

**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

FUNDAMINISTRATION, 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 EIGHTH 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**”),¹ 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 January 1, 2021 through March 31, 2021. The Standardized Accounting Report (the “**Accounting Report**”) for the time covered by this motion is attached as **Exhibit 1.**²

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 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

¹ On July 11, 2019, the Court entered the Consolidated Order (Doc. 177), which combined and superseded two prior orders (Docs. 7 and 44) and is the operative document governing the Receiver’s activities. *See also* Doc. 390. (reappointing Receiver).

² 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.

Lacantera Circle, LLC; 13318 Lost Key Place, LLC; and 4Oaks LLC.³

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

On April 30, 2021, the Receiver filed his Eighth Interim Report (Doc. 393) (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

³ Fundadministration, Inc. (“**Fundadministration**”) was a relief defendant, but the Receiver was not acting as Receiver over all that entity’s assets. The company 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. Fundadministration transferred those funds to the Receiver. The other accounts are not included in this Receivership. See Docs. 13, 14, 366. Fundadministration is no longer a party to this action in any capacity. See Doc. 376.

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 to 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 Fundadministration (Docs. 238 and 253), which the Court granted on April 7, 2020 (Doc. 261).⁴ 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). On March 31, 2021, the Receiver filed a motion to approve the retention of the Sallah Firm on a contingency fee basis

⁴ The Sallah Firm has been engaged on a contingency fee basis and thus will not be included in interim fee motions. This litigation has been resolved.

for the purpose of further investigating and pursuing claims against ATC Brokers Ltd. and related individuals and entities (Doc. 385), which the Court granted on April 23, 2021.⁵

Pursuant to the Consolidated Order and the aforementioned orders, the Receiver retained (1) Wiand Guerra King P.A., now known as Guerra King P.A. (“**GK**”), 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 Fundadministration, Inc.; and (9) Englander Fischer to assist the Receiver and his counsel with clawback litigation (collectively, the “**Professionals**”).⁶

As shown in the Interim Report, the Professionals have provided services and incurred expenses to investigate the affairs of the Receivership

⁵ As with the Receiver’s retention of this firm to pursue claims against Fundadministration, the Sallah Firm has been engaged on a contingency fee basis and thus will not be included in interim fee motions.

⁶ The Godfrey Firm, Maples Group, and Sergio Godinho did not submit any invoices for the time covered by this motion and therefore are not included in this motion.

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 January 1, 2021 through March 31, 2021, in the amount of \$35,712.00. 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.⁷ In addition to the work of the Receivership, the Receiver created two projects for litigation commenced on April 14, 2020.

A. The Receivership.

For the time covered by this motion, the work of the Receiver and GK 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 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 January 1, 2021 through March 31, 2021, are as follows:

⁷ 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	21.90	\$7,884.00
Asset Analysis and Recovery	40.40	\$14,544.00
Business Operations	1.90	\$684.00
Case Administration	1.40	\$504.00
Claims Administration	4.80	\$1,728.00
TOTAL	70.40	\$25,344.00

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.2.b.) 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 32. 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 January 1, 2021 through March 31, 2021 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	19.00	\$6,840.00
TOTAL	19.00	\$6,840.00

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.2.c.) A copy of the statement summarizing the Receiver's services rendered for this project from January 1, 2021 through March 31, 2021 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	9.80	\$3,528.00
TOTAL	9.80	\$3,528.00

II. Guerra King P.A.

The Receiver requests the Court award GK fees for professional services rendered and costs incurred from January 1, 2021 through March 31, 2021, in the amounts of \$152,562.50 and \$3,078.48, respectively. A categorization and summary of all costs for which GK seeks reimbursement is attached as **Exhibit 6**.⁸

As an accommodation to the Receiver and to conserve the resources of the Receivership Estate, GK'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**. GK began providing services immediately upon the appointment of the Receiver. The activities of GK for the time covered by

⁸ As noted on **Exhibit 6**, a total of \$497.47 in costs fall within the category of "other." These "other" costs include: (1) \$377.47 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 and (2) \$120.00 for costs associated with the sale of Receivership property, including costs for publication of proposed sales. All costs are itemized on **Exhibit 8**, referenced below.

this motion are set forth in the Interim Report. See Ex. 2. GK has billed time for these activities in accordance with the Billing Instructions.

A. The Receivership.

As discussed above, the work of the Receiver and GK 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 administering the claims process. Ex. 2. A copy of the statement summarizing the services rendered and costs incurred by GK from January 1, 2021 through March 31, 2021, is attached as **Exhibit 8**. GK's time and fees for services rendered on this matter for each Activity Category are as follows:

Receivership
GK's Time and Fees for Services Rendered

Activity Category	Hours Expended	Fee Amount
Asset Disposition	52.30	\$10,776.00
Asset Analysis and Recovery	154.70	\$44,305.50
Business Operations	17.00	\$2,316.00
Case Administration	24.90	\$7,095.00
Claims Administration	144.20	\$29,079.00
TOTAL	393.10	\$93,571.50

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.2.b.) 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 GK from January 1, 2021 through March 31, 2021 for this project is attached as **Exhibit 9**. GK's time and fees for services rendered for each Activity Category are as follows:

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

Activity Category	Hours Expended	Fee Amount
Asset Analysis and Recovery	27.10	\$7,342.50
TOTAL	27.10	\$7,342.50

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.2.c.) A copy of the statement summarizing the services rendered and costs incurred by GK from January 1, 2021 through March 31, 2021 for this project is attached as **Exhibit 10**. GK's time and fees for services rendered for each Activity Category are as follows:

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

Activity Category	Hours Expended	Fee Amount
Asset Analysis and Recovery	166.00	\$51,648.50
TOTAL	166.00	\$51,648.50

Additionally, the Receiver utilized the expert services of Harneys, located in the Cayman Islands, to provide an expert report on director duties under Cayman Islands law. Defendant Montie acted as one of the directors of OIG, a Cayman Islands corporation. The litigation against Defendant Montie includes counts of breach of fiduciary duty and aiding and abetting the other directors' breaches of fiduciary duty. The Harneys' expert, a receivership liquidator, opined in her report that Defendant Montie breached his duties under the relevant law. The Receiver requests that the Court award fees for expert services rendered and costs incurred by Harneys from January 1, 2021 through March 31, 2021 in the amount of \$38,095.00. A copy of the statement

summarizing the services rendered and costs incurred by Harneys is attached as **Exhibit 11**.

III. Englander Fischer.

The Receiver requests the Court award Englander Fischer fees for professional services rendered and costs incurred from January 1, 2021 through March 31, 2021 in the amount of \$61,048.31. 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, GK, 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 January 1, 2021 through March 31, 2021 are attached as **Exhibit 12**. (The statements reflect a larger "Balance Now Due" than currently outstanding or requested here because they were generated before the firm received payment for services performed in the fourth quarter of 2020 in connection with the Receiver's prior motion for fees.).

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.⁹

Professional	Hours	Rate	Total
John Waechter (JWW)	75.60	\$335.00	\$25,326.00
Beatriz McConnell (BM)	69.25	\$335.00	\$23,198.75
Alicia Gangi (AG)	26.20	\$275.00	\$7,205.00
Tara Dillon (TD)	7.05	\$150.00	\$1,057.50
Fees			\$56,787.25
Disbursements			\$4,261.06
Total	178.10		\$61,048.31

IV. KapilaMukamal, LLP.

The Receiver requests the Court award KM fees for professional services rendered and costs incurred from January 1, 2021 through March 31, 2021, in the amount of \$37,688.79. 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

⁹ Effective beginning January 1, 2021, Englander Fischer increased the hourly rate for Alicia Gangi from \$225 to \$275. The Receiver believes that this increase is reasonable and that Ms. Gangi's rate is still at or below those charged by attorneys of comparable skill from other law firms in the Middle District of Florida.

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 this period are attached as composite **Exhibit 13**.

V. PDR CPAs.

The Receiver requests the Court award PDR fees for professional services rendered and costs incurred from January 1, 2021 through March 31, 2021, in the amount of \$7,140.25. 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 14**.

VI. E-Hounds, Inc.

The Receiver requests the Court award E-Hounds fees for professional services rendered and costs incurred from January 1, 2021 through March 31, 2021, in the amount of \$7,406.49.¹⁰ E-Hounds is a computer forensics firm that assists the Receiver in securing, analyzing, and maintaining 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 15**.

VII. The RWJ Group, LLC.

The Receiver requests the Court award RWJ fees for professional services rendered and costs incurred from January 1, 2021 through March 31, 2021, in the amounts of \$6,487.50 and \$916.16, 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

¹⁰ In March 2021, E-Hounds increased its rates for maintaining the review platform by \$100 per user seat due to increased costs.

summarizing the services rendered and costs incurred for the pertinent period are attached as composite **Exhibit 16**.

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 GK 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:¹¹

Burton W. Wiand, Receiver	\$35,712.00
Guerra King P.A.	\$155,640.98
Englander Fischer	\$61,048.31
Harneys	\$38,095.00
KapilaMukamal, LLP	\$37,688.79
PDR CPAs	\$7,140.25
E-Hounds, Inc.	\$7,406.49
RWJ Group, LLC	\$7,403.66

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 do not oppose the motion, and defendant DaCorta takes no position on the motion. Former relief defendant Fundadministration, Inc. is no longer a party to this action.

¹¹ A proposed order is attached as **Exhibit 17**.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 21, 2021, 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:

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RECEIVER'S CERTIFICATION

The Receiver has reviewed this Eighth 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 01/01/2021 to 03/31/2021

		Details	Subtotal	Grand Total	Notes
Line 1	Beginning Balance (As of 01/01/2021)			\$ 8,912,078.04	
Increases in Fund Balance					
Line 2	Business Income	\$ 4,179.00			Rental/Mortgage Income
Line 3	Cash and Securities				
Line 4	Interest/Dividend Income	\$ 7,200.03			Interest Income
Line 5	Asset Liquidation	\$ 2,200,003.55			Sale of Real Estate
Line 6	Third-Party Litigation Income	\$ 3,588,065.56			Settlements
Line 7	Other Miscellaneous				
Total Funds Available - Totals Line 1 - 7			\$ 5,799,448.14	\$ 14,711,526.18	
Decreases in Fund Balance					
Line 9	Disbursements to Investors				
Line 10	Disbursements for Receivership Operations				
10a	Disbursements to Receiver/Other Professionals				
10b	Third-Party Litigation Expenses	22,700.00			Expert & Mediation Fees
10c	Asset Expenses	\$ 5,509.23			Condo Fees, Insurance (Net)
10d	Tax Payments				
Total Disbursements for Receivership Ops.			\$ 28,209.23		
Line 11	Disbursements Related to Distribution Expenses				
Line 12	Disbursement to Court/Other				
Line 13	Other	2,453.66			Cayman Registration Fee
Total Funds Disbursed - Total Lines 9 - 13			\$ 2,453.66	\$ 30,662.89	
Line 14	Ending Balance (as of 03/31/2021)			\$ 14,680,863.29	

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 03/31/2021

	Details	Subtotal	Grand Total	Notes
Line 1 Beginning Balance			-	
Increases in Fund Balance				
Line 2 Business Income	\$ 51,138.13			Rental/Mortgage Income
Line 3 Cash and Securities	\$ 8,661,433.46			Cash from Frozen Accts.
Line 4 Interest/Dividend Income	\$ 154,330.31			Interest Income
Line 5 Asset Liquidation	\$ 7,006,986.54			Sale of Real Estate/Misc.
Line 6 Third-Party Litigation Income	4,225,323.67			Settlements
Line 7 Other Miscellaneous	\$ 820.00			Cash from J. Anile House
Total Funds Available - Totals Line 1 - 7		\$ 20,100,032.11	\$ 20,100,032.11	
Decreases in Fund Balance				
Line 9 Disbursements to Investors	-			
Line 10 Disbursements for Receivership Operations				
10a Disbursements to Receiver/Other Professionals	\$ 1,655,461.75			
10b Third-Party Litigation Expenses	22,700.00			
10c Asset Expenses	\$ 333,316.11			Condo Fees, Insurance, Repairs, Maint. & Utilities
10d Tax Payments	\$ 109,117.36			County Sales & Property Tax
Total Disbursements for Receivership Ops.		\$ 2,120,595.22		
Line 11 Disbursements Related to Distribution Expenses				
Line 12 Disbursement to Court/Other	3,296,119.94			US Marshals Service
Line 13 Other	2,453.66			Cayman Registration Fee
Total Funds Disbursed - Total Lines 9 - 13		\$ 3,298,573.60	\$ 5,419,168.82	
Line 14 Ending Balance (as of 03/31/2021)			\$ 14,680,863.29	

Line		
15	Number of Claims	785
15a	No. of Claims Received This Reporting Period	1
15b	No. of Claims Received Since Inception of Estate	785
Line		
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: 

Signature

Burton W. Wiand, Receiver

Printed Name

Date: 4/30/2021

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

FUNDADMINISTRATION, 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.

_____ /

THE RECEIVER'S EIGHTH INTERIM REPORT

Information and Activity from January 1, 2021 through March 31, 2021.

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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 Eighth 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 a website, 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 Eighth Interim Report, as well as all other reports, will be posted on the website.¹

Overview of Significant Activities During this Reporting Period

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

- Obtained Court approval of a settlement with Fundadministration, Inc. and recovered **\$3,555,000.00** (net; *see infra* § V.1.a.);
- Closed the sale of 6300 Midnight Pass Road, No. 1002 in Sarasota, Florida and recovered **\$863,654.69** (net);
- Closed the sale of 7312 Desert Ridge Glen in Bradenton, Florida and recovered **\$774,740.08** (net);

¹ 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 March 31, 2021 (the end of the reporting period) and the date of this filing.

- Closed the sale of 17006 Vardon Terrace Unit #105 in Lakewood Ranch, Florida and recovered **\$187,813.91** (net);
- Closed the sale of 16804 Vardon Terrace Unit #307 in Lakewood Ranch, Florida and recovered **\$187,542.50** (net);
- Obtained Court approval and closed the sale of 4058 Founders Club Drive in Sarasota, Florida and recovered **\$186,252.37** (net);
- Obtained Court approval of the sale of 4064 Founders Club Drive in Sarasota, Florida for **\$1,875,000.00** (pending; gross);
- Collected **\$7,200.03** in interest income on seized funds;
- Continued to prosecute and reach settlements in a “clawback” action against **almost 100 defendants** who received “false profits” or other avoidable transfers from the Ponzi scheme underlying this enforcement action (*see infra* § V.2.b.);
- Obtained Court approval of 7 additional clawback settlements with 9 defendants or potential defendants in the total amount of **\$208,897.95** (the Receiver has already collected most of that money, but some settlements contain payment plans);
- Obtained Court approval of the engagement, on a contingency fee basis, of Sallah Astarita & Cox, LLC to further investigate and prosecute claims against ATC Brokers Ltd. and its affiliates and principals;
- Continued and substantially completed analyzing approximately **785 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 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;
- Continued to cooperate with the Department of Justice regarding its efforts to repatriate approximately **\$2 million** from the United Kingdom; and
- Continued efforts to repatriate **\$560,000** from Belize in cooperation with local counsel.

Overview of 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 **\$8.66 million** from frozen bank accounts at numerous financial institutions;
- Generated **\$51,138.13** in business income, primarily from mortgages and rentals;
- Liquidated an additional approximately **\$7,006,986.54** (net) in assets, mostly subject to agreements with the Department of Justice and the United States Marshals Service;
- Collected **\$154,330.31** in interest and/or dividend income;
- Collected total litigation income of **\$4,225,323.67** through clawback and other third-party settlements;
- 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;
- Completed 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 a 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.

Finally, although the Receiver and his professionals are not responsible for criminal prosecutions, on November 18, 2020, defendant Joseph S. Anile, II was sentenced to imprisonment of **120 months** (i.e., 10 years) and supervised release of three years. He was also ordered to pay restitution of **\$53,270,336.08**. The sentence was based on his plea of guilty to multiple felony counts underlying this Ponzi scheme. The above activities are discussed in more detail in the pertinent sections of this Eighth Interim Report and 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 Fundadministration, Inc. (“**FAI**”); 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.²

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

² On June 12, 2019, the CFTC filed an amended complaint (Doc. 110), which contains additional allegations about certain defendants and relief defendants.

Defendants.” *See id.* at p. 14, ¶ 32 & p. 15, ¶ 30.b. The SRO also imposed a temporary injunction against the defendants and relief defendants and froze their assets. *Id.* at 19.

Subsequently, all defendants and relief defendants 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**”).³ 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, 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

³ On April 23, 2021, the Court reappointed the Receiver for purposes of 28 U.S.C. § 754, but the order of reappointment attaches and incorporates the Consolidated Order by reference. *See* Doc. 390. As such, the provisions of the Consolidated Order continue to govern the Receiver’s mandate upon reappointment. *Id.*

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. On November 18, 2020, Anile was sentenced to imprisonment of 120 months and supervised release of three years. ACA Doc. 56. He was also ordered to pay restitution of \$53,270,336.08. *Id.*

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.

On February 17, 2021, the DOJ filed a superseding indictment against DaCorta, adding a third count for making a “false and fraudulent statement” on an income tax return. A copy of the superseding indictment is attached as **Exhibit D**. DaCorta’s jury trial is scheduled for the trial term commencing October 4, 2021 before Judge William F. Jung. DCA Doc. 38. A status conference is now scheduled for August 12, 2021. *Id.*

On January 19, 2021, the DOJ moved the Court to extend the stay in this enforcement action for an additional six months to protect its ongoing investigation. Doc. 353. The Court granted the motion and extended the stay until July 26, 2021. Doc. 354. 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.⁴ 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.

⁴ 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.

The Receiver's preliminary analysis indicates that a total of approximately \$80 million was raised from investors.⁵ 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 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. Doc. 177 ¶ 56.A.

III. Securing The Receivership Estate

Attached as **Exhibit A** to this Eighth Interim Report is a cash accounting report showing (1) the amount of money on hand from January 1, 2021, less operating expenses plus revenue, through March 31, 2021, 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 uncollected or unsold property discussed below is not included in the accounting report. From

⁵ 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.

January 1, 2021 through March 31, 2021, the Receiver collected income of \$5,799,448.14.⁶

A. Cooperation with the Department of Justice, Federal Bureau of Investigation, and U.S. 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 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

⁶ As explained in footnote 1, to the extent possible, the Receiver has included in this Eighth Interim Report transactions and events occurring after March 31, 2021 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.

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 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 \$3,295,119.94 to the USMS pursuant to the MOU, which is reflected in Exhibit A (from inception) at Line 12. 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 anticipated that approximately

\$2,000,000 recovered by British authorities will also be remitted to the Receiver for distribution after collection 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**”).⁷ The Receiver has now deposited more than \$8.6 million of the frozen funds into this account.⁸ 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 bank or 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,

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

⁸ 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.

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. The agency 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.3.b.

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 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.⁹ 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 actions in fulfillment of his mandate are explained in the following subsections. *See* Doc. 177 ¶ 56.D.

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

⁹ 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.

Receiver entered into an agreement to sell the Office for \$2,100,000. 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 ("**Lost Key**"). On October 16, 2020, the Receiver entered into an agreement to sell the property for \$1,100,00. The Receiver moved the Court to approve the sale, and the Court granted the Receiver's motion. *See* Docs. 330, 332, 334, 335. The transaction closed on December 8, 2020 and resulted in a net recovery of \$1,038,704.75, which is now reflected in Exhibit A. For more information, please see the Receiver's prior interim reports.

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. 222, 226, 232, 233. The Receiver closed the sale, and the net proceeds of \$372,823.83 are now within the Receivership Estate. The net proceeds differ substantially from the gross

proceeds because the property was encumbered by a large mortgage. 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.¹⁰ It was owned by relief defendant 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.¹¹ 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. On March 22, 2021, the Receiver entered into an agreement to sell Founders Club for \$1,875,000. The Receiver moved the Court to approve the sale, and the Court granted that motion.

¹⁰ 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 of forfeiture with respect to this property on August 20, 2019. *See* FA Doc. 63. On January 29, 2021, the Receiver entered into an agreement to sell the Founders Club Lot for \$195,000. The Receiver moved the Court to approve the sale, and the Court granted that motion. *See* Docs. 363, 365. The transaction closed on or about February 19, 2021 and resulted in a net recovery of \$186,252.37, which is now reflected in Exhibit A.

¹¹ *See* www.oasisreceivership.com/assets-for-sale/4064-founders-club-drive/.

See Docs. 387, 389. The transaction is scheduled to close shortly after this filing, and if the sale proceeds as anticipated, the net proceeds will be included in Exhibit A to the Receiver's next interim report.

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**"). On November 29, 2020, the Receiver entered into an agreement to sell Desert Ridge for \$846,000. The Receiver moved the Court to approve the sale, and the Court granted that motion. *See Docs. 340, 343.* The Receiver closed the sale on or about January 7, 2021, and the net proceeds of \$774,740.08 are now reflected in Exhibit A. For more information, please see the Receiver's prior interim reports.

6. The Vardon Terrace Condos

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 took ownership of the property. On November 30, 2020, the Receiver entered into an agreement to sell Condo #307 for \$198,000. The Receiver moved the Court to approve the sale, and the Court granted that motion. *See Docs. 341, 344.* The transaction closed on or about February 5, 2021, and the net proceeds of \$187,542.50 are now reflected in Exhibit A.

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. For more information, please see the Receiver's prior interim reports.

Defendant DaCorta was the authorized representative of the limited liability company that owned Condo #106, which was purchased for \$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. For more information, please see the Receiver's prior interim reports.

Oasis Management was the authorized representative of the limited liability company that owned Condo #105, which was purchased for \$190,999. On December 28, 2020, the Receiver entered into an agreement to sell Condo #105 for \$198,000. On January 22, 2021, the Receiver moved the Court to approve the sale (Docs. 359, 360), and the Court granted that motion (Docs. 361, 362). The transaction closed on or about February 18, 2021, and the net proceeds of \$187,813.91 are now reflected in Exhibit A.

7. 6300 Midnight Pass Rd., No. 1002, Sarasota, Florida

The condominium located at 6300 Midnight Pass Road, No. 1002 in Sarasota, Florida ("**Midnight Pass**") was owned by 6300 Midnight Pass Road, No. 1002, LLC. On December 14, 2020, the Receiver entered into an agreement to sell Midnight Pass for \$913,000. On January 4, 2021, the Receiver moved the Court to approve the sale (Doc. 345), and the Court granted that motion (Doc. 356). The transaction closed on or about February 3, 2021, and the net proceeds of \$863,654.69 are now reflected in Exhibit A.

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 has identified a buyer willing to pay \$505,000. The Receiver commissioned a certified independent appraisal and confirmed that the proposed sale price reflects market value. Montie conferred with the CFTC and the Receiver, and the parties agreed to the sale. On December 22, 2020, the Court granted Montie’s unopposed motion to permit the sale. Doc. 342. The transaction closed on April 23, 2021, but certain conditions still require satisfaction. The proceeds of the sale, currently estimated to be approximately \$269,349.46, will be held in escrow pending the resolution of the CFTC’s and/or the Receiver’s claims.

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 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. 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 carried positive net equity of approximately \$321,231 in 2019, 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. The Receiver has now sold all forfeited vehicles and collected all related funds. For more information, please see the Receiver's prior 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.¹² 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 has identified and/or seized the property listed in **Exhibit C**.¹³ He has sold most items as set forth in the exhibit. The Receiver is working with the defendants and

¹² This does not include certain assets in the possession of defendants Haas and Montie, as disclosed in their financial affidavits.

¹³ 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.

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.

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. n/k/a Guerra King P.A. (“**WGK**” or “**GK**”), 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 FAI. 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. FAI 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.1.a. below, the Receiver has since resolved his claims against FAI.

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.2.b. below, the Receiver is pursuing clawback litigation against numerous defendants.

On March 31, 2021, the Receiver filed a second motion seeking to retain the Sallah Firm on a contingency fee basis to investigate and pursue claims against ATC Brokers Ltd. and its affiliates and principals. Doc. 385. On April 23, 2021, the Court granted the Receiver's motion, thereby approving his second engagement of the Sallah Firm. Doc. 390.

V. Pending and Contemplated Litigation

The Consolidated Order requires this Eighth 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. Completed and Related Litigation

a. Fundadministration, Inc.

As explained above in Section IV, the Court authorized the Receiver to retain the Sallah Firm to investigate and pursue claims against FAI on a contingency fee basis. The Receiver and FAI mediated their dispute on October 13, 2020 and subsequently reached an agreement regarding the Receiver's claims. On February 8, 2021, the Receiver moved the Court to approve the parties' agreement (Doc. 368), and on February 25, 2021, the Court granted the Receiver's motion (Doc. 376). On or about March 1, 2021, FAI transferred net settlement proceeds of \$3,555,000.00 to the Receiver. FAI also reached an agreement with the CFTC, which provided for its dismissal as a relief defendant from the agency's enforcement action. *See* Docs. 364, 366. As such, FAI is no longer a party to any litigation involving the Receiver or the CFTC.

b. 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 has been selling those properties pursuant to the MOU. The Receiver understands that the FBI's administrative forfeiture proceeding against certain personal property is also complete. If the sale of Founders Club closes as anticipated, the Receiver will have sold all forfeited real and personal property subject to the MOU.

c. 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 was sentenced to imprisonment of 120 months (*i.e.*, 10 years) and supervised release of three years. He was also ordered to pay restitution of \$53,270,336.08. The DOJ is still pursuing forfeiture and repatriation of approximately \$2 million from the United Kingdom (*see supra* § III.B.1.), but the Receiver believes the Anile Criminal Action is otherwise complete.

2. Pending and Related Litigation

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

a. 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 2021.

b. 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).¹⁴

¹⁴ *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....”).

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 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, 2010. Doc. 264. Pursuant to the Consolidated Order and the Court’s express authorization, on April 14, 2020, the Receiver filed a clawback complaint against almost 100 non-settling investors, seeking to recover approximately \$4.4 million plus costs and prejudgment interest. A copy of the complaint can be found on [the Receiver’s website](#) (the “**Clawback Action**”).¹⁵

Since filing the Clawback Action, the Receiver has reached settlements with many defendants:

- 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 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.
- On January 14, 2021, the Receiver moved the Court to approve 5 settlements with 6 defendants or potential defendants in the total amount of \$175,631.62. *See* Doc. 350. The Court granted the Receiver’s motion on January 21, 2021. Doc. 357.
- On March 9, 2021, the Receiver moved the Court to approve 2 settlements with 3 defendants or potential defendants in the total amount of \$33,266.33. *See* Doc. 379. The Court granted the Receiver’s motion on March 31, 2021. Doc. 383.

¹⁵ 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.

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 Settlements	30	\$783,176.46
Other Settlements (Tolled Non-Parties)	3	\$139,806.23
Default Judgments	48	\$2,333,587.45
Pending	4	\$282,105.75
Voluntary Dismissal, Bankruptcy, or Other	12	\$777,721.08

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 recovery from non-settling defendants.

c. 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. On November 2, 2020, the Court denied Montie's second motion to dismiss. ML Doc. 45. The parties are currently engaged in discovery. Mediation is scheduled for April 30, 2021, and 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.

3. 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 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 claims against him 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. ATC Brokers Ltd. And Affiliates And Principals

The Receiver is also seeking documents from and considering claims against ATC Brokers Ltd. and its affiliates and principals, 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.

In his Seventh Interim Report, the Receiver stated that he anticipated instituting litigation against ATC. As explained above in Section IV, the Receiver subsequently moved the Court to approve his engagement of the Sallah Firm to pursue potential claims against ATC on a contingency fee basis. The Court granted that motion, and the Sallah Firm is now investigating and preparing to assert those claims.

On April 28, 2021, the CFTC also filed a motion seeking "an order granting limited relief from the stay of this litigation such that the CFTC may issue Federal Rule of Civil Procedure 45 subpoenas to the ATC Entities, as well as to any other non-party entities and individuals the CFTC believes likely to possess relevant information related to claims and possible defenses involving the ATC Entities." Doc. 391 at 3. "The Receiver's ATC Motion revealed the existence of significantly more relevant documents than the ATC Entities produced to the CFTC, highlighting the need for the requested third-party discovery." *Id.* As of the date of this filing, the CFTC's motion is pending.

c. 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. The Receiver served a subpoena on Spotex, and the company has produced certain 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 (with minimal exceptions), investors and other creditors submitted approximately 785 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 Eighth 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 stage, the Receiver recommends continuation of the Receivership because he still has (1) more than \$2 million to

repatriate from the United Kingdom (through the DOJ) and more than \$500,000 from Belize; (2) additional 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) 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@guerraking.com) or call Jeffrey Rizzo at 813-347-5100. The Receiver can be contacted directly by email (Burt@BurtonWWiandPA.com) or by phone at 727-460-4679.

Dated this 30th day of April 2021.

Respectfully submitted,

s/ Burton W. Wiand

Burton W. Wiand, Receiver

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 30, 2021, 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@guerraking.com

Lawrence J. Dougherty, FBN 0068637

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GUERRA KING P.A.

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Attorneys for Receiver, Burton W. Wiand

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 01/01/2021 to 03/31/2021

		Details	Subtotal	Grand Total	Notes
Line 1	Beginning Balance (As of 01/01/2021)			\$ 8,912,078.04	
Increases in Fund Balance					
Line 2	Business Income	\$ 4,179.00			Rental/Mortgage Income
Line 3	Cash and Securities				
Line 4	Interest/Dividend Income	\$ 7,200.03			Interest Income
Line 5	Asset Liquidation	\$ 2,200,003.55			Sale of Real Estate
Line 6	Third-Party Litigation Income	\$ 3,588,065.56			Settlements
Line 7	Other Miscellaneous				
Total Funds Available - Totals Line 1 - 7			\$ 5,799,448.14	\$ 14,711,526.18	
Decreases in Fund Balance					
Line 9	Disbursements to Investors				
Line 10	Disbursements for Receivership Operations				
10a	Disbursements to Receiver/Other Professionals				
10b	Third-Party Litigation Expenses	22,700.00			Expert & Mediation Fees
10c	Asset Expenses	\$ 5,509.23			Condo Fees, Insurance (Net)
10d	Tax Payments				
Total Disbursements for Receivership Ops.			\$ 28,209.23		
Line 11	Disbursements Related to Distribution Expenses				
Line 12	Disbursement to Court/Other				
Line 13	Other	2,453.66			Cayman Registration Fee
Total Funds Disbursed - Total Lines 9 - 13			\$ 2,453.66	\$ 30,662.89	
Line 14	Ending Balance (as of 03/31/2021)			\$ 14,680,863.29	

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 03/31/2021

	Details	Subtotal	Grand Total	Notes
Line 1 Beginning Balance			-	
Increases in Fund Balance				
Line 2 Business Income	\$ 51,138.13			Rental/Mortgage Income
Line 3 Cash and Securities	\$ 8,661,433.46			Cash from Frozen Accts.
Line 4 Interest/Dividend Income	\$ 154,330.31			Interest Income
Line 5 Asset Liquidation	\$ 7,006,986.54			Sale of Real Estate/Misc.
Line 6 Third-Party Litigation Income	4,225,323.67			Settlements
Line 7 Other Miscellaneous	\$ 820.00			Cash from J. Anile House
Total Funds Available - Totals Line 1 - 7		\$ 20,100,032.11	\$ 20,100,032.11	
Decreases in Fund Balance				
Line 9 Disbursements to Investors	-			
Line 10 Disbursements for Receivership Operations				
10a Disbursements to Receiver/Other Professionals	\$ 1,655,461.75			
10b Third-Party Litigation Expenses	22,700.00			
10c Asset Expenses	\$ 333,316.11			Condo Fees, Insurance, Repairs, Maint. & Utilities
10d Tax Payments	\$ 109,117.36			County Sales & Property Tax
Total Disbursements for Receivership Ops.		\$ 2,120,595.22		
Line 11 Disbursements Related to Distribution Expenses				
Line 12 Disbursement to Court/Other	3,296,119.94			US Marshals Service
Line 13 Other	2,453.66			Cayman Registration Fee
Total Funds Disbursed - Total Lines 9 - 13		\$ 3,298,573.60	\$ 5,419,168.82	
Line 14 Ending Balance (as of 03/31/2021)			\$ 14,680,863.29	

Line		
15	Number of Claims	785
15a	No. of Claims Received This Reporting Period	1
15b	No. of Claims Received Since Inception of Estate	785
Line		
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: 

Signature

Burton W. Wiand, Receiver

Printed Name

Date: 4/30/2021

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; MaryAnne E. Anile	Wells Fargo	Business Choice Checking	Liquidated	\$0.00	\$10,383.26
4064 Founders Club Drive, LLC	*1807	Joseph S. Anile II; MaryAnne E. Anile	Wells Fargo	Business Platinum Savings	Closed	\$0.00	\$0.00
444 Gulf of Mexico Drive, LLC	*3967	Michael Dacorta; Joseph S. Anile II	Wells Fargo	Simple Business Checking	Liquidated	\$0.00	\$15,600.10
4Oaks, LLC	*2572	Joseph S. Anile II; 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; 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; 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; 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	\$6,894.77	TBD
John J. Haas	TBD	John J. Haas	Equity Trust	IRA	TBD	\$174.66	\$0.00
John J. Haas; Lillian Haas	*2105	John J. Haas	TD Bank	Checking	Liquidated	\$0.00	\$4,362.80
John J. Haas; 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

Account Name by Party or Affiliate	Account	Authorized Signer(s)	Bank	Account Type	Status	Still Frozen	Liquidated
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; Joseph S. Anile II.	Regions	Business Checking	Liquidated	\$0.00	\$17,889.07
Mainstream Fund Services, Inc.	*1174	Denise DePaola; Michael Nolan	Citibank	Savings	Unfrozen by Agreement	\$0.00	\$0.00
Mainstream Fund Services, Inc.	*5606	Denise DePaola; Michael Nolan	Citibank	Checking	Unfrozen by Agreement	\$0.00	\$0.00
Mainstream Fund Services, Inc.	*0764	Denise DePaola; 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 7/15/16	\$0.00	\$0.00
Michael DaCorta	TBD	Michael Dacorta	PNC	TBD	TBD	\$0.00	\$0.00
Michael DaCorta; 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
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	Open	\$147,946.87	\$0.00
Raymond P. Montie	*8414	Raymond P. Montie	Federal Savings Bank; First SeaCoast Bank	Checking	New Income Account	\$44,431.92	N/A
Raymond P. Montie	*1574	Raymond P. Montie	Fidelity Investments	IRA Account	Open	\$6,163.41	\$0.00

Account Name by Party or Affiliate	Account	Authorized Signer(s)	Bank	Account Type	Status	Still Frozen	Liquidated
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; 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; Danielle TerraNova	NBT Bank	Free Business Checking	TBD	\$766.76	\$0.00
Roar of the Lion Fitness, LLC	*1396	Michael Dacorta; 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 or Purchase Price	Lien	Status or Disposition	Actual Value or Sale Price
Defendant Anile/4064 Founders Club Drive					
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
Defendant DaCorta/13318 Lost Key Place/6922 Lacantera Circle					
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; 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
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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 D

FILED

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

2021 FEB 17 PM 3:40

CLERK, US DISTRICT COURT
MIDDLE DISTRICT FLORIDA
TAMPA, FLORIDA

UNITED STATES OF AMERICA

v.

MICHAEL J. DACORTA

CASE NO. 8:19-cr-605-T-02CPT
18 U.S.C. § 1349
18 U.S.C. § 1957
26 U.S.C. § 7206(1)

SUPERSEDING INDICTMENT

The Grand Jury charges:

COUNT ONE

(Conspiracy to Commit Wire Fraud and Mail Fraud—18 U.S.C. § 1349)

Introduction

At all times material to this Superseding Indictment:

1. MICHAEL J. DACORTA, a resident of Sarasota, in the Middle District of Florida, who had been permanently banned from registering with the Commodity Futures Trading Commission and was prohibited from soliciting U.S. residents to trade in foreign currency and from trading foreign currency for U.S. residents in any capacity, was a co-founder, director, chief executive officer, and chief investment officer of OASIS INTERNATIONAL GROUP, LTD. DACORTA created entities, opened accounts, promoted the business, solicited funds from victim-investors, directed all trading decisions and the execution of trades and, among other conduct, interacted with victim-investors in order to perpetuate the scheme and for other purposes. DACORTA also created and/or controlled, among

other entities, OASIS MANAGEMENT, LLC; 13318 LOST KEY PLACE, LLC; 6922 LACANTERA CIRCLE, LLC; 6300 MIDNIGHT PASS ROAD NO. 1002, LLC; 16804 VARDON TERRACE #108, LLC; FULL SPECTRUM WELLNESS, LLC; and ROAR OF THE LION FITNESS, LLC.

2. OASIS INTERNATIONAL GROUP, LTD. (“OIG”), a Cayman Islands limited corporation, served as the parent company for other entities including, but not limited to, OASIS MANAGEMENT, LLC, OASIS GLOBAL FX, LTD., OASIS GLOBAL (BELIZE), S.A., and 444 GULF OF MEXICO DRIVE, LLC, utilized to carry out the scheme. DACORTA and his coconspirators held OIG out to victim-investors as the entity used to conduct foreign exchange market (“FOREX”) trading. OIG was not registered with the Commodity Futures Trading Commission in any capacity.

3. OASIS MANAGEMENT, LLC was a Wyoming limited liability company created and controlled by DACORTA, who used the entity to open a bank account and to receive victim-investors’ funds for his personal enrichment.

4. 13318 LOST KEY PLACE, LLC was a Florida limited liability company created by DACORTA and used to open a bank account and to purchase, make improvements to, and maintain DACORTA’s personal residence, located at 13318 Lost Key Place, Sarasota, Florida.

5. 6922 LACANTERA CIRCLE, LLC was a Florida limited liability company created by DACORTA and used to open a bank account and to purchase,

make improvements to, and maintain DACORTA's future personal residence, located at 6922 LaCantera Circle, Sarasota, Florida.

6. 6300 MIDNIGHT PASS ROAD NO. 1002, LLC was a Florida limited liability company created by DACORTA and used to purchase DACORTA's beach condominium, located at 6300 Midnight Pass Road No. 1002, Sarasota, Florida.

7. 16804 VARDON TERRACE #108, LLC was a Florida limited liability company created by DACORTA and used to purchase a condominium, located at 16804 Vardon Terrace #108, Sarasota, Florida, for his son.

8. FULL SPECTRUM WELLNESS, LLC was a Florida limited liability company created by DACORTA and used to open a bank account and to pay business expenses and make payments to his sons.

9. ROAR OF THE LION FITNESS, LLC was a Florida limited liability company created by DACORTA and used to open a bank account and to fund a business operated by his sons.

10. COMMODITY FUTURES TRADING COMMISSION ("CFTC") was an independent federal regulatory agency charged by Congress with the administration and enforcement of the Commodity Exchange Act, 7 U.S.C. § 1 et seq., and regulations promulgated thereunder.

11. The foreign exchange market ("FOREX") was the market for buying and selling different currencies. It was primarily an over-the-counter market with trades between large commercial banks accounting for most foreign currency

transactions. Other participants in the foreign exchange market included brokers, who matched buyers and sellers in the market.

12. A “Ponzi” scheme was a fraudulent investment program in which funds paid in by later investors are used to pay out non-existent, phantom “profits” to earlier investors, thus creating the illusion that the fraudulent investment program is a successful, profit-generating enterprise which, in turn, attracts new investment funds that are used to sustain the fraudulent program.

The Conspiracy

13. Beginning on an unknown date, but at least as early as in or about November 2011, and continuing thereafter, through and including at least on or about April 18, 2019, in the Middle District of Florida, and elsewhere, the defendant,

MICHAEL J. DACORTA,

did knowingly combine, conspire, confederate, and agree with others, both known and unknown to the Grand Jury, to commit certain offenses against the United States, specifically:

a. To devise and intend to devise a scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, utilizing transmissions by means of wire and radio communication in interstate and foreign commerce of any writings, signs, signals, and sounds, in violation of 18 U.S.C. § 1343; and

b. To devise and intend to devise a scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent

pretenses, representations, and promises, utilizing the United States mail and private and commercial interstate carriers, in violation of 18 U.S.C. § 1341.

Manner and Means of the Conspiracy

14. The manner and means by which the defendant and his coconspirators sought to accomplish the objects and purpose of the conspiracy included, among others, the following:

a. It was a part of the conspiracy that conspirators would and did create both domestic and offshore entities and open bank accounts in the names of said entities to facilitate the scheme.

b. It was a further part of the conspiracy that conspirators would and did make false and fraudulent representations to victim-investors and potential investors in promoting one of the conspirators as an experienced FOREX trader with a record of success in order to persuade them to transmit their investment funds to OASIS MANAGEMENT, LLC to be traded in the FOREX market.

c. It was a further part of the conspiracy that conspirators would and did make material omissions and conceal from victim-investors and potential investors that one of the conspirators had been permanently banned from registering with the CFTC and was prohibited from soliciting U.S. residents to trade in FOREX and from trading FOREX for U.S. residents in any capacity.

d. It was a further part of the conspiracy that conspirators would and did make false and fraudulent representations to victim-investors and potential investors, including, but not limited to, that: (i) conspirators did not charge any fees

or commissions; (ii) investors were guaranteed a minimum 12 percent per year return on their investments; (iii) conspirators had never had a month when they had lost money on FOREX trades; (iv) interest and principal payments made to investors were funded by profitable FOREX trading; (v) conspirators owned other assets sufficient to repay investors' principal investments; and (vi) an investment with conspirators was safe and without risk.

e. It was a further part of the conspiracy that conspirators would and did encourage and cause victim-investors to transmit funds, via interstate wire transmissions and the United States mail and private and commercial interstate carriers, to OASIS MANAGEMENT, LLC to be traded in the FOREX market.

f. It was a further part of the conspiracy that conspirators would and did use funds transmitted by victim-investors for FOREX trading to: (i) make Ponzi-style payments to victim-investors; (ii) pay expenses associated with perpetuating the scheme; and (iii) fund their lifestyles and otherwise for their personal enrichment.

g. It was a further part of the conspiracy that conspirators would and did secure broker-dealer licenses from offshore regulatory entities to create the appearance that they could generate even greater earnings by facilitating FOREX trading.

h. It was a further part of the conspiracy that conspirators would and did solicit victim-investors to make "loans" to OIG, evidenced by promissory

notes, purportedly to enable OIG to facilitate a larger volume of FOREX trades and thereby generate greater earnings.

i. It was a further part of the conspiracy that conspirators would and did develop and administer a “back office” operation - that is, a secure website that falsely and fraudulently depicted victim-investors’ account balances and earnings - in order to convince victim-investors that their principal balances were safe and their investments were performing.

j. It was a further part of the conspiracy that conspirators would and did encourage and cause victim-investors to: (i) transmit funds, via interstate wire transmissions and the United States mail and private and commercial interstate carriers, to OASIS MANAGEMENT, LLC and/or to OIG via a third-party fund administrator purportedly to serve as collateral for FOREX trading activity; and (ii) access a “back office” website and monitor supposed activity in their accounts, including daily earnings, principal balances, and referral fees.

k. 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.

1. It was a further part of the conspiracy that conspirators would and did conceal the FOREX trading losses from victim-investors, including by omitting any mention of said losses from the “back office” website, in an effort to perpetuate the scheme.

m. It was a further part of the conspiracy that conspirators would and did misrepresent, hide, and conceal, and cause to be misrepresented, hidden, and concealed, the purpose of acts performed in furtherance of the conspiracy.

All in violation of 18 U.S.C. § 1349.

COUNT TWO
(Illegal Monetary Transaction—18 U.S.C. § 1957)

On or about February 19, 2019, in the Middle District of Florida, the defendant,

MICHAEL J. DACORTA,

did knowingly engage and attempt to engage in a monetary transaction, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful activity, that is, wire fraud, in violation of 18 U.S.C. § 1343, and mail fraud, in violation of 18 U.S.C. § 1341, in that defendant caused \$653,293.67 to be sent via an electronic wire from the Citibank account ending in 0764 in the name of Mainstream Fund Services to the Synovus Bank account ending in 3473 in the name of Berlin Patten Ebling, LLC in Sarasota, Florida, in connection with his purchase of the personal residence located at 13318 Lost Key Place, Sarasota, Florida.

In violation of 18 U.S.C. § 1957.

COUNT THREE
(False and Fraudulent Statement on Income Tax Return)

On or about October 8, 2018, in the Middle District of Florida, and elsewhere,
the defendant,

MICHAEL J. DACORTA,

did willfully make and subscribe, and cause to be made and subscribed, a 2017 U.S. Individual Income Tax Return, IRS Form 1040, which was verified by a written declaration that it was made under the penalties of perjury, and which he did not believe to be true and correct as to every material matter, in that the return reported an amount of total income at line 22, which the defendant then and there knew and believed understated his total income.

In violation of 26 U.S.C. § 7206(1), and 18 U.S.C. § 2.

FORFEITURES

1. The allegations contained in Counts One and Two of this Superseding Indictment are incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 982(a)(1), and 28 U.S.C. § 2461(c).

2. Upon conviction of a violation of 18 U.S.C. §§ 1341 and/or 1343 or a conspiracy to violate 18 U.S.C. §§ 1341 and/or 1343 (18 U.S.C. § 1349), the defendant,

MICHAEL J. DACORTA,

shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

3. Upon conviction of a violation of 18 U.S.C. § 1957, the defendant,

MICHAEL J. DACORTA,

shall forfeit to the United States of America, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in such offense and any property traceable to such property.

4. The property to be forfeited includes, but is not limited to an order of forfeiture in the amount of approximately \$7,128,410.65, which represents proceeds the defendant personally obtained from the offenses.

5. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;


the United States of America shall be entitled to forfeiture of substitute property under the provisions of 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c).

A TRUE BILL,



Foreperson


MARIA CHAPA LOPEZ
United States Attorney

By: 


Rachelle DesVaux Bedke
Assistant United States Attorney
Deputy Chief, Economic Crimes Section

By: 

Francis D. Murray
Assistant United States Attorney

By: 

David W.A. Chee
Assistant United States Attorney

By: 

for Jay G. Trezevant
Assistant United States Attorney
Chief, Economic Crimes Section

February 21

No.

UNITED STATES DISTRICT COURT
Middle District of Florida
Tampa Division

THE UNITED STATES OF AMERICA

vs.

MICHAEL J. DACORTA

SUPERSEDING INDICTMENT

Violations: 18 U.S.C. § 1349
18 U.S.C. § 1957
26 U.S.C. § 7206(1)

A true bill,



Foreperson

Filed in open court this 18th day of February, 2021.

Clerk

Bail \$ _____

EXHIBIT 3

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

June 01, 2021

Client: 025305

Matter: 001921

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RE: CFTC Oasis Receivership - Receiver

Travel is half rate outside of 20 miles.

For Professional Services Rendered Through March 31, 2021

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASDIS	Asset Disposition			
1/7/2021	BWW	Work on closing for Desert Ridge property (.5).	0.5	\$180.00
1/11/2021	BWW	Work on documents for closing of Vardon Terrace Unit #307 (.8); exchange emails with J. Rizzo and P. Taylor regarding same (.2).	1.0	\$360.00
1/12/2021	BWW	Review and execute closing documents for Vardon Terrace Unit #307 (1.0); exchange emails with J. Rizzo regarding same (.3); review and execute affidavit for online notary (.2); attend to condominium form for Midnight Pass property (.1); review email from L. Sullivan (.1); review email from J. Rizzo (.1).	1.8	\$648.00
1/13/2021	BWW	Review closing documents and participate in online closing of Vardon Terrace Unit #307 (1.5).	1.5	\$540.00
1/14/2021	BWW	Execute closing documents for Vardon Terrace Unit #307 and facilitate notarization of same (1.0).	1.0	\$360.00
1/15/2021	BWW	Execute affidavit for Vardon Terrace Unit #307 closing (.5); review and send counter-offer on Founders Club Drive property (.2); communicate with L. Sullivan regarding same (.1).	0.8	\$288.00
1/18/2021	BWW	Communicate with J. Rizzo regarding Vardon Terrace Unit #307 closing documents (.2).	0.2	\$72.00

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASDIS	Asset Disposition			
1/19/2021	BWW	Review new purchase and sale agreement for Founders Club Drive property (.2); prepare email to J. Rizzo and J. Perez regarding same (.1); continue negotiation of offers for Founders Club Drive properties (.2).	0.5	\$180.00
1/20/2021	BWW	Attend to closing matters for sale of Vardon Terrace Unit #307 (.5).	0.5	\$180.00
1/26/2021	BWW	Communicate with J. Rizzo regarding funds collected to date and status of asset collection efforts (.3).	0.3	\$108.00
1/28/2021	BWW	Work on title issue regarding Midnight Pass property (.5); telephone conference with L. Najmy and S. Kelly regarding same (.4); telephone conference with J. Rizzo regarding same (.3).	1.2	\$432.00
1/29/2021	BWW	Work on matters regarding Midnight Pass property (1.0); telephone conference with E. Feld, J. Rizzo, L. Najmy and S. Kelly regarding same (.5).	1.5	\$540.00
2/1/2021	BWW	Work on closing documents for sale of Midnight Pass property (1.3); execute closing documents and facilitate notarization of same (.5).	1.8	\$648.00
2/3/2021	BWW	Review communications from J. Rizzo regarding Midnight Pass property and Vardon Terrace Unit #307 (.2).	0.2	\$72.00
2/7/2021	BWW	Work on closing regarding sale of Midnight Pass property (1.3); exchange emails with J. Rizzo and Najmy Thompson firm regarding same (.2).	1.5	\$540.00
2/10/2021	BWW	Communicate with J. Rizzo regarding closing documents for Vardon Terrace Unit #105 and Founders Club Drive property (.1).	0.1	\$36.00
2/12/2021	BWW	Communicate with J. Rizzo regarding closing documents for Vardon Terrace Unit #105 and Founders Club Drive property (.3).	0.3	\$108.00
2/15/2021	BWW	Work on closing documents and deeds for Vardon Terrace Unit #105 and 4058 Founders Club Drive property (1.5).	1.5	\$540.00
2/16/2021	BWW	Confer with J. Rizzo and closing agent regarding update on closings for 4058 Founders Club Drive property and Vardon Terrace Unit #105 (.1); receive and respond to offer on Founders Club Drive property (.3).	0.4	\$144.00
2/17/2021	BWW	Confer with J. Rizzo and closing agent regarding update on closings for 4058 Founders Club Drive property and Vardon Terrace Unit #105 (.1).	0.1	\$36.00
2/18/2021	BWW	Work on closing regarding sale of Vardon Terrace Unit #105 (.5).	0.5	\$180.00

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASDIS	Asset Disposition			
2/19/2021	BWW	Communicate with J. Rizzo and closing agent regarding update on closings for 4058 Founders Club Drive property and Vardon Terrace Unit #105 (.2).	0.2	\$72.00
2/22/2021	BWW	Exchange correspondence with closing agent regarding property sale wires and documentation (.2).	0.2	\$72.00
3/3/2021	BWW	Work on offers for Founders Club Drive property (.2).	0.2	\$72.00
3/4/2021	BWW	Review offer on Founders Club Drive property (.3).	0.3	\$108.00
3/7/2021	BWW	Review offer on Founders Club Drive property (.2).	0.2	\$72.00
3/8/2021	BWW	Work on offers for Founders Club Drive property (.2).	0.2	\$72.00
3/9/2021	BWW	Review matters relating to offer on Founders Club Drive property (.4); communicate with L. Sullivan and J. Rizzo regarding same (.1).	0.5	\$180.00
3/16/2021	BWW	Exchange correspondence with R. Jernigan regarding furniture and other contents at 4064 Founders Club Drive property (.1).	0.1	\$36.00
3/17/2021	BWW	Work on contract for Founders Club Drive property (.4).	0.4	\$144.00
3/18/2021	BWW	Communicate with J. Rizzo regarding escrow deposit and sale of furniture at 4064 Founders Club Drive property and finalizing purchase and sale agreement (.1); communicate with J. Rizzo regarding remission of asset sale proceeds to U.S. Marshals Service (.1).	0.2	\$72.00
3/19/2021	BWW	Work on sales transactions for Founders Club Drive properties (.5).	0.5	\$180.00
3/22/2021	BWW	Review and sign purchase and sale agreement for Founders Club Drive property (.5).	0.5	\$180.00
3/23/2021	BWW	Attend to closing on Founders Club Drive property (.3); telephone conference with C. Johnson regarding same (.2).	0.5	\$180.00
3/24/2021	BWW	Execute final purchase and sale agreement for Founders Club Drive property and forward to P. Taylor and J. Rizzo (.5); review matters regarding mortgage on Bradenton house (.2).	0.7	\$252.00
Total: Asset Disposition			21.90	\$7,884.00
ASSET	Asset Analysis and Recovery			
1/4/2021	BWW	Prepare email to P.R. regarding credentials for the Oasis website (.3); telephone call with L. Dougherty regarding Spotex (.1).	0.4	\$144.00

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
1/5/2021	BWW	Call with legal team regarding strategy for call with counsel for Spotex (.6); telephone conference with L. Dougherty regarding communication with counsel for Spotex (.2); confer with L. Dougherty regarding Oasis records (.1).	0.9	\$324.00
1/6/2021	BWW	Prepare for and participate in conference call with counsel for Spotex (2.0); confer with L. Dougherty and E. Feld regarding Oasis documents (.3).	2.3	\$828.00
1/7/2021	BWW	Telephone conference with M. Wolf regarding enforcement of subpoena (.2); communicate with L. Dougherty regarding S. Liu and Oasis website (.2); review and revise settlement agreement with Fundadministration (.6); communicate with J. Sallah and P. Regenstl (.1); review motion for approval of settlement (.3).	1.4	\$504.00
1/8/2021	BWW	Exchange emails with L. Dougherty and E. Feld regarding D. Manoukian (.3); confer with L. Dougherty regarding same (.2).	0.5	\$180.00
1/12/2021	BWW	Telephone calls with confidential informant regarding Oasis allegations (1.0).	1.0	\$360.00
1/13/2021	BWW	Confer with L. Dougherty and J. Perez regarding stay of CFTC action (.1); confer with L. Dougherty and E. Feld regarding review of documents (.2).	0.3	\$108.00
1/14/2021	BWW	Work on affidavit for Belize regulators (.7).	0.7	\$252.00
1/19/2021	BWW	Telephone call with J. Chapin of CFTC regarding potential joint interest privilege and status of Fundadministration settlement (1.0); confer with L. Dougherty regarding privilege and progress with suit against ATC Brokers (.1); telephone conference with A. Oddsley regarding funds received by Receivership (.3); communicate with J. Rizzo regarding request from CFTC (.1); telephone conference with R. Bedke regarding criminal trial and new information regarding M. DaCorta's background (.3); prepare email to J. Rizzo regarding B. Lyle (.1).	1.9	\$684.00
1/21/2021	BWW	Confer with L. Dougherty regarding Spotex (.1); attend Zoom call with Sallah Astarita firm and legal team regarding claims against ATC Brokers (1.9).	2.0	\$720.00
1/25/2021	BWW	Prepare for and attend conference call with E. Feld, L. Dougherty, and K. Phelps regarding case against ATC Brokers (.5); prepare for and participate in conference call with J. Sallah regarding Fundadministration settlement and potential to handle case against ATC Brokers (1.0).	1.5	\$540.00
1/26/2021	BWW	Confer with J. Sallah regarding Fundadministration settlement and CFTC resolutions (.8); exchange emails with CFTC regarding same (.2); communicate with Sallah Astarita firm regarding language for settlement agreement (.3).	1.3	\$468.00

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
1/27/2021	BWW	Prepare for and participate in conference call with R. Jernigan, J. Rizzo, and W. Oliver regarding Fundadministration settlement (.5).	0.5	\$180.00
2/3/2021	BWW	Work on execution of settlement documents regarding Fundadministration (1.4); exchange emails with P. Regenstl and J. Sallah regarding same (.2); review and approve letter and sign agreement regarding same (.4).	2.0	\$720.00
2/4/2021	BWW	Communicate with J. Sallah regarding settlement with Fundadministration (.2).	0.2	\$72.00
2/5/2021	BWW	Review and sign final agreement to resolve the Fundadministration case (.8); work with J. Rizzo to facilitate notarization of same (.2); communicate with L. Dougherty regarding status of Spotex production (.2).	1.2	\$432.00
2/7/2021	BWW	Telephone conference with P.R. (.4); communicate with E. Feld (.1).	0.5	\$180.00
2/11/2021	BWW	Confer with L. Dougherty and J. Perez regarding M. DaCorta's status conference in criminal action (.2); confer with L. Dougherty regarding conversation with co-counsel (.1).	0.3	\$108.00
2/12/2021	BWW	Attend Zoom call with legal team regarding case against ATC Brokers (.9).	0.9	\$324.00
2/15/2021	BWW	Review motion relating to investors and representatives' websites (.5).	0.5	\$180.00
2/19/2021	BWW	Confer with L. Dougherty regarding Spotex (.1); attend Zoom call with Sallah Astarita firm and legal team regarding claims against ATC Brokers (1.9).	2.0	\$720.00
2/24/2021	BWW	Work on motion for reappointment and retention of T. Bakas and Sallah Astarita firm (.3); review letter from C. Torres regarding ATC Brokers (.3).	0.6	\$216.00
3/1/2021	BWW	Call with E. Feld regarding communications with T. Bakas (.3).	0.3	\$108.00
3/3/2021	BWW	Exchange emails with R. Bedke (.2); prepare emails to attorney (.2); phone call regarding various issues (.6).	1.0	\$360.00
3/4/2021	BWW	Communicate with J. Rizzo regarding status of recovery of funds from Belize (.1).	0.1	\$36.00
3/10/2021	BWW	Work on hiring expert for case against ATC Brokers (.2); telephone calls with J. Sallah and P. Regenstl regarding same (.3); attention to motion to approve counsel to bring action against ATC Brokers (.4).	0.9	\$324.00
3/12/2021	BWW	Review documents from Maples Group law firm (.5).	0.5	\$180.00
3/15/2021	BWW	Communicate with J. Rizzo regarding list of outstanding lenders prepared by J. Paniagua (.1).	0.1	\$36.00

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
3/16/2021	BWW	Telephone call with E. Feld and L. Dougherty regarding assistance of U.S. Attorney (.2); telephone call with L. Dougherty regarding Spotex (.1).	0.3	\$108.00
3/17/2021	BWW	Review evidence regarding Oasis transactions, preparation for expert report, and B. Lyle interview (1.8); exchange emails with B. Lyle (.2); telephone conversation with J. Anile (.7); review emails in preparation for same (.3).	3.0	\$1,080.00
3/18/2021	BWW	Phone calls with J. Anile regarding Oasis operations and formation (2.2); telephone call with B. Lyle regarding Stratta and Oasis matters (1.2).	3.4	\$1,224.00
3/19/2021	BWW	Prepare memorandum of conversation with J. Anile (1.5).	1.5	\$540.00
3/21/2021	BWW	Review motion to retain Sallah Astarita firm and reappoint Receiver (.6); prepare email to J. Perez regarding same (.1).	0.7	\$252.00
3/22/2021	BWW	Work on motion for reappointment (.3).	0.3	\$108.00
3/23/2021	BWW	Telephone conference with G. Guya regarding case against ATC Brokers (.2); telephone conferences with J. Sallah and J. Perez regarding same (.3); telephone call with J. Sallah (.2); telephone call with J. Perez regarding language of Sallah Astarita's retention agreement (.1).	0.8	\$288.00
3/24/2021	BWW	Attend Zoom meeting regarding case against ATC brokers (.2); review motion to retain Sallah Astarita and reappoint Receiver (.3).	0.5	\$180.00
3/25/2021	BWW	Attend to payment of fee for Fundadministration mediation (.2); work on motion regarding retaining Sallah Astarita firm and reappointment of Receiver (.3); attend to matters regarding Spotex confidentiality agreement (.4); review emails regarding Spotex and D. Manoukian (.3); telephone conference with informant (.4); telephone calls to potential witnesses regarding Sterling Foster (.5).	2.1	\$756.00
3/26/2021	BWW	Attend Zoom call with J. Perez, L. Dougherty, and Sallah Astarita attorneys regarding confidentiality and motion (.2); attend Zoom call with L. Dougherty, Sallah Astarita attorneys, and counsel for ATC Brokers (.3); confer with L. Dougherty regarding next steps (.1); communicate with J. Rizzo regarding status of recovery of funds (.1); telephone call with J. Chapin regarding motion and documents (.3).	1.0	\$360.00
3/29/2021	BWW	Review tolling agreement in ATC Brokers matter (.2).	0.2	\$72.00
3/31/2021	BWW	Telephone conversation with C. Lanachi of NFA regarding M. DaCorta's prohibition on registration (.5); review and authorize wire to the Maples Group firm (.3).	0.8	\$288.00
Total: Asset Analysis and Recovery			40.40	\$14,544.00

June 01, 2021

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
BUSIN	Business Operations			
1/15/2021	BWW	Review and approve payments to vendors (.1).	0.1	\$36.00
1/19/2021	BWW	Review and authorize repair work at Founders Club Drive property (.3).	0.3	\$108.00
1/26/2021	BWW	Communicate with J. Rizzo regarding invoices to be paid and issue checks (.1).	0.1	\$36.00
2/1/2021	BWW	Exchange correspondence with R. Jernigan and J. Rizzo regarding invoices to be paid (.1).	0.1	\$36.00
2/16/2021	BWW	Review communications from J. Rizzo regarding operating account balance and returned mortgage payment (.1).	0.1	\$36.00
3/1/2021	BWW	Communicate with J. Rizzo and R. Jernigan regarding invoices to be paid and issued checks (.1).	0.1	\$36.00
3/10/2021	BWW	Review cash bank balance and other banking matters (.1); authorize transfers of funds (.1); review Oasis expense checks (.2); communicate with J. Rizzo regarding account balances and transactions (.1).	0.5	\$180.00
3/15/2021	BWW	Communicate with J. Rizzo regarding domain and website renewal (.1).	0.1	\$36.00
3/24/2021	BWW	Attend to services agreement from T. Bakas (.3).	0.3	\$108.00
3/25/2021	BWW	Communicate with J. Rizzo regarding review and execution of 2020 tax return (.1).	0.1	\$36.00
3/31/2021	BWW	Communicate with J. Rizzo regarding execution of wire request to pay Cayman Islands registration fees (.1).	0.1	\$36.00
Total: Business Operations			1.90	\$684.00
CASE	Case Administration			
1/26/2021	BWW	Review and revise report (1.0).	1.0	\$360.00
1/31/2021	BWW	Telephone call with K.M. regarding Receivership status (.2).	0.2	\$72.00
2/1/2021	BWW	Work on interim report (.1); communicate with Sallah Astarita Firm and J. Perez regarding same (.1).	0.2	\$72.00
Total: Case Administration			1.40	\$504.00
CLAIM	Claims Administration and Objections			
2/7/2021	BWW	Telephone call with investor regarding interim report and status of claims process (.5).	0.5	\$180.00
2/11/2021	BWW	Communicate with M. Lockwood regarding T.C. (.1).	0.1	\$36.00
3/9/2021	BWW	Review proposed claims determination schedule prepared by M. Lockwood (.5).	0.5	\$180.00

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Client: 025305

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
3/10/2021	BWW	Exchange correspondence with M. Lockwood regarding claims review (.1).	0.1	\$36.00
3/11/2021	BWW	Prepare for claim evaluation meeting (1.0).	1.0	\$360.00
3/12/2021	BWW	Prepare for and attend Zoom meeting with M. Lockwood regarding claims determinations (2.5).	2.5	\$900.00
3/30/2021	BWW	Telephone call with M. Lockwood regarding claims (.1).	0.1	\$36.00
Total: Claims Administration and Objections			4.80	\$1,728.00
Total Professional Service:			70.4	\$25,344.00
Total Services			\$25,344.00	
Total Current Charges				\$25,344.00
Previous Balance				\$30,528.00
<i>Less Payments</i>				<i>(\$30,528.00)</i>
PAY THIS AMOUNT				\$25,344.00

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Client: 025305

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TASK RECAP**Services**

<u>Project No.</u>	<u>Hours</u>	<u>Amount</u>
ASDIS - ASDIS	21.90	\$7,884.00
ASSET - ASSET	40.40	\$14,544.00
BUSIN - BUSIN	1.90	\$684.00
CASE - CASE	1.40	\$504.00
CLAIM - CLAIM	4.80	\$1,728.00
	<u>70.40</u>	<u>\$25,344.00</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	21.90	\$7,884.00
BWW Burton W. Wiand	ASSET - ASSET	40.40	\$14,544.00
BWW Burton W. Wiand	BUSIN - BUSIN	1.90	\$684.00
BWW Burton W. Wiand	CASE - CASE	1.40	\$504.00
BWW Burton W. Wiand	CLAIM - CLAIM	4.80	\$1,728.00
		<u>70.40</u>	<u>\$25,344.00</u>

EXHIBIT 4

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

June 01, 2021

Client: 025305

Matter: 002096

Invoice #: 19516

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RE: Oasis Receiver – Recovery from Investors

For Professional Services Rendered Through March 31, 2021

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
1/11/2021	BWW	Conference call with J. Waechter (.4); review various schedules regarding T. Hunt (.7); review information from Kapila Mukamal regarding expert reports (1.0).	2.1	\$756.00
1/12/2021	BWW	Review email from J. Waechter regarding additional payment (.1).	0.1	\$36.00
1/21/2021	BWW	Telephone call with B. McDonald regarding various filings in clawback case appeals (.3); review filings regarding same (.1).	0.4	\$144.00
1/31/2021	BWW	Review interrogatories from the Martinis (.5).	0.5	\$180.00
2/1/2021	BWW	Review settlement negotiations regarding the Kantor claim (.3).	0.3	\$108.00
2/5/2021	BWW	Review, revise, and sign interrogatory answers relating to Martinis (1.0).	1.0	\$360.00
2/7/2021	BWW	Communicate with A. Gangi regarding interrogatories from Martinis (.5).	0.5	\$180.00
2/24/2021	BWW	Review settlement agreement regarding Kantor matter (.3).	0.3	\$108.00
3/1/2021	BWW	Attend to engagement agreement for appeal (.3).	0.3	\$108.00
3/9/2021	BWW	Complete documentation for Kantor settlement (.3); review Oasis chronology (.4); review matters from settlement agreements with Kantor and A. Barton (.4).	1.1	\$396.00

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Client: 025305

Matter: 002096

Invoice #: 19516

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET		Asset Analysis and Recovery		
3/17/2021	BWW	Communications with Englander Fischer regarding McMahon bankruptcy (.3).	0.3	\$108.00
3/18/2021	BWW	Review and comment on new draft of expert opinion (1.2).	1.2	\$432.00
3/23/2021	BWW	Review and comment on mediation statement (.2); telephone conference with Arduini (.3); prepare email to G. Miller regarding bankruptcy case counsel in Salt Lake City (.2); prepare email to J. Perez and B. McConnell (.1).	0.8	\$288.00
3/29/2021	BWW	Participate in conference call with J. Waechter and B. McConnell in preparation for mediation (.5); attend to discovery matters (.2); telephone conference with J. Chapin regarding Local Rule 3.01(g) notice and emails (.3).	1.0	\$360.00
3/30/2021	BWW	Attend and participate in mediation with five defendants (8.5).	8.5	\$3,060.00
3/31/2021	BWW	Telephone conversation with J. Wechter regarding settlement agreements (.3); review mediation report (.1); communicate with J. Waechter regarding meeting with appellants' attorneys (.1); communicate regarding settlement agreement (.1).	0.6	\$216.00
Total: Asset Analysis and Recovery			19.00	\$6,840.00
Total Professional Service:			19.0	\$6,840.00
Total Services			\$6,840.00	
Total Current Charges			\$6,840.00	
Previous Balance			\$4,536.00	
Less Payments			(\$4,536.00)	
PAY THIS AMOUNT			\$6,840.00	

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TASK RECAP**Services**

<u>Project No.</u>	<u>Hours</u>	<u>Amount</u>
ASSET - ASSET	19.00	\$6,840.00
	19.00	\$6,840.00

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	19.00	\$6,840.00
	19.00	\$6,840.00

EXHIBIT 5

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

June 01, 2021

Client: 025305

Matter: 002097

Invoice #: 19517

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RE: Oasis Receiver – Raymond Montie, III.

For Professional Services Rendered Through March 31, 2021

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
1/13/2021	BWW	Telephone conference with L. Dougherty and CFTC regarding documents (.5).	0.5	\$180.00
1/19/2021	BWW	Telephone call with L. Dougherty regarding discovery (.2).	0.2	\$72.00
2/15/2021	BWW	Confer with L. Dougherty regarding selection of new mediator (.2).	0.2	\$72.00
2/16/2021	BWW	Confer with L. Dougherty regarding discovery issues (.1).	0.1	\$36.00
2/23/2021	BWW	Confer with L. Dougherty and J. Perez regarding mediation issues (.2).	0.2	\$72.00
2/24/2021	BWW	Telephone conference with L. Dougherty regarding mediation (.1).	0.1	\$36.00
2/28/2021	BWW	Communicate with J. Perez and L. Dougherty regarding expert witness issues (.3).	0.3	\$108.00
3/1/2021	BWW	Attend to matters relating to witness on fiduciary duty (.3).	0.3	\$108.00
3/2/2021	BWW	Attend to litigation issues (.5).	0.5	\$180.00
3/3/2021	BWW	Work on expert for fiduciary claim (.9); telephone calls with L. Dougherty regarding same (.3).	1.2	\$432.00
3/7/2021	BWW	Communicate with L. Dougherty regarding assignments for Cayman Islands expert (.5).	0.5	\$180.00

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Matter: 002097

Invoice #: 19517

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
3/7/2021	BWW	Prepare for and participate in call with K. Pearson of Harneys firm (1.9); work on issues regarding expert report (.6).	2.5	\$900.00
3/9/2021	BWW	Review and execute engagement agreement for expert in Cayman Islands (.5).	0.5	\$180.00
3/10/2021	BWW	Work on items for expert on fiduciary duty (.3).	0.3	\$108.00
3/16/2021	BWW	Participate in conference call with E. Feld and L. Dougherty regarding expert material in Belize (.6).	0.6	\$216.00
3/19/2021	BWW	Prepare for and participate in conference call with K. Pearson and L. Dougherty (.8); confer with L. Dougherty regarding expert's opinion (.2).	1.0	\$360.00
3/22/2021	BWW	Review final draft of expert opinion for R. Montie case (.2); telephone conference with K. Pearson regarding same (.6).	0.8	\$288.00
Total: Asset Analysis and Recovery			9.80	\$3,528.00
Total Professional Service:			9.8	\$3,528.00
Total Services			\$3,528.00	
Total Current Charges				\$3,528.00
Previous Balance				\$936.00
Less Payments				(\$936.00)
PAY THIS AMOUNT				\$3,528.00

June 01, 2021

Client: 025305

Matter: 002097

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TASK RECAP**Services**

<u>Project No.</u>	<u>Hours</u>	<u>Amount</u>
ASSET - ASSET	9.80	\$3,528.00
	9.80	\$3,528.00

Disbursements

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

BREAKDOWN BY PERSONPerson

RMM Max McKinley
 BWW Burton W. Wiand

<u>Project No.</u>	<u>Hours</u>	<u>Amount</u>
ASSET - ASSET	0.00	\$0.00
ASSET - ASSET	9.80	\$3,528.00
	9.80	\$3,528.00

EXHIBIT 6

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

Receivership	
Expense Type	Amount
Photocopies (180 Pages)	\$ 27.00
Online Research	\$ 151.18
Delivery Services / Messengers	\$ 280.61
Telephone	\$ 18.96
Court Fees	\$ 85.50
Web-Related Expenses	\$ 1,232.50
Subpoena Fees	\$ 200.00
Other	\$ 497.47
SUBTOTAL	\$ 2,493.22

Recovery from Investors	
Expense Type	Amount
Telephone	\$ 8.14
Online Research	\$ 36.50
SUBTOTAL	\$ 44.64

Litigation Against Raymond P. Montie	
Expense Type	Amount
Photocopies (12 pages)	\$ 1.80
Telephone	\$ 10.08
Online Research	\$ 528.74
SUBTOTAL	\$ 540.62

TOTAL **\$ 3,078.48**

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

FIRM MEMBERS	STANDARD RATES	DISCOUNTED RATE
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

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

June 17, 2021

Client: 025305

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RE: CFTC Oasis Receivership - Legal Team

Travel is half rate outside of 20 miles.

For Professional Services Rendered Through March 31, 2021

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASDIS	Asset Disposition			
1/4/2021	JJP	Communicate with Receiver and team regarding status of several real estate transactions (.3); communicate with F. Duran regarding Desert Ridge property (.1); revise motion to approve sale of Midnight Pass property to address objections made by M. DaCorta and finalize and file motion (1.5).	1.9	\$608.00
1/4/2021	JR	Communicate with Receiver, listing agent, closing agent, and legal team regarding status of listed properties and properties under contract (.5); review correspondence between J. Perez and F. Duran regarding removal of possessions in Desert Ridge property (.1); review correspondence from J. Perez and draft motion to approve sale of Midnight Pass property (.1).	0.7	\$94.50
1/4/2021	LD	Review correspondence concerning Desert Ridge property (.1); attend portion of telephone conference with counsel for R. Montie that concerned Hauppauge, N.Y. house sale (.1).	0.2	\$64.00
1/5/2021	JR	Communicate with Receiver, listing agent, closing agent, and legal team regarding status of listed properties and properties under contract (.5).	0.5	\$67.50

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASDIS	Asset Disposition			
1/5/2021	LD	Confer with real estate attorney concerning R. Montie's house sale (.1); review executed R. Montie's house sales contract, confer with real estate attorney, and update team (.2).	0.3	\$96.00
1/6/2021	JJP	Communicate with title counsel and team regarding tax lien on Desert Ridge property (.5).	0.5	\$160.00
1/6/2021	JR	Communicate with Receiver, listing agent, closing agent, and legal team regarding status of listed properties and properties under contract (.5); receipt and review of offer to purchase Founders Club properties (.2).	0.7	\$94.50
1/7/2021	JR	Communicate with Receiver, listing agent, closing agent, and legal team regarding status of listed properties and properties under contract (.5); communicate with Receiver, legal team and PDR regarding receipt of net proceeds related to sale of Desert Ridge property (.1); assemble materials related to asset sales in preparation for remission of funds to U.S. Marshals Service (.3).	0.9	\$121.50
1/8/2021	JJP	Communicate with B. Price and PDR regarding transfer of funds to U.S. Marshals Service (.3).	0.3	\$96.00
1/8/2021	JR	Communicate with Receiver, listing agent, closing agent, and legal team regarding status of listed properties and properties under contract (.5).	0.5	\$67.50
1/11/2021	JJP	Communicate with team regarding affidavits of publication and other items necessary to close pending real estate transactions (1.0).	1.0	\$320.00
1/11/2021	JR	Communicate with Receiver, listing agent, closing agent, and legal team regarding status of listed properties and properties under contract (.5).	0.5	\$67.50
1/11/2021	MG	Communicate with the Sarasota Herald-Tribune regarding the affidavit for Midnight Pass property notice of sale (.3).	0.3	\$40.50
1/12/2021	AS	Review deed for Vardon Terrace property and witness same through DocVerify (.5); prepare emails to J. Rizzo (.2).	0.7	\$94.50
1/12/2021	JR	Communicate with Receiver, listing agent, closing agent, and legal team regarding status of listed properties and properties under contract (.5).	0.5	\$67.50
1/12/2021	MG	Assist with finalizing the Receiver's deed for Vardon Terrace Unit #105 (.1).	0.1	\$13.50
1/13/2021	JJP	Revise, finalize, and file several notices regarding pending real estate transactions (1.2).	1.2	\$384.00
1/13/2021	AS	Review deed for Vardon Terrace property and witness same via DocVerify with Receiver, J. Rizzo and M. Gura (.7).	0.7	\$94.50

June 17, 2021

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASDIS	Asset Disposition			
1/13/2021	JR	Communicate with Receiver, listing agent, closing agent, and legal team regarding status of listed properties and properties under contract (2.5).	2.5	\$337.50
1/13/2021	MG	Assist with finalizing the Receiver's deed for Vardon Terrace Unit #105 (1.1).	1.1	\$148.50
1/14/2021	JR	Communicate with Receiver, listing agent, closing agent, and legal team regarding status of listed properties and properties under contract (1.0).	1.0	\$135.00
1/15/2021	JJP	Direct publication of notice of sale for Vardon Terrace Unit #105 (.3).	0.3	\$96.00
1/15/2021	JR	Communicate with Receiver, listing agent, closing agent, and legal team regarding status of listed properties and properties under contract (.5).	0.5	\$67.50
1/15/2021	MG	Communicate with the Herald Tribune regarding a notice of sale for Vardon Terrace Unit #105 (.3).	0.3	\$40.50
1/19/2021	JJP	Draft and revise motion to approve sale of Vardon Terrace Unit #105, including exhibits and proposed order (3.3); begin Local Rule 3.01(g) communications regarding motion (.3); revise second notice of publication regarding Midnight Pass property (.5).	4.1	\$1,312.00
1/19/2021	JR	Communicate with Receiver, listing agent, closing agent, and legal team regarding status of listed properties and properties under contract (.5); prepare purchase and sale agreement for Founders Club vacant lot (.4); review correspondence regarding sale of R. Montie's car and status of sale of New York house (.1); review correspondence related to discovery responses and status of E-Hounds platform (.1).	1.1	\$148.50
1/19/2021	MG	Communicate with the Sarasota Herald-Tribune regarding the notice of sale for Vardon Terrace Unit #105 (.3).	0.3	\$40.50
1/20/2021	JJP	Revise, finalize, and file second notice of publication regarding Midnight Pass property (.2).	0.2	\$64.00
1/20/2021	JR	Communicate with Receiver, listing agent, closing agent, and legal team regarding status of listed properties and properties under contract (.5).	0.5	\$67.50
1/21/2021	JJP	Communicate with team regarding items needed to close pending real estate transactions (.3).	0.3	\$96.00
1/21/2021	JR	Communicate with Receiver, listing agent, closing agent, and legal team regarding status of listed properties and properties under contract (.5).	0.5	\$67.50
1/22/2021	JJP	Revise, finalize, and file motion to approve sale of Vardon Terrace Unit #105, including final Local Rule 3.01(g) communications (1.0).	1.0	\$320.00

June 17, 2021

Client: 025305

Matter: 001922

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASDIS	Asset Disposition			
1/22/2021	JR	Communicate with Receiver, listing agent, closing agent, and legal team regarding status of listed properties and properties under contract (.5).	0.5	\$67.50
1/22/2021	MG	Initial review of the affidavit for notice of sale for Vardon Terrace Unit #105 (.1).	0.1	\$13.50
1/25/2021	JJP	Communicate with team regarding closing pending real estate transactions (.3).	0.3	\$96.00
1/25/2021	JR	Communicate with Receiver, listing agent, closing agent, and legal team regarding status of listed properties and properties under contract (.5).	0.5	\$67.50
1/25/2021	LD	Confer with real estate attorney concerning status of title search and closing on R. Montie's house in New York (.1).	0.1	\$32.00
1/26/2021	JR	Communicate with Receiver, listing agent, closing agent, and legal team regarding status of listed properties and properties under contract (.3); communicate with Receiver and CFTC regarding funds collected to date and assets sold and status of remaining asset collection efforts (.3).	0.6	\$81.00
1/27/2021	JJP	Draft motion to approve sale of 4058 Founders Club property, including revisions to proposed order and notice of sale (2.5); begin Local Rule 3.01(g) communications regarding motion (.3).	2.8	\$896.00
1/27/2021	JR	Communicate with Receiver, listing agent, closing agent, and legal team regarding status of listed properties and properties under contract (.4).	0.4	\$54.00
1/28/2021	JJP	Coordinate publication of notice of sale for 4058 Founders Club property (.2).	0.2	\$64.00
1/28/2021	JR	Communicate with Receiver, listing agent, closing agent, and legal team regarding status of listed properties and properties under contract (.5).	0.5	\$67.50
1/28/2021	MG	Communicate with the Sarasota Herald-Tribune regarding the notice of sale for Founders Club Drive property (.2).	0.2	\$27.00
1/28/2021	LD	Review correspondence concerning Founders Club Drive property (.1).	0.1	\$32.00
1/29/2021	JJP	Revise, finalize, and file motion to approve sale of 4058 Founders Club property (1.0); attention to potential title issue regarding sale of Midnight Pass property (1.3).	2.3	\$736.00
1/29/2021	EF	Call with Receiver and attention to Oasis International Group director change and share transfers for clearing title issues relating to Midnight Pass property (.5).	0.5	\$120.00
1/29/2021	JR	Communicate with Receiver, listing agent, closing agent, and legal team regarding status of listed properties and properties under contract (.5).	0.5	\$67.50

June 17, 2021

Client: 025305

Matter: 001922

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASDIS	Asset Disposition			
1/29/2021	MG	Communicate with Sarasota Herald-Tribune to finalize the notice of sale for Founders Club Drive property (.2).	0.2	\$27.00
1/31/2021	LD	Review correspondence on Midnight Pass property (.2).	0.2	\$64.00
2/1/2021	JR	Communicate with Receiver, listing agent, closing agent, and legal team regarding status of listed properties and properties under contract (.5).	0.5	\$67.50
2/2/2021	JR	Communicate with Receiver, listing agent, closing agent, and legal team regarding status of listed properties and properties under contract (.3).	0.3	\$40.50
2/2/2021	MG	Initial review of the affidavit for the notice of sale for Founders Club Drive property (.1).	0.1	\$13.50
2/3/2021	JR	Communicate with Receiver, listing agent, closing agent, and legal team regarding status of listed properties, properties under contract and closing documents for Midnight Pass property and Vardon Terrace Unit #307 (.4).	0.4	\$54.00
2/4/2021	JR	Communicate with closing agent regarding status of closing Vardon Terrace Unit #307 (.1).	0.1	\$13.50
2/5/2021	JR	Communicate with Receiver, listing agent, closing agent, and legal team regarding status of listed properties, properties under contract and closing documents for Midnight Pass property and Vardon Terrace Unit #307 (.3).	0.3	\$40.50
2/9/2021	JR	Review correspondence between closing agent and listing agent regarding status of setting closing date for Founders Club property (.1); communicate with closing agent regarding status of closing for Vardon Terrace Unit #105 (.1).	0.2	\$27.00
2/10/2021	JJP	Revise, finalize, and file notice regarding sale of 4058 Founders Club property (.5).	0.5	\$160.00
2/10/2021	JR	Review correspondence and closing documents regarding Founders Club property and Vardon Terrace Unit #105 (.2); communicate with closing agent and Receiver regarding closing documents for Vardon Terrace Unit #105 and Founders Club property (.1); update chart of sold properties for remission to U.S. Marshals Service (.2).	0.5	\$67.50
2/11/2021	JR	Review correspondence and spreadsheet of expenses related to Founders Club property (.1); update chart of sold properties for remission to U.S. Marshals Service (.1); review closing documents related to Founders Club property and Vardon Terrace Unit #105 (.4); communicate with Receiver and closing agent regarding closing documents for Founders Club property and Vardon Terrace Unit #105 (.1).	0.7	\$94.50

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Date	TKPR	Description of Services	Hours	Amount
ASDIS	Asset Disposition			
2/12/2021	JJP	Revise and file second notice of publication regarding Vardon Terrace Unit #105 (.4).	0.4	\$128.00
2/12/2021	JR	Review and revise closing documents for Founders Club property and Vardon Terrace Unit #105 (.4); communicate with Receiver regarding closing documents for Founders Club property and Vardon Terrace Unit #105 (.3).	0.7	\$94.50
2/15/2021	AS	Review and witness multiple property deeds and attend Zoom notary session regarding same (1.1).	1.1	\$148.50
2/15/2021	JR	Conference with Receiver and witnesses regarding execution of closing documents for Founders Club property and Vardon Terrace Unit #105 (.4); communicate with closing agent regarding closing documents for Founders Club property and Vardon Terrace Unit #105 (.1); communicate with listing agent regarding inquiry and purchase offer on Founders Club property (.1).	0.6	\$81.00
2/15/2021	MG	Assist with finalizing the deeds for Vardon Terrace Unit #105 and 4058 Founders Club property (.8).	0.8	\$108.00
2/16/2021	JJP	Revise, finalize, and file consolidated notice of publication regarding 4058 Founders Club property (.4).	0.4	\$128.00
2/16/2021	JR	Conference with closing agent regarding status of closings for 4058 Founders Club property and Vardon Terrace Unit #105 (.1); review correspondence from listing agent regarding inquiry and purchase offer on 4064 Founders Club property (.1).	0.2	\$27.00
2/16/2021	LD	Confer with real estate attorney P. Wagner concerning sale of R. Montie's residence in Hauppauge, New York (.1).	0.1	\$32.00
2/17/2021	JR	Conference with closing agent and Receiver regarding status of closings for 4058 Founders Club property and Vardon Terrace Unit #105 (.1); review correspondence regarding buyer's counter-offer for 4064 Founders Club property (.1); communicate with Receiver regarding buyer's counter-offer and other information related to 4064 Founders Club property (.1).	0.3	\$40.50
2/18/2021	JR	Conference with closing agent and Receiver regarding status of closings for 4058 Founders Club property and Vardon Terrace Unit #105 (.1).	0.1	\$13.50
2/18/2021	MG	Assist with finalizing the deed for Founders Club property (.1).	0.1	\$13.50

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Date	TKPR	Description of Services	Hours	Amount
ASDIS	Asset Disposition			
2/19/2021	JR	Conference with closing agent and Receiver regarding status of closings for 4058 Founders Club property and Vardon Terrace Unit #105 (.1); review correspondence from ServisFirst Bank regarding proceeds of sale of 4058 Founders Club property (.1); prepare correspondence to Receiver, J. Perez and PDR regarding receipt of sale proceeds of 4058 Founders Club property (.1); update spreadsheet of remission information for asset sales for U.S. Marshals Service (.3); communicate with J. Perez, Receiver and PDR regarding remission information (.1).	0.7	\$94.50
2/22/2021	JR	Review correspondence between closing agent and Receiver regarding final property sale wires and documentation (.1).	0.1	\$13.50
3/1/2021	JR	Review correspondence from listing agent regarding potential purchaser for 4064 Founders Club property and request for documentation of the work being completed in the home (.1).	0.1	\$13.50
3/2/2021	JR	Communicate with listing agent, Receiver, R. Jernigan and J. Perez regarding status of offer to purchase 4064 Founders Club property (.1); communicate with Receiver, PDR and J. Perez regarding second remission of asset sale proceeds to U.S. Marshals Service (.1).	0.2	\$27.00
3/3/2021	JJP	Communicate with F. Duran and team regarding vehicle (.2).	0.2	\$64.00
3/3/2021	JR	Review correspondence from listing agent and offer to purchase 4064 Founders Club property (.1); review correspondence from Receiver in response to offer to purchase 4064 Founders Club property (.1); communicate with F. Duran and legal team regarding sale of Porsche 911 per review of sale documentation (.2).	0.4	\$54.00
3/4/2021	JR	Review correspondence from F. Duran regarding sale of Porsche 911 (.1); review correspondence from listing agent and offer to purchase 4064 Founders Club property (.1); review correspondence from Receiver in response to offer to purchase 4064 Founders Club property (.1); communicate with U.S. Marshals Service regarding sale of Porsche 911 and status of loan payoff (.1).	0.4	\$54.00
3/4/2021	LD	Confer with counsel for R. Montie concerning sale of Hauppauge, New York house (.1).	0.1	\$32.00
3/5/2021	LD	Review and respond to correspondence from real estate counsel concerning sale of R. Montie's residence in Hauppauge, New York (.1).	0.1	\$32.00

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Date	TKPR	Description of Services	Hours	Amount
ASDIS	Asset Disposition			
3/8/2021	JR	Review correspondence from listing agent and offer to purchase 4064 Founders Club property (.1); review correspondence from Receiver in response to offer to purchase 4064 Founders Club property (.1); review correspondence from listing agent in response to Receiver's counter-offer to purchase 4064 Founders Club property (.1).	0.3	\$40.50
3/9/2021	JR	Review correspondence from listing agent and offer to purchase 4064 Founders Club property (.1); review Receiver's response to offer to purchase 4064 Founders Club property (.1); communicate with listing agent regarding current offers on 4064 Founders Club property (.1).	0.3	\$40.50
3/9/2021	LD	Review and respond to correspondence from real estate attorney concerning sale of R. Montie residence in Hauppauge, New York (.1).	0.1	\$32.00
3/10/2021	JR	Review correspondence from listing agent with counter-offer to purchase 4064 Founders Club property (.1); receipt and review of Receiver's correspondence and response to counter-offer to purchase 4064 Founders Club property (.1).	0.2	\$27.00
3/11/2021	JR	Review correspondence from listing agent with second counter-offer to purchase 4064 Founders Club property (.1).	0.1	\$13.50
3/12/2021	JR	Review Receiver's response to counter-offer to purchase 4064 Founders Club property (.1); communicate with L. Dougherty regarding status of sale of R. Montie's New York home and vehicle (.1).	0.2	\$27.00
3/15/2021	JR	Review correspondence from listing agent regarding 4064 Founders Club property (.1).	0.1	\$13.50
3/15/2021	LD	Review and respond to correspondence from counsel for R. Montie concerning vehicle at Hauppauge property (.1).	0.1	\$32.00
3/16/2021	JR	Review correspondence from listing agent with buyer's acceptance of Receiver's counter-offer to purchase 4064 Founders Club property (.1); review correspondence from Receiver and R. Jernigan regarding furniture and other contents at 4064 Founders Club property (.1); draft purchase and sale agreement for 4064 Founders Club property per request of Receiver (.8); prepare correspondence to Receiver, J. Perez and legal team regarding draft purchase and sale agreement, sale terms and other issues related to 4064 Founders Club property (.2).	1.2	\$162.00
3/17/2021	JJP	Attention to issues relating to sale of 4064 Founders Club property (.5).	0.5	\$160.00

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Date	TKPR	Description of Services	Hours	Amount
ASDIS	Asset Disposition			
3/17/2021	JR	Communicate with R. Jernigan regarding Receiver's review of draft purchase and sale agreement for 4064 Founders Club property (.1); communicate with listing agent regarding status of draft purchase and sale agreement for 4064 Founders Club property (.1); prepare correspondence to Receiver, listing agent, R. Jernigan and J. Perez regarding edits to purchase and sale agreement for 4064 Founders Club property, potential title issues, escrow deposit, payoff of loan and remaining contents per review of case and property-related documentation (.3); prepare correspondence to closing agent regarding potential title issues and loan payoff for 4064 Founders Club property per request of J. Perez and Receiver (.2); review inventory of remaining furniture and items at 4064 Founders Club property and related correspondence from R. Jernigan (.1); review correspondence from listing agent regarding escrow deposit for 4064 Founders Club property (.1).	0.9	\$121.50
3/18/2021	JR	Review correspondence from listing agent regarding title issues related to 4064 Founders Club property (.1); communicate with Receiver regarding escrow deposit and sale of furniture at 4064 Founders Club property and finalizing purchase and sale agreement (.1); communicate with Receiver regarding remission of asset sale proceeds to U.S. Marshals Service (.1).	0.3	\$40.50
3/19/2021	JR	Review correspondence from listing agent regarding status of purchase and sale agreement for 4064 Founders Club property (.1); review correspondence from Receiver regarding escrow deposit and sale of furniture at 4064 Founders Club property and finalizing purchase and sale agreement (.1); revise purchase and sale agreement for 4064 Founders Club property per request of Receiver (.3); communicate with Receiver and listing agent regarding revised purchase and sale agreement for 4064 Founders Club property (.1).	0.6	\$81.00
3/22/2021	JR	Review correspondence from listing agent with executed purchase and sale agreement from buyers and agents for 4064 Founders Club property (.1); review correspondence from Receiver with executed purchase and sale agreement (.1); prepare correspondence to U.S. Marshals Service with executed purchase and sale agreement for 4064 Founders Club property and request for execution of U.S. Marshals Service consent page (.1); review correspondence from Receiver regarding remission of asset sale proceeds to U.S. Marshals Service upon completion of sale of 4064 Founders Club property (.1); communicate with listing agent regarding status of execution of purchase and sale agreement for 4064 Founders Club property (.1).	0.5	\$67.50

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Date	TKPR	Description of Services	Hours	Amount
ASDIS	Asset Disposition			
3/23/2021	JR	Review correspondence from listing agent with executed purchase and sale agreement for 4064 Founders Club property (.1); communicate with Receiver regarding executed purchase and sale agreement (.1); review correspondence from U.S. Marshal's Service regarding execution of consent to purchase and sale agreement for 4064 Founders Club property (.1); prepare correspondence to closing agent, listing agent, Receiver and legal team regarding fully executed purchase and sale agreement for 4064 Founders Club property and loan payoff (.2); review correspondence from listing agent regarding buyer's contact information for 4064 Founders Club property (.1).	0.6	\$81.00
3/26/2021	JR	Communicate with closing agent regarding status of receipt of escrow deposit from buyer for 4064 Founders Club property (.1).	0.1	\$13.50
3/29/2021	JR	Review correspondence from closing agent regarding receipt of escrow deposit from buyer for 4064 Founders Club property (.1).	0.1	\$13.50
3/30/2021	JR	Communicate with closing agent regarding status of lien search on 4064 Founders Club property (.1); review correspondence from closing agent regarding survey for 4064 Founders Club property (.1).	0.2	\$27.00
Total: Asset Disposition			52.30	\$10,776.00
ASSET	Asset Analysis and Recovery			
1/4/2021	EF	Continue review of documents for analysis of potential claims against third-parties for fraudulent transfers and aiding and abetting fraud (6.6).	6.6	\$1,584.00
1/4/2021	AS	Review and revise solicitor information for Receiver (2.5).	2.5	\$337.50
1/4/2021	JR	Communicate with L. Dougherty regarding contact information for J. Paniagua (.1); review correspondence between L. Dougherty, J. Perez and E-Hounds regarding document platform access and implementation of new system (.1).	0.2	\$27.00
1/4/2021	LD	Confer with E-Hounds concerning case documents (.1); telephone conference with Receiver concerning Spotex (.1); review case notes and make list of next tasks (.2); confer with E. Feld (.1); confer with J. Rizzo (.1); confer with counsel for Spotex (.1); update Receiver concerning preparations for call (.2).	0.9	\$288.00
1/5/2021	EF	Call with Receiver and legal team regarding strategy for call with Spotex counsel (.6); continue review of Spotex, ATC Brokers and documents provided by J. Paniagua for analysis of potential third-party claims (5.1).	5.7	\$1,368.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET		Asset Analysis and Recovery		
1/5/2021	LD	Telephone conference with Receiver and E. Feld concerning Spotex (.6); review emails from former Oasis employee (.4); make notes concerning next case steps (.3); confer with former Oasis employee (.1); call former Oasis employee (.1); review Oasis documents (3.1); draft and revise correspondence with Spotex attorney (.4); telephone conference with Receiver (.2); confer with counsel for Spotex (.1); confer with Receiver concerning Oasis records (.1).	5.4	\$1,728.00
1/6/2021	EF	Zoom conference call with counsel for Spotex regarding requests for documents and information (1.5); continue review of Spotex and ATC Brokers documents for analysis of potential third-party claims (4.7).	6.2	\$1,488.00
1/6/2021	LD	Review notes in preparation for call with counsel for Spotex (.5); confer with J. Perez concerning Spotex (.1); Zoom conference with counsel for Spotex, Receiver, and E. Feld (1.5); research Oasis documents on U drive (1.8); advise Receiver concerning Oasis technical personnel (.1); research Oasis documents on E-Hounds platform (1.6); confer with Receiver and E. Feld about results of research (.3).	5.9	\$1,888.00
1/7/2021	AS	Prepare final changes to solicitor spreadsheet and prepare email to M. Gura regarding same (2.1).	2.1	\$283.50
1/7/2021	LD	Confer with J. Perez concerning R. Montie's vehicle at Hauppauge, New York house (.1); confer with Receiver and E. Feld concerning broker (.1); confer with K. Phelps concerning investigation (.1); review case records (.6); review Oasis documents (.7); update K. Phelps (.2).	1.8	\$576.00
1/8/2021	EF	Communicate with legal team regarding funds directed to Godfrey firm from Oasis (.2).	0.2	\$48.00
1/8/2021	LD	Confer with Receiver regarding possible claims and next steps (.2).	0.2	\$64.00
1/11/2021	EF	Review documents from legal team database for analysis of potential third party claims for fraudulent transfers and/or aiding and abetting (3.5).	3.5	\$840.00
1/11/2021	LD	Confer with counsel for Spotex (.1).	0.1	\$32.00
1/12/2021	EF	Continue review of Spotex and ATC Brokers documents for evaluation of potential third-party claims (2.9).	2.9	\$696.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
1/12/2021	LD	Telephone conference with Spotex counsel M. Adams and M. Kingman concerning document production (.5); review Spotex documents (.8); review notes of conference with Spotex counsel (.2); summarize conference and next steps for Receiver (.2); review correspondence from Department of Justice concerning stay of CFTC case (.1); review correspondence and transaction schedules concerning Glenn Godfrey & Co. (.1).	1.9	\$608.00
1/13/2021	EF	Continue review of documents for potential third-party aiding/abetting and fraudulent transfer claims (3.3).	3.3	\$792.00
1/13/2021	LD	Confer with Receiver and J. Perez concerning stay of CFTC action (.1); review documents provided by Spotex counsel (.2); review additional Spotex documents (.4); confer with Receiver and E. Feld (.2).	0.9	\$288.00
1/14/2021	JJP	Revise, finalize, and file Receiver's third motion to approve clawback settlements (.8).	0.8	\$256.00
1/19/2021	LD	Telephone conference with Receiver concerning status (.1); telephone conference with J. Perez concerning next steps (.1); confer with K. Phelps (.1); review intervenor United States' motion to extend stay and order granting same (.2); confer with counsel for R. Montie concerning car at New York house (.1).	0.6	\$192.00
1/20/2021	LD	Telephone conference with counsel for R. Montie concerning vehicle at Hauppauge, New York house (.2).	0.2	\$64.00
1/21/2021	LD	Confer with counsel for Spotex (.1); confer with Receiver (.1); confer with K. Phelps concerning call (.2).	0.4	\$128.00
1/22/2021	LD	Review correspondence from counsel for J. Haas (.1).	0.1	\$32.00
1/23/2021	LD	Review status of Spotex production and make notes for follow-up and next steps (.2).	0.2	\$64.00
1/25/2021	EF	Call with outside counsel regarding representation for potential third-party claims (.3); review margin call documents provided by Spotex for evaluation of same (.4).	0.7	\$168.00
1/25/2021	LD	Confer with counsel for Spotex (.1); confer with Receiver (.1); telephone conference with K. Phelps (.2); research reappointment (.4); direct drafting of motion to reappoint Receiver (.2); confer with J. Perez (.1); confer with counsel for Spotex (.1); telephone conference with counsel for Spotex (.3); revise motion for reappointment (.8); review update on Belize funds (.1).	2.4	\$768.00
1/27/2021	JR	Communicate with Receiver and outside counsel regarding status of settlement with Fundadministration and wire instructions (.2).	0.2	\$27.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
1/28/2021	LD	Review proposed consent order between CFTC and Fundadministration (.2); review correspondence and documents concerning Full Spectrum Wellness (.2).	0.4	\$128.00
1/31/2021	LD	Confer with J. Perez (.1); revise motion for reappointment of Receiver (1.8).	1.9	\$608.00
2/1/2021	LD	Draft and revise motion to reappoint Receiver (5.1); review statutes and case law concerning reappointment (2.8); review executed consent of Fundadministration (.1); confer with J. Perez and E. Feld (.1).	8.1	\$2,592.00
2/2/2021	LD	Review edits by E. Feld to motion to reappoint Receiver (.1); confer with E. Feld and J. Perez (.1).	0.2	\$64.00
2/5/2021	JJP	Begin Local Rule 3.01(g) communications regarding motion to approve settlement with Fundadministration, Inc. and related communications with J. Sallah and team (.9).	0.9	\$288.00
2/5/2021	JR	Communicate with Receiver regarding Fundadministration settlement agreement and execution of same (.2).	0.2	\$27.00
2/5/2021	LD	Advise Receiver concerning status of Spotex production (.2).	0.2	\$64.00
2/8/2021	JJP	Continue Local Rule 3.01(g) communications regarding motion to approve settlement with Fundadministration, Inc. and related communications with J. Sallah and team (.7).	0.7	\$224.00
2/9/2021	LD	Review motion for approval of Fundadministration settlement (.1); confer with K. Phelps concerning status (.1).	0.2	\$64.00
2/11/2021	LD	Confer with Receiver and J. Perez concerning M. DaCorta status conference in criminal action (.2); confer with Receiver concerning conference with co-counsel (.1); monitor status conference in M. DaCorta criminal case (.3); summarize status conference for Receiver and summarize advice concerning next steps (.4).	1.0	\$320.00
2/12/2021	JJP	Review and revise motion to reappoint Receiver (.7); telephone conference with L. Dougherty regarding motion (.2); Zoom call with Receiver and team regarding claims against ATC Brokers (.9).	1.8	\$576.00
2/12/2021	EF	Zoom conference with Receiver and legal team regarding claims against ATC Brokers (.9); correspondence with T. Bakas regarding trading analysis (.1).	1.0	\$240.00
2/12/2021	MG	Review investors who claim they were solicited by R. Montie and J. Haas (.9).	0.9	\$121.50
2/12/2021	LD	Telephone call with J. Perez concerning motion to reappoint Receiver (.2); Zoom conference with Receiver and outside counsel (.9); review and respond to correspondence concerning consultant (.1).	1.2	\$384.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
2/15/2021	JR	Communicate with R. Jernigan regarding Roar of the Lion Fitness investor analysis (.1); review correspondence from MS Bioanalytical regarding Roar of the Lion Fitness inventory analysis (.1).	0.2	\$27.00
2/15/2021	MG	Continue review of investors who claim they were solicited by R. Montie and J. Haas (1.6).	1.6	\$216.00
2/15/2021	LD	Review edits to motion to reappoint Receiver (.4); confer with J. Perez (.1); review case notes and list of next steps (.3); revise motion to reappoint Receiver (1.6); review past motions to engage contingency counsel and litigation consultants (.5); revise motion to reappoint Receiver and engage contingency counsel and litigation consultant (1.1).	4.0	\$1,280.00
2/16/2021	JJP	Communicate with outside counsel regarding potential third-party litigation and attention to related issues (.6).	0.6	\$192.00
2/16/2021	LD	Confer with J. Sallah concerning meeting (.1); revise motion to reappoint Receiver and engage J. Sallah and T. Bakas (1.8); review case notes (.7); review case filings (1.3).	3.9	\$1,248.00
2/17/2021	LD	Revise motion to reappoint Receiver and engage J. Sallah and T. Bakas (5.2); review correspondence from counsel for J. Haas (.1); review docket and filings in clawback case for information for motion (1.5); review case law (1.1); review background of T. Bakas (.4).	8.3	\$2,656.00
2/19/2021	JJP	Prepare for and participate in call with Receiver and team regarding potential claims against ATC (2.0).	2.0	\$640.00
2/19/2021	EF	Call with Sallah Astarita firm and legal team regarding ATC Brokers claims (1.9); prepare presentation for same (.9).	2.8	\$672.00
2/19/2021	LD	Review case filings, document production, and case notes in preparation for Zoom call (.7); Zoom call with case team and J. Sallah firm (1.9); confer with J. Sallah firm (.1); review Florida Bar correspondence concerning B. Winters (.1); research case filings and forward additional documents to J. Sallah firm (.2); review and respond to message from counsel for Spotex seeking update (.1); confer with Receiver concerning Spotex (.1); summarize status, background, and advice concerning inquiry from ATC Brokers (.3); review case notes and next steps (.4).	3.9	\$1,248.00
2/23/2021	JJP	Review letter from C. Torres regarding potential litigation against ATC and communicate with team regarding same (.8); revise motion to reappoint Receiver and approve engagement of contingency counsel to assert claims against ATC (3.5).	4.3	\$1,376.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
2/23/2021	LD	Review letter from counsel for ATC Brokers (.3); review revised draft of motion to reappoint Receiver and engage Sallah Astarita firm (.5); review case notes and summarize additional information for J. Perez (.3); review and revise language (.2); confer with J. Perez regarding revisions (.1).	1.4	\$448.00
2/24/2021	EF	Exchange correspondence with Sallah Astarita Firm regarding documents and information for drafting claims against ATC Brokers (.4); review ATC Brokers documents for same (.8); review and submit comments for motion to reappoint Receiver and to approve engagement of Sallah Astarita firm (.2); exchange correspondence with T. Bakas of RPM Markets regarding potential trading review analysis (.1).	1.5	\$360.00
2/24/2021	LD	Review case notes (.3); review Spotex confidentiality agreement (.3); review case documents (.3); telephone conference with J. Perez (.4); research case pleadings (.2); confer with co-counsel (.1); research case files and update Sallah Astarita firm (2.4); confer with J. Perez and E. Feld regarding E-Hounds platform (.1); confer with E-Hounds about access to database (.1).	4.2	\$1,344.00
2/25/2021	LD	Confer with E. Feld regarding call (.1); review order approving Receiver's settlement with Fundadministration, Inc. (.1); review Receiver's edits to motion to reappoint Receiver (.2); review additional edits to motion (.1); confer with J. Perez concerning motion (.1); review case notes and next tasks (.2).	0.8	\$256.00
3/1/2021	EF	Call with T. Bakas regarding potential trading analysis engagement (.9); call with Receiver regarding same (.3); prepare materials to send to T. Bakas for same (.4).	1.6	\$384.00
3/1/2021	JR	Communicate with Receiver and J. Sallah regarding receipt of wire and settlement funds from Fundadministration (.1).	0.1	\$13.50
3/1/2021	LD	Confer with Sallah Astarita firm (.2).	0.2	\$64.00
3/2/2021	EF	Exchange correspondence with T. Bakas (.2); review trading records for providing to potential experts (.4); exchange correspondence with Belize counsel regarding services (.2).	0.8	\$192.00
3/2/2021	LD	Review correspondence with T. Bakas (.1).	0.1	\$32.00
3/3/2021	EF	Exchange correspondence with T. Bakas regarding potential engagement (.3); review and attention to documents in database relating to ATC Brokers for outside counsel review (.9).	1.2	\$288.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
3/3/2021	JR	Communicate with legal team regarding ATC Brokers productions per review of case files and related correspondence from L. Dougherty (.3); assemble ATC Brokers documentation for outside counsel per request of L. Dougherty (.3).	0.6	\$81.00
3/3/2021	LD	Confer with Sallah team concerning case records (.2); research case records in E-Hounds platform (.9); direct Sallah team concerning E-Hounds platform (.1); confer with J. Rizzo concerning case records (.2); confer with Sallah team (.1).	1.5	\$480.00
3/4/2021	EF	Additional correspondence with T. Bakas regarding engagement (.2).	0.2	\$48.00
3/4/2021	JR	Communicate with Receiver regarding status of recovery of funds from Belize (.1).	0.1	\$13.50
3/5/2021	JJP	Draft fourth motion to approve clawback settlements and begin Local Rule 3.01(g) communications (2.2).	2.2	\$704.00
3/9/2021	JJP	Revise, finalize, and file fourth motion to approve clawback settlements (.5).	0.5	\$160.00
3/10/2021	LD	Review correspondence from Sallah Astarita firm (.2).	0.2	\$64.00
3/15/2021	JJP	Analyze forensic bank reconstruction to determine need for additional litigation against recipients of transfers (4.2).	4.2	\$1,344.00
3/15/2021	JR	Communicate with Receiver regarding list of outstanding lenders prepared by J. Paniagua (.1); review Department of Justice's status report (.1).	0.2	\$27.00
3/15/2021	LD	Review status report of United States (.1); review correspondence concerning investigation (.2).	0.3	\$96.00
3/16/2021	EF	Review and analysis of Oasis Amazon investor site (2.1); draft correspondence to U.S. Attorney regarding Oasis investor reporting manipulation (.2); call with Receiver regarding U.S. Attorney assistance (.2).	2.5	\$600.00
3/16/2021	JR	Communicate with Receiver regarding status of recovery of Belize funds (.1).	0.1	\$13.50
3/16/2021	LD	Confer with Receiver concerning Spotex (.1); telephone conference with Receiver and E. Feld (.1); review and summarize case records for E. Feld (.2); review case notes and next steps (.2).	0.6	\$192.00
3/17/2021	JR	Update master spreadsheet with Amazon investor site username and password information per request of E. Feld (.1).	0.1	\$13.50
3/17/2021	LD	Review correspondence and documents concerning investor website (.3).	0.3	\$96.00

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
3/19/2021	JJP	Revise motion to retain contingency counsel and to reappoint the Receiver (6.0).	6.0	\$1,920.00
3/19/2021	JR	Review correspondence from J. Perez requesting information related to asset sales and funds collected to date in preparation for applying to court for approval of contingency fee arrangement for ATC Brokers litigation (.1); review and calculate asset sales and funds collected per request of J. Perez (.2).	0.3	\$40.50
3/19/2021	LD	Confer with J. Perez concerning ATC Brokers (.1); review draft of ATC Brokers motion (.3); review ATC Brokers documents and confer with J. Perez concerning same (.2).	0.6	\$192.00
3/22/2021	LD	Confer with Sallah Astarita firm concerning motion to reappoint Receiver (.1).	0.1	\$32.00
3/23/2021	JJP	Review proposed engagement agreement from J. Sallah and discuss same with Receiver and Sallah firm (.8).	0.8	\$256.00
3/23/2021	JR	Communicate with Receiver regarding status of recovery of funds from Belize and UK (.1).	0.1	\$13.50
3/24/2021	JR	Review E-Hounds platform for property related documentation (.4).	0.4	\$54.00
3/25/2021	JJP	Revise motion to retain contingency counsel and to reappoint the Receiver and circulate updated draft with exhibits (3.3); research legal and factual issues related to certain exhibits and communicate with Receiver and team regarding same (2.4); research jurisdictional issues and communicate with team regarding same (1.0).	6.7	\$2,144.00
3/25/2021	LD	Confer with J. Perez about Spotex confidentiality agreement (.2); review draft of Sallah Astarita firm engagement motion and provide comments (.4); review update on documents (.2); review and respond to correspondence from Sallah Astarita firm (.1).	0.9	\$288.00
3/26/2021	JJP	Revise motion to retain contingency counsel and to reappoint the Receiver and begin Local Rule 3.01(g) communications (1.7); communicate with team regarding payment of Cayman registration fees (.2).	1.9	\$608.00
3/26/2021	JR	Communicate with Receiver regarding conference call with outside counsel to discuss claims against ATC Brokers (.1); communicate with Receiver regarding status of recovery of funds from Belize (.1); communicate with Receiver regarding status of recovery of funds from UK (.1); communicate with L. Dougherty regarding conference call with outside counsel and counsel for ATC Brokers (.1).	0.4	\$54.00

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
3/26/2021	LD	Zoom conference with Receiver, Sallah Astarita firm, and counsel for ATC Brokers (.3); Zoom conference with Receiver and Sallah Astarita firm (.2); draft letter to counsel for Spotex (.2); confer with Receiver and Sallah Astarita firm concerning correspondence and next steps (.1); prepare letter to counsel for Spotex (.1).	0.9	\$288.00
3/28/2021	LD	Review correspondence from M. DaCorta concerning motion to engage Sallah Astarita firm (.1).	0.1	\$32.00
3/29/2021	JJP	Continue Local Rule 3.01(g) communications regarding motion to retain contingency counsel and to reappoint the Receiver (.5).	0.5	\$160.00
3/29/2021	JR	Communicate with Receiver regarding status of recovery of funds from Belize (.1); communicate with Receiver regarding status of recover of funds from UK (.1).	0.2	\$27.00
3/29/2021	LD	Review correspondence concerning motion to re-engage Sallah Astarita firm (.1).	0.1	\$32.00
3/30/2021	LD	Review correspondence from CFTC concerning motion to engage Sallah Astarita firm (.1); telephone conference with J. Sallah (.2).	0.3	\$96.00
3/31/2021	JJP	Complete Local Rule 3.01(g) communications and revise, finalize, and file motion to retain contingency counsel and to reappoint the Receiver (2.4); communicate with team regarding payment of Cayman registration fees (.3).	2.7	\$864.00
Total: Asset Analysis and Recovery			154.70	\$44,305.50
BUSIN	Business Operations			
1/4/2021	JR	Process checks to vendors (.1); update account ledger (.1); review online accounts (.1); communicate with D. Marerro, Receiver and PDR regarding deposits (.1); retrieve December 2020 account statements per request of PDR (.1); communicate with PDR regarding December account statements (.1); communicate with ServisFirst Bank regarding updating account information and email addresses (.1).	0.7	\$94.50
1/6/2021	JR	Communicate with PDR regarding issuance of 1099s to vendors (.1); review online account balances and transactions (.1); update account ledger (.1).	0.3	\$40.50
1/7/2021	JR	Review online account balances and transactions (.1); update account ledger (.1); communicate with R. Jernigan regarding payment of utility invoice (.1); review correspondence from R. Jernigan regarding invoices and issued checks (.1).	0.4	\$54.00

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
BUSIN	Business Operations			
1/8/2021	JR	Communicate with R. Jernigan regarding returned check (.1); receipt and review of December 2020 bank account statements (.2); communicate with PDR regarding December 2020 bank account statements (.1); communicate with PDR regarding information related to remission payment to U.S. Marshals Service (.2).	0.6	\$81.00
1/13/2021	JR	Review online account balances and transactions (.1); update account ledger (.1); communicate with D. Marrero regarding deposits (.1).	0.3	\$40.50
1/15/2021	JR	Review online account balances and transactions and confirm deposits (.1); update account ledger (.1); process checks to vendors per approval of Receiver (.2).	0.4	\$54.00
1/20/2021	JR	Review online bank account balances and transactions and confirm cleared checks (.1).	0.1	\$13.50
1/21/2021	JR	Review online bank account balances and transactions and confirm cleared checks (.1); communicate with R. Jernigan regarding cleared checks (.1).	0.2	\$27.00
1/22/2021	JR	Review online bank account balances and transactions and confirm cleared checks (.1); review correspondence from R. Jernigan regarding invoices and issued checks (.1); update account ledger (.1).	0.3	\$40.50
1/25/2021	JR	Review online bank account balances and transactions (.1).	0.1	\$13.50
1/26/2021	JR	Communicate with Receiver regarding invoices to be paid and issued checks (.1); review online accounts to confirm January 2021 interest deposit (.1); update account ledger (.1); review 1099-INT from ServisFirst Bank (.1); communicate with Receiver and PDR regarding 1099 INT from ServisFirst Bank (.1).	0.5	\$67.50
1/29/2021	JR	Prepare corporate resolution and written consent for 6300 Midnight Pass Road No. 1002, LLC per communications with Receiver and S. Kelly (.5); communicate with Receiver and J. Perez regarding filing motion to include 6300 Midnight Pass Road No. 1002, LLC in Receivership (.2).	0.7	\$94.50

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
BUSIN	Business Operations			
2/1/2021	JR	Review correspondence from R. Jernigan and Receiver regarding invoices to be paid and issued checks (.1); update account ledger (.1); communicate with E-Hounds and Receiver regarding GoDaddy and Amazon charges for websites and domains (.1); communicate with Receiver and legal team regarding Receiver's credit card expenditure and reimbursement (.1); review 1099-INT from ServisFirst Bank (.1); communicate with Receiver and PDR regarding 1099-INT from ServisFirst Bank (.1); review online account to confirm January 2021 interest deposit (.1); update account ledger (.1); retrieve January 2021 bank account statements from ServisFirst Bank (.1); communicate with PDR regarding January 2021 bank account statements from ServisFirst Bank (.1).	1.0	\$135.00
2/2/2021	JR	Review online bank account to confirm transactions (.1).	0.1	\$13.50
2/3/2021	JR	Process checks to vendors (.1); review online account balances and transactions (.1); communicate with D. Marerro and PDR regarding depositing refund checks (.1); update account ledger (.1); communicate with Receiver, PDR and legal team regarding receipt of wire for sale of Midnight Pass property (.1); review mortgage and note on 1605 55th Ave property to confirm maturity date (.1).	0.6	\$81.00
2/8/2021	JR	Review documents provided to R. Jernigan (.1); discuss status of remaining properties with R. Jernigan (.3); communicate with R. Jernigan regarding Midnight Pass property rental history and rental funds and deposits owed (.2).	0.6	\$81.00
2/11/2021	JR	Review online bank account balances and transactions (.1); communicate with Receiver, J. Perez, and PDR regarding bounced and returned B. Rodriguez mortgage check on 1605 55th Ave property (.1).	0.2	\$27.00
2/15/2021	JR	Communicate with Receiver, legal team, PDR and R. Jernigan regarding payment of mediation invoice (.1); review correspondence from R. Jernigan regarding FLP and Crystal Sands refund checks (.1); communicate with R. Jernigan regarding refund check from Crystal Sands related to Midnight Pass property (.1).	0.3	\$40.50
2/16/2021	JR	Review online account balances and transactions (.1); communicate with PDR, J. Perez, R. Jernigan and Receiver regarding operating account balance (.1); communicate with R. Jernigan regarding status of new mortgage payment from B. Rodriguez related to 1605 55th Ave. property (.1); review notice from ServisFirst Bank regarding returned mortgage payment (.1); communicate with Receiver regarding returned mortgage payment (.1).	0.5	\$67.50

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Date	TKPR	Description of Services	Hours	Amount
BUSIN	Business Operations			
2/17/2021	JR	Review online account balances and transactions (.1); review correspondence regarding change order related to repairs at 4064 Founders Club property (.1).	0.2	\$27.00
2/18/2021	JR	Review online account balances and transactions (.1); update account ledger (.1).	0.2	\$27.00
3/1/2021	JR	Review online account balances and transactions (.1); update account ledger (.1); communicate with PDR regarding receipt of wire and settlement funds from Fundadministration (.1); communicate with D. Marrero and PDR regarding deposits (.1); review correspondence from R. Jernigan regarding refund from Manatee County related to Lost Key property and December 2020 rental proceeds related to Midnight Pass property (.1); review correspondence from R. Jernigan regarding invoices to be paid and issued checks (.1); communicate with Receiver and R. Jernigan regarding issued checks and invoices to be paid (.1); review correspondence between Receiver and outside counsel regarding retention agreement for appeal (.1); retrieve February 2021 ServisFirst Bank account statements (.1); communicate with Receiver and PDR regarding February 2021 ServisFirst Bank account statements (.1).	1.0	\$135.00
3/2/2021	JR	Communicate with D. Marrero and PDR regarding deposit (.1); review Manatee County Tax Collector website to determine status of B. Rodriguez's payment of tax bill (.1).	0.2	\$27.00
3/4/2021	JR	Review online account balances and transactions (.1).	0.1	\$13.50
3/5/2021	JR	Review correspondence from R. Jernigan and status report regarding 4064 Founders Club property (.1).	0.1	\$13.50
3/8/2021	JR	Review online accounts to confirm transactions and deposits (.1); update account ledger (.1); review February 2021 mailed versions of ServisFirst Bank account statements (.1); communicate with PDR and Receiver regarding February 2021 mailed versions of ServisFirst Bank account statements (.1).	0.4	\$54.00
3/9/2021	JR	Communicate with PDR regarding asset expenses related to 4064 Founders Club property per request of J. Perez (.1); review spreadsheet of asset expenses related to 4064 Founders Club property (.1); prepare correspondence to ServisFirst Bank requesting wire transfer to Cayman Islands law firm per request of Receiver and review related correspondence from Receiver and L. Dougherty (.3).	0.5	\$67.50

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
BUSIN	Business Operations			
3/10/2021	JR	Review online account balances and transactions (.1); communicate with Receiver, PDR and R. Jernigan regarding account balances and transactions (.1); review correspondence from R. Jernigan regarding invoices and checks to be paid (.1); perform fund transfer per request of Receiver (.1); update account ledger (.1).	0.5	\$67.50
3/12/2021	JR	Review GoDaddy domain renewal notifications and receipts (.1); communicate with Receiver and L. Dougherty regarding status of execution of wire request to ServisFirst Bank (.1); communicate with ServisFirst Bank regarding wire request (.1).	0.3	\$40.50
3/15/2021	JR	Communicate with D. Marrero regarding depositing checks (.1); update account ledger (.1); review correspondence from E-Hounds regarding domain and website information (.1); communicate with Receiver regarding domain and website renewal information (.1).	0.4	\$54.00
3/16/2021	JR	Prepare checks for deposit at ServisFirst Bank (.1); update account ledger (.1); prepare correspondence to PDR regarding depositing checks (.1); communicate with E. Feld and legal team regarding Oasis investor website login (.1); review Manatee County Tax Collector website to confirm payment of property taxes on 1605 55th Avenue West (.1).	0.5	\$67.50
3/17/2021	JR	Review online accounts and recent transactions (.1); update account ledger (.1); review correspondence from Receiver and R. Jernigan regarding property maintenance issues (.1).	0.3	\$40.50
3/22/2021	JR	Review correspondence from GoDaddy regarding domain renewal (.1); communicate with Receiver regarding domain renewal notification (.1); review mortgage interest payment for 1605 55th Avenue West (.1); prepare check for deposit (.1); prepare correspondence to PDR regarding deposits (.1).	0.5	\$67.50
3/23/2021	JR	Communicate with R. Jernigan regarding status of payment of taxes on 1605 55th Avenue West and proof of property insurance (.1); review correspondence between R. Jernigan and B. Rodriguez regarding property taxes and insurance on 1605 55th Avenue West (.1); review correspondence from GoDaddy regarding domain renewal (.1); communicate with Receiver and E-Hounds regarding GoDaddy domain renewal (.1).	0.4	\$54.00
3/24/2021	JR	Review online accounts (.1).	0.1	\$13.50

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Date	TKPR	Description of Services	Hours	Amount
BUSIN	Business Operations			
3/25/2021	JR	Review correspondence from J. Perez regarding payment of H. Tescher mediation invoice (.1); review account ledger, bank statement and emails to determine status of payment of H. Tescher mediation invoice (.1); prepare correspondence to J. Perez, Receiver, R. Jernigan and PDR regarding payment of H. Tescher mediation invoice (.1); communicate with PDR regarding 2020 tax return packet (.1); communicate with Receiver regarding review and execution of 2020 tax return (.1); communicate with PDR regarding ordering checks for operating account (.1).	0.6	\$81.00
3/26/2021	JR	Review correspondence from R. Jernigan regarding invoices and issued checks (.1); update account ledger (.1); review correspondence from PDR regarding check order for operating account (.1); review correspondence from Maples Group and related correspondence from J. Perez regarding wire for registration fees (.1); communicate with D. Marrero regarding check for H. Tescher mediation fees (.1).	0.5	\$67.50
3/29/2021	JR	Review correspondence from PDR regarding March 2021 bank statements (.1); communicate with PDR regarding bank statements (.1); review Manatee County Tax Collector website to check status of payment of mortgagor's taxes on 1605 55th Avenue West (.1); communicate with Receiver, R. Jernigan and J. Perez regarding same (.1); communicate with PDR regarding tax returns (.1).	0.5	\$67.50
3/30/2021	EF	Attention to issues regarding payment of Oasis International Group Ltd. fees to Cayman Islands business regulators (.2).	0.2	\$48.00
3/30/2021	JR	Prepare checks for deposit (.1); prepare memorandum to PDR regarding deposits (.1); review correspondence from R. Jernigan regarding refund from Frontier related to Midnight Pass (.1); communicate with J. Perez, E. Feld and Receiver regarding wire to Maples Group for registration fees (.1); prepare wire request for Receiver's execution to pay Cayman Islands registration fees (.3).	0.7	\$94.50

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
BUSIN	Business Operations			
3/31/2021	JR	Communicate with Receiver regarding execution of wire request to pay Cayman Islands registration fees (.1); communicate with Receiver, R. Jernigan and J. Perez regarding status of payment of property taxes by mortgagor on 1605 55th Avenue West (.1); conference call with R. Jernigan and mortgagor of 1605 55th Avenue West regarding payoff of loan (.3); prepare correspondence to Receiver and legal team regarding conference call with mortgagor regarding payoff (.1); communicate with R. Jernigan regarding refund for condominium association insurance premium for Midnight Pass property and request for closing statement (.1); communicate with closing agent regarding Midnight Pass closing statement for insurance refund purposes (.1); review correspondence from Receiver regarding mortgagor's payoff of loan on 1605 55th Avenue West (.1).	0.9	\$121.50
Total: Business Operations			17.00	\$2,316.00
CASE	Case Administration			
1/4/2021	JR	Communicate with KTek regarding website updates (.1).	0.1	\$13.50
1/5/2021	JR	Review correspondence from KTek regarding website updates (.1).	0.1	\$13.50
1/6/2021	AS	Review Receiver's motion to approve the sale of real property with exhibits and forward to R. During for website update (.4).	0.4	\$54.00
1/7/2021	JR	Review correspondence from KTek regarding website updates (.1).	0.1	\$13.50
1/8/2021	MML	Review communication from B. Price regarding accounting report (.1).	0.1	\$24.00
1/11/2021	JR	Receipt and review of PDR accounting report and related correspondence from M. Lockwood (.1).	0.1	\$13.50
1/13/2021	JJP	Review and respond to government's request to extend stay of litigation (.2).	0.2	\$64.00
1/14/2021	AS	Review court filing and forward to R. During with instructions for website update (.3).	0.3	\$40.50
1/19/2021	JJP	Begin draft of next interim report (3.9).	3.9	\$1,248.00
1/21/2021	AS	Review investor email and forward to M. Gura (.1).	0.1	\$13.50
1/25/2021	JJP	Draft interim report, including numerous related communications with team (3.5).	3.5	\$1,120.00
1/25/2021	EF	Review case status report (.3).	0.3	\$72.00
1/25/2021	JR	Communicate with KTek regarding website updates (.1).	0.1	\$13.50

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
CASE	Case Administration			
1/25/2021	MML	Review draft interim report and correspondence from J. Perez regarding same (.2).	0.2	\$48.00
1/26/2021	JJP	Revise interim report and exhibits (3.0).	3.0	\$960.00
1/26/2021	MG	Review draft interim report (.3).	0.3	\$40.50
1/26/2021	LD	Revise summary of sale of R. Montie's residence in Hauppauge, New York for interim report (.3).	0.3	\$96.00
1/27/2021	JJP	Revise interim report and exhibits (2.2).	2.2	\$704.00
1/27/2021	LD	Review fund accounting reports (.2).	0.2	\$64.00
1/28/2021	LD	Review draft interim Receiver's report (.4).	0.4	\$128.00
2/1/2021	JJP	Revise, finalize, and file interim report and exhibits, including numerous communications with team (5.7).	5.7	\$1,824.00
2/1/2021	JR	Review draft interim report and related correspondence from J. Perez and Receiver (.3); communicate with J. Perez regarding suggested edits to interim report (.1).	0.4	\$54.00
2/1/2021	MG	Review exhibits to the interim report for updated claim information (.5).	0.5	\$67.50
2/1/2021	MML	Review correspondence from J. Perez regarding interim report (.1); exchange correspondence with M. Gura regarding claims information for same (.1); review seventh interim report (.1).	0.3	\$72.00
2/3/2021	JR	Communicate with KTek regarding updates to website (.1).	0.1	\$13.50
2/9/2021	AS	Review court filing and email R. During regarding website update for same (.5).	0.5	\$67.50
2/9/2021	JR	Communicate with KTek regarding website updates (.1).	0.1	\$13.50
2/12/2021	LD	Review status report of intervenor United States (.1).	0.1	\$32.00
2/15/2021	AS	Review three court filings and prepare email to R. During for website updates for same (.5).	0.5	\$67.50
3/2/2021	JR	Communicate with KTek regarding updates to website (.1); communicate with E-Hounds regarding domain and website bills and expenses (.1).	0.2	\$27.00
3/3/2021	JR	Communicate with KTek regarding updates to website (.1).	0.1	\$13.50
3/23/2021	EF	Review case status report (.3).	0.3	\$72.00
3/23/2021	JR	Communicate with KTek regarding website updates (.1).	0.1	\$13.50
3/24/2021	JR	Review correspondence from KTek regarding website updates (.1).	0.1	\$13.50
Total: Case Administration			24.90	\$7,095.00

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
1/1/2021	MML	Review and further analyze five claims based on additional information provided (.8); prepare correspondence to R. Weiss regarding J.W., J. and J.V., C.U., and J.J. (.3); update master claims spreadsheet for same (.2).	1.3	\$312.00
1/3/2021	MML	Review documents and additional information regarding multiple claims (1.0); prepare follow up correspondence to R. Weiss regarding same for seven claimants (.5); conduct further analysis of claims and revise master claims spreadsheet and proposed determinations for same (2.5).	4.0	\$960.00
1/4/2021	JJP	Analyze claims or potential claims related to insiders (1.0).	1.0	\$320.00
1/4/2021	MG	Communicate with an investor regarding his proof of claim form (.4).	0.4	\$54.00
1/4/2021	LD	Research claims data at request of J. Perez (.3).	0.3	\$96.00
1/4/2021	MML	Review communications regarding verification of no claim from R. Montie (.1); exchange correspondence with R. Weiss regarding C.M. (.1).	0.2	\$48.00
1/5/2021	MG	Review outstanding claim form deficiencies (.4); review correspondence from the power of attorney for a deceased investor (.4).	0.8	\$108.00
1/5/2021	MML	Communicate with M. Gura regarding outstanding deficiencies and other matters (.5).	0.5	\$120.00
1/6/2021	MG	Communications regarding the process for handling claim form deficiencies (1.1); telephone call with M. Lockwood regarding follow-up communication with investors after their deficiency is resolved (.4).	1.5	\$202.50
1/6/2021	MML	Telephone call with M. Gura regarding claims process and deficiencies (.4); review correspondence from J. Waechter regarding claims question (.1); respond to same (.1); exchange correspondence with R. Weiss regarding T.H. (.1).	0.7	\$168.00
1/7/2021	MG	Communicate with Kapila Mukamal regarding master claims database (.1).	0.1	\$13.50
1/7/2021	MML	Review correspondence from J. Waechter regarding certain claims (.1); review three related proof of claim forms, investments by related parties not claimed, and additional analysis of same by Kapila Mukamal (1.0); telephone call with J. Waechter regarding same (.8); follow up call with J. Waechter regarding additional considerations for claim determinations for one of these claims (.1); review revised analysis from R. Weiss (.1); exchange correspondence with M. Gura regarding spreadsheet formatting (.2); exchange correspondence with R. Weiss regarding master claims spreadsheet (.1).	2.4	\$576.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
1/8/2021	MG	Communicate regarding the status of the deficiencies (.4).	0.4	\$54.00
1/8/2021	MML	Review additional information and conduct further analyses regarding twelve claimants (2.0); revise proposed determinations and master claims spreadsheet for same (.7); review correspondence and claims spreadsheet to ascertain any outstanding claim determination or deficiency issues (1.0); exchange correspondence with J. Perez regarding status of claims process (.1).	3.8	\$912.00
1/11/2021	MG	Communicate regarding the status of deficiencies (.4).	0.4	\$54.00
1/11/2021	MML	Telephone call with J. Waechter regarding T.H. and related claims (.1); review revised analysis from R. Weiss regarding same (.1); update master spreadsheet and claim determinations for same (.1); review additional information regarding J.B., T.C., L.M., and A.D. (.6); revise analysis for same (.5); review and revise recommended determinations for certain non-Winters claims per directions from Receiver (1.2); prepare correspondence to J. Perez regarding A.D. judgment and any claim implications (.1); review correspondence between Receiver and J. Waechter regarding T.H. related claims (.1); review correspondence from R. Weiss regarding V.D. (.1).	2.9	\$696.00
1/12/2021	MG	Communicate with A. Stephens regarding the spreadsheet of solicitor information (.5); update the master spreadsheet with attorney information for claims associated with B. Winters (1.2); review and update the discrepancy list (.8).	2.5	\$337.50
1/12/2021	MML	Review additional information regarding J.B., T.C., and A.D. (.5); revise analysis for same (.5); review and revise recommended determinations for non-Winters proposed allowed claims with possible noted deficiencies per directions from Receiver (1.0); exchange correspondence with R. Weiss regarding K.P. (.2); exchange correspondence with R. Weiss regarding C.N. (.2).	2.4	\$576.00
1/14/2021	MG	Communicate with Team regarding his recent communications with investors regarding deficiencies on their claim forms (.4); communicate with M. Lockwood regarding additional deficiencies (.6).	1.0	\$135.00
1/14/2021	LD	Confer with J. Perez concerning claimant W.B. and Dollhouse Properties LLC after reviewing case records (.2).	0.2	\$64.00
1/14/2021	MML	Exchange correspondence with J. Perez regarding W.B. (.1); review and analyze deficiencies, discrepancies, and other issues for proposed claim determinations (1.8); review deficiencies spreadsheet from Team (.2).	2.1	\$504.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
1/19/2021	MML	Review and analyze deficiencies, discrepancies, and other issues for proposed claim determinations (2.7); prepare correspondence to M. Gura regarding additional deficiencies (.1); prepare correspondence to R. Weiss regarding V.D. (.1).	2.9	\$696.00
1/20/2021	MG	Communicate with claimant regarding the status of the Receivership (.1).	0.1	\$13.50
1/20/2021	MML	Continue review and analysis of deficiencies, discrepancies, and other issues for proposed claim determinations (2.5).	2.5	\$600.00
1/21/2021	MG	Communicate with claimant regarding the status of the Receivership (.3); communicate with M. Lockwood regarding the solicitor project (.1).	0.4	\$54.00
1/21/2021	MML	Review correspondence from M.R. (.1); communicate with M. Gura regarding same (.1).	0.2	\$48.00
1/22/2021	MML	Telephone call with M. Gura regarding outstanding deficiencies and claim tasks (1.0).	1.0	\$240.00
1/25/2021	MG	Review and resolve proof of claim form deficiencies with claimants (3.4).	3.4	\$459.00
1/25/2021	MML	Review and revise email and letter to claimants regarding deficiencies (.5); communicate with M. Gura regarding same and deficiency questions (.5); prepare correspondence to J. Perez regarding procedure (.2); review correspondence to J.R., J.C., C.B., A.R., J.T., M.Y. and R.S. (.2).	1.4	\$336.00
1/26/2021	JJP	Telephone call with M. Lockwood regarding claims process (.6).	0.6	\$192.00
1/26/2021	MG	Communicate with three investors regarding the status of the Receivership (.6); communicate with B. McConnell regarding an investor (.3).	0.9	\$121.50
1/26/2021	MML	Telephone call with J. Perez regarding claims process (.6); telephone call with M. Gura regarding deficiency responses (.2); update and revise proposed claim determinations for claims from J.C., C.B., J.T., M.Y., R.S. (.5); review communication from C.H. (.1).	1.4	\$336.00
1/27/2021	MG	Communicate with an investor regarding the status of the Receivership (.3).	0.3	\$40.50
1/28/2021	MG	Communicate with investors regarding the status of the Receivership (.3); communicate with Team regarding the status of claim form deficiencies (.2).	0.5	\$67.50
1/28/2021	LD	Review correspondence from claimant M.R. (.1).	0.1	\$32.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims Administration and Objections			
1/28/2021	MML	Review additional analysis regarding S.D. (.3); review documents relating to S.D.'s claim and related family members (.3); review correspondence from M. Gura regarding outstanding deficiencies (.1); review spreadsheet regarding solicitation of investments as identified by claimants (.1); exchange correspondence with M. Gura regarding same (.1); review and analyze additional information for V.D. and L.D. (.2); revise proposed determinations and notes for same (.2); review new proof of claim form submitted by J.C. (.1); update claims spreadsheet and proposed determination for same (.2); review correspondence from J.R. (.1); update claims spreadsheet and proposed determination for same (.1); review further communication from R.S. (.1).	1.9	\$456.00
1/29/2021	MG	Communicate with claimant regarding a deficiency with his claim (.2); draft memorandum to Team regarding additional deficiencies (1.1).	1.3	\$175.50
1/29/2021	MML	Review documents regarding R.M. and J.T. (.1); conduct internet search regarding same (.1); update claims spreadsheets for additional information (.1); review correspondence to C.A. regarding answer to deficiency and revise proposed determination for same (.1); review communications with Team regarding deficiencies (.1); communicate with M. Gura regarding solicitors and other claims matters (.3); review correspondence from M. Gura regarding same (.1).	0.9	\$216.00
2/1/2021	MG	Continue review of claims forms with discrepancies (2.5).	2.5	\$337.50
2/1/2021	MML	Review correspondence from R. Weiss regarding V.D. (.1); telephone call with R. Weiss regarding same and additional related claims (.4); review results of search regarding G.M. (.1); revise proposed claim determinations for G.M., N.M., and C.M. (.1).	0.7	\$168.00
2/2/2021	MG	Communicate with an investor regarding the status of the Receivership (.3); review revised claim form for an investor (.2); continue review of claim form deficiencies (1.2).	1.7	\$229.50
2/2/2021	MML	Review documents regarding C.M. (.1); revise proposed claim determination for same (.1); review documents for J.S. (.1); revise proposed claim determination for same (.1); review communications with L.W. (.1); review communications regarding M.R. (.1).	0.6	\$144.00
2/3/2021	MG	Review deficiencies with four investor claim forms and communicate with claimants regarding same (1.2).	1.2	\$162.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
2/3/2021	MML	Review additional information from C.B. (.1); revise proposed claim determination for same (.1); review correspondence from M. Gura regarding B. Winters' email return (.1); review communication with A.F. (.1); revise proposed claim determination for same (.1); review communication with C.M. (.1); revise proposed claim determination for same (.1); review communication with R.F. (.1); revise proposed claim determination for same (.1).	0.9	\$216.00
2/4/2021	MG	Review claim forms to search for a form from a particular investor (.4); communicate with an investor regarding mention of J. Haas on their claim form (.4); communicate with an investor regarding late claim (.2); continue review of other claim deficiencies (1); prepare spreadsheet of investors who did not file a claim (.6).	2.6	\$351.00
2/4/2021	MML	Communicate with M.G. regarding J.B. (.1); telephone call with M. Gura regarding claims tasks (.4); review correspondence regarding J.D. (.1); review correspondence from M. Gura regarding G.C. and N.C. (.1); exchange correspondence with M. Gura regarding M.J. (.1); review documents regarding same (.1).	0.9	\$216.00
2/5/2021	MG	Continue review of claim deficiencies and draft 13 emails and three letters to investors (4.3) communicate with four investors regarding the status of the Receivership (.5).	4.8	\$648.00
2/5/2021	LD	Research B. Winters correspondence and summarize results for M. Gura (.2).	0.2	\$64.00
2/5/2021	MML	Review documents regarding Voyager Enterprises (.2); update master spreadsheet for same (.1); telephone call with M. Gura regarding questions on outstanding deficiencies (.5); review communications between M. Gura and L. Dougherty regarding B. Winters (.1); review correspondence to C.D. and J.V. regarding deficiency (.1); review communications with D.C. (.1); review spreadsheet regarding investors who did not submit claims (.1).	1.2	\$288.00
2/6/2021	MML	Review communications and additional information provided for 10 claimants (.6); revise proposed claim determinations for same (.3); prepare correspondence to M. Gura regarding two claimants (.1).	1.0	\$240.00
2/9/2021	MG	Communicate with an investor regarding the status of the Receivership (.1); continue review of claim deficiencies and update the spreadsheets (.8).	0.9	\$121.50
2/9/2021	MML	Review communications between M. Gura and claimant M.J. regarding J. Haas (.1); telephone call with M. Gura regarding same (.1); review claims documents for J. Haas reference (.2).	0.4	\$96.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
2/10/2021	MG	Continue review of discrepancies in account names drafted by K. Paulson and update the list with supporting information (4.3).	4.3	\$580.50
2/11/2021	MG	Continue review of discrepancies in account names drafted by K. Paulson and update the list with supporting information (2.5).	2.5	\$337.50
2/11/2021	MML	Work on outstanding issues with several claims (1.5); communicate with Receiver regarding T. and T.C. (.1); communicate with M. Gura regarding certain claims (.2); revise master claims spreadsheet and proposed claim determinations (.5); review correspondence from J.V. (.1); review correspondence from M. Gura regarding discrepancies (.1).	2.5	\$600.00
2/12/2021	EF	Exchange correspondence with investor regarding claim (.1).	0.1	\$24.00
2/12/2021	MG	Communicate with an investor regarding the deficiencies with their claim form (.3).	0.3	\$40.50
2/15/2021	MG	Communicate with an investor regarding the status of the Receivership (.1).	0.1	\$13.50
2/15/2021	MML	Review correspondence from B.W. regarding claim status (.1).	0.1	\$24.00
2/16/2021	MML	Work on deficiencies and outstanding questions for 11 claims (2.5); revise proposed claim determinations for same (.6); exchange correspondence with R. Weiss regarding K.M. (.2); update analysis for same (.1).	3.4	\$816.00
2/17/2021	MG	Review records for a second claim form from an investor (.4); review the master spreadsheet for inconsistencies in the various name fields (1.2); continue communication with investors regarding deficient claim forms (.8).	2.4	\$324.00
2/17/2021	MML	Work on deficiencies and outstanding questions for 12 claims (2.6); revise proposed claim determinations for same (.5); exchange correspondence with R. Weiss regarding N.S. (.1).	3.2	\$768.00
2/18/2021	MG	Communicate with Team regarding work on claim form deficiencies (.2); telephone call with M. Lockwood regarding remaining claim form deficiencies (1.2); continue review of the master spreadsheet for consistencies in the various name fields (.8).	2.2	\$297.00
2/18/2021	MML	Telephone call with M. Gura regarding outstanding claims matters (1.2); continue work on same (1.5); review documents provided by M. Gura for D.W and L.W. (.1).	2.8	\$672.00
2/24/2021	MG	Review and revise the no claim form received spreadsheet (.8); continue to review and revise the master spreadsheet to confirm name consistencies (2.2).	3.0	\$405.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
2/24/2021	MML	Review questions from M. Gura regarding claims (.2); communicate with M. Gura regarding same (.3).	0.5	\$120.00
2/25/2021	MG	Communicate with an investor regarding deficiencies with their claim form (.2).	0.2	\$27.00
2/25/2021	LD	Confer with M. Lockwood concerning claims (.1).	0.1	\$32.00
2/25/2021	MML	Exchange correspondence with J. Perez regarding M.N. and related claims (.1); exchange correspondence with J. Waechter regarding several claimants (.2); analyze claims with outstanding issues, review documents for same, and revise proposed claim determinations (2.7); communicate with M. Gura for same (.4).	3.4	\$816.00
2/26/2021	MG	Communicate with M. Lockwood regarding outstanding claim tasks (.5); research E-Hounds for information related to two investors (.8); revise email to an investor regarding her claim deficiencies (.3).	1.6	\$216.00
2/26/2021	MML	Exchange correspondence with M. Gura regarding naming for living trust (.1); communicate with M. Gura regarding additional documents needed for certain claimants (.5); analyze claims with outstanding issues, review documents for same, and revise proposed claim determinations (3.0); review communication between M. Gura and P.D. regarding additional claim information (.1); prepare correspondence to R. Weiss regarding P.L. (.1).	3.8	\$912.00
3/1/2021	MML	Review documents from R. Weiss regarding P.L. (.1); revise proposed determination for same (.1); review documents from R. Weiss regarding F.N. (.1); revise proposed determination for same (.1); work on spreadsheet of remaining claims questions for Receiver (1.5).	1.9	\$456.00
3/2/2021	MG	Continue to revise the master spreadsheet to ensure proper investor name has been captured in necessary places (4.3); revise the master list of non-investor claim forms received (1.2).	5.5	\$742.50
3/2/2021	MML	Communicate with M. Gura regarding claims (.4).	0.4	\$96.00
3/5/2021	JJP	Telephone call with M. Lockwood regarding claims process status and administration (.2).	0.2	\$64.00
3/5/2021	MG	Continue to revise the master spreadsheet to ensure proper investor name has been captured in all necessary places (2.2).	2.2	\$297.00
3/5/2021	MML	Telephone call with J. Perez regarding claims process status and administration going forward (.2); communicate with M. Gura regarding same (.4).	0.6	\$144.00
3/8/2021	MG	Communicate with an investor regarding the claims process (.4).	0.4	\$54.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
3/8/2021	LD	Review correspondence concerning K.M. (.1).	0.1	\$32.00
3/8/2021	MML	Telephone call with M. Gura regarding K.M. (.1); review correspondence between M. Gura and K.M. regarding late claim (.1).	0.2	\$48.00
3/9/2021	MML	Analyze claims with outstanding issues, review documents for same, and prepare spreadsheet with questions regarding same for Receiver (5.2); prepare correspondence to Receiver regarding remaining questions (.1); review law regarding combining accounts (.1).	5.4	\$1,296.00
3/10/2021	MG	Communicate with three investors regarding their claim forms (.8); research information related to an investor and an entity (.5).	1.3	\$175.50
3/10/2021	MML	Exchange correspondence with Receiver regarding claims review (.1); exchange correspondence with J. Perez regarding same (.1); review correspondence from M. Gura regarding various claimants (.2); communicate with M. Gura regarding specific claims and outstanding questions (.5).	0.9	\$216.00
3/11/2021	MML	Exchange correspondence with Receiver regarding claims review (.1); exchange correspondence with M. Gura regarding additional review (.1); review correspondence from M. Gura regarding K.M. (.1).	0.3	\$72.00
3/12/2021	JJP	Telephone call with M. Lockwood regarding claim determinations (.8).	0.8	\$256.00
3/12/2021	MG	Continue organization of investor files (1.5).	1.5	\$202.50
3/12/2021	MML	Prepare for and attend Zoom meeting with Receiver regarding claim determinations (3.5); telephone call with J. Perez regarding claim determinations (.8); telephone call with M. Gura regarding same and claims administration (.3); review correspondence from J. Perez regarding Voyager Gateway (.1).	4.7	\$1,128.00
3/15/2021	MML	Exchange correspondence with R. Weiss regarding Voyager Gateway (.1).	0.1	\$24.00
3/16/2021	MML	Review payment support from R. Weiss regarding Voyager Gateway (.1).	0.1	\$24.00
3/18/2021	JR	Call with investor regarding status of claims process and case status (.2).	0.2	\$27.00
3/23/2021	MML	Review communication from K.M. (.1); work on claims with outstanding issues (2.3).	2.4	\$576.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
3/24/2021	MML	Review late-submitted proof of claim form from K.M and related correspondence (.2); update master claims spreadsheet for same (.1); prepare email to R. Weiss regarding additional claimed deposit (.1); communicate with M. Gura regarding M.C. (.1); review and revise proposed claim determinations based on additional instructions from Receiver (2.5).	3.0	\$720.00
3/26/2021	MML	Exchange correspondence with R. Weiss regarding K.M. (.1); review documents regarding K.M. (.2); revise proposed claim determination for same (.1); continue to review and revise proposed claim determinations per Receiver's further direction (3.0); exchange correspondence with M. Gura regarding L.W. (.1).	3.5	\$840.00
3/30/2021	MML	Telephone call with Receiver regarding certain claims (.1); exchange correspondence with M. Gura regarding same (.1).	0.2	\$48.00
3/31/2021	MML	Review and revise proposed claim determinations for claims with discrepancies (3.5).	3.5	\$840.00
Total: Claims Administration and Objections			144.20	\$29,079.00
WFEE	Work on Fees	Motions		
1/4/2021	MML	NO CHARGE: Gather and initial review of third party invoices (.2); exchange correspondence with E. Feld and J. Perez regarding any invoices from Godinho, Maples Group, or Godfrey (.1); update spreadsheet for same (.1); review E-Hounds October, November, and December invoices and update spreadsheet for same (.2); exchange correspondence with R. Jernigan regarding invoices (.1); exchange correspondence with A. Whitby regarding December prebills (.2).	0.9	\$0.00
1/6/2021	MML	NO CHARGE: Review November prebills (2.0).	2.0	\$0.00
1/7/2021	MML	NO CHARGE: Exchange correspondence with A. Whitby regarding prebills (.2); telephone call with A. Whitby regarding same (.2); review prebill and send additional revisions (.2).	0.6	\$0.00
1/8/2021	MML	NO CHARGE: Review RWJ invoices for October, November and December (.3); prepare correspondence to R. Jernigan regarding the December invoice (.1).	0.4	\$0.00
1/11/2021	KAP	NO CHARGE: Review and revise prebills (1.1).	1.1	\$0.00
1/12/2021	KAP	NO CHARGE: Continue to review and revise prebills (1.6); send corrected prebills to A. Whitby (.1); exchange emails with M. Lockwood regarding prebill revisions (.1).	1.8	\$0.00

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Date	TKPR	Description of Services	Hours	Amount
WFEE	Work on Fees Motions			
1/12/2021	MML	NO CHARGE: Exchange correspondence with R. Jernigan regarding December invoice (.2); review revised invoice (.1); exchange correspondence with K. Paulson regarding billing matters (.1); review revisions to November prebills (.1).	0.5	\$0.00
1/14/2021	MML	NO CHARGE: Exchange correspondence with A. Whitby regarding prebills (.2).	0.2	\$0.00
1/15/2021	KAP	NO CHARGE: Review and revise prebills (.4); send corrected prebills to A. Whitby (.1).	0.5	\$0.00
1/15/2021	MML	NO CHARGE: Review additional edits to prebills (.1).	0.1	\$0.00
1/18/2021	MML	NO CHARGE: Review and revise December prebills (1.0); review Kapila Mukamal December invoice (.1).	1.1	\$0.00
1/19/2021	KAP	NO CHARGE: Communicate with M. Lockwood regarding additional process for editing prebills (.5).	0.5	\$0.00
1/19/2021	MML	NO CHARGE: Telephone call with K. Paulson regarding prebills (.2).	0.2	\$0.00
1/25/2021	KAP	NO CHARGE: Review and revise prebills (2.0); send corrections to A. Whitby (.1).	2.1	\$0.00
1/25/2021	MML	NO CHARGE: Review revisions to prebills (.1).	0.1	\$0.00
1/26/2021	MML	NO CHARGE: Review and revise Receiver's time entries for October through December 3, 2020 (1.0).	1.0	\$0.00
1/27/2021	MML	NO CHARGE: Continue review of Receiver's time entries (.2); prepare correspondence to A. Whitby regarding same (.1); telephone call with A. Whitby regarding status of fees motion (.1).	0.4	\$0.00
1/29/2021	MML	NO CHARGE: Review prebill for January (.1); prepare correspondence to J. Perez regarding same (.1); review cost for Oasis paid by Receiver (.1).	0.3	\$0.00
2/1/2021	KAP	NO CHARGE: Review edited prebills (.3); exchange emails with A. Whitby regarding same (.1).	0.4	\$0.00
2/1/2021	MML	NO CHARGE: Exchange correspondence with K. Paulson regarding time entry (.2); review January invoice from E-Hounds (.1).	0.3	\$0.00
2/2/2021	KAP	NO CHARGE: Review and revise edited prebills (.3); exchange emails with M. Lockwood and A. Whitby regarding same (.1).	0.4	\$0.00
2/2/2021	MML	NO CHARGE: Exchange correspondence with K. Paulson regarding prebills (.2); review and edit Receiver's time entries (.5); communicate regarding same and additional prebills (.4); exchange correspondence with B. Nguyen regarding prebills (.1); initial review of Englander Fischer January invoice (.1).	1.3	\$0.00

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WFEE	Work on Fees Motions			
2/3/2021	MML	NO CHARGE: Communicate with J. Perez and K. Paulson regarding status of prebills (.2); telephone call with A. Whitby regarding same (.3); review third party invoices for 4th quarter and update third party spreadsheet for same (1.0); prepare correspondence to J. Waechter regarding November invoice (.1); prepare correspondence to K. Paulson regarding Englander Fischer entries (.2); prepare correspondence to E. Henderson regarding October invoice (.1); exchange correspondence with A. Whitby regarding certain entries (.1).	2.0	\$0.00
2/4/2021	MML	NO CHARGE: Exchange correspondence with E. Henderson regarding October invoice (.1); review revised invoice from Englander Fischer (.1); exchange correspondence with J. Waechter regarding timekeepers (.1); work on motion for fees (2.0); prepare correspondence to J. Perez regarding draft motion (.1).	2.4	\$0.00
2/5/2021	KAP	NO CHARGE: Review and revise Receiver's prebills (4.9); exchange emails and participate in call with M. Lockwood regarding same (.3).	5.2	\$0.00
2/5/2021	MML	NO CHARGE: Telephone call with K. Paulson regarding billing (.3); review correspondence from K. Paulson regarding certain time entry for Receiver (.1); exchange correspondence with E. Feld regarding same (.1).	0.5	\$0.00
2/6/2021	MML	NO CHARGE: Exchange correspondence with B. Nguyen regarding Receivership cost (.1).	0.1	\$0.00
2/8/2021	KAP	NO CHARGE: Review and revise team and Receiver prebills (1.8); send corrections to A. Whitby (.1); exchange emails with M. Lockwood regarding same (.1).	2.0	\$0.00
2/8/2021	MML	NO CHARGE: Communicate with K. Paulson regarding prebills (.2); telephone call with A. Whitby regarding same (.1); review edits to Receiver's December time (.1); exchange correspondence with A. Whitby regarding same (.1).	0.5	\$0.00
2/9/2021	KAP	NO CHARGE: Exchange emails with M. Lockwood regarding revisions to Receiver's 4th quarter prebills (.1); make additional revisions to Receiver's prebills (.2); send revisions to prebills to A. Whitby (.1).	0.4	\$0.00
2/9/2021	MML	NO CHARGE: Review additional edits to prebills (.1); review additional entries for Receiver (1.0); communicate with K. Paulson regarding same (.2).	1.3	\$0.00
2/10/2021	JJP	NO CHARGE: Review third party invoices and send to Receiver for additional review (1.3).	1.3	\$0.00
2/10/2021	MML	NO CHARGE: Exchange correspondence with A. Whitby regarding Englander Fischer (.1).	0.1	\$0.00

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Date	TKPR	Description of Services	Hours	Amount
WFEE	Work on Fees Motions			
2/12/2021	JJP	NO CHARGE: Draft and file motion for extension of time to file fee application, including LR 3.01(g) communications (.6); review and revise invoices (1.9).	2.5	\$0.00
2/12/2021	MML	NO CHARGE: Telephone call with J. Perez regarding fees motion (.2); review correspondence regarding mediation costs (.1); receipt and initial review of January 2021 invoice from PDR (.1).	0.4	\$0.00
2/15/2021	KAP	NO CHARGE: Review and revise team and Receiver prebills for fourth quarter (3.0); send corrections to A. Whitby (.1); exchange emails with A. Whitby regarding same (.1).	3.2	\$0.00
2/15/2021	LD	NO CHARGE: Review endorsed order granting extension for motion of time to file fee application (.1).	0.1	\$0.00
2/15/2021	MML	NO CHARGE: Exchange correspondence with M. Gura and J. Perez regarding additional expenses (.1); review additional prebill edits (.1).	0.2	\$0.00
2/16/2021	JJP	NO CHARGE: Review and revise invoices for team and Receiver (4.2).	4.2	\$0.00
2/16/2021	MML	NO CHARGE: Review correspondence from A. Whitby and J. Perez regarding fees motion (.1).	0.1	\$0.00
2/17/2021	KAP	NO CHARGE: Review and revise team and Receiver prebills for fourth quarter (.6); send corrections to A. Whitby (.1); exchange emails with M. Lockwood and A. Whitby regarding additional edits to prebills (.1).	0.8	\$0.00
2/17/2021	MML	NO CHARGE: Review edits to prebills from J. Perez (.1); review edits from K. Paulson (.1); communicate with J. Perez and K. Paulson regarding same (.1); communicate with M. Gura regarding additional expenses (.1); exchange correspondence with A. Whitby and K. Paulson regarding December 16 and 17 entries for Receiver (.1).	0.5	\$0.00
2/18/2021	KAP	NO CHARGE: Review and revise team and Receiver prebills for fourth quarter (1.9).	1.9	\$0.00
2/18/2021	MML	NO CHARGE: Receipt and initial review of January invoice from Kapila Mukamal (.1); receipt and review of invoice (.1); telephone call with M. Gura regarding same (.1); review additional prebill edits (.1).	0.4	\$0.00
2/19/2021	JJP	NO CHARGE: Review and revise invoices (2.0).	2.0	\$0.00
2/19/2021	KAP	NO CHARGE: Review and revise team and Receiver prebills for fourth quarter (.7).	0.7	\$0.00
2/19/2021	MML	NO CHARGE: Review communications regarding prebills (.1).	0.1	\$0.00

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WFEE	Work on Fees Motions			
2/23/2021	JJP	NO CHARGE: Review and revise invoices and send to Receiver for further review (3.0).	3.0	\$0.00
2/24/2021	JJP	NO CHARGE: Communicate with CFTC regarding invoices and direct assembly of complete fee motion and exhibits (2.2).	2.2	\$0.00
2/24/2021	MML	NO CHARGE: Revise motion for fees (1.0); prepare proposed order (.1); prepare categorization of costs (.1); communicate with A. Whitby regarding motion and exhibits (.2); prepare correspondence to J. Perez regarding revised motion (.1); review correspondence from J. Perez regarding motion for fees (.1); review correspondence from CFTC regarding invoices (.1); review correspondence from A. Whitby regarding same (.1); exchange correspondence with B. Nguyen regarding amounts owed (.1).	1.9	\$0.00
2/25/2021	JJP	NO CHARGE: Communicate with CFTC regarding invoices and direct assembly of complete fee motion and exhibits (2.5).	2.5	\$0.00
2/26/2021	JJP	NO CHARGE: Communicate with CFTC regarding invoices (.3); finalize motion for fees and begin Local Rule 3.01(g) communications (2.0).	2.3	\$0.00
2/26/2021	MML	NO CHARGE: Exchange correspondence with J. Perez regarding Englander Fischer's invoices (.1); prepare correspondence to J. Waechter regarding updated invoice reflecting payment of third quarter fees (.1).	0.2	\$0.00
2/28/2021	LD	NO CHARGE: Review correspondence concerning motion for fees and confer with J. Perez regarding the same (.1).	0.1	\$0.00
3/1/2021	JJP	NO CHARGE: Revise, finalize, and file seventh motion for fees, including LR 3.01(g) communications (1.9).	1.9	\$0.00
3/1/2021	MML	NO CHARGE: Exchange correspondence with J. Waechter regarding invoice (.1); communicate with J. Perez regarding same (.1); review revised invoice (.1); prepare correspondence to legal team regarding time entry (.1); review E-Hounds February invoice (.1).	0.5	\$0.00
3/2/2021	JR	NO CHARGE: Review fees motion and update master spreadsheet with payment information (.2).	0.2	\$0.00
3/8/2021	MML	NO CHARGE: Exchange correspondence with A. Whitby regarding prebills (.2).	0.2	\$0.00
3/11/2021	MML	NO CHARGE: Exchange correspondence with A. Whitby regarding prebills (.1); exchange correspondence with K. Paulson regarding same (.1); receipt and initial review of February invoice from PDR (.1).	0.3	\$0.00
3/15/2021	MML	NO CHARGE: Receipt and initial review of Kapila Mukamal's February invoice (.1).	0.1	\$0.00

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
WFEE	Work on Fees Motions			
3/16/2021	MML	NO CHARGE: Review communications between J. Perez and J. Waechter regarding fees (.1).	0.1	\$0.00
3/18/2021	MML	NO CHARGE: Review and revise prebills for January and February (3.0); prepare correspondence to A. Whitby and K. Paulson regarding same (.2).	3.2	\$0.00
3/22/2021	MML	NO CHARGE: Communicate with B. Nguyen regarding new cost category (.1).	0.1	\$0.00
3/24/2021	JR	NO CHARGE: Communicate with R. Jernigan regarding status of ruling on motion for fees (.1).	0.1	\$0.00
3/25/2021	MML	NO CHARGE: Review correspondence regarding mediation invoice (.1); communicate with A. Whitby regarding prebills (.1).	0.2	\$0.00
3/26/2021	MML	NO CHARGE: Exchange correspondence with A. Whitby regarding March prebills (.1).	0.1	\$0.00
3/29/2021	KAP	NO CHARGE: Review and revise January and February legal team prebills for Oasis (3.5).	3.5	\$0.00
3/29/2021	MML	NO CHARGE: Review additional edits to prebills for January (.1); exchange correspondence with K. Paulson regarding same (.1); review additional edits to prebills for February (.1).	0.3	\$0.00
3/31/2021	MML	NO CHARGE: Receipt and review of order granting Receiver's motion for fees (.1).	0.1	\$0.00
Total: Work on Fees Motions			72.20	\$0.00
Total Professional Service:			465.3	\$93,571.50

DISBURSEMENTS

Date	Description of Disbursements	Amount
E101	Photocopies	
3/9/2021	Photocopies @ .15 each (180 @ \$0.15)	\$27.00
E105	Telephone	
1/5/2021	Conference Call Charges	\$0.35
1/5/2021	Conference Call Charges	\$6.77
1/25/2021	Conference Call Charges	\$3.92
3/12/2021	Conference Call Charges	\$7.92

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DISBURSEMENTS

Date	Description of Disbursements	Amount
E106	On Line Research	
1/1/2021	PACER printing costs for month of October 1, 2020-December 31, 2020 (358 @ \$0.10)	\$35.80
3/11/2021	Westlaw	\$115.38
E107	Del. Services/Messengers	
1/4/2021	FedEx to Pamlyn Taylor	\$20.45
1/4/2021	Choice Express- Courier Service- Choice Express delivery to Federal Courthouse	\$31.36
1/22/2021	FedEx to Pamlyn Taylor	\$20.50
1/22/2021	Choice Express- Courier Service- Choice Express delivery to Federal Courthouse	\$62.60
1/29/2021	Choice Express- Courier Service- Choice Express delivery to Federal Courthouse	\$62.60
1/29/2021	FedEx to Pamlyn Taylor	\$20.50
2/5/2021	Choice Express- Courier Service- Choice Express delivery to Federal Courthouse	\$62.60
E112	Court Fees	
1/19/2021	US District Clerk, Middle District of Florida- Clerk of Court- Copy of Certified order granting sale of 6300 Midnight Pass property.	\$12.00
1/25/2021	U.S. District Court Clerk- Clerk of Court- Copy of certified order approving sale of 17006 Vardon Terrace #105	\$12.00
2/2/2021	US District Clerk, Middle District of Florida- Clerk of Court- Copy of certified order approving the sale of 4058 Founders Club Drive	\$12.50
3/24/2021	Clerk, U.S. District Court- Clerk of Court- Misc. Action Filing Fee - \$49.00	\$49.00
E113	Subpoena Fees	
3/26/2021	Bolter & Carr Investigations- Service of Process- Rush fee for subpoena - DE to be served on Bank of America on 4.7.20	\$200.00
E123	Web-Related Expenses	
1/1/2021	K. Tek Systems, Inc.- Web-related expenses- Business website monthly	\$50.00
1/1/2021	K. Tek Systems, Inc.- Web-related expenses- Monthly service work order	\$450.00
2/1/2021	K. Tek Systems, Inc.- Web-related expenses- Business website hosting monthly	\$50.00

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DISBURSEMENTS

Date	Description of Disbursements	Amount
E123	Web-Related Expenses	
2/1/2021	K. Tek Systems, Inc.- Web-related expenses- Internet domain name renewal	\$70.00
2/1/2021	K. Tek Systems, Inc.- Web-related expenses- Monthly service work order	\$337.50
3/1/2021	K. Tek Systems, Inc.- Web-related expenses- Monthly service work order	\$225.00
3/1/2021	K. Tek Systems, Inc.- Web-related expenses- Business website	\$50.00
E124	Other	
1/1/2021	Burton Wiand- Web-related expenses- GoDaddy.com - Web services	\$29.99
1/3/2021	Burton Wiand- Web-related expenses- Amazon Web Services - Web services	\$257.60
1/8/2021	Burton Wiand- Web-related expenses- Shopify - Web services - Roar of the Lion	\$89.88
1/15/2021	American Express- Miscellaneous- Sarasota Herald - Notice of Sale	\$37.50
2/2/2021	American Express- Miscellaneous- Notice of Sale	\$82.50
Total Disbursements		\$2,493.22
Total Services		\$93,571.50
Total Disbursements		\$2,493.22
Total Current Charges		\$96,064.72
Previous Balance		\$161,900.16
<i>Less Payments</i>		<i>(\$161,900.16)</i>
PAY THIS AMOUNT		\$96,064.72

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TASK RECAP**Services**

<u>Project No.</u>	<u>Hours</u>	<u>Amount</u>
ASDIS - ASDIS	52.30	\$10,776.00
ASSET - ASSET	154.70	\$44,305.50
BUSIN - BUSIN	17.00	\$2,316.00
CASE - CASE	24.90	\$7,095.00
CLAIM - CLAIM	144.20	\$29,079.00
WFEE - WFEE	72.20	\$0.00
	0.00	\$0.00
	0.00	\$0.00
	<u>465.30</u>	<u>\$93,571.50</u>

Disbursements

<u>Project No.</u>	<u>Amount</u>
Photocopies	\$27.00
Telephone	\$18.96
On Line Research	\$151.18
Del. Services/Messengers	\$280.61
Court Fees	\$85.50
Subpoena Fees	\$200.00
Web-Related Expenses	\$1,232.50
Other	\$497.47
	<u>\$2,493.22</u>

BREAKDOWN BY PERSON

<u>Person</u>	<u>Project No.</u>	<u>Hours</u>	<u>Amount</u>
JJP Jared J. Perez	ASDIS - ASDIS	18.40	\$5,888.00
JJP Jared J. Perez	ASSET - ASSET	36.60	\$11,712.00
JJP Jared J. Perez	CASE - CASE	18.50	\$5,920.00
JJP Jared J. Perez	CLAIM - CLAIM	2.60	\$832.00
JJP Jared J. Perez	WFEE - WFEE	21.90	\$0.00
EF Eric Feld	ASDIS - ASDIS	0.50	\$120.00
EF Eric Feld	ASSET - ASSET	40.70	\$9,768.00
EF Eric Feld	BUSIN - BUSIN	0.20	\$48.00
EF Eric Feld	CASE - CASE	0.60	\$144.00
EF Eric Feld	CLAIM - CLAIM	0.10	\$24.00
MG Mary Gura	ASDIS - ASDIS	3.60	\$486.00
MG Mary Gura	ASSET - ASSET	2.50	\$337.50
MG Mary Gura	CASE - CASE	0.80	\$108.00
MG Mary Gura	CLAIM - CLAIM	55.20	\$7,452.00

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BREAKDOWN BY PERSON

<u>Person</u>		<u>Project No.</u>	<u>Hours</u>	<u>Amount</u>
KAP	Kimberly A. Paulson	WFEE - WFEE	24.50	\$0.00
JR	Jeffrey Rizzo	ASDIS - ASDIS	25.90	\$3,496.50
JR	Jeffrey Rizzo	ASSET - ASSET	3.40	\$459.00
JR	Jeffrey Rizzo	BUSIN - BUSIN	16.80	\$2,268.00
JR	Jeffrey Rizzo	CASE - CASE	1.60	\$216.00
JR	Jeffrey Rizzo	CLAIM - CLAIM	0.20	\$27.00
JR	Jeffrey Rizzo	WFEE - WFEE	0.30	\$0.00
AS	Amanda Stephens	ASDIS - ASDIS	2.50	\$337.50
AS	Amanda Stephens	ASSET - ASSET	4.60	\$621.00
AS	Amanda Stephens	CASE - CASE	1.80	\$243.00
LD	Larry J. Dougherty	ASDIS - ASDIS	1.40	\$448.00
LD	Larry J. Dougherty	ASSET - ASSET	66.90	\$21,408.00
LD	Larry J. Dougherty	CASE - CASE	1.00	\$320.00
LD	Larry J. Dougherty	CLAIM - CLAIM	1.00	\$320.00
LD	Larry J. Dougherty	WFEE - WFEE	0.20	\$0.00
MML	Maya M. Lockwood	CASE - CASE	0.60	\$144.00
MML	Maya M. Lockwood	CLAIM - CLAIM	85.10	\$20,424.00
MML	Maya M. Lockwood	WFEE - WFEE	25.30	\$0.00
			<u>465.30</u>	<u>\$93,571.50</u>

EXHIBIT 9

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

June 10, 2021

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RE: Oasis Legal Team – Recovery from Investors

For Professional Services Rendered Through March 31, 2021

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
1/4/2021	JR	Review correspondence from outside counsel regarding status of clawback settlement payment (.1).	0.1	\$13.50
1/4/2021	MG	Communicate with T. Dillon regarding the E-Hounds platform and preparing for depositions (.1); research for a phone number for a clawback defendant (.5).	0.6	\$81.00
1/4/2021	LD	Review latest filing in Eleventh Circuit by B. Winters and summarize for team (.2); review exemplar confidentiality agreement (.2); review case notes and case correspondence (.4); revise draft confidentiality agreement (1.2).	2.0	\$640.00
1/5/2021	MG	Communicate with T. Dillon regarding the E-Hounds platform (.2).	0.2	\$27.00
1/5/2021	LD	Revise stipulated confidentiality agreement (.9).	0.9	\$288.00
1/7/2021	LD	Review and analyze case files, production, and discovery material (.8); review federal rules and local rules (.4); revise confidentiality agreement (2.4); confer with B. McConnell, J. Waechter, and J. Perez concerning confidentiality agreement and next steps (.1).	3.7	\$1,184.00
1/11/2021	LD	Review correspondence concerning T. Hunte deposition (.1).	0.1	\$32.00

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
1/12/2021	LD	Confer with counsel for clawback defendants concerning E-Hounds data (.1); review Receiver's expert disclosure (.3).	0.4	\$128.00
1/13/2021	JR	Communicate with legal team regarding clawback settlement payments (.1); update clawback settlement spreadsheet (.1).	0.2	\$27.00
1/13/2021	LD	Review update on payment by defendant N. Patterson, research related case records, and update B. McConnell and J. Waechter regarding status (.3).	0.3	\$96.00
1/14/2021	JR	Communicate with outside counsel regarding cleared clawback settlement payments (.1); review motion to approve clawback settlements (.1).	0.2	\$27.00
1/14/2021	LD	Confer with B. McConnell concerning A. Shams and review case records (.2); telephone conference with B. McConnell concerning discovery platform for defendants (.1); confer with N. Patterson concerning remaining payments (.1).	0.4	\$128.00
1/15/2021	JR	Update clawback settlement spreadsheet (.1).	0.1	\$13.50
1/15/2021	LD	Update J. Waechter concerning status of document discovery room for defendants (.1); two telephone conferences with B. McConnell concerning document requests (.2).	0.3	\$96.00
1/19/2021	JR	Review clawback settlement payments status (.1); update account ledger (.1); review online accounts to confirm deposits of clawback settlement payments (.1); communicate with outside counsel regarding status of payment from clawback settlement investor (.1).	0.4	\$54.00
1/19/2021	LD	Review response to T. Hunte's request for production of documents (.1); review correspondence from T. Hunte concerning deposition (.1).	0.2	\$64.00
1/20/2021	JR	Review correspondence from outside counsel regarding status of payment from clawback settlement investor (.1).	0.1	\$13.50
1/20/2021	LD	Review K. Kerrigan certificate of interested persons filed in Eleventh Circuit (.1).	0.1	\$32.00
1/21/2021	LD	Review multiple notices of payment of fees in Eleventh Circuit (.1); confer with J. Perez (.1).	0.2	\$64.00
1/25/2021	JR	Communicate with outside counsel regarding receipt of payment from clawback settlement investor and status of past-due payments (.1).	0.1	\$13.50
1/25/2021	LD	Review order on motion to tax costs (.1); telephone conference with B. McConnell concerning Drohan Lee (.1).	0.2	\$64.00
1/26/2021	EF	Attention to call from investor C. Huckabee (.2).	0.2	\$48.00

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
1/26/2021	LD	Telephone conference with M. Gura concerning C. Huckabee (.1).	0.1	\$32.00
1/27/2021	JJP	Review files prepared by forensic accountants and communicate with clawback team regarding defendants and potential defendants (.8); review interrogatory from Martini defendants and communicate with clawback team regarding same (.3).	1.2	\$384.00
1/27/2021	JR	Review correspondence from outside counsel and legal team regarding inquiries from clawback investors (.2).	0.2	\$27.00
1/28/2021	JR	Review correspondence from outside counsel and legal team regarding inquiries from clawback investors (.2).	0.2	\$27.00
1/28/2021	LD	Review multiple notices of filing in interlocutory appeals (.1); review correspondence concerning discovery and Drohan Lee (.2).	0.3	\$96.00
1/29/2021	LD	Confer with B. McConnell and J. Perez concerning discovery platform (.1).	0.1	\$32.00
2/1/2021	LD	Review status of pending appeals and 11th Circuit rules and summarize advice (.4).	0.4	\$128.00
2/2/2021	LD	Review update on appeals (.1); confer with Englander Fischer team regarding call (.1); review standing order from Hon. T. Wilson concerning discovery disputes (.1).	0.3	\$96.00
2/3/2021	JJP	Telephone conference with clawback team regarding electronic discovery and attention to follow-up issues (1.0).	1.0	\$320.00
2/3/2021	JR	Communicate with outside counsel regarding clawback settlement check and final payment (.1); review online accounts to confirm deposit of clawback settlement check (.1).	0.2	\$27.00
2/3/2021	LD	Telephone conference with J. Waechter, A. Gangi, and J. Perez concerning discovery (.5); research discovery material and provide to J. Waechter, A. Gangi, and B. McConnell (.4); review E-Hounds files concerning Martini investments (.6).	1.5	\$480.00
2/5/2021	JR	Communicate with Receiver and outside counsel regarding interrogatory responses and execution and notarization of same (.2).	0.2	\$27.00
2/9/2021	JR	Review correspondence from J. Perez regarding clawback investor settlement (.1); update clawback settlement spreadsheet (.1).	0.2	\$27.00
2/9/2021	LD	Review notices of filings by appellants in Eleventh Circuit (.1).	0.1	\$32.00
2/10/2021	LD	Review judge's order on mediation appearance by video or telephone (.1).	0.1	\$32.00

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
2/11/2021	MG	Communicate with T. Dillon regarding settlement agreement (.2).	0.2	\$27.00
2/11/2021	LD	Review order granting enlargement of time as to Martini defendants (.1).	0.1	\$32.00
2/12/2021	JR	Communicate with outside counsel regarding status of settlement check (.1); review accounts to confirm deposited clawback settlement checks (.1) update account ledger (.1).	0.3	\$40.50
2/16/2021	LD	Review order appointing G. Holder as new mediator (.1).	0.1	\$32.00
2/22/2021	JR	Communicate with outside counsel regarding status of clawback settlement payments (.2); update clawback settlement (.1); review online accounts to confirm cleared clawback settlement (.1); review correspondence from L. Dougherty to clawback investor regarding status of payment (.1).	0.5	\$67.50
2/22/2021	LD	Review Eleventh Circuit order reinstating appeals of some appellants (.1); confer with N. Patterson concerning settlement payment (.1).	0.2	\$64.00
2/23/2021	LD	Review judge's order requesting additional documentation of service costs (.1); review affidavit in support of service costs (.1); confer with M. Gura concerning investor settlements (.1).	0.3	\$96.00
2/24/2021	LD	Confer with N. Patterson regarding settlement payments (.1).	0.1	\$32.00
2/25/2021	LD	Review suggestion of bankruptcy by E. McMahon (.1).	0.1	\$32.00
3/1/2021	JR	Review correspondence from clawback investor regarding status of payments (.1); review correspondence from L. Dougherty to clawback investor regarding status of settlement payments (.1); review online account transactions to confirm clawback settlement deposits (.1); review correspondence from outside counsel regarding communications with clawback investor regarding status of payment (.1); review clawback settlement payment (.1); update clawback settlement spreadsheet (.1).	0.6	\$81.00
3/1/2021	LD	Review Englander Fischer engagement letter for appeals (.1); telephone conference with J. Waechter concerning database access for O. Attia (.1).	0.2	\$64.00
3/2/2021	JJP	Communicate with team regarding electronic discovery issues (.3).	0.3	\$96.00
3/2/2021	JR	Review clawback settlement payment (.1); update clawback settlement spreadsheet (.1).	0.2	\$27.00

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
3/2/2021	LD	Telephone conference with J. Waechter concerning discovery (.1); confer with J. Perez concerning discovery (.1); confer with E-Hounds and Englander Fischer team concerning discovery (.1); confer with A. Gangi concerning document production (.1); confer with team and set up call (.1).	0.5	\$160.00
3/3/2021	JR	Review account to confirm deposit of clawback settlement payments (.1); update clawback settlement spreadsheet (.1).	0.2	\$27.00
3/4/2021	JJP	Telephone conference with A. Gangi, J. Waechter, L. Dougherty, and E-Hounds concerning document production and creation of virtual discovery room (.5).	0.5	\$160.00
3/4/2021	JR	Conference call with J. Perez, L. Dougherty and outside counsel regarding database of case-related documents (.5); review account to confirm deposit of clawback settlement payments (.1); update clawback settlement spreadsheet (.1); communicate with L. Dougherty and outside counsel regarding status of clawback settlement payments from investor and dismissal from case (.1); review correspondence from L. Dougherty to clawback settlement investor regarding status of payments and dismissal from case (.1).	0.9	\$121.50
3/4/2021	LD	Telephone conference with A. Gangi, J. Waechter, J. Perez, and E-Hounds concerning document production and creation of virtual discovery room (.5); confer with B. McConnell about status of M. DaCorta prosecution (.1); review and respond to correspondence from N. Patterson and confer with B. McConnell regarding same (.2); telephone call with A. Steinfeld (.2); confer with B. McConnell concerning A. Steinfeld (.1).	1.1	\$352.00
3/5/2021	LD	Review Receiver's draft motion for court to approve additional clawback settlements (.1).	0.1	\$32.00
3/10/2021	LD	Review correspondence concerning preparation of virtual data room (.1).	0.1	\$32.00
3/15/2021	JR	Communicate with D. Marrero regarding depositing investor clawback settlement check (.1); update clawback settlement spreadsheet (.1); review correspondence from J. Perez to outside counsel and legal team regarding spreadsheet of potential investors (.1).	0.3	\$40.50
3/15/2021	LD	Review and respond to correspondence concerning E. McMahon (.1).	0.1	\$32.00
3/16/2021	JR	Review correspondence from outside counsel regarding spreadsheet of potential investors (.1).	0.1	\$13.50
3/16/2021	LD	Confer with B. McConnell concerning affirmative defenses (.1).	0.1	\$32.00

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET		Asset Analysis and Recovery		
3/17/2021	LD	Review correspondence regarding E. McMahon (.1).	0.1	\$32.00
3/19/2021	JR	Communicate with outside counsel regarding delinquent clawback settlement payments from investors (.1); review notice of settlement and resolution of clawback case (.1).	0.2	\$27.00
3/22/2021	JR	Receipt and review of clawback settlement payments from investors (.1); update clawback settlement spreadsheet (.1); prepare clawback settlement payments for deposit (.1); communicate with outside counsel regarding receipt of clawback settlement checks (.1).	0.4	\$54.00
3/23/2021	JJP	Communicate with B. McConnell regarding post-judgment discovery and identify templates used in prior matters (1.1) and engagement of attorney to assist with defendant's Utah bankruptcy (.2).	1.3	\$416.00
3/23/2021	LD	Review orders regarding defendants B. and C. Kantor and E. McMahon (.1).	0.1	\$32.00
3/26/2021	LD	Review notices of dismissal (.1).	0.1	\$32.00
3/29/2021	LD	Review initial consolidated appellate brief of A. Johnston (.3).	0.3	\$96.00
3/31/2021	JR	Review correspondence from Receiver regarding settlements with clawback investors via mediation (.1); review order granting motion to approve clawback settlements (.1).	0.2	\$27.00
3/31/2021	LD	Review mediation report (.1).	0.1	\$32.00
Total: Asset Analysis and Recovery			27.10	\$7,342.50
Total Professional Service:			27.1	\$7,342.50

DISBURSEMENTS

Date	Description of Disbursements	Amount
E105	Telephone	
3/4/2021	Conference Call Charges	\$8.14
E106	On Line Research	
1/1/2021	PACER printing costs for month of October 1, 2020-December 31, 2020 (365 @ \$0.10)	\$36.50
Total Disbursements		\$44.64

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Total Services	\$7,342.50
Total Disbursements	\$44.64
Total Current Charges	\$7,387.14
Previous Balance	\$16,131.79
Less Payments	(\$16,131.79)
PAY THIS AMOUNT	\$7,387.14

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TASK RECAP**Services**

<u>Project No.</u>	<u>Hours</u>	<u>Amount</u>
ASSET - ASSET	27.10	\$7,342.50
	0.00	\$0.00
	<u>27.10</u>	<u>\$7,342.50</u>

Disbursements

<u>Project No.</u>	<u>Amount</u>
Telephone	\$8.14
On Line Research	\$36.50
	<u>\$44.64</u>

BREAKDOWN BY PERSON

<u>Person</u>		<u>Project No.</u>	<u>Hours</u>	<u>Amount</u>
JJP	Jared J. Perez	ASSET - ASSET	4.30	\$1,376.00
EF	Eric Feld	ASSET - ASSET	0.20	\$48.00
MG	Mary Gura	ASSET - ASSET	1.00	\$135.00
JR	Jeffrey Rizzo	ASSET - ASSET	6.10	\$823.50
LD	Larry J. Dougherty	ASSET - ASSET	15.50	\$4,960.00
			<u>27.10</u>	<u>\$7,342.50</u>

EXHIBIT 10

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

June 10, 2021

Client: 025305

Matter: 002095

Invoice #: 19524

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RE: Oasis Legal Team – Raymond Montie, III.

For Professional Services Rendered Through March 31, 2021

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
1/4/2021	JR	Review correspondence from L. Dougherty and notice of mediation (.1).	0.1	\$13.50
1/4/2021	LD	Confer with E-Hounds concerning discovery portal for R. Montie (.1); attend portion of telephone conference with counsel for R. Montie that concerned document production and settlement (.2).	0.3	\$96.00
1/8/2021	LD	Confer with E-Hounds concerning electronic discovery platform (.1); review initial disclosures of Receiver and R. Montie (.3); review case records (.4); revise confidentiality agreement (2.2); confer with J. Perez regarding confidentiality agreement and next steps (.2).	3.2	\$1,024.00
1/10/2021	LD	Draft and revise responses and objections to R. Montie's request for production (2.4); review case records (3.1); review federal rules (.4); research case law on work product protection (.5); research case law on common interest privilege (2.2).	8.6	\$2,752.00
1/11/2021	JJP	Communicate with L. Dougherty regarding responses and objections to document requests and other case management issues (.5); review and revise confidentiality agreement (.4).	0.9	\$288.00
1/11/2021	AS	Review R. Montie's documents in previous production and communicate with J. Perez regarding same (.5).	0.5	\$67.50

June 10, 2021

Client: 025305

Matter: 002095

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
1/11/2021	JR	Review correspondence between J. Perez and L. Dougherty regarding discovery responses and production (.2).	0.2	\$27.00
1/11/2021	LD	Confer with J. Perez concerning next steps (.1); confer with A. Baker concerning initial disclosures (.1); confer with E-Hounds concerning access to documents for counsel of R. Montie (.2); confer with CFTC concerning R. Montie's request for production of documents (.1); confer with Department of Justice concerning R. Montie's request for production of documents (.1); review past correspondence concerning document production (.3); advise Receiver concerning document requests (.2); review Drohan Lee documents on E-Hounds platform (2.1); revise confidentiality agreement (.2); telephone conference with counsel for R. Montie (.3); review additional Drohan Lee documents (1.7); summarize status for Receiver and team (.1).	5.5	\$1,760.00
1/12/2021	JR	Review draft responses to R. Montie's request for production and related correspondence from L. Dougherty (.1); communicate with legal team regarding documentation related to Oasis necessary for finalizing responses to request for production (.1).	0.2	\$27.00
1/12/2021	LD	Review update from A. Stephens concerning documents (.1); confer with Receiver concerning document production (.1); revise notice of mediation date and direct filing and service of same (.3); revise responses and objections to R. Montie's request for production (.4); confer with team concerning E-Hounds production (.1); confer with E-Hounds (.1).	1.1	\$352.00
1/13/2021	JR	Communicate with L. Dougherty regarding discovery responses and production (.3).	0.3	\$40.50
1/13/2021	LD	Review E-Hounds databases to produce to R. Montie (1.3); confer with J. Perez concerning Drohan Lee documents (.1); revise Receiver's responses and objections to R. Montie's request for production (.3); telephone conference with J. Rizzo concerning documents (.2); telephone conference with CFTC and Receiver concerning documents (.5); confer with federal prosecutor (.1); review E-Hounds documents (1.4); draft and revise list of databases to make available to R. Montie (.3).	4.2	\$1,344.00
1/14/2021	LD	Review files on E-Hounds database for production to R. Montie (7.5); draft and revise list of databases to move to R. Montie's data platform (1.3); summarize status for team (.2).	9.0	\$2,880.00

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
1/15/2021	LD	Confer with E-Hounds concerning document discovery room (.1); telephone conference with R. Bedke (.1); revise list of databases for production (.2); review edits of R. Montie's counsel to confidentiality agreement (.3); revise confidentiality agreement (.7); confer with J. Perez concerning confidentiality agreement (.1).	1.5	\$480.00
1/19/2021	LD	Telephone conference with Receiver concerning document production and response to request to produce (.2); telephone conference with J. Perez concerning document production and response (.6); confer with Department of Justice (.2); review documents on E-Hounds platform (2.2); confer with E-Hounds concerning production room for R. Montie (.3); revise confidentiality agreement (.6); confer with counsel for R. Montie concerning confidentiality agreement and document production (.1); review case notes (.3); revise responses and objections to R. Montie's request for production (2.2); confer with J. Perez and J. Rizzo concerning next steps (.2).	6.9	\$2,208.00
1/20/2021	JJP	Review and revise responses and objections to document requests (1.0); communicate with L. Dougherty regarding discovery and case management issues (.6).	1.6	\$512.00
1/20/2021	JR	Communicate with L. Dougherty regarding responses to discovery requests and third-party documentation per review of productions and master spreadsheet (.2).	0.2	\$27.00
1/20/2021	LD	Confer with J. Rizzo concerning bank records (.2); confer with J. Perez concerning Receiver's response to R. Montie's request for production (.3); revise response (1.2); telephone conference with counsel for R. Montie concerning document production (.4); review records on E-Hounds platform (.7); confer with counsel for R. Montie concerning response (.1).	2.9	\$928.00
1/21/2021	LD	Telephone call with D. Bukas at E-Hounds concerning document production to R. Montie (.1); review correspondence from counsel for R. Montie (.1); revise and execute confidentiality agreement and confer with Receiver and J. Perez regarding the same (.2).	0.4	\$128.00
1/25/2021	LD	Confer with counsel for R. Montie concerning confidentiality agreement (.1).	0.1	\$32.00
1/26/2021	EF	Attention to online database matters regarding R. Montie's request for access to same (.7).	0.7	\$168.00
1/26/2021	LD	Confer with J. Perez concerning discovery (.2); direct drafting of discovery (.1); review confidentiality agreement executed by counsel for R. Montie (.1); confer with counsel for R. Montie concerning Drohan Lee documents (.2); confer with E-Hounds concerning virtual document room and device image drive (.3).	0.9	\$288.00

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
1/27/2021	JR	Communicate with L. Dougherty and E-Hounds regarding database materials of third-party documents (.2).	0.2	\$27.00
1/27/2021	LD	Confer with J. Perez (.1); review data inventory from D. Bukas and confer with him concerning same (.2); record notes on document production (.2); confer with J. Rizzo concerning document production (.2).	0.7	\$224.00
1/28/2021	LD	Review E-Hounds inventory of documents (.2); confer with J. Rizzo concerning documents (.1); call counsel for R. Montie (.1); confer with D. Bukas at E-Hounds (.1).	0.5	\$160.00
1/29/2021	LD	Call counsel for R. Montie (.1).	0.1	\$32.00
2/1/2021	LD	Telephone conferences with counsel for R. Montie (.3); confer with D. Bukas at E-Hounds concerning documents (.1); confer with J. Perez concerning discovery (.1).	0.5	\$160.00
2/2/2021	LD	Revise interrogatories to R. Montie (4.3); confer with J. Perez (.1); review R. Montie's answer and affirmative defenses (.8); review discovery provided to date (.7).	5.9	\$1,888.00
2/3/2021	LD	Draft and revise Receiver's first interrogatories to R. Montie (4.3); analyze bank records produced to R. Montie (.6); analyze R. Montie's affirmative defenses (1.6); analyze case records and notes (1.5); review rules (.3).	8.3	\$2,656.00
2/4/2021	LD	Revise interrogatories to R. Montie (3.1); analyze R. Montie's answer to amended complaint (1.1); analyze amended complaint (1.3); review case records (.4); confer with J. Perez (.1); confer with counsel for R. Montie (.1); revise request for production (.8).	6.9	\$2,208.00
2/5/2021	LD	Confer with J. Perez concerning discovery (.1); revise request for production to R. Montie (.8).	0.9	\$288.00
2/6/2021	LD	Review deadlines in case management order and case management report (.2).	0.2	\$64.00
2/9/2021	LD	Telephone conference with counsel for R. Montie concerning document production (.2); prepare list of next case tasks and deadlines after reviewing case notes and case filings (.4); draft and revise request for production to R. Montie (2.8); review case filings and case records (.8); revise interrogatories to R. Montie (1.1); revise requests for admissions to R. Montie (.2).	5.5	\$1,760.00
2/10/2021	JJP	Communicate with Receiver and legal team regarding discovery issues (.3).	0.3	\$96.00
2/10/2021	LD	Revise requests for admission to R. Montie (1.8); revise interrogatories (.6); revise request for production (.1); confer with J. Perez concerning status and next steps (.1); review team correspondence regarding investigation (.1).	2.7	\$864.00

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
2/12/2021	LD	Advise Receiver concerning scheduled mediation and illness of mediator (.1); direct outreach to mediator concerning our date (.1).	0.2	\$64.00
2/15/2021	LD	Confer with Receiver concerning selection of new mediator in wake of P. Grilli's illness (.2); review background of proposed mediator J. Betts (.1); confer with counsel for R. Montie concerning mediator J. Betts (.1); analyze claims analysis (.3).	0.7	\$224.00
2/16/2021	LD	Review and revise Receiver's initial discovery to R. Montie (.4); review correspondence from counsel for R. Montie (.1); confer with Receiver and J. Perez concerning discovery (.1); review case notes and next steps (.4).	1.0	\$320.00
2/18/2021	LD	Review and respond to correspondence from counsel for R. Montie concerning mediator and document production (.2); telephone conference with M. Horwitz and S. Dorcely concerning discovery (.2); telephone conference with J. Perez (.1); review case notes (.1).	0.6	\$192.00
2/22/2021	LD	Review correspondence with counsel for R. Montie concerning Receiver's document production (.1); confer with counsel for R. Montie about selecting new mediator and next steps in document production (.2); review revisions to draft discovery and make additional revisions (.7).	1.0	\$320.00
2/23/2021	JJP	Review and revise notice of mediation (.2).	0.2	\$64.00
2/23/2021	LD	Review correspondence from counsel for R. Montie (.1); telephone conference with counsel for R. Montie (.3); revise request for document production (.6); direct scheduling of mediation with substitute mediator (.2); confer with Receiver and J. Perez concerning mediation date, status, and strategy (.2); confer twice with counsel for R. Montie concerning mediation date (.1); direct drafting of amended notice of mediation date (1.); revise amended notice (.1); confer with J. Perez concerning mediation (.1); revise notice and direct filing of same (.2); revise request for production to R. Montie (.7); research change in rules on expert discovery (.8).	3.5	\$1,120.00
2/24/2021	LD	Review mediator's terms of engagement and advise Receiver concerning mediation (.1); direct A. Baker in calendaring deadline for providing mediation statement to mediator (.1); research case law on discovery of expert materials and summarize results (1.5); revise request for production (1.4).	3.1	\$992.00

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
2/25/2021	LD	Confer with J. Perez concerning expert discovery (.1); revise request for production (3.1); direct drafting and editing of exhibit to request for production (.2); search E-Hounds files concerning Receivership entities related to R. Montie (.9); revise interrogatories (.5); confer with J. Perez concerning status and next steps (.1).	4.9	\$1,568.00
2/28/2021	JJP	Communicate with Receiver and L. Dougherty regarding expert witness issues (.3).	0.3	\$96.00
2/28/2021	LD	Communicate with Receiver and J. Perez about expert disclosure (.3); confer with counsel for R. Montie concerning proposed motion to extend expert deadlines (.2); research expert issues (.6); summarize research for Receiver and J. Perez (.1).	1.2	\$384.00
3/1/2021	JJP	Draft joint motion for extension of time to serve expert disclosures (.3).	0.3	\$96.00
3/1/2021	JR	Receipt and review of Receiver's amended notice of mediation date (.1).	0.1	\$13.50
3/1/2021	LD	Confer with Receiver and J. Perez regarding discovery (.1); revise joint motion for extension of expert disclosure deadlines (.2); confer with counsel for R. Montie concerning draft of joint motion (.1); sign and direct filing of motion (.1).	0.5	\$160.00
3/2/2021	LD	Confer with Receiver concerning next steps (.1); review order granting joint motion for extension of expert deadlines and review revised deadlines (.1); review case notes and summarize for Receiver (.2); research additional possible trial fact and expert witnesses and summarize for Receiver (.4).	0.8	\$256.00
3/3/2021	JR	Communicate with L. Dougherty and outside counsel regarding database of non-party documentation (.1).	0.1	\$13.50
3/3/2021	LD	Research expert disclosure and confer with J. Perez regarding same (.2); telephone conference with Receiver regarding experts (.3); research possible experts (.3); communicate with possible experts (.2); confer with J. Perez about discovery (.1).	1.1	\$352.00
3/4/2021	LD	Confer with Receiver about potential expert (.1); confer with E. Feld regarding records (.1); review correspondence from potential experts and update Receiver (.2); confer with potential expert concerning identities of parties for conflict check (.5).	0.9	\$288.00
3/5/2021	EF	Telephone call with legal team regarding documents from Cayman Islands counsel (.5); review documents received from counsel for same in anticipation of expert disclosure in R. Montie case (1.9).	2.4	\$576.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
3/5/2021	LD	Telephone conference with E. Feld concerning documents (.5); confer with potential expert for conflict check (.1).	0.6	\$192.00
3/7/2021	LD	Confer with potential experts concerning next steps (.2); update Receiver (.1); confer with potential expert and Receiver and set telephone conference (.2).	0.5	\$160.00
3/8/2021	EF	Call with potential expert K. Pearson regarding Cayman Islands fiduciary laws and review Oasis International Group incorporation documents for same (.9).	0.9	\$216.00
3/8/2021	LD	Draft outline for conference with potential expert (2.1); update Receiver and confer with team concerning call (.1); telephone conference with potential expert (.5); research expert disclosures (.4); confer with J. Perez concerning expert disclosures (.1); confer with potential experts (.2); review draft engagement letter (.1); confer with J. Perez regarding discovery (.2); confer with Receiver concerning experts (.2); confer with E. Feld concerning discovery (.1); confer with Receiver about discovery (.1).	4.1	\$1,312.00
3/9/2021	JJP	Communicate with M. Davis and L. Dougherty regarding preparation of expert reports and attention to related issues (2.5); draft and revise discovery requests to defendant (3.0).	5.5	\$1,760.00
3/9/2021	EF	Draft declaration for J. Anile regarding R. Montie's fiduciary duties to OIG and review documents for same (2.3); call with legal team regarding strategy for same (.3).	2.6	\$624.00
3/9/2021	LD	Confer with J. Perez concerning expert discovery (.2); confer with potential expert (.1); confer with Receiver about experts (.2); confer with E. Feld about witness statement (.2); telephone conference with potential expert (.3); review correspondence concerning Kapila Mukamal (.1); telephone conference with Receiver (.1); confer with expert (.2); telephone conference with E. Feld (.3); update Receiver and legal team about discovery and next steps (.2); confer with J. Perez concerning motion (.1); review case records and revise draft statement of facts (1.5).	3.5	\$1,120.00
3/10/2021	JJP	Communicate with M. Davis and L. Dougherty regarding preparation of expert reports and attention to related issues (.5); review draft expert report (.8); draft motion for extension of time to serve expert disclosures (.2).	1.5	\$480.00
3/10/2021	LD	Confer with Receiver concerning expert discovery (.1); review draft expert report of Kapila Mukamal (.3); review case documents and emails (.7); revise statement of facts (.6); confer with Receiver concerning status and next steps (.1).	1.8	\$576.00
3/11/2021	JJP	Revise, finalize, and file motion for extension of time to serve expert disclosures (.2).	0.2	\$64.00

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
3/11/2021	EF	Review additional OIG corporate documentation for expert fiduciary duty analysis, including documents provided by Drohan Lee firm (3.6); exchange correspondence with Receiver and legal team regarding same (.3); exchange correspondence with OIG Cayman Islands counsel regarding documentation for OIG (.2).	4.1	\$984.00
3/11/2021	LD	Review edits by Receiver (.2); plan next steps (.1); confer with J. Perez (.1); telephone conference with and email to counsel for R. Montie concerning motion for extension (.1); telephone conference with J. Perez concerning extension (.1); telephone conference with associate at Maples law firm (.1); review Oasis corporate documents (.4); review draft motion for extension of time (.1); review documents provided by the Maples firm (.4); confer with Receiver (.1); confer with expert (.1); draft and revise statement of facts after reviewing corporate documents (1.7); review draft opinion (.3); confer with Receiver (.1).	3.9	\$1,248.00
3/12/2021	JJP	Communicate with M. Davis regarding preparation of expert report and attention to related issues (1.5).	1.5	\$480.00
3/12/2021	EF	Review additional documents provided by Cayman Islands counsel regarding OIG registration with financial services authority for R. Montie fiduciary duty analysis (.4); exchange correspondence with Receiver and legal team regarding same (.2).	0.6	\$144.00
3/12/2021	LD	Telephone conference with expert and J. Perez (.7); confer with Receiver concerning Cayman Islands expert (.2); review additional Oasis corporate documents (.2); confer with expert (.1).	1.2	\$384.00
3/14/2021	LD	Confer with Receiver and expert concerning expert report (.1).	0.1	\$32.00
3/15/2021	JJP	Prepare for and participate in telephone conference with Receiver and forensic accountants regarding expert report and disclosure (1.0); draft expert disclosure cover pleading (.3).	1.3	\$416.00
3/15/2021	EF	Call with expert consultants, Kapila Mukamal, regarding expert report (.5); review documents for expert review and provide memorandum regarding analysis of same (.7); review updated expert report (.7); exchange correspondence regarding expert report (.2).	2.1	\$504.00

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
3/15/2021	LD	Review draft report in preparation for call (.4); conference with Receiver and expert concerning case (.5); review lender spreadsheet (.3); review draft expert opinion on fiduciary duty (.3); confer with Receiver concerning expert (.1); review list of investors and confer with J. Perez regarding same (.3); review ATC Brokers records (.4); review records from expert (.2); confer with E. Feld and J. Perez (.1); review draft expert disclosure (.1); review updates on investor status (.2); review rules concerning form of disclosure and summarize advice for J. Perez (.2); review final expert report (.5).	3.6	\$1,152.00
3/16/2021	EF	Call with Cayman Islands fiduciary expert (Harneys) regarding expert report (.6).	0.6	\$144.00
3/16/2021	LD	Prepare for call with expert by reviewing draft report and case files (1.0); confer with Receiver (.2); video conference with Receiver, expert counsel, and legal team (.6); make notes of next steps (.2); confer with J. Perez (.2); confer with E. Feld (.1); confer with co-counsel concerning M. DaCorta (.1); review case notes and plan next steps (.5).	2.9	\$928.00
3/17/2021	LD	Review documents relating to Strata (.5); confer with Receiver regarding same (.1).	0.6	\$192.00
3/18/2021	LD	Review and revise draft expert report (.8); research case files on E-Hounds platform (.6); confer with J. Perez concerning Rule 44.1 notice (.1); research OIG corporate documents (.2); communicate with Receiver concerning next steps (.3); telephone conference with Receiver (.3); research case law regarding Receiver's claims (.8).	3.1	\$992.00
3/19/2021	LD	Revise memorandum of conversation with J. Anile and review documents for same (.8); review current draft of expert opinion (.3); confer with Receiver (.2); confer with J. Perez about motion (.1); telephone conference with Receiver and expert (.4); confer with expert concerning rules and report (.5); research case files (.2).	2.5	\$800.00
3/21/2021	LD	Confer with J. Perez about motion to approve engagement of expert (.2); revise motion for approval to engage expert in Cayman law (2.2); review case files (.7); review draft expert report (.3).	3.4	\$1,088.00
3/22/2021	JJP	Communicate with L. Dougherty regarding expert disclosure and report (.4).	0.4	\$128.00

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset Analysis and Recovery			
3/22/2021	LD	Revise motion for court to approve engagement of expert on Cayman Islands corporate law (1.2); review case filings (.3); confer with J. Perez concerning motion for approval to retain expert (.1); confer with A. Whitby and A. Stephens concerning website documents (.1); confer with Receiver concerning expert (.1); confer with expert (.2); revise second expert disclosure (1.0); confer with Receiver and J. Perez (.1); research case law on breach of fiduciary duty and summarize for J. Perez (.5); review and finalize final expert report and exhibits (1.2).	4.8	\$1,536.00
3/23/2021	LD	Confer with Receiver and J. Perez regarding discovery and next steps (.1).	0.1	\$32.00
3/24/2021	LD	Telephone conference with Receiver (.1); draft discovery plan notes (.4).	0.5	\$160.00
3/26/2021	LD	Review and respond to correspondence from counsel for R. Montie (.2).	0.2	\$64.00
3/29/2021	JJP	Review and revise Receiver's first set of document requests to defendant (1.0); review and revise Receiver's first set of interrogatories to defendant (.8).	1.8	\$576.00
3/31/2021	LD	Review invoice from Caymans Islands expert on fiduciary duty and confer with Receiver regarding same (.2); revise draft interrogatories (.3); confer with J. Perez regarding draft interrogatories (.1).	0.6	\$192.00
Total: Asset Analysis and Recovery			166.00	\$51,648.50
Total Professional Service:			166.0	\$51,648.50

DISBURSEMENTS

Date	Description of Disbursements	Amount
E101	Photocopies	
3/24/2021	Photocopies @ .15 each (12 @ \$0.15)	\$1.80
E105	Telephone	
3/8/2021	Conference Call Charges	\$10.08
E106	On Line Research	
1/1/2021	PACER printing costs for month of October 1, 2020-December 31, 2020 (137 @ \$0.10)	\$13.70
3/22/2021	Westlaw	\$515.04

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DISBURSEMENTS

Date	Description of Disbursements	Amount
	Total Disbursements	\$540.62
	Total Services	\$51,648.50
	Total Disbursements	\$540.62
	Total Current Charges	\$52,189.12
	Previous Balance	\$14,927.00
	<i>Less Payments</i>	<i>(\$14,927.00)</i>
	PAY THIS AMOUNT	\$52,189.12

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TASK RECAP**Services**

<u>Project No.</u>	<u>Hours</u>	<u>Amount</u>
ASSET - ASSET	166.00	\$51,648.50
	0.00	\$0.00
	0.00	\$0.00
	<u>166.00</u>	<u>\$51,648.50</u>

Disbursements

<u>Project No.</u>	<u>Amount</u>
Photocopies	\$1.80
Telephone	\$10.08
On Line Research	\$528.74
	<u>\$540.62</u>

BREAKDOWN BY PERSON

<u>Person</u>	<u>Project No.</u>	<u>Hours</u>	<u>Amount</u>
JJP Jared J. Perez	ASSET - ASSET	15.80	\$5,056.00
EF Eric Feld	ASSET - ASSET	14.00	\$3,360.00
JR Jeffrey Rizzo	ASSET - ASSET	1.40	\$189.00
AS Amanda Stephens	ASSET - ASSET	0.50	\$67.50
LD Larry J. Dougherty	ASSET - ASSET	134.30	\$42,976.00
		<u>166.00</u>	<u>\$51,648.50</u>

EXHIBIT 11

HARNEYS

Harney Westwood & Riegels
 3rd Floor, Harbour Place
 103 South Church Street
 P.O. Box 10240
 Grand Cayman KY1-1002
 Cayman Islands

Tel: +1 345 949 8599
 Fax: +1 345 949 4451
www.harneys.com

Burton W Wiand
 114 Turner Street
 Clearwater, FL 33756
 United States
 FAO: Larry Dougherty

INVOICE

Re: Expert Evidence Regarding Fiduciary Duties
Ref: KLP/055291.0001

Invoice Date: 07/04/2021
Invoice Number: 1391243
Invoice Total (US\$): 38,095.00

COST AND TIME SUMMARY

Date	Description	Disbursements	Fees	Total
	Please find attached to this fee note a full breakdown of all time spent on this matter by all Harneys attorneys and details of all disbursements to 24 March 2021.	-	38,095.00	
Subtotal		0.00	38,095.00	
TOTAL (US\$)				38,095.00

Please note that this fee note is not subject to US tax.
 Exemption code 03: Non-US source income received by a non resident alien.

This account is due and should be paid within 14 days.

Payment Instructions

For our full payment instructions, please visit <http://www.harneys.com/payments>

HARNEYS

Harney Westwood & Riegels
 3rd Floor, Harbour Place
 103 South Church Street
 P.O. Box 10240
 Grand Cayman KY1-1002
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Tel: +1 345 949 8599
 Fax: +1 345 949 4451
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Burton W Wiand
 114 Turner Street
 Clearwater, FL 33756
 United States
 FAO: Larry Dougherty

INVOICE DETAIL

Re:	Expert Evidence Regarding Fiduciary Duties	Invoice Date:	07/04/2021
Ref:	KLP/055291.0001	Invoice Number:	1391243

Date	Timekeeper		Hours	Amount
08/03/2021	KLP	Wiand/ OIG: prepare for and attend call with Guerra King and receiver re potential new matter; brief NDD re same.	2.50	2,375.00
08/03/2021	NDD	KLP expert evidence matter; review and consider materials provided including articles of association of Oasis International Group.	2.30	1,495.00
09/03/2021	KLP	Wiand/ OIG: email Guerra King re EL; discussion NDD re next steps/ research required; email Guerra King.	0.50	475.00
09/03/2021	NDD	Discussion of next steps with KLP; research and collation of materials for expert evidence; arrange for bundle of materials in preparation for expert evidence.	2.10	1,365.00
10/03/2021	KLP	Research for legal opinion on Cayman Islands law.	5.20	4,940.00
10/03/2021	NDD	Research and collation of materials for expert evidence.	0.50	325.00
11/03/2021	KLP	Draft expert opinion on Cayman Islands law; e-mail to Guerra King re same; review further materials received from Guerra King.	6.00	5,700.00
12/03/2021	KLP	Update NDD re evidence/ exhibits; e-mail in from Guerra King and respond.	0.30	285.00

Date	Timekeeper		Hours	Amount
12/03/2021	NDD	Liaise with junior paralegal in relation to preparation of appendices to KLP expert evidence; review and consider draft evidence; discuss the evidence with KLP; make additions / adjustments to appendices and provide to KLP for review.	2.20	1,430.00
15/03/2021	KLP	E-mail in from client re call tomorrow and email NDD re same.	0.10	95.00
15/03/2021	NDD	Review and consider email correspondence and additional expert report of Melissa Davis dated 15 March; liaise with KLP in relation to telephone call with Guerra King.	0.40	260.00
16/03/2021	NDD	Review and consider B Wiand comments on draft evidence; review and consider English authority of BTI 2014 v Sequana in relation to directors' duties to creditors in event of insolvency; discuss the same with KLP; identify articles on the topic and provide to KLP.	1.60	1,040.00
16/03/2021	KLP	Review client comments on draft declaration and other documents circulated by client prior to call; attend call with client to discuss draft declaration.	1.30	1,235.00
17/03/2021	KLP	Detailed review of further materials provided by Guerra King; amend draft declaration to take account of same.	7.00	6,650.00
19/03/2021	NDD	Review and consider B Wiand comments on draft evidence and memo from conversation with Anile; search for and insert relevant case law in respect of Annex 2 to KLP evidence; collation of relevant case law for Annex 2; preparation for conference call; attendance on call with Guerra King; review and consider emails and attachments from L Dougherty and format evidence in accordance with Federal Rules; proof reading the evidence.	4.60	2,990.00
19/03/2021	KLP	Review further comments on opinion received from client and further documents provided/ referred to; amend opinion to take account of same and send to client; call with client re same.	4.30	4,085.00
22/03/2021	NDD	Final review and proof read of KLP evidence; amend Annex 2 - inserting Companies Law section and provide to KLP; discuss the documents with KLP, making minor amendments to Annex 2.	1.50	975.00
22/03/2021	KLP	Amend opinion to include reference to additional materials provided on Friday; detailed check of same and of appendices; instructions to NDD re further docs to be included in appendix; e-mail to client; TC client re opinion; sign off and send to client.	2.50	2,375.00

Timekeeper	Timekeeper Name	Rate	Hours	Amount
KLP	Katie Pearson	950.00	29.70	28,215.00
NDD	Niall Dodd	650.00	15.20	9,880.00

Timekeeper	Timekeeper Name	Rate	Hours	Amount
Subtotal (US\$)			44.90	38,095.00

EXHIBIT 12

Invoice No. 73120
 John Waechter as Counsel
 Burton W. Wiand v. Chris Arduini, et al.



Invoice Date: February 02, 2021

FEES

Date	Staff	Description	Hours	Amount
01/04/2021	JWW	Email communications w/ counsel for defendants Kantor. Draft Settlement Agreement; email to counsel.	0.50	\$167.50
01/04/2021	JWW	Phone conference w/ defendant Harris re returned check. Email communications w/ EF bookkeeper re redeposit instructions.	0.20	\$67.00
01/04/2021	JWW	Continue drafting deposition outlines for defendants Hunte and Jackson.	0.75	\$251.25
01/04/2021	BM	Correspondence re: Procopio (0.10); correspondence with Tim Hunte (0.10); correspondence with counsel for Kantors (0.10); correspondence with attorney Dougherty (0.10); correspondence with expert (0.20)	0.60	\$201.00
01/05/2021	TD	Prepare Receiver's Amended Notice of Taking Video-Conferenced Deposition of Timothy Hunte and James Jackson (January 20th and 22nd, 2021)(0.2)	0.20	\$30.00
01/05/2021	JWW	Phone conference w/ BSM and expert witnesses re expert report and related matters (0.5). IOC w/ BSM re discovery responses, outstanding issues, tolling agreement group and deposition scheduling and preparation (1.0).	1.50	\$502.50
01/05/2021	TD	Prepare 2nd Am. Notice of Taking Depo, flip flopping James Jackson and Timothy Hunte per their request.	0.25	\$37.50
01/05/2021	BM	Telephonic conference with expert witness (0.50); IOC with attorney Waechter re: future action (1.00); directives re: responses to discovery requests (0.10); review documents provided by Kapilla (0.20); directives re: document production (0.10).	1.90	\$636.50
01/05/2021	AG	Begin drafting responses to Martini's discovery requests.	1.30	\$357.50
01/06/2021	JWW	IOC w/ BSM re investments and distributions for Timothy Hunte related accounts.	0.40	\$134.00
01/06/2021	JWW	Review accounting schedules, proofs of claim, bank statements and other documents related to investments and distributions for Timothy Hunte accounts. Phone conferences and email communications w/ forensic CPA and co-counsel re account reconciliation.	3.10	\$1,038.50
01/06/2021	BM	Correspondence with defendant Procopio.	0.10	\$33.50

Invoice No. 73120
 John Waechter as Counsel
 Burton W. Wiand v. Chris Arduini, et al.



Invoice Date: February 02, 2021

01/06/2021	BM	Review correspondence with defendant Hunte and counsel for Martinis.	0.20	\$67.00
01/06/2021	TD	Continue updating final judgment chart for default judgment defendants. (1.75)	1.75	\$262.50
01/06/2021	BM	Review documents provided by Kapilla re: Hunte, KATT Distribution, and Jackson (0.20); IOC with attorney Waechter re: expert report (0.40).	0.60	\$201.00
01/07/2021	JWW	Phone conferences and email communications w/ co-counsel and forensic CPA re various proof of claim forms and transaction summary spreadsheets.	1.00	\$335.00
01/07/2021	BM	Review correspondence from Tim Hunte (0.10); correspondence with expert (0.20); directives re: discovery; review documents produced (0.30); correspondence with counsel for McMahon (0.20)	0.80	\$268.00
01/07/2021	AG	Continue drafting responses to Martinis' RFP, RFA, and Rgs.	1.60	\$440.00
01/07/2021	AG	Continue drafting responses to Hunt RFP.	0.60	\$165.00
01/07/2021	AG	Draft responses to McMahon RFP.	0.40	\$110.00
01/08/2021	JWW	Update pre-judgment interest calculation for defendant McMahon; email to opposing counsel. Phone conference w/ opposing counsel re status of claim; possible settlement negotiation.	0.75	\$251.25
01/08/2021	JWW	Email communications w/ forensic CPAs and co-counsel re status of various defendants and claims. Review documents and respond to inquiry.	0.50	\$167.50
01/08/2021	BM	Correspondence with co-counsel (0.10); review revised confidentiality agreement (0.30); correspondence with expert (0.20)	0.60	\$201.00
01/09/2021	JWW	Review preliminary draft of Kapila/Mukamal expert witness report.	1.80	\$603.00
01/10/2021	JWW	Phone conference w/ Kapila representatives to review draft expert witness report. Email communications w/ Receiver re related accounts for defendant Hunte.	0.80	\$268.00
01/11/2021	JWW	Phone conference w/ Receiver re expert report, transactions for defendants Hunte and Jackson, deposition schedules and related matters.	0.40	\$134.00
01/11/2021	JWW	Phone conference and email communications w/ Kapila representatives re edits to draft expert report. Review revised schedules.	0.40	\$134.00
01/11/2021	JWW	Review claim forms and supporting documentation for defendants Jackson and Hunte.	0.50	\$167.50

Invoice No. 73120
 John Waechter as Counsel
 Burton W. Wiand v. Chris Arduini, et al.



Invoice Date: February 02, 2021

01/11/2021	JWW	Phone conference w/ co-counsel and email communications w/ Receiver re processing of investor claim for defendants Hunte/Jackson.	0.30	\$100.50
01/11/2021	JWW	Review revised draft of Expert Report. Email communications w/ experts re draft report.	0.70	\$234.50
01/11/2021	TD	Draft Notices of Taking Video-conferenced Depositions of Martinis, and Elizabeth McMahon.	0.50	\$75.00
01/11/2021	TD	Draft Notices of Taking Video-conferenced Depositions of Martinis, and Elizabeth McMahon.	0.50	\$75.00
01/11/2021	BM	Correspondence with attorney Waechter re: expert report (0.20); correspondence with def. Attia (0.10); directives re: McMahon deposition (0.10); review and analysis of expert report draft (0.30); review and analysis of revised report and correspondence with expert (0.60)	1.30	\$435.50
01/12/2021	JWW	Final review of preliminary expert report. Email communications w/ Receiver re filing.	0.30	\$100.50
01/12/2021	JWW	Continue drafting deposition outline for defendants Hunte and Jackson. Identify exhibits to be marked.	1.80	\$603.00
01/12/2021	BM	Correspondence with expert; directives re: disclosure; correspondence with Silvia Davis.	0.30	\$100.50
01/13/2021	JWW	Edit Confidentiality Agreement; email to counsel for defendants Martini, Sr. and Jr.	0.25	\$83.75
01/13/2021	JWW	Direct staff re preparation of exhibit binder for defendants' Hunte and Jackson depositions. Review exhibits.	0.40	\$134.00
01/13/2021	AG	Continue drafting responses and objections to Hunte/Jackson RFP.	1.60	\$440.00
01/13/2021	BM	Correspondence with counsel for Martinis (0.10); correspondence with co-counsel (0.30); correspondence with client re: Hunte (0.10); edit response to Hunte's RFP (1.40).	1.90	\$636.50
01/14/2021	BM	Correspondence re: Cardiello; draft and edit notice of voluntary dismissal; directives re: same; note file.	0.40	\$134.00
01/14/2021	TD	In preparation for depositions of Tim Hunte and James Jackson, prepare docs; prepare letters to Court Reporter and deponents.	0.50	\$75.00
01/14/2021	BM	Correspondence with attorney Perez re: motion to approve settlement with Estate of Mary McClare (0.10); correspondence with attorney Dougherty re: Shams suit(0.10); updated and noted file re: status of remaining defendants' claims (0.30)	0.50	\$167.50

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 John Waechter as Counsel
 Burton W. Wiand v. Chris Arduini, et al.



Invoice Date: February 02, 2021

01/14/2021	AG	Edit responses to Martini's RFP.	1.40	\$385.00
01/14/2021	BM	Correspondence with co-counsel re: ehounds production.	0.20	\$67.00
01/15/2021	AG	Phone call with J. Perez re: Martini discovery; Continue to draft responses to Interrogatories and RFA; Review underlying pleadings and consolidated receivership order.	3.90	\$1,072.50
01/15/2021	BM	Review correspondence re: Patterson (0.10); correspondence with co-counsel re: discovery (0.30); review and edit draft response to Martinis' RFP (0.50); review database and conduct key word search to finalize responses (1.10); directives re: same (0.20).	2.20	\$737.00
01/19/2021	AG	Email correspondence with counsel for martinis re: discovery production; Edit and finalize responses to Martinis's RFP/RFA and final review of documents produced.	2.00	\$550.00
01/19/2021	JWW	Review and revise deposition outline for Hunte/Jackson depositions. Email communications w/ defendant Hunte re deposition schedule and him retaining counsel.	1.40	\$469.00
01/19/2021	BM	Directives re: document production responsive to Martini RFP (0.20); IOC with attorney Gangi re: discovery responses and production (0.30); review and edit deposition outline re: Hunte and Jackson (0.90); correspondence with attorney Waechter re: depositions (0.10); review Kerrigan's certificate of interested persons filed in appellate matter (0.10); correspondence with counsel for Martinis (0.20); correspondence with Victoria Contino, friend of Ann Barton (0.30); correspondence with Tim Hunte re: deposition (0.20)	2.30	\$770.50
01/20/2021	AG	Review expert file for production; Continue answering discovery requests; Email correspondence with counsel re: same.	2.10	\$577.50
01/20/2021	JWW	Review and execute Confidentiality Agreement for defendant Attia.	0.20	\$67.00
01/20/2021	JWW	Email communications w/ co-counsel; phone conference w/ defendant Harris re delinquent settlement payment.	0.30	\$100.50
01/20/2021	JWW	Update pre-judgment interest calculation for defendant Hunte.	0.30	\$100.50

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Invoice Date: February 02, 2021

01/20/2021	BM	Correspondence with Victoria Contino and expert (0.30); review correspondence re: Hunte (0.20); review and identify expert correspondence (0.60); review appellate filings re: appeal fees by various defendants (0.20)	1.30	\$435.50
01/21/2021	JWW	Initial review of documents to be used as exhibits for deposition of defendants Martini.	1.20	\$402.00
01/21/2021	BM	Review multiple filings re: interlocutory appeal (0.30); correspondence with client and directives re: judgments (0.60);	0.90	\$301.50
01/22/2021	JWW	Initial review of documents produced by defendants Martini in response to RFP.	1.20	\$402.00
01/22/2021	JWW	Draft Notice of Voluntary Dismissal for defendant Estate of Mary McClare.	0.30	\$100.50
01/22/2021	BM	Correspondence with Maria Cardiello; directives re: Estate of Mary McClare dismissal.	0.20	\$67.00
01/25/2021	BM	Review and edit notice of voluntary dismissal (0.20); review order re: motion to tax costs (0.10); correspondence with expert (0.20); draft and edit supplement to motions to tax costs (0.90); directives re: supplement (0.20); correspondence with attorney Waechter (0.20); correspondence with attorney Perez (0.20); review filing re: appeal (0.20); correspondence with expert and review and analysis of additional documents (0.60)	2.80	\$938.00
01/26/2021	BM	Correspondence with attorney Perez and client.	0.30	\$100.50
01/26/2021	JWW	Set up template to calculate post-judgment interest. Calculate for Ann Barton.	0.75	\$251.25
01/26/2021	BM	Correspondence with client and expert re: Ann Barton; correspondence with Vicky Contino re: Ann Barton.	0.90	\$301.50
01/26/2021	BM	Correspondence with Mary Gura re: Huckabee.	0.20	\$67.00
01/27/2021	JWW	Continue review of documents produced by defendants Martini in discovery.	1.10	\$368.50
01/27/2021	JWW	Review and respond to email communications w/ co-counsel re phone calls from defendant Huckabee. Phone conference w/ Mr. Huckabee re status of litigation. Inquiry into status of claim submitted by Ms. Frase.	0.50	\$167.50
01/27/2021	JWW	Review and respond to email communications w/ counsel for defendants Kantor re settlement discussions (0.3). Phone conferences and email communications w/ co-counsel and Kapila re	1.20	\$402.00

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Invoice Date: February 02, 2021

		relationship between Full Spectrum Wellness (FSW) and Oasis (0.5). Research related to FSW and Oasis relationship (0.4).		
01/27/2021	BM	Correspondence re: Kantors.	0.20	\$67.00
01/28/2021	JWW	Email communications w/ co-counsel; phone conference w/ defendant Harris re late payment on Settlement Agreement.	0.30	\$100.50
01/28/2021	JWW	Phone conference w/ counsel for defendants Hunte and Jackson re rescheduling deposition, responses to discovery, outstanding balances and status of case. Obtain schedules from Kapila.	0.75	\$251.25
01/28/2021	JWW	IOC w/ BSM re depositions for defendants Martini Sr. and Jr.	0.40	\$134.00
01/28/2021	BM	IOC with attorney Waechter re: Martini depo (0.40); draft and edit answers to interrogatories (2.90) ; correspondence with expert (0.10); correspondence with ehounds (0.10).	3.50	\$1,172.50
01/28/2021	AG	Edit and finalize answers to Martinis's interrogatories.	1.60	\$440.00
01/29/2021	JWW	Document review and deposition preparation for defendants Martini Sr. and Jr.	1.40	\$469.00
01/29/2021	AG	Edit and finalize responses to Martinis's interrogatories; Directives to staff re: identifying bates label production; Email correspondence to client re: same.	0.90	\$247.50
01/29/2021	BM	Call with Vicky Contino re: Ann Barton and note file (0.20); correspondence with co-counsel re: ehounds platform (0.10)	0.30	\$100.50
Total Fees			73.25	\$22,810.25

EXPENSES

Date	Qty.	Description	Each	Amount
01/21/2021	1	Certified copies of Final Default Judgment	\$492.00	\$492.00
01/30/2021	1	Court Reporter - depo of Timothy Hunte Invoice No. 120571875	\$232.00	\$232.00
01/12/2021	1	Postage	\$5.30	\$5.30
01/28/2021	1	UPS 2nd day Timothy Hunte and Regus Court Reporting Invoice No. 2101125594	\$73.56	\$73.56

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John Waechter as Counsel
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Invoice Date: February 02, 2021

Total Expenses	\$802.86
Total Fees and Expenses	\$23,613.11
Previous Balance	\$62,774.20
Payments Received	\$0.00
Balance Now Due	\$86,387.31

\$86,387.31 TOTAL LEGAL SERVICES

Invoice No. 73420
 John Waechter as Counsel
 Burton W. Wiand v. Chris Arduini, et al.



Invoice Date: March 03, 2021

FEES

Date	Staff	Description	Hours	Amount
02/01/2021	JWW	Email communications w/ forensic accountants and counsel for defendants Kantor re settlement negotiations. Review revised schedules prepared by accountant.	0.40	\$134.00
02/01/2021	AG	Phone call with client re: Martini Rogs.	0.30	\$82.50
02/01/2021	TD	Draft NOS for unverified answers to Martinis' ROGS.	0.20	\$30.00
02/01/2021	BM	Correspondence with counsel for Ann Barton (0.20); multiple correspondence with co-counsel (0.30)	0.50	\$167.50
02/02/2021	AG	Phone call with R. Weiss re: Martinis interrogatories; Revise answers to interrogatories per conversation with client; Email correspondence with Martinis's counsel re: Ehounds database and upcoming deposition.	1.90	\$522.50
02/02/2021	JWW	Revise deposition outline for defendants Martini, Sr. and Jr.. Review and respond to multiple email re appeal and deposition exhibits.	1.40	\$469.00
02/02/2021	BM	Correspondence with expert re: answers to interrogatories	0.20	\$67.00
02/03/2021	JWW	Phone conference w/ co-counsel re granting defendants access to E-Hounds database for discovery purposes.	0.50	\$167.50
02/03/2021	BM	Correspondence with counsel for Ann Barton (0.40); correspondence with co-counsel re: production (0.20); legal research re: setoff defense (0.80); correspondence re: Davis settlement (0.10); draft and edit notice of voluntary dismissal re: Davises and directives re: same (0.20); correspondence with client re: Ann Barton settlement (0.20); draft and edit settlement agreement re: Barton (0.30).	2.20	\$737.00
02/03/2021	AG	Phone call with J. Perez, L. Dougherty, JWE re: Ehounds database; Phone call with Ehounds re: Martini database; Multiple email correspondence re: Ehounds.	1.30	\$357.50
02/04/2021	JWW	Phone conference w/ opposing counsel for defendants Martini re deposition exhibits, position of parties to the case and related matters (0.5). Direct staff recompilation and distribution of exhibits (0.3).	0.80	\$268.00

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 John Waechter as Counsel
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Invoice Date: March 03, 2021

02/04/2021	JWW	Email communications w/ counsel for Defendants Hunte and Jackson re rescheduling depositions, representation of client.	0.20	\$67.00
02/04/2021	JWW	Email communications w/ counsel for defendants Kantor re responses to discovery, settlement.	0.20	\$67.00
02/04/2021	AG	Review production to Martinis.	2.00	\$550.00
02/04/2021	AG	Email communications with E Hounds re: database.	0.30	\$82.50
02/04/2021	BM	Correspondence re: Tim Hunte.	0.20	\$67.00
02/05/2021	JWW	Review and respond to emails from counsel for defendants Kantor re settlement discussion. Review historical email chains and cash flows among various earlier investment schemes (0.4). Review Meeker case; email to counsel (0.4).	0.80	\$268.00
02/05/2021	JWW	Email communications re Meeker case w/ opposing counsel for defendants Martini.	0.20	\$67.00
02/05/2021	AG	Communications with client re: Martini interrogatories; Edit, finalize, and serve same.	0.60	\$165.00
02/05/2021	BM	Correspondence with client re: Barton settlement proposal (0.30); review correspondence from counsel for the Kantors (0.20); correspondence with attorney Waechter re: Kantors and Martinis (0.10); correspondence with counsel for Ann Barton (0.20).	0.80	\$268.00
02/08/2021	JWW	Review and update deposition exhibit book.	0.75	\$251.25
02/08/2021	JWW	Email communications w/ Counsel for defendants Kantor and Receiver re settlement. Prepare amortization schedule for 12-month payment plan; email to counsel	0.75	\$251.25
02/08/2021	JWW	Review documents produced by defendants Martini Sr. and Jr. and other exhibits in preparation for deposition.	1.80	\$603.00
02/08/2021	BM	Correspondence with counsel for Kantors (0.20); correspondence with counsel for Ann Barton re: settlement (0.20)	0.40	\$134.00
02/09/2021	BM	Directives re: Barton judgment.	0.20	\$67.00
02/09/2021	JWW	Document review and initial preparation for McMahon deposition. Email communications w/ counsel for defendant McMahon.	0.75	\$251.25
02/10/2021	JWW	Email communications w/ counsel for defendants Kantor. Update amortization schedule for 12-month payment plan. Draft Settlement Agreement; email to counsel.	0.80	\$268.00

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 John Waechter as Counsel
 Burton W. Wiand v. Chris Arduini, et al.



Invoice Date: March 03, 2021

02/10/2021	JWW	Deposition of Joseph Martini, Jr.	2.60	\$871.00
02/10/2021	JWW	Email communications w/ counsel for defendant McMahon; phone conference w/ Receiver re probable McMahon bankruptcy filing.	0.30	\$100.50
02/10/2021	JWW	Phone conference w/ counsel for defendant McMahon re bankruptcy filing.	0.25	\$83.75
02/10/2021	BM	Correspondence re: Kantor settlement and McMahon	0.20	\$67.00
02/11/2021	JWW	Prepare for and take deposition of defendant Joseph Martini, Sr.	1.80	\$603.00
02/11/2021	JWW	Email communications w/ defendant Chona and staff re Settlement Agreement; final payment.	0.20	\$67.00
02/11/2021	TD	Formalize Renewed Mtn to Tax Costs, including analyze all relevant service of process records.	1.25	\$187.50
02/11/2021	BM	Review order re: mediation; correspondence re: Hunte depo.	0.20	\$67.00
02/12/2021	BM	Correspondence with attorney Waechter re: case status.	0.20	\$67.00
02/15/2021	BM	Correspondence re: Hunte and Jackson depositions	0.20	\$67.00
02/16/2021	BM	Directives re: depositions; review order re: mediator; correspondence with co-counsel.	0.30	\$100.50
02/17/2021	BM	Wiand - Review exhibits re: supplemental memorandum to motion to tax costs and provide directives re: same (0.90); draft and edit supp. aff. and supplemental memo (0.90)	1.80	\$603.00
02/18/2021	BM	Correspondence with Elmore Harris.	0.10	\$33.50
02/22/2021	JWW	Email communications w/ counsel for defendants Kantor. Revise payment schedule and Settlement Agreement; email to counsel. Additional communications w/ counsel. Revise draft agreement to include prepayment option; email to counsel.	1.00	\$335.00
02/22/2021	JWW	Email communications w/ co-counsel re scheduling depositions for defendants Hunte and Jackson.	0.20	\$67.00
02/22/2021	JWW	Phone conference w/ BSM re status of outstanding discovery for various defendants.	0.30	\$100.50
02/22/2021	BM	Correspondence re: McMahon deposition and Kantor settlement.	0.20	\$67.00
02/22/2021	BM	Call with attorney Waechter re: case status and future action (0.30); review settlement agreement re: Kantors (0.20); draft and edit good faith letters re: unanswered discovery requests (0.70); note file and update case management charts re: settlement (0.30)	1.50	\$502.50

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 John Waechter as Counsel
 Burton W. Wiand v. Chris Arduini, et al.



Invoice Date: March 03, 2021

02/23/2021	TD	Prepare Third Amended Notice of Taking Depos of Tim Hunte & James Jackson - (03.16.2021-03.17.2021).	0.20	\$30.00
02/23/2021	JWW	Email communications w/ counsel for defendant McMahon re bankruptcy; w/ defendant Chona re settlement check and w/ counsel for defendants Hunte and Jackson re scheduling deposition (0.5). Direct staff re Notice of Deposition for Hunte and Jackson (0.2).	0.70	\$234.50
02/23/2021	BM	Correspondence with co-counsel; edit supplemental memorandum and affidavit re: costs motion; directives re: same; correspondence with mediator.	0.80	\$268.00
02/24/2021	BM	Correspondence with mediator (0.20); correspondence with attorney Waechter (0.20); directives re: good faith discovery letters (0.20)	0.60	\$201.00
02/24/2021	AG	Review email correspondence re: McMahon bankruptcy (.10); outstanding/overdue discovery (.10); status of E-hounds database (.10).	0.30	\$82.50
02/24/2021	JWW	Phone conference w/ BSM to review status of remaining defendants, outstanding discovery and related matters.	0.20	\$67.00
02/25/2021	JWW	Email communications w/ co-counsel re status of various defendants. Research status and respond.	0.40	\$134.00
02/25/2021	BM	Correspondence re: Duenas settlement; draft letter to Chona and Duenas; directives re: same.	0.50	\$167.50
02/26/2021	JWW	Email communications w/ counsel for defendants Kantor and Receiver. Review draft Stipulation of Dismissal; email to counsel.	0.40	\$134.00
02/26/2021	JWW	Phone conference w/ defendant Harris re late payment, status of litigation, settlement procedures and case management (1.0). Follow up phone conference re same matters (.75).	1.75	\$586.25
02/26/2021	BM	Draft joint stipulation for dismissal; correspondence with co-counsel; review correspondence.	0.60	\$201.00
Total Fees			39.50	\$12,525.25

EXPENSES

Date	Qty.	Description	Each	Amount
02/04/2021	1	2nd day Air Invoice No. 2102034084	\$35.27	\$35.27

Invoice No. 73420
 John Waechter as Counsel
 Burton W. Wiand v. Chris Arduini, et al.



Invoice Date: March 03, 2021

02/08/2021	1	Domesticating Judgment F/B/O Alan Johnston	\$49.00	\$49.00
02/05/2021	1	Domesticating Judgment F/B/O Black Dragon Capital, LLC	\$47.00	\$47.00
02/08/2021	1	Domesticating Judgment F/B/O Chad Hicks	\$49.00	\$49.00
02/05/2021	1	Domesticating Judgment F/B/O Chris and Shelley Arduini -	\$49.00	\$49.00
02/05/2021	1	Domesticating Judgment F/B/O Commonwealth Network Marketing Corp.	\$47.00	\$47.00
02/05/2021	1	Domesticating Judgment F/B/O Crichlow Computer Concepts	\$47.00	\$47.00
02/08/2021	1	Domesticating Judgment F/B/O David Paul Lipinczyk	\$49.00	\$49.00
02/08/2021	1	Domesticating Judgment F/B/O Henry & Anna Fuksman	\$49.00	\$49.00
02/08/2021	1	Domesticating Judgment F/B/O Impulse Ventures	\$49.00	\$49.00
02/05/2021	1	Domesticating Judgment F/B/O Jay Renner	\$49.00	\$49.00
02/05/2021	1	Domesticating Judgment F/B/O Joseph and Cushaun Charles	\$47.00	\$47.00
02/05/2021	1	Domesticating Judgment F/B/O Joseph and Lynne LaVecchia	\$49.00	\$49.00
02/08/2021	1	Domesticating Judgment F/B/O Kathryn McClare	\$49.00	\$49.00
02/08/2021	1	Domesticating Judgment F/B/O Kayla Crowley	\$49.00	\$49.00
02/05/2021	1	Domesticating Judgment F/B/O Life's Elements	\$47.00	\$47.00
02/05/2021	1	Domesticating Judgment F/B/O Matthew Leach	\$49.00	\$49.00
02/05/2021	1	Domesticating Judgment F/B/O Michael Rubel	\$47.00	\$47.00
02/05/2021	1	Domesticating Judgment F/B/O Patrick Flander	\$49.00	\$49.00
02/08/2021	1	Domesticating Judgment F/B/O Piotr Luda	\$49.00	\$49.00
02/08/2021	1	Domesticating Judgment F/B/O Richard and Courtney Hubbard	\$47.00	\$47.00
02/05/2021	1	Domesticating Judgment F/B/O Shawn Marshall	\$47.00	\$47.00
02/08/2021	1	Domesticating Judgment F/B/O Thomas and Anne Daidone	\$47.00	\$47.00
02/08/2021	1	Domesticating Judgment F/B/O Vince Petralis, Jr	\$49.00	\$49.00
02/08/2021	1	Domesticating Judgment F/B/O Vince Petralis, Sr.	\$49.00	\$49.00
02/05/2021	1	Domesticating Judgment F/B/O Wayne Lynch	\$49.00	\$49.00
02/04/2021	1	LSE - personal	\$16.89	\$16.89
02/02/2021	1	Photocopies	\$40.80	\$40.80
02/17/2021	1	Postage	\$12.40	\$12.40
02/18/2021	1	UPS delivery to U.S. Legal Invoice No. 2102083392	\$34.18	\$34.18

Invoice No. 73420
John Waechter as Counsel
Burton W. Wiand v. Chris Arduini, et al.



Invoice Date: March 03, 2021

Total Expenses	\$1,346.54
Total Fees and Expenses	\$13,871.79
Previous Balance	\$86,387.31
Payments Received	\$0.00
Balance Now Due	\$100,259.10

\$100,259.10 TOTAL LEGAL SERVICES

Invoice No. 73419
 John Waechter as Counsel
 Burton W. Wiand, et al. v. Raymond P. Montie, III



Invoice Date: March 03, 2021

FEES

Date	Staff	Description	Hours	Amount
02/24/2021	BM	Review mediation correspondence.	0.20	\$67.00
Total Fees			0.20	\$67.00

Total Fees and Expenses	\$67.00
Previous Balance	\$60.00
Payments Received	\$1,158.50
Balance Now Due	\$127.00

\$127.00 TOTAL LEGAL SERVICES

Invoice No. 73794
 John Waechter as Counsel
 Burton W. Wiand v. Chris Arduini, et al.



Invoice Date: April 07, 2021

FEES

Date	Staff	Description	Hours	Amount
03/01/2021	AG	Phone call with Ehounds.	0.20	\$55.00
03/01/2021	JWW	Phone conference and email communications w/ co-counsel and E-Hounds representative re access to E-Hounds database. Email communications w/ defendant Attia re discovery matters and E-Hounds database access.	0.40	\$134.00
03/02/2021	JWW	Phone conference w/ Carter Anderson re deposition for Tim Hunte, false profits claim and related matters.	0.40	\$134.00
03/02/2021	AG	Multiple email correspondence re: database.	0.40	\$110.00
03/03/2021	JWW	Email communications w/ counsel for defendants Hunte and Jackson re calculation of false profits. Review schedule of investments and distributions.	0.30	\$100.50
03/03/2021	BM	Correspondence re: depositions.	0.20	\$67.00
03/04/2021	JWW	Research distributions made for the account of defendant Hunte dba KATT distribution. Email communications w/ opposing counsel re setoff (Meeker case) and supporting documents for distributions.	0.40	\$134.00
03/04/2021	JWW	Email communications w/ defendant Attia re discovery responses.	0.20	\$67.00
03/04/2021	JWW	Phone conference w/ co-counsel and E-Hounds database representative re process for granting access to defendants.	0.50	\$167.50
03/04/2021	JWW	Follow-up emails w/ co-counsel re access to E-Hounds database.	0.20	\$67.00
03/04/2021	JWW	Review email from dismissed defendant Ford Sumner. Email communications w/ Receiver re response.	0.20	\$67.00
03/04/2021	AG	Phone call with counsel and Ehounds re: Clawback data room.	0.50	\$137.50
03/04/2021	BM	Directives re: discovery (0.20); correspondence with client and Ford Sumner (0.20); correspondence with attorney Dougherty (0.10); directives re: foreign judgments (0.20); draft omnibus motion for summary judgment (3.20).	3.90	\$1,306.50
03/05/2021	BM	Correspondence re: Hunte deposition.	0.20	\$67.00

Invoice No. 73794
 John Waechter as Counsel
 Burton W. Wiand v. Chris Arduini, et al.



Invoice Date: April 07, 2021

03/05/2021	JWW	Phone conference w/ defendant Harris re notices to all defendants resulting from recording judgments in districts where defendants reside.	0.50	\$167.50
03/05/2021	JWW	Phone conference w/ defendant Monahan re emails being generated resulting from recording judgments in various jurisdictions.	0.25	\$83.75
03/08/2021	JWW	Phone conference w/ defendant Duenas re amount of alleged false profits claim.	0.30	\$100.50
03/08/2021	BM	Correspondence re: approval of settlements; review court notifications re: foreign judgments; directives re: same; correspondence re: Wilkerson discovery.	0.50	\$167.50
03/09/2021	JWW	Phone conference w/ defendant Harris re payment checks that have not cleared; status of case.	0.40	\$134.00
03/09/2021	BM	Correspondence with client; correspondence with clerk of court for the southern district of Manhattan; directives re: same.	0.60	\$201.00
03/09/2021	AG	Email correspondence re: clawback room.	0.20	\$55.00
03/11/2021	JWW	Email communications w/ counsel for defendants Hunte and Jackson re discovery responses, false profits claim.	0.20	\$67.00
03/11/2021	JWW	Review email from mediator re mediation schedule. Email communications w/ co-counsel re mediation.	0.20	\$67.00
03/11/2021	BM	Correspondence with counsel re: Hunte.	0.20	\$67.00
03/12/2021	JWW	Phone conference w/ counsel for defendants Hunte and Jackson re discovery, deposition and outstanding claims.	0.40	\$134.00
03/12/2021	BM	Correspondence with attorney Waechter re: discovery; review additional correspondence.	0.20	\$67.00
03/15/2021	JWW	Preparation for deposition of defendant Hunte. Direct staff re Zoom preparations and distribution of exhibit binders.	1.90	\$636.50
03/15/2021	BM	Draft mediation statement.	1.80	\$603.00
03/16/2021	JWW	Email communications w/ defendant Duenas re investment in Oasis.	0.20	\$67.00
03/16/2021	BM	Correspondence re: Duenas (0.10); correspondence with co-counsel (0.20); review Martini discovery documents (0.90); continue drafting mediation statement (0.80); directives re: recording judgment (0.20).	2.20	\$737.00
03/17/2021	JWW	Phone conference and email communications w/ Receiver re promissory notes given by Oasis for losses incurred in prior entities.	0.30	\$100.50

Invoice No. 73794
 John Waechter as Counsel
 Burton W. Wiand v. Chris Arduini, et al.



Invoice Date: April 07, 2021

03/17/2021	JWW	Phone conference w/ BSM and JP re mediation statement, appellate case and status of various outstanding issues.	1.20	\$402.00
03/17/2021	TD	With regard to John Bacon - Prepare Motion, Affidavit, and Proposed Order for Admission Pro Hac Vice; send all with court forms for attorney to reconcile and revise.	1.00	\$150.00
03/17/2021	BM	Call with attorney Perez (1.20); review and analysis of McMahon bk schedules (0.50); correspondence with client (0.20); draft and edit mediation statement (0.80)	2.70	\$904.50
03/18/2021	JWW	Prepare for and take deposition of Tim Hunte.	4.10	\$1,373.50
03/18/2021	JWW	Recalculate pre-judgment interest for each of the remaining defendants in preparation for mediation.	2.10	\$703.50
03/18/2021	BM	Call with client (0.50); note file (0.20); call with attorney Perez (0.20); draft McMahon proof of claim and review applicable local bankruptcy rules (0.40); correspondence with co-counsel (0.20); review documents provided by client (0.10); IOC with attorney Waechter (0.10) re: Hunte deposition.	1.70	\$569.50
03/19/2021	JWW	Mediation preparation. Review and edit mediation statement. Review Court Orders re mediation and communications from mediator.	0.75	\$251.25
03/19/2021	BM	Correspondence with attorney Waechter; draft notices of resolution; correspondence with counsel for Kantors; correspondence with Barton's counsel; directives re: Harris filing; update status chart; correspondence re: Procopio and Harris settlements.	0.90	\$301.50
03/22/2021	JWW	Phone conference w/ defendant Harris re March settlement payment, authorization to use e-signature on Notice of Resolution, status of case and related matters.	0.40	\$134.00
03/22/2021	BM	Review correspondence from Alfredo Duenas; Correspondence with client re: mediation statement; correspondence with Rune Harris; directives re: notice of resolution; correspondence with attorney Perez.	0.50	\$167.50
03/23/2021	JWW	Review draft Request for Production in Aid of Execution.	0.40	\$134.00
03/23/2021	JWW	Phone conference w/ defendant Harris re settlement payment.	0.20	\$67.00
03/23/2021	BM	Correspondence with client (0.20); edit and finalize mediation statement and direct staff re: same (0.30);	2.50	\$837.50

Invoice No. 73794
 John Waechter as Counsel
 Burton W. Wiand v. Chris Arduini, et al.



Invoice Date: April 07, 2021

		correspondence with attorney Perez (0.20); draft and edit post judgment discovery requests (1.80).		
03/23/2021	JWW	Review draft Notices of Resolution for defendants Patterson and Procopio.	0.15	\$50.25
03/23/2021	TD	Formalize Creditor's RFP and eserve all parties; directions to Legal Assistant on mailing/service.	0.50	\$75.00
03/23/2021	BM	Review order re: dismissal of Kantors; draft notices of resolution re: Procopio and Patterson; correspondence with attorney Perez re: McMahon; correspondence with Utah bankruptcy counsel.	0.90	\$301.50
03/24/2021	BM	Correspondence with client; review correspondence from attorney Johnson.	0.20	\$67.00
03/25/2021	TD	Prepare Notice of Continued Zoom Deposition of Tim Hunte.	0.20	\$30.00
03/25/2021	AG	Email correspondence with J. Rosen re: WF account statements; Review expert file for same.	0.60	\$165.00
03/25/2021	BM	Outline opening statement for mediation; directives re: Martini production.	0.50	\$167.50
03/26/2021	JWW	Email communications w/ mediator's office re scheduling issues. Prepare for mediation.	0.50	\$167.50
03/26/2021	BM	Review report and recommendation re: taxation of costs; correspondence with client; edit opening statement.	0.90	\$301.50
03/26/2021	BM	Correspondence with mediator and Utah bankruptcy counsel.	0.30	\$100.50
03/29/2021	JWW	Phone conference w/ Receiver and BSM to prepare for mediation.	0.50	\$167.50
03/29/2021	JWW	Review and respond to email from Alfredo and Mariana Duenas re evidence of investments in Oasis.	0.20	\$67.00
03/29/2021	AG	Email correspondence re: Wells Fargo documents.	0.20	\$55.00
03/29/2021	BM	Review orders re: notices of settlement and note file (0.20); call with client re: mediation (0.50); correspondence with mediator (0.50); correspondence with attorney Waechter re: mediation (0.20)	1.40	\$469.00
03/30/2021	JWW	Prepare for and attend mediation.	9.75	\$3,266.25
03/30/2021	BM	Attend mediation.	9.75	\$3,266.25
03/31/2021	JWW	Review emails and other documents from database related to defendant Hunte.	0.50	\$167.50
03/31/2021	JWW	Phone conference w/ defendant Harris re status of case and related matters.	0.25	\$83.75
03/31/2021	JWW	Update pre-judgment interest calculations for defendant McMahon.	0.25	\$83.75

Invoice No. 73794
 John Waechter as Counsel
 Burton W. Wiand v. Chris Arduini, et al.



Invoice Date: April 07, 2021

03/31/2021	BM	Correspondence with attorney Rosen re: Martini, Sr. settlement agreement; correspondence with mediator, client, and attorney Johnson.	0.80	\$268.00
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Total Fees			65.15	\$21,384.75
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EXPENSES

Date	Qty.	Description	Each	Amount
03/31/2021	1	Court Reporter Transcript Joseph Martini, Sr. Invoice No. 120597419	\$777.00	\$777.00
03/30/2021	1	Court reporter transcript Timothy Hunte Invoice No. 120596959	\$1,179.55	\$1,179.55
03/10/2021	1	Filing Fee - Southern District of New York	\$7.25	\$7.25
03/02/2021	1	Postage - Express 1 Day to Josef Rosen - Gray-Robinson	\$29.17	\$29.17
03/24/2021	1	UPS Tim Hunte Invoice No. 2103115344	\$118.69	\$118.69

Total Expenses				\$2,111.66
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Total Fees and Expenses	\$23,496.41
Previous Balance	\$100,259.10
Payments Received	\$0.00
Balance Now Due	\$123,755.51

\$123,755.51 TOTAL LEGAL SERVICES

EXHIBIT 13

Kapila Mukamal

CPAs, Forensic and Insolvency Advisors

EIN #46-5394135

CFTC V. OASIS INTERNATIONAL GROUP, LIMITED, ET AL**Client ID: 90141****Invoice #7461 - 01/31/21****TIME SUMMARY BY STAFF**

<u>Staff</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
MMD - MELISSA DAVIS - PARTNER CPA, CIRA, CFE	25.50	530.00	13,515.00
SRK - SONEET KAPILA - PARTNER CPA, CFF, CIRA, CFE	2.40	475.00	1,140.00
JLP - JOEL PATHIYIL - CONSULTANT CPA	3.80	280.00	1,064.00
RLW - RACHEL WEISS - CONSULTANT CPA, CFE	40.80	350.00	14,280.00
TOTAL	72.50		\$29,999.00

BLENDED RATE \$413.78**AGREED 15% DISCOUNT*** (4,328.85)**EXPENSES** 73.89**TOTAL AMOUNT OF THIS INVOICE** \$25,744.04**ADJUSTED
BLENDED RATE \$354.07****OPTIONAL WIRE/ACH INSTRUCTIONS**

Bank Name: The Northern Trust Company
 1100 East Las Olas Blvd.
 Fort Lauderdale, FL 33301-2387
 Phone: 954-768-4053
 Fax: 954-768-4017

Bank ABA Routing:

Swift Code:

Account Name: KAPILAMUKAMAL, LLP

Account Number:

* SONEET KAPILA TIME NOT SUBJECT
 TO THIS 15% DISCOUNT.



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@WIANDLAW.COM

Invoice: 7461

01/31/2021

Client ID: 90141

For Professional Services Rendered Through January 31, 2021

<u>DATE</u>	<u>STAFF</u>	<u>DESCRIPTION</u>	<u>HRS</u>	<u>AMOUNT</u>
LITIGATION SUPPORT				
01/04/2021	RLW	CONTINUE TO INVESTIGATE CLAIMANT TRANSACTIONS	1.70	595.00
01/04/2021	RLW	CONTINUE TO DRAFT EXPERT REPORT	0.80	280.00
01/04/2021	MMD	PREPARE EXPERT REPORT RE PONZI AND NET WINNER TRANSACTIONS.	2.70	1,431.00
01/05/2021	RLW	TC WITH COUNSEL RE: NET WINNER TRANSACTIONS	0.30	105.00
01/05/2021	RLW	CONTINUE TO DRAFT EXPERT REPORT AND PREPARE EXHIBITS	3.70	1,295.00
01/05/2021	RLW	CONTINUE TO ANALYZE CLAIMANT TRANSACTIONS	1.20	420.00
01/05/2021	RLW	INVESTIGATE NET WINNER TRANSACTIONS	0.80	280.00
01/05/2021	MMD	TC WITH COUNSEL.	0.50	265.00
01/06/2021	RLW	TC WITH COUNSEL RE: NET WINNER TRANSACTIONS	0.20	70.00
01/06/2021	RLW	CONTINUE TO DRAFT EXPERT REPORT AND PREPARE EXHIBITS	4.30	1,505.00
01/06/2021	MMD	PREPARE EXPERT REPORT RE PONZI AND NET WINNER TRANSACTIONS (CONTINUED).	4.30	2,279.00
01/07/2021	RLW	TC WITH COUNSEL RE: NET WINNER TRANSACTIONS	0.30	105.00
01/07/2021	RLW	CONTINUE TO DRAFT EXPERT REPORT AND PREPARE EXHIBITS	5.10	1,785.00
01/07/2021	MMD	PREPARE EXPERT REPORT RE PONZI.	2.60	1,378.00
01/08/2021	RLW	CONTINUE TO DRAFT EXPERT REPORT AND PREPARE EXHIBITS	5.40	1,890.00
01/08/2021	MMD	PREPARE EXPERT REPORT RE PONZI AND NET WINNER TRANSACTIONS (CONTINUED).	5.40	2,862.00
01/08/2021	SRK	QUALITY CONTROL EXPERT REPORT	2.00	950.00
01/10/2021	RLW	TC WITH COUNSEL RE: EXPERT REPORT	0.60	210.00
01/10/2021	MMD	TC WITH COUNSEL.	0.50	265.00
01/11/2021	JLP	REVIEW AND QUALITY CONTROL OVER OASIS REPORT PREPARED.	2.80	784.00
01/11/2021	RLW	CONTINUE TO DRAFT EXPERT REPORT AND PREPARE EXHIBITS	6.20	2,170.00
01/11/2021	RLW	CONTINUE TO REVIEW CLAIMANT TRANSACTIONS	2.10	735.00
01/11/2021	MMD	PREPARE EXPERT REPORT RE PONZI AND NET WINNER TRANSACTIONS (CONTINUED).	4.10	2,173.00

KapilaMukamal, LLP

Invoice #7461

4/13/2021

Page 2 of 3

01/12/2021	JLP	REVIEW AND QUALITY CONTROL OVER OASIS REPORT PREPARED.	0.50	140.00
01/12/2021	RLW	CONTINUE TO DRAFT EXPERT REPORT AND PREPARE EXHIBITS	3.80	1,330.00
01/12/2021	MMD	CONTINUE TO PREPARE EXPERT REPORT AND FINALIZE FOR FILING.	3.60	1,908.00
01/12/2021	SRK	REVIEW EXPERT REPORT OF MELISSA DAVIS	0.40	190.00
01/13/2021	JLP	REVIEW AND QUALITY CONTROL OVER OASIS REPORT PREPARED.	0.50	140.00
01/13/2021	RLW	PREPARE DEPOSITION SUPPORT BINDER FOR EXPERT REPORT	3.70	1,295.00
01/15/2021	RLW	EXAMINE FUND ADMINISTRATION CITI BANK 0764 BANK STATEMENTS	0.10	35.00
01/19/2021	MMD	CREATE SHAREFILE WITH DOCUMENTS UTILIZED.	0.70	371.00
01/20/2021	MMD	CONTINUE TO COMPILE BANK RECORDS TO PRODUCE FOR REPORT.	0.70	371.00
01/25/2021	MMD	REVIEW ANN BARTON INVESTOR INFORMATION FOR COUNSEL.	0.40	212.00
01/26/2021	RLW	CONTINUE TO REVIEW CLAIMANT AND NET WINNER TRANSACTIONS	0.40	140.00
01/27/2021	RLW	TC WITH COUNSEL RE: FULL SPECTRUM WELLNESS	0.10	35.00
				29,999.00
				29,999.00
EXPENSES				
01/10/2021	EXP	OPENVOICE - JANUARY 2021		7.68
01/31/2021	EXP	SHAREFILE - JANUARY 2021		5.01
01/31/2021	EXP	PRINTED COPIES - JANUARY 2021 (01/01/21-01/31/21)		61.20
				73.89
				73.89

KapilaMukamal, LLP

Invoice #7461

4/13/2021

Page 3 of 3

Agreed 15% Discount (4,328.85)

Total amount of this invoice \$25,744.04

OPTIONAL WIRE/ACH INSTRUCTIONS

Bank Name: The Northern Trust Company
1100 East Las Olas Blvd.
Fort Lauderdale, FL 33301-2387
Phone: 954-768-4053
Fax: 954-768-4017

Bank ABA Routing:

Swift Code:

Account Name: KAPILAMUKAMAL, LLP

Account Number:

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 #7571 - 02/28/21****TIME SUMMARY BY STAFF**

<u>Staff</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
RLW - RACHEL WEISS - CONSULTANT CPA, CFE	2.10	350.00	735.00
TOTAL	2.10		\$735.00
BLENDED RATE		\$350.00	
AGREED 15% DISCOUNT			(110.25)
TOTAL EXPENSES			5.12
TOTAL AMOUNT OF THIS INVOICE			\$629.87
ADJUSTED BLENDED RATE		\$297.50	

OPTIONAL WIRE/ACH INSTRUCTIONS

Bank Name: The Northern Trust Company
 1100 East Las Olas Blvd.
 Fort Lauderdale, FL 33301-2387
 Phone: 954-768-4053
 Fax: 954-768-4017

Bank ABA Routing:

Swift Code:

Account Name: KAPILAMUKAMAL, LLP

Account Number:



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@WIANDLAW.COM

Invoice: 7571

02/28/2021

Client ID: 90141

For Professional Services Rendered Through February 28, 2021

<u>DATE</u>	<u>STAFF</u>	<u>DESCRIPTION</u>	<u>HRS</u>	<u>AMOUNT</u>
LITIGATION SUPPORT				
02/01/2021	RLW	TC WITH MAYA LOCKWOOD RE: CLAIMS	0.40	140.00
02/01/2021	RLW	CONTINUE TO INVESTIGATE NET WINNER AND CLAIMANT TRANSACTIONS	0.30	105.00
02/02/2021	RLW	TC WITH ALICIA GANGI RE: JOSEPH MARTINI, SR AND JOSEPH MARTINI JR'S FIRST SET OF INTERROGATORIES TO PLAINTIFF	0.30	105.00
02/02/2021	RLW	REVIEW THE JOSEPH MARTINI, SR AND JOSEPH MARTINI JR'S FIRST SET OF INTERROGATORIES TO PLAINTIFFS	0.10	35.00
02/08/2021	RLW	CONTINUE TO INVESTIGATE NET WINNER TRANSACTIONS	0.10	35.00
02/09/2021	RLW	CONTINUE TO INVESTIGATE NET WINNER TRANSACTIONS	0.10	35.00
02/16/2021	RLW	CONTINUE TO INVESTIGATE CLAIMANT TRANSACTIONS	0.60	210.00
02/17/2021	RLW	CONTINUE TO ANALYZE CLAIMANT TRANSACTIONS	0.20	70.00
				735.00
				735.00
EXPENSES				
02/28/2021	EXP	SHAREFILE - FEBRUARY 2021		5.12
				5.12
				5.12

KapilaMukamal, LLP

Invoice #7571

3/12/2021

Page 2 of 2

Agreed 15% Discount (110.25)

Total amount of this invoice \$629.87

OPTIONAL WIRE/ACH INSTRUCTIONS

Bank Name: The Northern Trust Company
1100 East Las Olas Blvd.
Fort Lauderdale, FL 33301-2387
Phone: 954-768-4053
Fax: 954-768-4017

Bank ABA Routing:

Swift Code:

Account Name: KAPILAMUKAMAL, LLP

Account Number:

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 #7687 - 03/31/21****TIME SUMMARY BY STAFF**

<u>Staff</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
MMD - MELISSA DAVIS - PARTNER CPA, CIRA, CFE	15.60	530.00	8,268.00
SRK - SONEET KAPILA - PARTNER CPA, CFF, CIRA, CFE	1.80	475.00	855.00
RLW - RACHEL WEISS - CONSULTANT CPA, CFE	11.50	350.00	4,025.00
TOTAL	28.90		\$13,148.00
		BLENDED RATE	\$454.95
* Discount excludes SRK Fees, already reduced.	* AGREED 15% DISCOUNT		(1,843.95)
		TOTAL EXPENSES	10.83
TOTAL AMOUNT OF THIS INVOICE			\$11,314.88
		ADJUSTED BLENDED RATE	\$391.14

OPTIONAL WIRE/ACH INSTRUCTIONS

Bank Name: The Northern Trust Company
1100 East Las Olas Blvd.
Fort Lauderdale, FL 33301-2387
Phone: 954-768-4053
Fax: 954-768-4017

Bank ABA Routing:

Swift Code:

Account Name: KAPILAMUKAMAL, LLP

Account Number:



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@WIANDLAW.COM

Invoice: 7677

03/31/2021

Client ID: 90141

For Professional Services Rendered Through March 31, 2021

<u>DATE</u>	<u>STAFF</u>	<u>DESCRIPTION</u>	<u>HRS</u>	<u>AMOUNT</u>
LITIGATION SUPPORT				
03/01/2021	RLW	CONTINUE TO INVESTIGATE CLAIMANT TRANSACTIONS	0.40	140.00
03/10/2021	RLW	PREPARATION OF MONTIE EXPERT REPORT AND EXHIBITS	1.30	455.00
03/10/2021	MMD	PREPARE EXPERT REPORT FOR MONTIE MATTER.	1.30	689.00
03/12/2021	MMD	TC WITH COUNSEL.	0.70	371.00
03/12/2021	MMD	CONTINUE TO PREPARE EXPERT REPORT.	2.70	1,431.00
03/13/2021	MMD	CONTINUE TO PREPARE EXPERT REPORT FOR MONTIE MATTER.	1.80	954.00
03/14/2021	MMD	PREPARE EXPERT REPORT FOR MONTIE MATTER.	3.70	1,961.00
03/14/2021	SRK	ATTEND TO EXPERT REPORT DISCUSSIONS	0.50	237.50
03/15/2021	RLW	TC WITH RECEIVER AND COUNSEL	0.90	315.00
03/15/2021	RLW	PREPARE EXPERT EXHIBITS	4.80	1,680.00
03/15/2021	MMD	TC WITH RECEIVER AND COUNSEL.	1.00	530.00
03/15/2021	MMD	CONTINUE TO PREPARE REPORT ON PONZI.	4.40	2,332.00
03/15/2021	SRK	T/C WITH RECEIVER AND LEGAL COUNSEL RE EXPERT REPORT AND FOLLOW UP THEREAFTER	1.30	617.50
03/16/2021	RLW	INVESTIGATE CLAIMANT TRANSACTIONS	0.20	70.00
03/17/2021	RLW	UPDATE BANK RECONSTRUCTION	0.20	70.00
03/17/2021	RLW	PREPARE THE DEPOSITION SUPPORT BINDER	1.70	595.00
03/18/2021	RLW	CONTINUE TO PREPARE THE DEPOSITION SUPPORT BINDER	1.30	455.00
03/25/2021	RLW	INVESTIGATE OASIS BANK RECORDS	0.30	105.00
03/26/2021	RLW	INVESTIGATE CLAIMANT TRANSACTIONS	0.20	70.00
03/30/2021	RLW	ANALYZE BANK RECONSTRUCTION FOR WF 9302	0.20	70.00
				13,148.00
				13,148.00

EXPENSES

KapilaMukamal, LLP

Invoice #7677

4/12/2021

Page 2 of 2

03/31/2021	EXP	SHAREFILE - MARCH 2021	5.28
03/31/2021	EXP	PRINTED COPIES - MARCH 2021 (03/01/21-03/31/21)	5.55

10.83

10.83

Agreed 15% Discount (1,843.95)

Total amount of this invoice \$11,314.88

OPTIONAL WIRE/ACH INSTRUCTIONS

Bank Name: The Northern Trust Company
1100 East Las Olas Blvd.
Fort Lauderdale, FL 33301-2387
Phone: 954-768-4053
Fax: 954-768-4017

Bank ABA Routing:

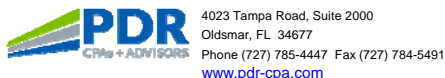
Swift Code:

Account Name: KAPILAMUKAMAL, LLP

Account Number:

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

EXHIBIT 14



OASIS MANAGEMENT
January 1, 2021 through January 31, 2021

Date	Activity Category	Timekeeper	Description	Hours	Rate	Amount
1/3/2021	Accounting & Auditing	SAO	Recorded bank account activity	0.30	\$ 130.00	\$ 39.00
1/3/2021	Accounting & Auditing	SAO	Recorded bank deposits	0.30	\$ 130.00	\$ 39.00
1/3/2021	Accounting & Auditing	SAO	Prepared report of Midnight Pass expenses for attorney	0.30	\$ 130.00	\$ 39.00
1/4/2021	Accounting & Auditing	SAO	Reviewed bank account activity	0.30	\$ 130.00	\$ 39.00
1/4/2021	Accounting & Auditing	SAO	Recorded bank account activity	0.60	\$ 130.00	\$ 78.00
1/4/2021	Accounting & Auditing	SAO	Reconciled #4299 bank account statement	0.25	\$ 130.00	\$ 32.50
1/4/2021	Accounting & Auditing	SAO	Reconciled #3838 bank account statement	0.50	\$ 130.00	\$ 65.00
1/4/2021	Accounting & Auditing	SAO	Updated QuickBooks activity	0.30	\$ 130.00	\$ 39.00
1/4/2021	Accounting & Auditing	SAO	Recorded bank deposits	0.30	\$ 130.00	\$ 39.00
1/5/2021	Accounting & Auditing	SAO	Prepared Fund Accounting Report for attorney	2.00	\$ 130.00	\$ 260.00
1/5/2021	Accounting & Auditing	SAO	Reviewed bank account activity	0.50	\$ 130.00	\$ 65.00
1/6/2021	Accounting & Auditing	SAO	Recorded bank account activity	0.25	\$ 130.00	\$ 32.50
1/6/2021	Accounting & Auditing	SAO	Reviewed bank account activity	0.30	\$ 130.00	\$ 39.00
1/6/2021	Accounting & Auditing	SAO	Reviewed QuickBooks and discussed with Asset Manager 2020 Form 1099's	0.50	\$ 130.00	\$ 65.00
1/6/2021	Accounting & Auditing	SAO	Prepared 2020 Form 1099's	1.50	\$ 130.00	\$ 195.00
1/7/2021	Accounting & Auditing	SAO	Updated account activity	0.20	\$ 130.00	\$ 26.00
1/7/2021	Accounting & Auditing	SAO	Reviewed bank account activity	0.30	\$ 130.00	\$ 39.00
1/7/2021	Accounting & Auditing	SAO	Updated QuickBooks file	0.30	\$ 130.00	\$ 39.00
1/7/2021	Accounting & Auditing	SAO	Recorded bank account activity	0.50	\$ 130.00	\$ 65.00
1/8/2021	Accounting & Auditing	SAO	Updated court reports for attorney	0.50	\$ 130.00	\$ 65.00
1/8/2021	Accounting & Auditing	SAO	Recorded bank account activity	0.80	\$ 130.00	\$ 104.00
1/8/2021	Accounting & Auditing	SAO	Prepared and make changes to FSAR report for attorney	0.80	\$ 130.00	\$ 104.00
1/10/2021	Accounting & Auditing	SAO	Recorded bank account activity	0.30	\$ 130.00	\$ 39.00
1/11/2021	Accounting & Auditing	SAO	Recorded bank account activity	0.30	\$ 130.00	\$ 39.00
1/12/2021	Accounting & Auditing	SAO	Reviewed bank account activity	0.30	\$ 130.00	\$ 39.00
1/12/2021	Accounting & Auditing	SAO	Updated vendor activity	0.30	\$ 130.00	\$ 39.00
1/12/2021	Accounting & Auditing	GAH	Reviewed 2020 Form 1099's	0.25	\$ 155.00	\$ 38.75
1/13/2021	Accounting & Auditing	SAO	Updated accounting records	0.30	\$ 130.00	\$ 39.00
1/13/2021	Accounting & Auditing	SAO	Prepared and updated 2020 Form 1099's	0.60	\$ 130.00	\$ 78.00
1/13/2021	Accounting & Auditing	SAO	Reviewed 2020 Form 1099's	0.25	\$ 155.00	\$ 38.75
1/13/2021	Accounting & Auditing	SAO	Discussed 2020 Form 1099 with vendor	0.20	\$ 130.00	\$ 26.00
1/13/2021	Accounting & Auditing	SAO	Reviewed and discussed back-up for 2020 Form 1099's with Asset Manager	0.50	\$ 130.00	\$ 65.00
1/13/2021	Accounting & Auditing	SAO	Recorded bank deposits	0.30	\$ 130.00	\$ 39.00
1/15/2021	Accounting & Auditing	SAO	Reviewed bank account activity	0.30	\$ 130.00	\$ 39.00
1/15/2021	Accounting & Auditing	SAO	Recorded bank account activity	0.60	\$ 130.00	\$ 78.00
1/15/2021	Accounting & Auditing	SAO	Recorded bank deposits	0.30	\$ 130.00	\$ 39.00
1/19/2021	Accounting & Auditing	GAH	Reviewed revenue reports from inception with SAO	1.00	\$ 155.00	\$ 155.00
1/19/2021	Accounting & Auditing	SAO	Reviewed and prepared revenue report since inception for attorney	0.50	\$ 130.00	\$ 65.00
1/19/2021	Accounting & Auditing	SAO	Prepared report of Vardon #155 expenses for attorney	0.50	\$ 130.00	\$ 65.00
1/19/2021	Accounting & Auditing	SAO	Updated accounting records	0.80	\$ 130.00	\$ 104.00
1/19/2021	Accounting & Auditing	SAO	Discussed reports with CPA and attorney	0.20	\$ 130.00	\$ 26.00
1/19/2021	Accounting & Auditing	SAO	Updated revenue reports for attorney	0.50	\$ 130.00	\$ 65.00
1/19/2021	Accounting & Auditing	SAO	Recorded bank deposits	0.30	\$ 130.00	\$ 39.00
1/20/2021	Accounting & Auditing	SAO	Reviewed bank account activity	0.30	\$ 130.00	\$ 39.00
1/20/2021	Accounting & Auditing	SAO	Reviewed and prepared report of vendor transactions for attorney	0.30	\$ 130.00	\$ 39.00
1/20/2021	Accounting & Auditing	SAO	Recorded bank account activity	0.30	\$ 130.00	\$ 39.00
1/23/2021	Accounting & Auditing	SAO	Recorded bank account activity	0.30	\$ 130.00	\$ 39.00
1/25/2021	Accounting & Auditing	SAO	Recorded bank account activity	0.30	\$ 130.00	\$ 39.00
1/25/2021	Accounting & Auditing	SAO	Updated accounting records	0.30	\$ 130.00	\$ 39.00
1/29/2021	Accounting & Auditing	SAO	Reviewed bank account activity	0.30	\$ 130.00	\$ 39.00
1/29/2021	Accounting & Auditing	SAO	Recorded bank account activity	0.30	\$ 130.00	\$ 39.00
	Total Accounting & Auditing			22.60		\$ 2,975.50
1/7/2021	Consulting	GAH	Reviewed Fund Account Report	0.50	\$ 155.00	\$ 77.50
1/8/2021	Consulting	WEO	Updated Fund Accounting Report	0.75	\$ 320.00	\$ 240.00
1/11/2021	Consulting	WEP	Reviewed and signed 12-31-2020 FSAR Report	0.50	\$ 320.00	\$ 160.00
	Total Consulting			1.75		\$ 477.50

Total Burton Wiand as Receiver, Oasis Management

24.35

\$ 3,453.00



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

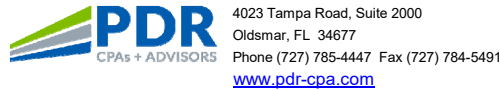
OASIS MANAGEMENT
February 1, 2021 through February 28, 2021

Date	Activity Category	Timekeeper	Description	Hours	Rate	Amount
2/1/2021	Accounting & Auditing	SAO	Reconciled account #4299 bank statement	0.30	\$ 130.00	\$ 39.00
2/1/2021	Accounting & Auditing	SAO	Recorded bank account activity	0.60	\$ 130.00	\$ 78.00
2/1/2021	Accounting & Auditing	SAO	Reconciled account #3838 bank statement	0.30	\$ 130.00	\$ 39.00
2/1/2021	Accounting & Auditing	SAO	Recorded bank account deposits	0.30	\$ 130.00	\$ 39.00
2/1/2021	Accounting & Auditing	SAO	Reviewed accounting records	0.30	\$ 130.00	\$ 39.00
2/4/2021	Accounting & Auditing	SAO	Recorded bank account activity	0.60	\$ 130.00	\$ 78.00
2/4/2021	Accounting & Auditing	SAO	Recorded sale of property	0.30	\$ 130.00	\$ 39.00
2/5/2021	Accounting & Auditing	SAO	Recorded sale of Vardon #307	0.30	\$ 130.00	\$ 39.00
2/8/2021	Accounting & Auditing	SAO	Reviewed tax documents received	0.60	\$ 130.00	\$ 78.00
2/8/2021	Accounting & Auditing	SAO	Updated accounting records	0.30	\$ 130.00	\$ 39.00
2/8/2021	Accounting & Auditing	SAO	Recorded bank account activity	0.60	\$ 130.00	\$ 78.00
2/10/2021	Accounting & Auditing	SAO	Recorded bank account deposits	0.30	\$ 130.00	\$ 39.00
2/10/2021	Accounting & Auditing	SAO	Updated accounting records	0.30	\$ 130.00	\$ 39.00
2/11/2021	Accounting & Auditing	SAO	Recorded bank account activity	0.60	\$ 130.00	\$ 78.00
2/11/2021	Accounting & Auditing	SAO	Prepared Standardized Fund Accounting Report	0.50	\$ 130.00	\$ 65.00
2/15/2021	Accounting & Auditing	SAO	Recorded bank account activity	0.30	\$ 130.00	\$ 39.00
2/15/2021	Accounting & Auditing	SAO	Recorded bank account deposits	0.30	\$ 130.00	\$ 39.00
2/16/2021	Accounting & Auditing	SAO	Recorded bank account activity	0.30	\$ 130.00	\$ 39.00
2/18/2021	Accounting & Auditing	SAO	Recorded sale of Vardon #105	0.30	\$ 130.00	\$ 39.00
2/18/2021	Accounting & Auditing	SAO	Updated accounting records	0.30	\$ 130.00	\$ 39.00
2/18/2021	Accounting & Auditing	SAO	Recorded bank account activity	0.30	\$ 130.00	\$ 39.00
2/18/2021	Accounting & Auditing	SAO	Recorded vendor payments	0.30	\$ 130.00	\$ 39.00
2/19/2021	Accounting & Auditing	SAO	Recorded bank account deposits	0.30	\$ 130.00	\$ 39.00
2/19/2021	Accounting & Auditing	SAO	Updated accounting records	0.30	\$ 130.00	\$ 39.00
2/19/2021	Accounting & Auditing	SAO	Recorded bank account activity	0.30	\$ 130.00	\$ 39.00
2/22/2021	Accounting & Auditing	SAO	Recorded bank account deposits	0.30	\$ 130.00	\$ 39.00
2/22/2021	Accounting & Auditing	SAO	Updated accounting records	0.20	\$ 130.00	\$ 26.00
2/24/2021	Accounting & Auditing	SAO	Updated accounting records	0.30	\$ 130.00	\$ 39.00
	Total Accounting & Auditing			10.00		\$ 1,300.00

Total Burton Wiand as Receiver, Oasis Management

10.00

\$ 1,300.00



OASIS MANAGEMENT
March 1, 2021 through March 31, 2021

Date	Activity Category	Timekeeper	Description	Hours	Rate	Amount
3/13/2021	Tax Services	WEP	Reviewed and prepped for December 31, 2020 tax return	0.75	\$ 320.00	\$ 240.00
	Total Tax Services			0.75		\$ 240.00
3/1/2021	Consulting	WEP	Reviewed and responded re: deposits	0.50	\$ 320.00	\$ 160.00
3/11/2021	Consulting	WEP	Prepped for December 31, 2020 tax return	2.25	\$ 320.00	\$ 720.00
3/25/2021	Consulting	GAH	Reviewed bank records	0.25	\$ 155.00	\$ 38.75
				3.00		\$ 918.75
3/1/2021	Accounting & Auditing	SAO	Recorded bank activity	0.85	\$ 130.00	\$ 110.50
3/1/2021	Accounting & Auditing	SAO	Recorded deposits	0.85	\$ 130.00	\$ 110.50
3/1/2021	Accounting & Auditing	SAO	Recorded vendor payments	0.30	\$ 130.00	\$ 39.00
3/1/2021	Accounting & Auditing	SAO	Updated accounting records	0.30	\$ 130.00	\$ 39.00
3/1/2021	Accounting & Auditing	SAO	Reconciled #3838 bank statement	0.30	\$ 130.00	\$ 39.00
3/1/2021	Accounting & Auditing	SAO	Discussed deposit with attorney	0.25	\$ 130.00	\$ 32.50
3/1/2021	Accounting & Auditing	SAO	Reconciled #4299 bank statement	0.30	\$ 130.00	\$ 39.00
3/3/2021	Accounting & Auditing	SAO	Recorded bank activity	0.60	\$ 130.00	\$ 78.00
3/9/2021	Accounting & Auditing	SAO	Prepared report of 4064 Founder's Club expenses since inception to attorney	0.50	\$ 130.00	\$ 65.00
3/10/2021	Accounting & Auditing	SAO	Recorded bank activity	0.60	\$ 130.00	\$ 78.00
3/12/2021	Accounting & Auditing	SAO	Recorded bank activity	0.60	\$ 130.00	\$ 78.00
3/16/2021	Accounting & Auditing	SAO	Recorded bank activity	0.30	\$ 130.00	\$ 39.00
3/16/2021	Accounting & Auditing	SAO	Updated accounting records	0.30	\$ 130.00	\$ 39.00
3/23/2021	Accounting & Auditing	SAO	Recorded bank activity	0.30	\$ 130.00	\$ 39.00
3/24/2021	Accounting & Auditing	SAO	Updated accounting records	0.25	\$ 130.00	\$ 32.50
3/25/2021	Accounting & Auditing	SAO	Recorded bank activity	0.30	\$ 130.00	\$ 39.00
3/25/2021	Accounting & Auditing	SAO	Paid invoices	0.30	\$ 130.00	\$ 39.00
3/25/2021	Accounting & Auditing	SAO	Updated accounting records	0.30	\$ 130.00	\$ 39.00
3/26/2021	Accounting & Auditing	SAO	Placed check order through QuickBooks	0.30	\$ 130.00	\$ 39.00
3/26/2021	Accounting & Auditing	SAO	Recorded bank activity	0.60	\$ 130.00	\$ 78.00
3/30/2021	Accounting & Auditing	SAO	Recorded bank activity	0.30	\$ 130.00	\$ 39.00
3/31/2021	Accounting & Auditing	SAO	Updated accounting records	0.50	\$ 130.00	\$ 65.00
3/31/2021	Accounting & Auditing	SAO	Recorded bank activity	0.25	\$ 130.00	\$ 32.50
	Total Accounting & Auditing			9.45		\$ 1,228.50

Total Burton Wiand as Receiver, Oasis Management

13.20

\$ 2,387.25

EXHIBIT 15



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
01/01/2021	01/31/2021	88393	\$1698.99	CFTC v. Oasis, et al.	Due on Receipt

Invoice to:

Guerra King
5505 W. Gray Street
Tampa, FL 33609

Case Contact:

Guerra King
Jeff Rizzo
813-347-5100

Q	Date	Expedited	All quantities are based Hourly unless otherwise noted	Tech	Price	Ext
3	01/01/2021		E-Hounds Review® Platform (incl 6 user seat) Courtesy Rate Monthly		\$495.00	\$1485.00
1	01/26/2021		Hard Drive 10TB E9295-8 Ehounds Stock#3727	SPO	\$213.99	\$213.99

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 **\$1698.99**

Payments Applied

TOTAL **\$1698.99**

Balance Due \$1698.99

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
02/01/2021	02/28/2021	88866	\$2560.00	CFTC v. Oasis, et al.	Due on Receipt

Invoice to:

Guerra King
5505 W. Gray Street
Tampa, FL 33609

Case Contact:

Guerra King
Jeff Rizzo
813-347-5100

Q	Date	Expedited	All quantities are based Hourly unless otherwise noted	Tech	Price	Ext
3	02/01/2021		E-Hounds Review® Platform (incl 6 user seat) Courtesy Rate Monthly		\$495.00	\$1485.00
1	02/03/2021		Project Management - Search Request - Export - Deliverable martini search, export (native)	SPO	\$195.00	\$195.00
4	02/25/2021		E-Hounds Review® Platform Add'l Users (per user) (4) @sallahlaw.com		\$125.00	\$500.00

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 **\$2560.00**

Payments Applied

TOTAL **\$2560.00****Balance Due \$2560.00**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:



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
03/01/2021	03/31/2021	89680	\$3147.50	CFTC v. Oasis, et al.	Due on Receipt

Invoice to:

Guerra King
5505 W. Gray Street
Tampa, FL 33609

Case Contact:

Guerra King
Jeff Rizzo
813-347-5100

Q	Date	Expedited	All quantities are based Hourly unless otherwise noted	Tech	Price	Ext
3	03/01/2021		E-Hounds Review® Platform (incl 2 user seat) Courtesy Rate Monthly		\$595.00	\$1785.00
2.5	03/05/2021		Project Management - Data Load-in, Load File, OCR, QC for "Clawback" platform	DAB	\$195.00	\$487.50
3	03/10/2021		E-Hounds Review® Platform Add'l Users (per user) frederick.schrills@gray-robinson.com;michal@attiaenterprises.net;		\$125.00	\$375.00
4	03/25/2021		E-Hounds Review® Platform Add'l Users (per user) (4) @sallahlaw.com		\$125.00	\$500.00

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 **\$3147.50**

Payments Applied

TOTAL **\$3147.50****Balance Due \$3147.50**Retainer Amount Remaining **\$0.01**

Please note: Our fees are subject to change annually. Last change: 1/2/2021

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 16

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 20282

Date	Jan 31, 2021
Terms	
Service Thru	Jan 31, 2021

In Reference To: Oasis (Time)

Date	Services	Hours
01/03/2021	Communications with Mrs. Sullivan regarding 5 upcoming showings at Foulders Club (.2).	0.20
01/04/2021	Communications with Mrs. Sullivan regarding the status of Founders Club Drive repairs, estoppel issues at Desert Ridge Glen and the closing update on 6300 Midnight Pass Rd. (.6). Communications with Mr. Wiand regarding same (.2). Communications with Mr. Winkle regarding Founders Club repairs (.2). Communications with moving companies regarding moving items from Desert Ridge Glen to storage (.5). Monthly inspection of the Vardon Terrace condominiums, Desert Ridge Glen, Founders Club Drive and the Midnight Pass Road condominium. Inventoried 2 storage units for Mr. Perez regarding items from Desert Ridge Glen. Communications with Mr. Perez regarding same (5.5). Communications with Mr. Rizzo regarding Mr. Rodriguez's payments (.2).	7.20
01/05/2021	Met with Benson Quality Cleaning at Desert Ridge Glen regarding pressure cleaning to the tile roof, walls of the house, driveway and sidewalk. Met with Klean Movers while they removed items from Desert Ridge Glen and moved them to xPress Storage in Sarasota. Communication with Mr. Rizzo and Mrs. Sullivan regarding the closing at Desert Ridge Glen (4.25).	4.25
01/07/2021	Received, reviewed, approved and prepared checks for the Oasis invoices. Prepared correspondence to Mr. Wiand, PDR Accounting and Mr. Rizzo regarding same (1.3). Several communications with Mr. Rizzo and the closing agent for Desert Ridge Glen. Several communications with Manatee County Utilities regarding payments so the closing of Desert Ridge Glen could happen today. Made telephone payment for same (1.4). Communications with the lawn care, pool service, electric service and insurance companies to cancel the accounts due to the sale (2.0). Remove lockbox and security cameras and internet equipment (1.0). Inspected the roofing contractors' work to clean the roof, walls, driveway and sidewalk (.2).	5.90
01/11/2021	Met with Blu-Sky Construction to evaluate and measure for a quote to make all the repairs to 4064 Founders Club Drive. Communications with Mrs. Sullivan regarding same (2.25). Communications with Adrian Lawn Maintenance regarding items of concern with the yard at 4064 Founders Club Drive (.2).	2.45

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 20282

Date	Jan 31, 2021
Terms	
Service Thru	Jan 31, 2021

01/12/2021	Several communications with PDR Accounting to review all the contractor's invoices for 2020 regarding 1099's.	1.60
01/13/2021	Communications with the 4064 Founders Club Drive insurance company and the insurance adjuster to discuss the engineer's report (.9). Communications with Mrs. Sullivan regarding the findings (.2).	1.10
01/15/2021	Received, reviewed, approved and prepared checks for the Oasis invoices. Prepared correspondence to Mr. Wiand, PDR Accounting and Mr. Rizzo regarding same (1.0). Communications with Adrian's Lawn Care regarding invoice corrections (.2). Communications with Florida Power and Light regarding a refund for Desert Ridge Glen (.2).	1.40
01/22/2021	Received, reviewed, approved and prepared checks for the Oasis invoices. Prepared correspondence to Mr. Wiand, PDR Accounting and Mr. Rizzo regarding same (1.0).	1.00
01/29/2021	Received, reviewed, approved and prepared checks for the Oasis invoices. Prepared correspondence to Mr. Wiand, PDR Accounting and Mr. Rizzo regarding same (1.0).	1.00

In Reference To: Oasis (Expenses)

Date	Expenses
01/04/2021	Mileage to Vardon Terr, Desert Ridge Glen, Founders Club, Storage units, Midnight Pass and back to the office. 155 miles @ .56 = \$86.80.
01/05/2021	Mileage to and from Desert Ridge Glen and xPress Storage in Sarsota. 72 miles @ .56 = \$40.32.
01/07/2021	Mileage to and from Desert Ridge Glen. 71 miles @ .56 = \$39.76.
01/11/2021	Mileage to and from 4064 Founders Club Drive 74 miles @ .56 = \$41.44

Total Hours	26.10 hrs
Total Time	\$ 1,957.50
Total Expenses	\$ 208.32
Total Invoice Amount	\$ 2,165.82

The RWJ Group,LLC

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INVOICE

Wiand Guerra King

5505 West Gray Street
Tampa, FL 33609

Invoice 20282

Date	Jan 31, 2021
Terms	
Service Thru	Jan 31, 2021

User Hours Summary

Billing Period: 01/01/2021 - 01/31/2021

User Hour Totals

User	Hours Billed	Rate/Hour	Amount Billed
Roger Jernigan	26.10	\$ 75.00	\$ 1,957.50

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 20283

Date	Feb 28, 2021
Terms	
Service Thru	Feb 28, 2021

In Reference To: Oasis (Time)

Date	Services	Hours
02/01/2021	Monthly inspection of the Vardon Terrace condominiums, Founders Club Drive and the Midnight Pass Road condominium.	3.00
02/02/2021	Communications with the utility companies, condominium vendors and insurance companies to cancel their services due to the sale of 6300 Midnight Pass Road (2.5).	2.50
02/05/2021	Received, reviewed, approved and prepared checks for the Oasis invoices. Prepared correspondence to Mr. Wiand, PDR Accounting and Mr. Rizzo regarding same (1.0).	1.00
02/08/2021	Met with Mr. Rizzo to deliver documents and discuss the closing of the Oasis properties.	0.60
02/12/2021	Received, reviewed, approved and prepared checks for the Oasis invoices. Prepared correspondence to Mr. Wiand, PDR Accounting and Mr. Rizzo regarding same (1.0).	1.00
02/15/2021	Obtained samples of the Roar of the Lion Fitness products from the storage units. Researched to locate the scientist that made up the formula for each product. Communications with same. Provided copies of the court order to same. Researched the marketing and bottling company. Communications with Same. Provided copies of the court order to same. Communications with Mr. Wiand regarding my findings (6.75).	6.75
02/18/2021	Prepared an inventory of all the assets within 4064 Founders Club Drive. Prepared the report and photos to Mr. Wiand and Mr. Rizzo (3.75). Prepared an inventory of all the assets in the two storage units at 7600 Claxstrauss Drive regarding the remaining Oasis assets (2.0).	5.75
02/19/2021	Met with appliance repairman at 4064 Founders Club Drive regarding issues with the two ovens (1.75). Received and reviewed correspondence from Lakewood National regarding Vardon Terrerrace unit #105's account. Communications with Mr. Rizzo, PDR Accounting and Mr. Rizzo regarding same (.4). Received, reviewed, approved and prepared checks for the Oasis invoices. Prepared correspondence to Mr. Wiand, PDR Accounting and Mr. Rizzo regarding same (1.0).	3.15
02/26/2021	Received, reviewed, approved and prepared checks for the Oasis invoices. Prepared correspondence to Mr. Wiand, PDR Accounting and Mr. Rizzo regarding same (1.0).	1.00

In Reference To: Oasis (Expenses)

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 20283

Date	Feb 28, 2021
Terms	
Service Thru	Feb 28, 2021

Date	Expenses
02/01/2021	Mileage to Vardon Terr, Founders Club, Gulf of Mexico Drive, Midnight Pass and back to the office. 148 miles @ .56 = \$82.88
02/08/2021	Mileage to and from WGK office and 188miles @ .56 = \$105.28
02/15/2021	Mileage to and from WGK office and 188 miles @ .56 = \$105.28
02/18/2021	Mileage to and from 4064 Founders Club Drive 74 miles @ .56 = \$41.44
02/19/2021	Mileage to and from 4064 Founders Club Drive 74 miles @ .56 = \$41.44

Total Hours	24.75 hrs
Total Time	\$ 1,856.25
Total Expenses	\$ 376.32
Total Invoice Amount	\$ 2,232.57

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 20283

Date	Feb 28, 2021
Terms	
Service Thru	Feb 28, 2021

User Hours Summary

Billing Period: 02/01/2021 - 02/28/2021

User Hour Totals

User	Hours Billed	Rate/Hour	Amount Billed
Roger Jernigan	24.75	\$ 75.00	\$ 1,856.25

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 20284

Date	Mar 31, 2021
Terms	
Service Thru	Mar 31, 2021

In Reference To: Oasis (Time)

Date	Services	Hours
03/03/2021	Inspected 4064 Founders Club Drive and the ongoing construction project. Met with a new contractor regarding repairing the items that were demoed (2.2). Researched and visited several flooring stores in the area to try and locate the matching wood flooring that needs to be replaced due to the water issue. Updated Mr. Wiand on same (4.0).	6.20
03/05/2021	Received, reviewed, approved and prepared checks for the Oasis invoices. Prepared correspondence to Mr. Wiand, PDR Accounting and Mr. Rizzo regarding same (1.0).	1.00
03/05/2021	Met with Blu-Sky Construction at 4064 Founders Club Drive to inspect the work due to the water damage (2.0).	2.00
03/08/2021	Met Blu-Sky Construction at 4064 Founders Club Drive regarding concerns with the repairs. Updated Mr. Wiand on same (2.5).	2.50
03/12/2021	Received, reviewed, approved and prepared checks for the Oasis invoices. Prepared correspondence to Mr. Wiand, PDR Accounting and Mr. Rizzo regarding same (1.0).	1.00
03/15/2021	Met with Blu-Sky Construction at 4064 Founders Club Drive to inspect the work regarding the water damage (2.0). Communications with Frontier Communications regarding a refund for 6300 Midnight Pass Road (.4).	2.40
03/16/2021	Met with Mr. MacGranor at 4064 Founders Club Drive regarding plumbing issues (1.0)	1.00
03/17/2021	Several communications with Blu-Sky Construction regarding their final invoice and additional work that needs to be completed (1.25). Met with same to review the work that needed to be corrected (2.0).	3.25
03/18/2021	Met with the flooring company at 4064 Founders Club Drive to correct the wood flooring issues (4.0).	4.00
03/19/2021	Received, reviewed, approved and prepared checks for the Oasis invoices. Prepared correspondence to Mr. Wiand, PDR Accounting and Mr. Rizzo regarding same (1.0).	1.00
03/22/2021	Met with Mr. MacGranor at 4064 Founders Club Drive to discuss him repairing paver issues around the swimming pool (1.25)	1.25
03/26/2021	Received, reviewed, approved and prepared checks for the Oasis invoices. Prepared correspondence to Mr. Wiand, PDR Accounting and Mr. Rizzo regarding same (1.0).	1.00
03/29/2021	Communications with Mrs. Sullivan regarding the home inspection of 4064 Founders Club Drive and needing the gas turned on for same. Visited 4064 Founders Club Drive to locate the gas. Communications with TECO Gas Company to set up a new account in the receiver's name and have the gas turned on for the inspection (4.5).	4.50
03/31/2021	Several communications with Merkel Insurance Company regarding the claim at 4064 Founders Club Drive. Update Mr. Wiand on same (.8).	0.80
03/31/2021	Communications with Safe Point Insurance regarding 6300 Midnight Pass Road. Prepared correspondence for Mr. Wiand to review, sign and return. Researched files for closing statements for same. Prepared documents to send to Safe Point Insurance (1.75). Several communications with Mr. Rodriguez regarding his property taxes and his property insurance. Reviewed documents from same. Communications with Mr. Rizzo regarding same. Teleconference with Mr. Rodriguez, Mr. Rizzo and Mrs. Burnett (Spanish translator) regarding his mortgage balloon payments and refinancing his house (2.0).	3.75

In Reference To: Oasis (Expenses)

User Hours Summary

Billing Period: 03/01/2021 - 03/31/2021

User Hour Totals

User	Hours Billed	Rate/Hour	Amount Billed
Roger Jernigan	35.65	\$ 75.00	\$ 2,673.75

EXHIBIT 17

**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

FUNDADMINISTRATION, 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 Eighth 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 Eighth 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	\$35,712.00
Guerra King P.A.	\$155,640.98
Englander Fischer	\$61,048.31
Harneys	\$38,095.00
KapilaMukamal, LLP	\$37,688.79
PDR CPAs	\$7,140.25
E-Hounds, Inc.	\$7,406.49
RWJ Group, LLC	\$7,403.66

DONE AND ORDERED at Tampa, Florida, this ____ day of _____, 2021.

VIRGINIA M. HERNANDEZ-COVINGTON
UNITED STATES DISTRICT COURT JUDGE