| 08/31/2020  | AG           | Review, finalize, and file notice re: B. Winters.   | 0.20         | \$45.00       |
| 08/31/2020  | AG           | Phone call with Perry Legal re: strategy going forward with service.  | 0.60         | \$135.00      |
| 09/01/2020  | JWW          | Email communications w/ CPA and defendant Doolin re check copies for Oasis distributions.   | 0.20         | \$67.00       |
| 09/02/2020  | AG           | Draft, finalize and file response in opposition to motion to quash and request for substitute service re: K. Crowley; Draft affidavit in support of same.   | 3.70         | \$832.50      |
| 09/02/2020  | JWW          | Draft Motion for Clerk's Default against defendant DeYoung.   | 0.50         | \$167.50      |
| 09/02/2020  | JWW          | Review and revise Plaintiff's Amended Motion for Default Judgment. Review Response in Opposition to Crowley Motion to Quash and accompanying affidavit.   | 0.80         | \$268.00      |
| 09/02/2020  | JWW          | IOC re handling of second settlement payment check from defendant Cardiello made payable to Bea McConnell. Directed staff to return check to defendant with instructions as to payee and address. | 0.20         | \$67.00       |
| 09/02/2020  | AG           | Email correspondence with client re: private investigator.  | 0.10         | \$22.50       |
| 09/08/2020  | JWW          | Review various docket entries. Update status document for all defendants.   | 0.30         | \$100.50      |
| 09/09/2020  | JWW          | Draft Motion for Clerk's Default vs defendant Luda.   | 0.40         | \$134.00      |
| 09/09/2020  | AG           | Email correspondence with T. Lacy's counsel re: cleared check.  | 0.20         | \$45.00       |
| 09/09/2020  | AG           | Review letter to investors re: B. Winters.  | 0.20         | \$45.00       |
| 09/09/2020  | AG           | Review status of case and recent filings re: remaining unserved defendants.   | 0.60         | \$135.00      |
| 09/10/2020  | JWW          | Phone conferences w/ defendant Greg Corcoran and Receiver re settlement negotiations.   | 0.60         | \$201.00      |
| 09/11/2020  | JWW          | Phone conference w/ defendant Corcoran re settlement negotiations.  | 0.25         | \$83.75       |
| 09/14/2020  | BM           | Correspondence with client.   | 0.20         | \$67.00       |
| 09/14/2020  | JWW          | Review Motion to Dismiss filed by defendant Johnston.   | 0.25         | \$83.75       |
| 09/14/2020  | BM           | Review court order re: Crowley (0.1); draft and edit notice of voluntary dismissal re: Lacy (0.20); directives re: same (0.10).   | 0.40         | \$134.00      |

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|            |     |  |      |          |
|------------|-----|--|------|----------|
| 09/15/2020 | JWW | Phone conference w/ defendant Monahan re settlement procedures.  | 0.20 | \$67.00  |
| 09/15/2020 | AG  | Review status of service of process issues re: K. Crowley and M. Deyoung.  | 0.40 | \$90.00  |
| 09/15/2020 | BM  | Correspondence re: service of DeYoung; correspondence with co-counsel.   | 0.30 | \$100.50 |
| 09/16/2020 | JWW | Draft Motions for Clerk's Default against defendants Black Dragon Capital, LLC, Timothy Hunte d/b/a KATT Distribution, Kerrigan Management, Inc. and Life's Elements, Inc. | 1.00 | \$335.00 |
| 09/16/2020 | BM  | Correspondence re: Chambless payment; draft and edit notice of voluntary dismissal re: Chambless; directives re: same.   | 0.30 | \$100.50 |
| 09/16/2020 | BM  | Correspondence with co-counsel re: ongoing service issues; update file re: same and settlement updates.  | 0.90 | \$301.50 |
| 09/16/2020 | BM  | Draft certificate of interested persons (0.30); correspondence with co-counsel re: same (0.20); begin review and completion of Case Management Report (0.30).              | 0.80 | \$268.00 |
| 09/17/2020 | JWW | Draft Motions for Clerk's Default against defendants Barton and Flander.   | 0.70 | \$234.50 |
| 09/17/2020 | JWW | IOC w/ BSM, AG and TD re status of outstanding issues, service of process, motions and related matters.  | 0.50 | \$167.50 |
| 09/17/2020 | BM  | Directives re: Wilkerson service issues (0.40); IOC re: motion to substitute parties (0.30).   | 0.70 | \$234.50 |
| 09/17/2020 | BM  | Correspondence with Silvia Davis re: settlement payment.   | 0.20 | \$67.00  |
| 09/17/2020 | BM  | Draft and edit motion to substitute party; directives re: same.  | 1.30 | \$435.50 |
| 09/17/2020 | AG  | IOC with JWW, BSM, and TD re: update on issues in case and strategy going forward.   | 0.50 | \$112.50 |
| 09/17/2020 | AG  | Review status of unserved defendants; Phone call with PI re: D. Wilkerson.   | 0.30 | \$67.50  |
| 09/17/2020 | TD  | Strategy and status meeting with attorneys.  | 0.50 | \$75.00  |
| 09/17/2020 | BM  | Directives re: Divergent Investments, LLC.   | 0.20 | \$67.00  |
| 09/17/2020 | BM  | Note file and provide directives re: case management (0.40); attend and direct case status meeting (0.50).   | 0.90 | \$301.50 |
| 09/17/2020 | AG  | Review Maryland statutes re: substitute service on Sec of Stat.  | 0.30 | \$67.50  |
| 09/18/2020 | JWW | Draft multiple motions for clerk's default.  | 1.50 | \$502.50 |

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|            |     |   |      |            |
|------------|-----|---|------|------------|
| 09/18/2020 | BM  | Review clerk's default entries; correspondence with co-counsel re: certificate of interested persons and corp. disclosure; directives re: same.   | 0.30 | \$100.50   |
| 09/18/2020 | JWW | Prepare or revise pre-judgment interest calculations for multiple defendants.   | 4.50 | \$1,507.50 |
| 09/18/2020 | BM  | Review Alan Johnston's Supplemental Motion (0.20); directives re: motions for clerk's default re: joinders (0.10); draft and edit summary re: relevant joinders to assist with motions (0.30); review and analysis of Johnston's Motion to Dismiss (0.40); draft and edit Response in Opposition to Johnston's Motion to Dismiss (0.80) | 1.80 | \$603.00   |
| 09/21/2020 | JWW | Draft Motion for Clerk's Default against defendant Gladman.   | 0.40 | \$134.00   |
| 09/21/2020 | JWW | Update summary of claims status report in preparation for conference call w/ Reciever.  | 0.50 | \$167.50   |
| 09/21/2020 | JWW | Prepare for (0.75) and attend conference call w/ Receiver and co-counsel re various outstanding issues (1.0).   | 1.75 | \$586.25   |
| 09/21/2020 | BM  | Wiand - Directives re: Response to Johnston MTD (0.30); directives re: memo of law for motion to substitute party defendants (0.20); prepare for client call (1.30); attend client conference call (1.00);  | 2.80 | \$938.00   |
| 09/21/2020 | AG  | Draft and edit motion to substitute party defendant; Legal research re: same.   | 1.20 | \$270.00   |
| 09/22/2020 | JWW | Review and update internal status reports.  | 0.25 | \$83.75    |
| 09/22/2020 | JK  | Started drafting response in opposition to defendant alan johnston's motion to dismiss.   | 3.20 | \$720.00   |
| 09/22/2020 | AG  | Continue legal research re: substitute parties; Edit motion.  | 0.80 | \$180.00   |
| 09/22/2020 | BM  | Correspondence re: response to Johnston MTD.  | 0.20 | \$67.00    |
| 09/23/2020 | DT  | Telephone call with firm attorney regarding information on Mary McClare; Review file for previous information found on Mary McClare; Search Monroe County New York Records for information relating to Mary McClare; Send email to attorney with findings.  | 0.20 | \$30.00    |
| 09/23/2020 | JWW | Phone conference w/ defendant Procopio re September settlement payment not yet received.  | 0.20 | \$67.00    |
| 09/23/2020 | JWW | Phone conferences w/ co-counsel and Receiver re settlement offer to defendants Kantor.  | 0.20 | \$67.00    |

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Invoice Date: October 02, 2020

|            |     |  |      |            |
|------------|-----|--|------|------------|
| 09/23/2020 | AG  | Edit and finalize motion to substitute parties; Email correspondence with defendants re: good faith certification.   | 2.40 | \$540.00   |
| 09/23/2020 | BM  | Review clerk's defaults (0.20); update charts re: motions for default judgment and defendant status (1.30); directives re: conferring related to substitution motion (0.30). | 1.80 | \$603.00   |
| 09/23/2020 | AG  | Email correspondence with Kantor's counsel re: settlement discussions and case management report; Review Kantor's spreadsheet re: interest to date and false profits.        | 0.40 | \$90.00    |
| 09/23/2020 | BM  | Review and edit motion to substitute party defendants; directives re: same (0.40); correspondence with co-counsel (0.10).  | 0.50 | \$167.50   |
| 09/23/2020 | JK  | Legal research re: response in opposition to Johnston's motion to dismiss.   | 0.30 | \$67.50    |
| 09/23/2020 | BM  | Correspondence re: Ford Sumner.  | 0.20 | \$67.00    |
| 09/24/2020 | JWW | Review and edit Motion for Substitution of Parties.  | 0.20 | \$67.00    |
| 09/24/2020 | JWW | Review numerous notifications from Clerk re Court filings.   | 0.25 | \$83.75    |
| 09/24/2020 | JWW | Review and respond to various emails from co-counsel and receiver re outstanding issues.   | 0.40 | \$134.00   |
| 09/24/2020 | JWW | Update records on status of multiple defendants.   | 0.30 | \$100.50   |
| 09/24/2020 | BM  | Correspondence re: motion to substitute party defendant (0.10); correspondence with co-counsel (0.10); directives and correspondence with process server (0.20).             | 0.40 | \$134.00   |
| 09/24/2020 | JK  | Continued drafting response in opposition to Johnston's motion to dismiss.   | 6.30 | \$1,417.50 |
| 09/24/2020 | AG  | Edit and finalize motion to substitute party defendants.   | 0.30 | \$67.50    |
| 09/24/2020 | AG  | Email correspondence with counsel for Kantors re: follow up on settlement offer and Case management report.  | 0.20 | \$45.00    |
| 09/24/2020 | AG  | Follow up with counsel for E. McMahon re: opposition to motion.  | 0.10 | \$22.50    |
| 09/24/2020 | BM  | Review additional clerk's defaults entered and joinders to Johnston's motion to dismiss; note file.  | 0.40 | \$134.00   |
| 09/24/2020 | AG  | Review and edit Case Management Report; Email correspondence re: same.   | 0.40 | \$90.00    |

Invoice No. 71589  
 John Waechter as Counsel  
 Burton W. Wiand v. Chris Arduini, et al.



Invoice Date: October 02, 2020

|            |     |  |      |            |
|------------|-----|--|------|------------|
| 09/25/2020 | JWW | Email communications w/ defendant Ford Sumner and Receiver re Oasis Global FX files. Draft Notice of Dismissal.  | 0.60 | \$201.00   |
| 09/25/2020 | BM  | Edit and finalize response to Johnston's MTD and motion for clerk's default; directives re: same.  | 1.30 | \$435.50   |
| 09/25/2020 | BM  | Correspondence re: case management; review correspondence re: Brent Winters; directives re: same (0.20); note file re: status of remaining defendants (0.70); correspondence with co-counsel re: omnibus motion for default judgment (0.30). | 1.20 | \$402.00   |
| 09/25/2020 | TD  | Prepare Summons to Be Issued for The Estate of Mary H. McClare.  | 0.10 | \$15.00    |
| 09/25/2020 | JK  | Continued drafting response in opposition to dismiss. Legal research re: insufficiency of process and time for serving complaint.  | 4.00 | \$900.00   |
| 09/25/2020 | AG  | Review email correspondence re: McClare estate and issues with Divergent ROS.  | 0.40 | \$90.00    |
| 09/27/2020 | AG  | Review and edit Amended motion for default judgment.   | 0.40 | \$90.00    |
| 09/28/2020 | JWW | Phone conference w/ Mary McGee re Service of Process for Estate of Mary McClare. Review Certificate of Appointment of Executors. Direct staff re issuance of subpoena for Estate of Mary McClare.  | 0.40 | \$134.00   |
| 09/28/2020 | JWW | Email communications and phone calls w/ co-counsel and defendant Procopio re settlement check that was due 9/15 but not received until 9/28.   | 0.30 | \$100.50   |
| 09/28/2020 | BM  | wiand - Directives re: summonses (0.10); correspondence with co-counsel (0.10); draft and edit omnibus motion for default judgment (5.0)   | 5.20 | \$1,742.00 |
| 09/29/2020 | AG  | Review edited Amended Motion for Default Judgment.   | 0.30 | \$67.50    |
| 09/29/2020 | JWW | Draft Motion for Clerk's Default against defendant Todd Berry.   | 0.25 | \$83.75    |
| 09/29/2020 | JWW | Phone conference w/ co-counsel to review draft Case Management Report.   | 0.75 | \$251.25   |
| 09/29/2020 | AG  | Status update re: Divergent, McClare Estate and Terranova.   | 0.10 | \$22.50    |
| 09/29/2020 | BM  | Correspondence with investigator re: Terranova (0.20); directives re: McClare estate service (0.20); draft and edit omnibus motion (1.60); correspondence with co-counsel re: CMC (0.70)   | 2.70 | \$904.50   |
| 09/30/2020 | JWW | Phone conference w/ opposing counsel re Case Management Report.  | 1.00 | \$335.00   |



Invoice No. 71589  
 John Waechter as Counsel  
 Burton W. Wiand v. Chris Arduini, et al.



Invoice Date: October 02, 2020

|            |     |  |       |             |
|------------|-----|--|-------|-------------|
| 09/30/2020 | JWW | Phone conference w/ Chris Whitelock, counsel for defendants Bradley and Carrie Kantor; phone conference w/ Receiver re settlement. Prepare spreadsheet calculating monthly payments under a 12-month plan; email to counsel. Request copies of supporting documents for investments and distributions from CPA; email to counsel.                        | 1.30  | \$435.50    |
| 09/30/2020 | BM  | Prepare for case management call with opposing counsel (0.10); attend telephonic conference with all counsel re: case management report (1.0); correspondence with counsel re: CMC and note file (0.40); draft omnibus motion for default judgment; directives re: declaration in support (0.20); correspondence with investigator re: Terranova (0.20). | 1.90  | \$636.50    |
| Total Fees |     |  | 76.55 | \$22,427.25 |

### **EXPENSES**

| Date       | Qty. | Description  | Each     | Amount   |
|------------|------|--|----------|----------|
| 09/23/2020 | 1    | David Wikerson Waxhaw Invoice No. 4884647                | \$150.80 | \$150.80 |
| 08/31/2020 | 1    | Postage  | \$12.55  | \$12.55  |
| 09/17/2020 | 1    | Research/Locate time - David Wilkerson                   | \$180.80 | \$180.80 |
| 09/03/2020 | 1    | Service of Process Black Dragon Capital Invoice No. 5027 | \$173.85 | \$173.85 |
| 08/21/2020 | 1    | Service of Process Commonwealth Network Marketing        | \$140.00 | \$140.00 |
| 08/21/2020 | 1    | Service of Process Crichlow Computer Concepts            | \$140.00 | \$140.00 |
| 09/03/2020 | 1    | Service of Process David Paul Lipinczyk Invoice No. 5098 | \$173.85 | \$173.85 |
| 09/24/2020 | 1    | Service of Process David Wilkerson                       | \$648.70 | \$648.70 |
| 09/03/2020 | 1    | Service of Process Frank Nagel Invoice No. 5073          | \$173.85 | \$173.85 |
| 09/17/2020 | 1    | Service of Process Invoice No. 5250                      | \$160.00 | \$160.00 |
| 08/21/2020 | 1    | Service of Process Jason Gladman                         | \$308.85 | \$308.85 |
| 09/17/2020 | 1    | Service of Process Jason Gladman Invoice No. 2392        | \$776.85 | \$776.85 |
| 09/03/2020 | 1    | Service of Process Joseph LaVecchia Invoice No. 5096     | \$173.85 | \$173.85 |
| 09/03/2020 | 1    | Service of Process Kathryn McClare Invoice No. 5069      | \$173.85 | \$173.85 |



Invoice No. 71589  
 John Waechter as Counsel  
 Burton W. Wiand v. Chris Arduini, et al.



Invoice Date: October 02, 2020

|                       |   |  |          |                   |
|-----------------------|---|--|----------|-------------------|
| 09/16/2020            | 1 | Service of Process Kayla Crowley Invoice 2388          | \$683.70 | \$683.70          |
| 09/03/2020            | 1 | Service of Process Maria Charuk Invoice No. 5039       | \$173.85 | \$173.85          |
| 08/28/2020            | 1 | Service of Process Piotr Luda                          | \$523.85 | \$523.85          |
| 09/11/2020            | 1 | Service of Process Todd Berry Inv. 2583                | \$416.70 | \$416.70          |
| 09/03/2020            | 1 | Service of Process Vince Petralis Sr. Invoice No. 5061 | \$173.85 | \$173.85          |
| 09/01/2020            | 1 | SOP Stefania Wood                                      | \$173.85 | \$173.85          |
| <b>Total Expenses</b> |   |  |          | <b>\$5,533.60</b> |

|                                |                    |
|--------------------------------|--------------------|
| <b>Total Fees and Expenses</b> | <b>\$27,960.85</b> |
| Previous Balance               | \$112,700.03       |
| Payments Received              | \$42,113.61        |
| <b>Balance Now Due</b>         | <b>\$98,547.27</b> |

**\$98,547.27 TOTAL LEGAL SERVICES**

Invoice No. 70644  
 John Waechter as Counsel  
 Burton W. Wiand, et al. v. Raymond P. Montie, III



Invoice Date: August 14, 2020

**FEES**

| <b>Date</b> | <b>Staff</b> | <b>Description</b>  | <b>Hours</b> | <b>Amount</b> |
|-------------|--------------|---|--------------|---------------|
| 07/02/2020  | BM           | Correspondence with co-counsel re: waiver of service and notice of lawsuit; draft same; directives.   | 0.30         | \$100.50      |
| 07/10/2020  | BM           | Correspondence with attorney Dougherty re: Certificate of Interested persons; review track two order. | 0.30         | \$100.50      |
| 07/14/2020  | BM           | Review Opposition to Motion to Strike.  | 0.20         | \$67.00       |
| 07/15/2020  | BM           | Review certificate of interested parties.   | 0.20         | \$67.00       |
| Total Fees  |              |   | 1.00         | \$335.00      |

|                                |                 |
|--------------------------------|-----------------|
| <b>Total Fees and Expenses</b> | <b>\$335.00</b> |
| Previous Balance               | \$283.50        |
| Payments Received              | \$0.00          |
| <b>Balance Now Due</b>         | <b>\$618.50</b> |

**\$618.50 TOTAL LEGAL SERVICES**

Invoice No. 71587  
 John Waechter as Counsel  
 Burton W. Wiand, et al. v. Raymond P. Montie, III



Invoice Date: October 02, 2020

**FEES**

| <b>Date</b> | <b>Staff</b> | <b>Description</b>   | <b>Hours</b> | <b>Amount</b> |
|-------------|--------------|--|--------------|---------------|
| 09/12/2020  | BM           | Review correspondence from opposing counsel; correspondence with attorney Perez.   | 0.20         | \$67.00       |
| 09/21/2020  | BM           | Review draft Case Management Report.   | 0.30         | \$100.50      |
| 09/22/2020  | JWW          | Review draft Case Management Report in preparation for call with opposing counsel. | 0.30         | \$100.50      |
| 09/22/2020  | JWW          | Phone conference w/ co-counsel and opposing counsel re Case Management Conference. | 0.50         | \$167.50      |
| 09/22/2020  | BM           | Review draft response to order to show cause.                                      | 0.20         | \$67.00       |
| 09/25/2020  | TD           | Analyze CMC Report for pertinent deadlines.  | 0.25         | \$37.50       |
| Total Fees  |              |  | 1.75         | \$540.00      |

|                                |                  |
|--------------------------------|------------------|
| <b>Total Fees and Expenses</b> | <b>\$540.00</b>  |
| Previous Balance               | \$618.50         |
| Payments Received              | \$283.50         |
| <b>Balance Now Due</b>         | <b>\$ 875.00</b> |

**\$875.00 TOTAL LEGAL SERVICES**

# **EXHIBIT 12**

# Kapila Mukamal

CPAs, Forensic and Insolvency Advisors

EIN #46-5394135

**CFTC V. OASIS INTERNATIONAL GROUP, LIMITED, ET AL**

**Client ID: 90141**

**Invoice #6944 - 07/31/20**

## TIME SUMMARY BY STAFF

| <u>Staff</u>                             | <u>Hours</u>             | <u>Rate</u>     | <u>Amount</u> |
|--|--------------------------|-----------------|---------------|
| RLW - RACHEL WEISS - CONSULTANT CPA, CFE | 8.40                     | 320.00          | 2,688.00      |
| TOTAL                                    | 8.40                     |                 | \$2,688.00    |
|  | <b>BLENDED RATE</b>      | <b>\$320.00</b> |               |
|  | AGREED 15% DISCOUNT      |                 | (403.20)      |
|  | TOTAL EXPENSES           |                 | 4.74          |
| TOTAL AMOUNT OF THIS INVOICE             |                          |                 | \$2,289.54    |
|  | ADJUSTED<br>BLENDED RATE | \$272.00        |               |



***Kapila Mukamal***

CPAs, Forensic and Insolvency Advisors

1000 S. Federal Highway, Suite 200

Fort Lauderdale, FL 33316

Phone - 954-761-1011 F - 954-761-1033 www.kapilamukamal.com  
EIN #46-5394135

CFTC V. OASIS INTERNATIONAL GROUP, LIMITED, ET AL

C/O BURTON W. WIAND, RECEIVER

VIA EMAIL ONLY:

BWIAND@WIANDLAW.COM;

JRIZZO@WIADLAW.COM

Invoice: 6944

07/31/2020

Client ID: 90141

For Professional Services Rendered Through July 31, 2020

| <u>DATE</u>        | <u>STAFF</u> | <u>DESCRIPTION</u>                            | <u>HRS</u> | <u>AMOUNT</u> |
|--------------------|--------------|---|------------|---------------|
| LITIGATION SUPPORT |              |   |            |               |
| 07/07/2020         | RLW          | INVESTIGATE RAY MONTIE TRANSACTIONS           | 0.10       | 32.00         |
| 07/08/2020         | RLW          | TC WITH MAYA LOCKWOOD RE: NEW HORIZON POC     | 0.20       | 64.00         |
| 07/08/2020         | RLW          | ANALYSIS OF NEW HORIZON POC                   | 1.40       | 448.00        |
| 07/09/2020         | RLW          | CONTINUE ANALYSIS OF NEW HORIZON POC          | 3.40       | 1,088.00      |
| 07/10/2020         | RLW          | TC WITH J. WAECHTER RE: CHRIS CHAMBLESS       | 0.20       | 64.00         |
| 07/10/2020         | RLW          | INVESTIGATE CHRIS CHAMBLESS TRANSACTIONS      | 0.30       | 96.00         |
| 07/15/2020         | RLW          | INVESTIGATE NET WINNER ALTERNATIVE ADDRESSES  | 0.20       | 64.00         |
| 07/16/2020         | RLW          | TC WITH MAYA LOCKWOOD RE: NEW HORIZON         | 0.40       | 128.00        |
| 07/24/2020         | RLW          | INVESTIGATE POTENTIAL NET WINNER TRANSACTIONS | 0.50       | 160.00        |
| 07/27/2020         | RLW          | INVESTIGATE INVESTOR TRANSACTIONS             | 0.20       | 64.00         |
| 07/28/2020         | RLW          | REVIEW INVESTOR PROOF OF CLAIMS               | 1.00       | 320.00        |
| 07/29/2020         | RLW          | INVESTIGATE CLAIMANT TRANSACTIONS             | 0.30       | 96.00         |
| 07/30/2020         | RLW          | INVESTIGATE NET WINNERS                       | 0.20       | 64.00         |

2,688.00

2,688.00

## EXPENSES

|            |     |                       |  |      |
|------------|-----|-----------------------|--|------|
| 07/31/2020 | EXP | SHAREFILE - JULY 2020 |  | 4.74 |
|------------|-----|-----------------------|--|------|

4.74

4.74

Agreed 15% Discount

(403.20)

Total amount of this invoice

\$2,289.54

# Kapila Mukamal

CPAs, Forensic and Insolvency Advisors

EIN #46-5394135

**CFTC V. OASIS INTERNATIONAL GROUP, LIMITED, ET AL**

**Client ID: 90141**

**Invoice #6996 - 08/31/20**

## TIME SUMMARY BY STAFF

| <u>Staff</u>                             | <u>Hours</u>                     | <u>Rate</u>     | <u>Amount</u> |
|--|----------------------------------|-----------------|---------------|
| RLW - RACHEL WEISS - CONSULTANT CPA, CFE | 0.60                             | 320.00          | 192.00        |
| TOTAL                                    | 0.60                             |                 | \$192.00      |
|  | <b>BLENDED RATE</b>              | <b>\$320.00</b> |               |
|  | <b>15% DISCOUNT</b>              |                 | (28.80)       |
|  | <b>TOTAL EXPENSES</b>            |                 | 4.71          |
| TOTAL AMOUNT OF THIS INVOICE             |                                  |                 | \$167.91      |
|  | <b>ADJUSTED<br/>BLENDED RATE</b> | <b>\$272.00</b> |               |



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EIN #46-5394135

CFTC V. OASIS INTERNATIONAL GROUP, LIMITED, ET AL

C/O BURTON W. WIAND, RECEIVER

VIA EMAIL ONLY:

BWIAND@WIANDLAW.COM;

JRIZZO@WIADLAW.COM

Invoice: 6996

08/31/2020

Client ID: 90141

For Professional Services Rendered Through August 31, 2020

| <u>DATE</u>                  | <u>STAFF</u> | <u>DESCRIPTION</u>                          | <u>HRS</u> | <u>AMOUNT</u> |
|------------------------------|--------------|---|------------|---------------|
| LITIGATION SUPPORT           |              |   |            |               |
| 08/07/2020                   | RLW          | INVESTIGATE NET WINNER TRANSACTIONS         | 0.20       | 64.00         |
| 08/18/2020                   | RLW          | INVESTIGATE CLAIMANT TRANSACTIONS           | 0.10       | 32.00         |
| 08/24/2020                   | RLW          | INVESTIGATE NET WINNER TRANSACTIONS         | 0.10       | 32.00         |
| 08/26/2020                   | RLW          | CONTINUE TO INVESTIGATE NET WINNER ACTIVITY | 0.20       | 64.00         |
|                              |              |   |            | 192.00        |
|                              |              |   |            | 192.00        |
| EXPENSES                     |              |   |            |               |
| 08/31/2020                   | EXP          | SHAREFILE - AUGUST 2020                     |            | 4.71          |
|                              |              |   |            | 4.71          |
|                              |              |   |            | 4.71          |
| Courtesy Discount            |              |   |            | (28.80)       |
| Total amount of this invoice |              |   |            | \$167.91      |

Invoice payable upon receipt. Thank you for this opportunity to be of service.



# Kapila Mukamal

CPAs, Forensic and Insolvency Advisors

EIN #46-5394135

CFTC V. OASIS INTERNATIONAL GROUP, LIMITED, ET AL

Client ID: 90141

Invoice #7088 - 09/30/20

## TIME SUMMARY BY STAFF

| <u>Staff</u>                             | <u>Hours</u>             | <u>Rate</u>     | <u>Amount</u> |
|--|--------------------------|-----------------|---------------|
| RLW - RACHEL WEISS - CONSULTANT CPA, CFE | 4.30                     | 320.00          | 1,376.00      |
| TOTAL                                    | 4.30                     |                 | \$1,376.00    |
| <b>BLENDED RATE</b>                      |                          | <b>\$320.00</b> |               |
| AGREED 15% DISCOUNT                      |                          |                 | (206.40)      |
| TOTAL EXPENSES                           |                          |                 | 5.24          |
| TOTAL AMOUNT OF THIS INVOICE             |                          |                 | \$1,174.84    |
|  | ADJUSTED<br>BLENDED RATE | \$272.00        |               |



**Kapila Mukamal**

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EIN #46-5394135

CFTC V. OASIS INTERNATIONAL GROUP, LIMITED, ET AL

C/O BURTON W. WIAND, RECEIVER

VIA EMAIL ONLY:

BWIAND@WIANDLAW.COM;

JRIZZO@WIADLAW.COM

Invoice: 7088

09/30/2020

Client ID: 90141

For Professional Services Rendered Through September 30, 2020

| <u>DATE</u>                  | <u>STAFF</u> | <u>DESCRIPTION</u>   | <u>HRS</u> | <u>AMOUNT</u> |
|------------------------------|--------------|--|------------|---------------|
| LITIGATION SUPPORT           |              |  |            |               |
| 09/01/2020                   | RLW          | INVESTIGATE NET WINNER TRANSACTIONS                            | 0.10       | 32.00         |
| 09/01/2020                   | RLW          | INVESTIGATE CLAIMANT TRANSACTIONS                              | 0.20       | 64.00         |
| 09/02/2020                   | RLW          | INVESTIGATE CLAIMANT TRANSACTIONS                              | 0.70       | 224.00        |
| 09/04/2020                   | RLW          | REVIEW INVESTOR ACTIVITY WITHIN MAINSTREAM OPERATING ACCOUNTS  | 0.30       | 96.00         |
| 09/16/2020                   | RLW          | INVESTIGATE PRODUCTIONS FOR INVESTOR BALANCES AS OF APRIL 2019 | 0.30       | 96.00         |
| 09/22/2020                   | RLW          | INVESTIGATE CLAIMANT TRANSACTIONS                              | 1.10       | 352.00        |
| 09/24/2020                   | RLW          | INVESTIGATE CLAIMANT TRANSACTIONS                              | 0.40       | 128.00        |
| 09/25/2020                   | RLW          | INVESTIGATE CLAIMANT TRANSACTIONS                              | 0.70       | 224.00        |
| 09/30/2020                   | RLW          | INVESTIGATE CLAIMANT AND NET WINNER TRANSACTIONS               | 0.50       | 160.00        |
|                              |              |  |            | 1,376.00      |
|                              |              |  |            | 1,376.00      |
| EXPENSES                     |              |  |            |               |
| 09/30/2020                   | EXP          | SHAREFILE - SEPTEMBER 2020                                     |            | 4.64          |
| 09/30/2020                   | EXP          | PRINTED COPIES - SEPTEMBER 2020 (09/01/20-09/30/20)            |            | 0.60          |
|                              |              |  |            | 5.24          |
|                              |              |  |            | 5.24          |
| Agreed 15% Discount          |              |  |            | (206.40)      |
| Total amount of this invoice |              |  |            | \$1,174.84    |

Invoice payable upon receipt. Thank you for this opportunity to be of service.

# **EXHIBIT 13**



4023 Tampa Road, Suite 2000  
Oldsmar, FL 34677  
Phone (727) 785-4447 Fax (727) 784-5491  
[www.pdr-cpa.com](http://www.pdr-cpa.com)

BURTON W. WIAND AS RECEIVER, OASIS MANAGEMENT  
July 1 - July 31, 2020

| Date  | Activity Category   | Timekeeper | Description   | Hours        | Rate      | Amount             |
|---|---|------------|---|--------------|-----------|--------------------|
| 7/1/2020  | Accounting & Auditing   | SAO        | Reconciled MM Bank Statement  | 0.30         | \$ 130.00 | \$ 39.00           |
| 7/1/2020  | Accounting & Auditing   | SAO        | Recorded Bank Activity  | 0.30         | \$ 130.00 | \$ 39.00           |
| 7/1/2020  | Accounting & Auditing   | SAO        | Prepared Court Reports  | 1.50         | \$ 130.00 | \$ 195.00          |
| 7/1/2020  | Accounting & Auditing   | SAO        | Updated Accounting Records  | 0.30         | \$ 130.00 | \$ 39.00           |
| 7/2/2020  | Accounting & Auditing   | SAO        | Updated Court Reports   | 1.25         | \$ 130.00 | \$ 162.50          |
| 7/2/2020  | Accounting & Auditing   | GAH        | Reviewed from Inception Report and 2nd Quarter Report through June 2020 | 0.95         | \$ 155.00 | \$ 147.25          |
| 7/2/2020  | Accounting & Auditing   | GAH        | Discussed Court Reports with SAO  | 0.30         | \$ 155.00 | \$ 46.50           |
| 7/2/2020  | Accounting & Auditing   | SAO        | Discussed Court Reports with GAH  | 0.30         | \$ 130.00 | \$ 39.00           |
| 7/6/2020  | Accounting & Auditing   | SAO        | Recorded Bank Activity  | 0.30         | \$ 130.00 | \$ 39.00           |
| 7/6/2020  | Accounting & Auditing   | SAO        | Updated Accounting Records  | 0.20         | \$ 130.00 | \$ 26.00           |
| 7/6/2020  | Accounting & Auditing   | SAO        | Recorded Deposits   | 0.30         | \$ 130.00 | \$ 39.00           |
| 7/8/2020  | Accounting & Auditing   | SAO        | Recorded Deposits   | 0.30         | \$ 130.00 | \$ 39.00           |
| 7/8/2020  | Accounting & Auditing   | SAO        | Prepared Report of Varden #106 Expenses for Attorney                    | 0.30         | \$ 130.00 | \$ 39.00           |
| 7/8/2020  | Accounting & Auditing   | SAO        | Updated Accounting Records  | 0.30         | \$ 130.00 | \$ 39.00           |
| 7/8/2020  | Accounting & Auditing   | SAO        | Reviewed Reports  | 0.30         | \$ 130.00 | \$ 39.00           |
| 7/8/2020  | Accounting & Auditing   | SAO        | Updated Reports   | 0.30         | \$ 130.00 | \$ 39.00           |
| 7/9/2020  | Accounting & Auditing   | SAO        | Recorded Deposits   | 0.30         | \$ 130.00 | \$ 39.00           |
| 7/13/2020   | Accounting & Auditing   | SAO        | Recorded Bank Activity  | 0.60         | \$ 130.00 | \$ 78.00           |
| 7/13/2020   | Accounting & Auditing   | SAO        | Updated Accounting Records  | 0.20         | \$ 130.00 | \$ 26.00           |
| 7/14/2020   | Accounting & Auditing   | SAO        | Recorded Bank Activity  | 0.30         | \$ 130.00 | \$ 39.00           |
| 7/14/2020   | Accounting & Auditing   | SAO        | Prepared Request for Ordering Checks                                    | 0.30         | \$ 130.00 | \$ 39.00           |
| 7/15/2020   | Accounting & Auditing   | SAO        | Updated Accounting Records  | 0.30         | \$ 130.00 | \$ 39.00           |
| 7/15/2020   | Accounting & Auditing   | SAO        | Recorded Bank Activity  | 0.50         | \$ 130.00 | \$ 65.00           |
| 7/16/2020   | Accounting & Auditing   | SAO        | Recorded Bank Activity  | 0.30         | \$ 130.00 | \$ 39.00           |
| 7/20/2020   | Accounting & Auditing   | SAO        | Recorded Bank Activity  | 0.20         | \$ 130.00 | \$ 26.00           |
| 7/20/2020   | Accounting & Auditing   | SAO        | Updated Accounting Records  | 0.80         | \$ 130.00 | \$ 104.00          |
| 7/21/2020   | Accounting & Auditing   | SAO        | Prepared Report of All Lost Key Expenses for Attorney                   | 0.40         | \$ 130.00 | \$ 52.00           |
| 7/22/2020   | Accounting & Auditing   | SAO        | Updated Accounting Records  | 0.30         | \$ 130.00 | \$ 39.00           |
| 7/24/2020   | Accounting & Auditing   | SAO        | Recorded Bank Activity  | 0.30         | \$ 130.00 | \$ 39.00           |
| 7/24/2020   | Accounting & Auditing   | SAO        | Updated Accounting Records  | 0.20         | \$ 130.00 | \$ 26.00           |
| 7/24/2020   | Accounting & Auditing   | SAO        | Recorded Bank Activity  | 0.30         | \$ 130.00 | \$ 39.00           |
| 7/28/2020   | Accounting & Auditing   | GAH        | Reviewed Detail Report on Asset Liquidation                             | 0.25         | \$ 155.00 | \$ 38.75           |
| 7/30/2020   | Accounting & Auditing   | DRH        | Updated Inception Through June Report                                   | 0.25         | \$ 130.00 | \$ 32.50           |
|   | <b>Total Accounting &amp; Auditing</b>                            |            |   | <b>13.30</b> |           | <b>\$ 1,766.50</b> |
| 7/21/2020   | Consulting  | WEP        | Reviewed Changes to Fund Accounting Report                              | 1.25         | \$ 320.00 | \$ 400.00          |
|   | <b>Total Consulting</b>   |            |   | <b>1.25</b>  |           | <b>\$ 400.00</b>   |
| 7/1/2020  | Tax Services - 1120-SF - Return for Settlement Funds              | LH         | Prepared Florida Extensions   | 0.50         | \$ 130.00 | \$ 65.00           |
|   | <b>Total Tax Services - 1120-SF - Return for Settlement Funds</b> |            |   | <b>0.50</b>  |           | <b>\$ 65.00</b>    |
| <b>Total Burton Wiand as Receiver, Oasis Management</b> |   |            |   | <b>15.05</b> |           | <b>\$ 2,231.50</b> |



4023 Tampa Road, Suite 2000  
 Oldsmar, FL 34677  
 Phone (727) 785-4447 Fax (727) 784-5491  
[www.pdr-cpa.com](http://www.pdr-cpa.com)

**OASIS MANAGEMENT**  
**August 1 - August 31, 2020**

| Date      | Activity Category                      | Timekeeper | Description   | Hours        | Rate      | Amount             |
|-----------|--|------------|---|--------------|-----------|--------------------|
| 8/2/2020  | Accounting & Auditing                  | SAO        | Recorded Bank Account Activity                                    | 0.20         | \$ 130.00 | \$ 26.00           |
| 8/2/2020  | Accounting & Auditing                  | SAO        | Updated Accounting Records  | 0.30         | \$ 130.00 | \$ 39.00           |
| 8/3/2020  | Accounting & Auditing                  | SAO        | Recorded Bank Account Activity                                    | 0.20         | \$ 130.00 | \$ 26.00           |
| 8/3/2020  | Accounting & Auditing                  | SAO        | Updated Accounting Records  | 0.50         | \$ 130.00 | \$ 65.00           |
| 8/4/2020  | Accounting & Auditing                  | SAO        | Recorded Bank Account Activity                                    | 0.80         | \$ 130.00 | \$ 104.00          |
| 8/4/2020  | Accounting & Auditing                  | SAO        | Updated Accounting Records  | 0.50         | \$ 130.00 | \$ 65.00           |
| 8/4/2020  | Accounting & Auditing                  | SAO        | Reconciled MM Bank Statement                                      | 0.30         | \$ 130.00 | \$ 39.00           |
| 8/4/2020  | Accounting & Auditing                  | SAO        | Reconciled Checking Account Bank Statement                        | 0.30         | \$ 130.00 | \$ 39.00           |
| 8/5/2020  | Accounting & Auditing                  | SAO        | Called QuickBooks Regarding Check Order Not Received              | 0.30         | \$ 130.00 | \$ 39.00           |
| 8/5/2020  | Accounting & Auditing                  | SAO        | Updated Accounting Records  | 0.20         | \$ 130.00 | \$ 26.00           |
| 8/5/2020  | Accounting & Auditing                  | SAO        | Prepared Report of Founders Club Vacant Lot Expenses for Attorney | 0.20         | \$ 130.00 | \$ 26.00           |
| 8/5/2020  | Accounting & Auditing                  | SAO        | Recorded Bank Account Activity                                    | 0.20         | \$ 130.00 | \$ 26.00           |
| 8/10/2020 | Accounting & Auditing                  | SAO        | Recorded Bank Account Activity                                    | 0.30         | \$ 130.00 | \$ 39.00           |
| 8/10/2020 | Accounting & Auditing                  | SAO        | Updated Accounting Records  | 0.20         | \$ 130.00 | \$ 26.00           |
| 8/11/2020 | Accounting & Auditing                  | SAO        | Updated Accounting Records  | 0.20         | \$ 130.00 | \$ 26.00           |
| 8/12/2020 | Accounting & Auditing                  | SAO        | Recorded Bank Account Activity                                    | 0.30         | \$ 130.00 | \$ 39.00           |
| 8/12/2020 | Accounting & Auditing                  | SAO        | Updated Accounting Records  | 0.30         | \$ 130.00 | \$ 39.00           |
| 8/12/2020 | Accounting & Auditing                  | GAH        | Updated Accounting Records  | 0.30         | \$ 155.00 | \$ 46.50           |
| 8/13/2020 | Accounting & Auditing                  | SAO        | Updated Accounting Records  | 1.00         | \$ 130.00 | \$ 130.00          |
| 8/13/2020 | Accounting & Auditing                  | SAO        | Recorded Bank Account Activity                                    | 0.60         | \$ 130.00 | \$ 78.00           |
| 8/14/2020 | Accounting & Auditing                  | SAO        | Updated Accounting Records  | 0.20         | \$ 130.00 | \$ 26.00           |
| 8/17/2020 | Accounting & Auditing                  | SAO        | Recorded Bank Account Activity                                    | 0.30         | \$ 130.00 | \$ 39.00           |
| 8/19/2020 | Accounting & Auditing                  | SAO        | Recorded Bank Deposits  | 0.30         | \$ 130.00 | \$ 39.00           |
| 8/19/2020 | Accounting & Auditing                  | SAO        | Recorded Bank Account Activity                                    | 0.30         | \$ 130.00 | \$ 39.00           |
| 8/21/2020 | Accounting & Auditing                  | SAO        | Recorded Bank Account Activity                                    | 0.30         | \$ 130.00 | \$ 39.00           |
| 8/21/2020 | Accounting & Auditing                  | SAO        | Reviewed Documents Received from Attorney                         | 0.30         | \$ 130.00 | \$ 39.00           |
| 8/24/2020 | Accounting & Auditing                  | SAO        | Prepared Reports of Property Expenses for Attorney                | 0.70         | \$ 130.00 | \$ 91.00           |
| 8/24/2020 | Accounting & Auditing                  | SAO        | Recorded Bank Account Activity                                    | 0.20         | \$ 130.00 | \$ 26.00           |
| 8/24/2020 | Accounting & Auditing                  | SAO        | Reviewed Accounting Records                                       | 0.20         | \$ 130.00 | \$ 26.00           |
| 8/25/2020 | Accounting & Auditing                  | SAO        | Updated Property Expenses Spreadsheet                             | 0.60         | \$ 130.00 | \$ 78.00           |
| 8/25/2020 | Accounting & Auditing                  | SAO        | Prepared Reports of Property Expenses for Attorney                | 1.30         | \$ 130.00 | \$ 169.00          |
| 8/26/2020 | Accounting & Auditing                  | SAO        | Recorded Bank Deposits  | 0.30         | \$ 130.00 | \$ 39.00           |
| 8/26/2020 | Accounting & Auditing                  | SAO        | Updated Property Expense Reports for Attorney                     | 0.30         | \$ 130.00 | \$ 39.00           |
| 8/27/2020 | Accounting & Auditing                  | SAO        | Reviewed Documents Received from Attorney                         | 0.30         | \$ 130.00 | \$ 39.00           |
| 8/28/2020 | Accounting & Auditing                  | SAO        | Reviewed Bank Account Activity                                    | 0.30         | \$ 130.00 | \$ 39.00           |
| 8/31/2020 | Accounting & Auditing                  | SAO        | Updated Accounting Records  | 0.20         | \$ 130.00 | \$ 26.00           |
| 8/31/2020 | Accounting & Auditing                  | SAO        | Recorded Bank Account Activity                                    | 0.30         | \$ 130.00 | \$ 39.00           |
|           | <b>Total Accounting &amp; Auditing</b> |            |   | <b>13.60</b> |           | <b>\$ 1,775.50</b> |
| 8/24/2020 | Consulting                             | WEP        | Followed Up on Asset Sale and Forecast for Receiver               | 1.00         | \$ 320.00 | \$ 320.00          |
| 8/25/2020 | Consulting                             | GAH        | Updated QuickBooks Accounting Reports for Attorney                | 0.40         | \$ 155.00 | \$ 62.00           |
| 8/27/2020 | Consulting                             | WEP        | Responded to Tax Questions Regarding Sale of Property             | 0.75         | \$ 320.00 | \$ 240.00          |
|           | <b>Total Consulting</b>                |            |   | <b>2.15</b>  |           | <b>\$ 622.00</b>   |

**Total Burton Wiand as Receiver, Oasis Management**

**15.75**

**\$ 2,397.50**



4023 Tampa Road, Suite 2000  
Oldsmar, FL 34677  
Phone (727) 785-4447 Fax (727) 784-5491  
[www.pdr-cpa.com](http://www.pdr-cpa.com)

**OASIS MANAGEMENT**  
**September 1, 2020 - September 30, 2020**

| Date      | Activity Category                      | Timekeeper | Description   | Hours        | Rate      | Amount             |
|-----------|--|------------|---|--------------|-----------|--------------------|
| 9/2/2020  | Accounting & Auditing                  | SAO        | Recorded Bank Activity  | 0.30         | \$ 130.00 | \$ 39.00           |
| 9/2/2020  | Accounting & Auditing                  | SAO        | Reconciled Bank Statement MM                                    | 0.30         | \$ 130.00 | \$ 39.00           |
| 9/2/2020  | Accounting & Auditing                  | SAO        | Updated Accounting Records                                      | 0.30         | \$ 130.00 | \$ 39.00           |
| 9/2/2020  | Accounting & Auditing                  | SAO        | Reconciled Checking Account Bank Statement                      | 0.30         | \$ 130.00 | \$ 39.00           |
| 9/2/2020  | Accounting & Auditing                  | SAO        | Prepared Report of Vardon #106 Expenses for Attorney            | 0.30         | \$ 130.00 | \$ 39.00           |
| 9/2/2020  | Accounting & Auditing                  | SAO        | Reviewed Documents Received from Attorney                       | 0.30         | \$ 130.00 | \$ 39.00           |
| 9/3/2020  | Accounting & Auditing                  | SAO        | Recorded Bank Deposits  | 0.30         | \$ 130.00 | \$ 39.00           |
| 9/8/2020  | Accounting & Auditing                  | SAO        | Recorded Bank Activity  | 0.30         | \$ 130.00 | \$ 39.00           |
| 9/8/2020  | Accounting & Auditing                  | SAO        | Reviewed Bank Activity  | 0.20         | \$ 130.00 | \$ 26.00           |
| 9/8/2020  | Accounting & Auditing                  | PDR CPAs   | Out-of-Pocket Expense: Sent Checks to Roger via Federal Express | -            | -         | \$ 14.21           |
| 9/8/2020  | Accounting & Auditing                  | SAO        | Updated Accounting Records                                      | 0.30         | \$ 130.00 | \$ 39.00           |
| 9/8/2020  | Accounting & Auditing                  | SAO        | Updated Accounting Information                                  | 0.20         | \$ 130.00 | \$ 26.00           |
| 9/9/2020  | Accounting & Auditing                  | SAO        | Recorded Bank Deposits  | 0.30         | \$ 130.00 | \$ 39.00           |
| 9/9/2020  | Accounting & Auditing                  | SAO        | Updated Accounting Records                                      | 0.30         | \$ 130.00 | \$ 39.00           |
| 9/10/2020 | Accounting & Auditing                  | SAO        | Recorded Bank Activity  | 0.30         | \$ 130.00 | \$ 39.00           |
| 9/14/2020 | Accounting & Auditing                  | SAO        | Recorded Bank Activity  | 0.80         | \$ 130.00 | \$ 104.00          |
| 9/14/2020 | Accounting & Auditing                  | SAO        | Updated Accounting Records                                      | 0.30         | \$ 130.00 | \$ 39.00           |
| 9/14/2020 | Accounting & Auditing                  | SAO        | Updated QuickBooks  | 0.20         | \$ 130.00 | \$ 26.00           |
| 9/15/2020 | Accounting & Auditing                  | SAO        | Updated Accounting Records                                      | 0.30         | \$ 130.00 | \$ 39.00           |
| 9/15/2020 | Accounting & Auditing                  | SAO        | Recorded Bank Activity  | 0.30         | \$ 130.00 | \$ 39.00           |
| 9/16/2020 | Accounting & Auditing                  | SAO        | Recorded Bank Activity  | 0.30         | \$ 130.00 | \$ 39.00           |
| 9/16/2020 | Accounting & Auditing                  | SAO        | Reviewed QuickBooks Reports                                     | 0.30         | \$ 130.00 | \$ 39.00           |
| 9/21/2020 | Accounting & Auditing                  | SAO        | Recorded Bank Activity  | 0.30         | \$ 130.00 | \$ 39.00           |
| 9/22/2020 | Accounting & Auditing                  | SAO        | Recorded Bank Activity  | 0.20         | \$ 130.00 | \$ 26.00           |
| 9/22/2020 | Accounting & Auditing                  | SAO        | Updated Accounting Records                                      | 0.20         | \$ 130.00 | \$ 26.00           |
| 9/24/2020 | Accounting & Auditing                  | SAO        | Updated Accounting Records                                      | 0.30         | \$ 130.00 | \$ 39.00           |
| 9/24/2020 | Accounting & Auditing                  | SAO        | Recorded Bank Activity  | 0.30         | \$ 130.00 | \$ 39.00           |
| 9/26/2020 | Accounting & Auditing                  | SAO        | Recorded Bank Activity  | 0.30         | \$ 130.00 | \$ 39.00           |
| 9/26/2020 | Accounting & Auditing                  | SAO        | Updated Accounting Records                                      | 0.30         | \$ 130.00 | \$ 39.00           |
| 9/28/2020 | Accounting & Auditing                  | SAO        | Updated Accounting Records                                      | 0.25         | \$ 130.00 | \$ 32.50           |
| 9/29/2020 | Accounting & Auditing                  | SAO        | Updated Accounting Records                                      | 0.30         | \$ 130.00 | \$ 39.00           |
| 9/29/2020 | Accounting & Auditing                  | SAO        | Recorded Bank Activity  | 0.30         | \$ 130.00 | \$ 39.00           |
| 9/30/2020 | Accounting & Auditing                  | SAO        | Recorded Bank Activity  | 0.30         | \$ 130.00 | \$ 39.00           |
| 9/30/2020 | Accounting & Auditing                  | SAO        | Reviewed and Updated Accounting Records                         | 1.25         | \$ 130.00 | \$ 162.50          |
|           | <b>Total Accounting &amp; Auditing</b> |            |   | <b>10.80</b> |           | <b>\$ 1,418.21</b> |
| 9/21/2020 | Tax Issues                             | LH         | Prepared 12-31-19 Form 1120-SF & F-1120                         | 1.25         | \$ 130.00 | \$ 162.50          |
| 9/22/2020 | Tax Issues                             | LH         | Prepared 12-31-19 Form 1120-SF & F-1120                         | 1.00         | \$ 130.00 | \$ 130.00          |
| 9/23/2020 | Tax Issues                             | LH         | Prepared 12-31-19 Form 1120-SF & F-1120                         | 1.25         | \$ 130.00 | \$ 162.50          |
| 9/23/2020 | Tax Issues                             | WEP        | Reviewed 12-31-19 Form 1120-SF                                  | 2.50         | \$ 320.00 | \$ 800.00          |
| 9/29/2020 | Tax Issues                             | WEP        | Reviewed & Wrapped Up 12-31-19 Form 1120-SF                     | 1.35         | \$ 320.00 | \$ 432.00          |
| 9/29/2020 | Tax Issues                             | WEP        | Reviewed 12-31-19 F-1120  | 0.15         | \$ 320.00 | \$ 48.00           |
|           | <b>Total Tax Issues</b>                |            |   | <b>7.50</b>  |           | <b>\$ 1,735.00</b> |

**Total Burton Wiand as Receiver, Oasis Management**

**18.30**

**\$ 3,153.21**

# **EXHIBIT 14**



All funds payable to:

**E-Hounds, Inc.**

32815 US 19 North Suite 100

Palm Harbor, Florida 34684

www.ehounds.com (727) 726-8985

**Invoice for Services**

| Open Date  | Close Date | Invoice # | Balance Due      | Case Reference (E9295) | Terms          |
|------------|------------|-----------|------------------|------------------------|----------------|
| 07/01/2020 | 07/31/2020 | 83278     | <b>\$1777.50</b> | CFTC v. Oasis, et al.  | Due on Receipt |

**Invoice to:**

Wiand Guerra King  
5505 W. Gray Street  
Tampa, FL 33609

**Case Contact:**

Wiand, Guerra King  
Jeff Rizzo  
813-347-5100

| Q   | Date       | Expedited | All quantities are based Hourly unless otherwise noted             | Tech | Price    | Ext       |
|-----|------------|-----------|--|------|----------|-----------|
| 3   | 07/01/2020 |           | E-Hounds Review® Platform (incl 6 user seat) Courtesy Rate Monthly |      | \$495.00 | \$1485.00 |
| 1.5 | 07/21/2020 |           | Technician Hours Password Recover PDF per B Wiand                  | RTR  | \$195.00 | \$292.50  |

If you would prefer to apply the balance of your retainer to this statement, please pay the difference. Requesting additional services may result in our request for additional retainer.

SUBTOTAL **\$1777.50****Payments Applied**TOTAL **\$1777.50****Balance Due** **\$1777.50**Retainer Amount Remaining **\$0.01****Please note: Our fees are subject to change annually. Last change: 1/2/2018****Statement of Limited Liability and Financial Responsibility**

E-Hounds, Inc. shall not be liable under any circumstances for any special, consequential, or exemplary damages arising from the use or misuse of data or equipment after it has been returned to the client and/or owner(s). E-Hounds shall not be liable for the continued storage of recovered data for more than 30 days unless otherwise specified in writing by the client. Any problems with recovered data must be reported to E-Hounds within 5 business days of receipt. Property and/or equipment held for legal matters is held for 1 Year at the client's request or upon case closure. Additional storage fees may apply to extended storage/maintenance. ABSOLUTELY NO REFUNDS. This invoice is made under the fee agreement signed on behalf of the above listed client. As stated in the Fee Agreement for E-Hound's services, Final billing must be satisfied before the final release of equipment or findings/reporting. All billing is DUE ON RECEIPT, unless stated otherwise above. All unpaid balances over 30 days will be subject to a 1.5% fee per month. Any unpaid balances over 60 days will be subject to equipment liquidation, collection process and reasonable attorney's fees incurred in collection. Services by E-Hounds is rendered on behalf of the agency, agent, or party contracting for the services, and payment for such services is the sole liability and responsibility of that agency, agent, or party, and is not transferrable or assignable.

E-Hounds also accepts:





**E-Hounds, Inc.**

32815 US 19 North Suite 100

Palm Harbor, Florida 34684

www.ehounds.com (727) 726-8985

**Invoice for Services**

| Open Date  | Close Date | Invoice # | Balance Due      | Case Reference (E9295) | Terms          |
|------------|------------|-----------|------------------|------------------------|----------------|
| 08/01/2020 | 08/31/2020 | 84851     | <b>\$1485.00</b> | CFTC v. Oasis, et al.  | Due on Receipt |

**Invoice to:**

Wiand Guerra King  
5505 W. Gray Street  
Tampa, FL 33609

**Case Contact:**

Wiand, Guerra King  
Jeff Rizzo  
813-347-5100

| Q | Date       | Expedited | All quantities are based Hourly unless otherwise noted             | Tech | Price    | Ext       |
|---|------------|-----------|--|------|----------|-----------|
| 3 | 08/01/2020 |           | E-Hounds Review® Platform (incl 6 user seat) Courtesy Rate Monthly |      | \$495.00 | \$1485.00 |

If you would prefer to apply the balance of your retainer to this statement, please pay the difference. Requesting additional services may result in our request for additional retainer.

SUBTOTAL

**\$1485.00****Payments Applied**

TOTAL

**\$1485.00****Balance Due****\$1485.00**

Retainer Amount Remaining

**\$0.01**

**Please note: Our fees are subject to change annually. Last change: 1/2/2018**

**Statement of Limited Liability and Financial Responsibility**

E-Hounds, Inc. shall not be liable under any circumstances for any special, consequential, or exemplary damages arising from the use or misuse of data or equipment after it has been returned to the client and/or owner(s). E-Hounds shall not be liable for the continued storage of recovered data for more than 30 days unless otherwise specified in writing by the client. Any problems with recovered data must be reported to E-Hounds within 5 business days of receipt. Property and/or equipment held for legal matters is held for 1 Year at the client's request or upon case closure. Additional storage fees may apply to extended storage/maintenance. **ABSOLUTELY NO REFUNDS.** This invoice is made under the fee agreement signed on behalf of the above listed client. As stated in the Fee Agreement for E-Hound's services, Final billing must be satisfied before the final release of equipment or findings/reporting. All billing is DUE ON RECEIPT, unless stated otherwise above. All unpaid balances over 30 days will be subject to a 1.5% fee per month. Any unpaid balances over 60 days will be subject to equipment liquidation, collection process and reasonable attorney's fees incurred in collection. Services by E-Hounds is rendered on behalf of the agency, agent, or party contracting for the services, and payment for such services is the sole liability and responsibility of that agency, agent, or party, and is not transferrable or assignable.

E-Hounds also accepts:





All funds payable to:

**E-Hounds, Inc.**

32815 US 19 North Suite 100

Palm Harbor, Florida 34684

www.ehounds.com (727) 726-8985

**Invoice for Services**

| Open Date  | Close Date | Invoice # | Balance Due      | Case Reference (E9295) | Terms          |
|------------|------------|-----------|------------------|------------------------|----------------|
| 09/01/2020 | 09/30/2020 | 85621     | <b>\$1485.00</b> | CFTC v. Oasis, et al.  | Due on Receipt |

**Invoice to:**

Wiand Guerra King  
5505 W. Gray Street  
Tampa, FL 33609

**Case Contact:**

Wiand, Guerra King  
Jeff Rizzo  
813-347-5100

| Q | Date       | Expedited | All quantities are based Hourly unless otherwise noted             | Tech | Price    | Ext       |
|---|------------|-----------|--|------|----------|-----------|
| 3 | 09/01/2020 |           | E-Hounds Review® Platform (incl 6 user seat) Courtesy Rate Monthly |      | \$495.00 | \$1485.00 |

If you would prefer to apply the balance of your retainer to this statement, please pay the difference. Requesting additional services may result in our request for additional retainer.

SUBTOTAL **\$1485.00**

**Payments Applied**

TOTAL **\$1485.00**

**Balance Due** **\$1485.00**

Retainer Amount Remaining **\$0.01**

**Please note: Our fees are subject to change annually. Last change: 1/2/2018**

**Statement of Limited Liability and Financial Responsibility**

E-Hounds, Inc. shall not be liable under any circumstances for any special, consequential, or exemplary damages arising from the use or misuse of data or equipment after it has been returned to the client and/or owner(s). E-Hounds shall not be liable for the continued storage of recovered data for more than 30 days unless otherwise specified in writing by the client. Any problems with recovered data must be reported to E-Hounds within 5 business days of receipt. Property and/or equipment held for legal matters is held for 1 Year at the client's request or upon case closure. Additional storage fees may apply to extended storage/maintenance. **ABSOLUTELY NO REFUNDS.** This invoice is made under the fee agreement signed on behalf of the above listed client. As stated in the Fee Agreement for E-Hound's services, Final billing must be satisfied before the final release of equipment or findings/reporting. All billing is DUE ON RECEIPT, unless stated otherwise above. All unpaid balances over 30 days will be subject to a 1.5% fee per month. Any unpaid balances over 60 days will be subject to equipment liquidation, collection process and reasonable attorney's fees incurred in collection. Services by E-Hounds is rendered on behalf of the agency, agent, or party contracting for the services, and payment for such services is the sole liability and responsibility of that agency, agent, or party, and is not transferrable or assignable.

E-Hounds also accepts:



# **EXHIBIT 15**

**The RWJ Group, LLC**  
 1181 S. Sumter Blvd.  
 Suite 312  
 North Port, FL 34287

# INVOICE

**Wiand Guerra King**  
 5505 West Gray Street  
 Tampa, FL 33609

## Invoice 20273

|                     |              |
|---------------------|--------------|
| <b>Date</b>         | Jul 31, 2020 |
| <b>Terms</b>        |              |
| <b>Service Thru</b> | Jul 31, 2020 |

### In Reference To: Oasis (Time)

| <b>Date</b> | <b>Services</b>   | <b>Hours</b> |
|-------------|---|--------------|
| 07/01/2020  | Numerous communications throughout the day regarding offer and questions about the Lost Key Place house (1.3). Several communications from Crystal Sands regarding maintenance issues at 6300 Midnight Pass Road. Researched replacement appliances. Communications with the tenant regarding the issues. Purchased temporary oven for same (2.5).  | 3.80         |
| 07/02/2020  | Delivered and installed the countertop oven. Received and returned the broken Frontier cable box to the Frontier store (2.0).   | 2.00         |
| 07/03/2020  | Received, reviewed, approved and prepared checks for the Oasis invoices. Prepared correspondence to Mr. Wiand, PDR Accounting, Mr. Rizzo and Mr. Perez regarding same (1.0).  | 1.00         |
| 07/04/2020  | Received and reviewed correspondence from the HOA for 7312 Desert Ridge Glen (.2).  | 0.20         |
| 07/05/2020  | Monthly inspection of the Vardon Terrace condominiums, Desert Ridge Glen, Lost Key Place, LaCantera Circle, Founders Club Drive and the Midnight Pass Road condominium (4.0). Inventory items and review records in the Fruitville storage unit (2.0).  | 6.00         |
| 07/06/2020  | Several communications with the HOA relating to the water damage at the Vardon condo. Communications with the contractor and the realtor regarding same. Visited the condo to evaluate the damage (2.5).  | 2.50         |
| 07/09/2020  | Research and ordered an oven and freezer for 6300 Midnight Pass Road. Communications with the property manager regarding the delivery. Communications with installers regarding same (2.5). Communications with Mrs. Sullivan regarding a task list of items that need to be completed prior to the inspection of 13318 Lost Key Place. Communications with TECO regarding setting up a new account to have the gas turned on for the inspection (1.25) | 3.75         |
| 07/13/2020  | Received, reviewed, approved and prepared checks for the Oasis invoices. Prepared correspondence to Mr. Wiand, PDR Accounting, Mr. Rizzo and Mr. Perez regarding same (1.0).  | 1.00         |
| 07/14/2020  | Met with the inspectors and TECO gas company while they did the inspections. Met with a contractor regarding repairs (4.5).   | 4.50         |
| 07/15/2020  | Met with Mr. Wiand regarding invoices and offers on properties. Reviewed the current check run for Mr. Wiand's approval. Discussed issues with 6300 Midnight Pass Road and the Lost Key Place inspections (1.1).  | 1.10         |
| 07/16/2020  | Researched and purchased additional appliances at Home Depot for 6300 Midnight Pass Road. Several communications with installers and the rental staff at Crystal Sands (2.75). Received and reviewed owners' statements for same. Prepared correspondence to Mr. Wiand and Mr. Rizzo regarding same (.25).  | 3.00         |
| 07/17/2020  | Communications with Founders Club HOA regarding a violation letter. Communications with the handyman regarding same.  | 0.50         |
| 07/19/2020  | Received, reviewed, approved and prepared checks for the Oasis invoices. Prepared correspondence to Mr. Wiand, PDR Accounting, Mr. Rizzo and Mr. Perez regarding same (1.0).  | 1.00         |
| 07/20/2020  | Met with the Founders Club HOA representative at 4064 Founders Club Drive regarding the receivership and the empty lot (.9). Met MidCoast Roofer at 13318 Lost Key Place regarding an active roof leak (2.0).   | 2.90         |

|            |   |      |
|------------|---|------|
| 07/22/2020 | Several communications with Mrs. Sullivan regarding unit 106 on Vardon Terr. and Lost Key Place. (.6). Communications with ICON Management regarding documents that we received for unit 108 on Vardon Terr. Communications with First Communities regarding the sale of unit 106 on Vardon Terr. and the status of the flood repairs (.8). Met Global Air Conditioning at Lost Key Place to evaluate A/C issues (1.7). | 3.10 |
| 07/23/2020 | Communications with Mrs. Sullivan regarding issues with the sale of Lost Key Place (.3). Communications with Tropic Isles Management regarding issues with the leak in unit 106 on Vardon Terr. Inspected the work regarding same (2.4).  | 2.70 |
| 07/27/2020 | Communications with TECO regarding gas issues at Lost Key. Communications with Mrs. Sullivan regarding same. Communications with Mrs. Sullivan regarding the closing of Lost Key and the remaining assets in the house. Communications with local moving companies to obtain quotes for same.   | 1.60 |
| 07/29/2020 | Communications with Crystal Sands regarding issues with unit 1002. Communications with Home Depot regarding a freezer that is being delivered (.8). Communications with Vardon Terrace maintenance regarding the shower ceiling leak (.4).  | 1.20 |
| 07/31/2020 | Communications with Home Depot and Lowes regarding the wrong delivery of the freezer and oven for 6300 Midnight Pass Road. Communications with Crystal Sands Management regarding same (.8). Received, reviewed, approved and prepared checks for the Oasis invoices. Prepared correspondence to Mr. Wiand, PDR Accounting, Mr. Rizzo and Mr. Perez regarding same (1.0).   | 1.80 |

**In Reference To: Oasis (Expenses)**

| <b>Date</b> | <b>Expenses</b>   |                             |             |
|-------------|---|-----------------------------|-------------|
| 07/02/2020  | Mileage to and from 6300 Midnight Pass Road and 1701 Ringling Blvd. 82 miles @ .575 = \$47.15   |                             |             |
| 07/05/2020  | Mileage to Vardon Terr, Desert Ridge Glen, Founders Club, Gulf of Mexico Drive, Midnight Pass and back to the office. 164 miles @ .57.5 = \$94.30 |                             |             |
| 07/06/2020  | Mileage to Vardon Terrace and back to the office. 90 miles @ .57.5 = \$51.75  |                             |             |
| 07/09/2020  | Mileage to Vardon Terr, Desert Ridge Glen, Founders Club, Gulf of Mexico Drive, Midnight Pass and back to the office. 164 miles @ .57.5 = \$94.30 |                             |             |
| 07/14/2020  | Mileage to and from Lost Key Place. 71 miles @ .575 = \$40.83.  |                             |             |
| 07/15/2020  | Mileage to and from WGK office. 188 miles @ .575 = 108.10   |                             |             |
| 07/20/2020  | Mileage to and from Founders Club Drive and Lost Key Place. 73 miles @ .575 = \$41.98.  |                             |             |
| 07/23/2020  | Mileage to Vardon Terrace and back to the office. 90 miles @ .575 = \$51.75   |                             |             |
|             |   | <b>Total Hours</b>          | 43.65 hrs   |
|             |   | <b>Total Time</b>           | \$ 3,273.75 |
|             |   | <b>Total Expenses</b>       | \$ 530.16   |
|             |   | <b>Total Invoice Amount</b> | \$ 3,803.91 |

**User Hours Summary**

**Billing Period: 07/01/2020 - 07/31/2020**

**User Hour Totals**

| <b>User</b>    | <b>Hours Billed</b> | <b>Rate/Hour</b> | <b>Amount Billed</b> |
|----------------|---------------------|------------------|----------------------|
| Roger Jernigan | 43.65               | \$75.00          | \$3,273.75           |

**The RWJ Group, LLC**  
 1181 S. Sumter Blvd.  
 Suite 312  
 North Port, FL 34287

# INVOICE

**Wiand Guerra King**  
 5505 West Gray Street  
 Tampa, FL 33609

## Invoice 20277

|                     |              |
|---------------------|--------------|
| <b>Date</b>         | Aug 31, 2020 |
| <b>Terms</b>        |              |
| <b>Service Thru</b> | Aug 31, 2020 |

### In Reference To: Oasis (Time)

| <b>Date</b> | <b>Services</b>  | <b>Hours</b> |
|-------------|--|--------------|
| 08/01/2020  | Monthly inspection of the Vardon Terrace condominiums, Desert Ridge Glen, Lost Key Place, Founders Club Drive and the Midnight Pass Road condominium (3.75). Received, reviewed, approved and prepared checks for the Oasis invoices. Prepared correspondence to Mr. Wiand, PDR Accounting, Mr. Rizzo and Mr. Perez regarding same (1.0). Communications with Mr. Wiand regarding an offer on the Founders Club Drive lot (.1).        | 4.85         |
| 08/02/2020  | Communications with Mr. Wiand and Mr. Rizzo regarding selecting a moving company to move assets from Lost Key Place to Desert Ridge Glen since Lost Key Place was due to close. Researched moving companies. Set up a company to move items (1.3).   | 1.30         |
| 08/04/2020  | Communications with Mr. Rizzo and PDR Accounting regarding Oasis invoices. Ordered additional Oasis checks (.4). Communications with PDR Accounting regarding the Lost Key Place moving company (.2).  | 0.60         |
| 08/05/2020  | Communications with Mr. MacGranor regarding maintenance concerns and set up the repairs at Desert Ridge Glen (.4). Communications with PDR Accounting regarding a returned check on the Bradenton property. Communications with the homeowner regarding same (.4). Communications with Mr. Rizzo regarding HOA fees on the Founders Club Place lot (.1).   | 0.90         |
| 08/07/2020  | Received, reviewed, approved and prepared checks for the Oasis invoices. Prepared correspondence to Mr. Wiand, PDR Accounting, Mr. Rizzo and Mr. Perez regarding same (1.0).   | 1.00         |
| 08/11/2020  | Communications with Lost Key Place HOA regarding violation letters. Communications with Mr. MacGranor regarding same (.7). Communications with Mrs. Sullivan regarding Vardon Terr. Unit #106 closing issues. Communications with the Vardon Terr. maintenance regarding the shower ceiling repair (.6).   | 1.30         |
| 08/14/2020  | Received, reviewed, approved and prepared checks for the Oasis invoices. Prepared correspondence to Mr. Wiand, PDR Accounting, Mr. Rizzo and Mr. Perez regarding same (1.0).   | 1.00         |
| 08/17/2020  | Communications with GlobalAir Conditioning regarding AC issues at Desert Ridge Glen (.3). Communications with Lennar Construction regarding additional issues with Vardon Terr. Unit #106. Communications with Mrs. Sullivan regarding same (.3).  | 0.60         |
| 08/20/2020  | Communications with Mr. Rizzo regarding Oasis check that issued this week (.2)   | 0.20         |
| 08/20/2020  | Communications with Cyrtal Sands regarding the appliance installation (.3).  | 0.30         |
| 08/21/2020  | Received, reviewed, approved and prepared checks for the Oasis invoices. Prepared correspondence to Mr. Wiand, PDR Accounting, Mr. Rizzo and Mr. Perez regarding same (1.0).   | 1.00         |
| 08/24/2020  | Communications with Mr. Rizzo and Mr. Wiand regarding a conference call with DOJ regarding assets that were forfeited (.3).  | 0.30         |
| 08/25/2020  | Several Communications with Mr. Wiand regarding an appraisal on 4064 Founders Club Drive. Communications with the appraiser regarding access and interior information (.6). Communications with Mrs. Thompson and Mrs. Love regarding questions with the renewal of the property insurance for Lost Key Place. Received and completed all the renewal applications. Communications with Mr. Rizzo and Mr. Wiand regarding same (1.25). | 1.85         |





**User Hours Summary**

**Billing Period: 08/01/2020 - 08/31/2020**

**User Hour Totals**

| <b>User</b>    | <b>Hours Billed</b> | <b>Rate/Hour</b> | <b>Amount Billed</b> |
|----------------|---------------------|------------------|----------------------|
| Roger Jernigan | 17.00               | \$75.00          | \$1,275.00           |

**The RWJ Group, LLC**

1181 S. Sumter Blvd.  
Suite 312  
North Port, FL 34287

## INVOICE

**Wiand Guerra King**

5505 West Gray Street  
Tampa, FL 33609

**Invoice 20278**

|                     |              |
|---------------------|--------------|
| <b>Date</b>         | Sep 30, 2020 |
| <b>Terms</b>        |              |
| <b>Service Thru</b> | Sep 30, 2020 |

**In Reference To: Oasis (Time)**

| <b>Date</b> | <b>Services</b>  | <b>Hours</b> |
|-------------|--|--------------|
| 09/01/2020  | Communications with Mrs. Sullivan regarding Lost Key Place (.3). Communications with Crystal Sands regarding 6300 Midnight Pass Rd. (.2). Communications with Mr. Rizzo and Mrs. Marrero regarding outgoing Oasis checks (.2).   | 0.70         |
| 09/03/2020  | Communications with Sarasota County Utilities regarding invoices for 4064 Founders Club Drive (.3).  | 0.30         |
| 09/04/2020  | Received, reviewed, approved and prepared checks for the Oasis invoices. Prepared correspondence to Mr. Wiand, PDR Accounting, Mr. Rizzo and Mr. Perez regarding same (1.0).   | 1.00         |
| 09/08/2020  | Communications with PDR Accounting regarding reviewing Oasis bank account statement and recent check activity (.4). Communications with PDR Accounting regarding ordering additional bank supplies (.1). Communications with Mrs. Sullivan regarding the escrow for Lost Key Place (.2).                             | 0.70         |
| 09/09/2020  | Communications with Mr. Wiand and Mrs. Sullivan regarding 16904 Vardon Terr. and the government forfeiture (.2).   | 0.20         |
| 09/10/2020  | Communications with Mr. Rizzo regarding a current list of properties and insurance. Communications with Mrs. Love regarding same. Prepared chart for Mr. Rizzo (.8). Communications with Mrs. Thompson regarding a new quote for the renewal of insurance at 13318 Lost Key Place. Received and reviewed quote (.3). | 1.10         |
| 09/11/2020  | Received, reviewed, approved and prepared checks for the Oasis invoices. Prepared correspondence to Mr. Wiand, PDR Accounting, Mr. Rizzo and Mr. Perez regarding same (1.0). Communications with Crystal Sands regarding errors on the invoice (.3).   | 1.30         |
| 09/15/2020  | Several communications with Mr. MacGranor regarding questions on the requested handyman repairs at Lost Key Place, Desert Ridge Glen and Founders Club Drive houses. Communications with Mrs. Sullivan regarding same (1.25).  | 1.25         |
| 09/16/2020  | Communications with Crystal Sands regarding incorrect appliances being delivered. Communications with Home Depot and Lowes regarding same. Reordered the appliances (1.3). Worked on remote access to the security cameras at Founders Club Drive (.6).  | 1.90         |

**The RWJ Group, LLC**

1181 S. Sumter Blvd.  
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North Port, FL 34287

## INVOICE

**Wiand Guerra King**

5505 West Gray Street  
Tampa, FL 33609

**Invoice 20278**

|                     |              |
|---------------------|--------------|
| <b>Date</b>         | Sep 30, 2020 |
| <b>Terms</b>        |              |
| <b>Service Thru</b> | Sep 30, 2020 |

|            |  |      |
|------------|--|------|
| 09/17/2020 | Communications with Mr. Wiand to review all the upcoming insurance policies. Received and reviewed the signed insurance documents from Mr. Wiand. Provided copies to Mrs. Love (.6).   | 0.60 |
| 09/19/2020 | Received, reviewed, approved and prepared checks for the Oasis invoices. Prepared correspondence to Mr. Wiand, PDR Accounting, Mr. Rizzo and Mr. Perez regarding same (1.0).   | 1.00 |
| 09/22/2020 | Received, reviewed and provided Mr. Wiand with additional insurance documents to sign. Received signed documents back from Mr. Wiand and provided them to Mrs. Love.   | 0.40 |
| 09/25/2020 | Received, reviewed, approved and prepared checks for the Oasis invoices. Prepared correspondence to Mr. Wiand, PDR Accounting, Mr. Rizzo and Mr. Perez regarding same (1.0).   | 1.00 |
| 09/26/2020 | Communications with PDR Accounting regarding Oasis checks (.2).  | 0.20 |
| 09/28/2020 | Monthly inspection of the Vardon Terrace condominiums, Desert Ridge Glen, Lost Key Place, LaCantera Circle, Founders Club Drive and the Midnight Pass Road condominium (4.0). Communications with Mr. MacGranor regarding a list of maintenance issues on the properties (.4).             | 4.40 |
| 09/29/2020 | Communications with Mrs. Thompson regarding the insurance renewal payments and status of the renewals (.3).  | 0.30 |
| 09/30/2020 | Communications with Ryan's Pool Maintenance regarding the theft of the pool filter at the Desert Ridge Glen house. Communications with the neighbors regarding same. Researched replacement costs of the required parts. Communications with Mr. Wiand and Mr. Rizzo regarding same (2.2). | 2.20 |

**In Reference To: Oasis (Expenses)**

| <b>Date</b> | <b>Expenses</b>   |
|-------------|---|
| 09/28/2020  | Mileage to Vardon Terr, Desert Ridge Glen, Founders Club, Gulf of Mexico Drive, Midnight Pass and back to the office. 164 miles @ .57.5 = \$94.30 |

|                    |             |
|--------------------|-------------|
| <b>Total Hours</b> | 18.55 hrs   |
| <b>Total Time</b>  | \$ 1,391.25 |

**The RWJ Group,LLC**  
1181 S. Sumter Blvd.  
Suite 312  
North Port, FL 34287

# INVOICE

**Wiand Guerra King**  
5505 West Gray Street  
Tampa, FL 33609

## Invoice 20278

|                     |              |
|---------------------|--------------|
| <b>Date</b>         | Sep 30, 2020 |
| <b>Terms</b>        |              |
| <b>Service Thru</b> | Sep 30, 2020 |

|                             |             |
|-----------------------------|-------------|
| <b>Total Expenses</b>       | \$ 94.30    |
| <b>Total Invoice Amount</b> | \$ 1,485.55 |

**The RWJ Group,LLC**  
1181 S. Sumter Blvd.  
Suite 312  
North Port, FL 34287

# INVOICE

**Wiand Guerra King**  
5505 West Gray Street  
Tampa, FL 33609

## Invoice 20278

|                     |              |
|---------------------|--------------|
| <b>Date</b>         | Sep 30, 2020 |
| <b>Terms</b>        |              |
| <b>Service Thru</b> | Sep 30, 2020 |

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### User Hours Summary

**Billing Period: 09/01/2020 - 09/30/2020**

#### User Hour Totals

| <b>User</b>    | <b>Hours Billed</b> | <b>Rate/Hour</b> | <b>Amount Billed</b> |
|----------------|---------------------|------------------|----------------------|
| Roger Jernigan | 18.55               | \$75.00          | \$1,391.25           |

# **EXHIBIT 16**

**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**

This cause comes before the Court for consideration of the Receiver's Sixth Interim Motion for Order Awarding Fees, Costs and Reimbursement of Costs to Receiver and His Professionals (Doc. \_\_\_\_). The Commodity Futures Trading Commission does not oppose the granting of the relief sought.

Having considered the motion, and being otherwise fully advised, it is **ORDERED AND ADJUDGED** that the Receiver's Sixth Interim Motion for Order Awarding Fees, Costs and Reimbursement of Costs to Receiver and His Professionals (Doc. \_\_\_\_ ) is **GRANTED**. The Court awards the following sums and directs that payment be made from the Receivership assets:

|                           |              |
|---------------------------|--------------|
| Burton W. Wiand, Receiver | \$25,884.00  |
| Wiand Guerra King P.A.    | \$188,312.68 |
| Englander Fischer         | \$99,422.27  |
| KapilaMukamal, LLP        | \$3,632.29   |
| PDR CPAs                  | \$7,782.21   |
| E-Hounds, Inc.            | \$4,747.50   |
| RWJ Group, LLC            | \$6,564.46   |

DONE AND ORDERED at Tampa, Florida, this \_\_\_\_ day of \_\_\_\_\_, 2020.

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VIRGINIA M. HERNANDEZ-COVINGTON  
UNITED STATES DISTRICT COURT JUDGE