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

FUNDAMDINISTRATION, 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 FIFTEENTH 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"), 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 October 1, 2022 through December 31, 2022. 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¹ On July 11, 2019, the Court entered the Consolidated Order (Doc. 177), which combined and superseded two prior orders (Docs. 7 and 44) and is the operative document governing the Receiver's activities.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 February 2, 2023, the Receiver filed his Fifteenth Interim Report (Doc. 706) (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 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 was engaged on a contingency fee basis and thus was not included in prior 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 (generally, "ATC") (Doc. 385), which the Court granted on April 23, 2021.⁵ On June 25, 2021, the Receiver filed a motion to approve the engagement of Thomas J. Bakas as a litigation consultant to assist the Sallah Firm with litigation against ATC (Doc. 412). The Court granted this motion on July 13, 2021 (Doc. 415).

On March 1, 2022, the Receiver filed a motion to approve the retention of Wayne Piper and Flores Piper LLP (the "Piper Firm"), a law firm in Belize (Doc. 478). The Receiver sought the Piper Firm's retention as special foreign counsel in Belize to facilitate the return of a \$500,000 license deposit held by a bank in Belize for Oasis Global FX, S.A. ("Oasis FX") as well as the return of Receivership records currently in the possession of Glenn D. Godfrey and the Godfrey Firm of Belize City (the "Godfrey Firm"). The Court granted this motion on March 24, 2022 (Doc. 488). In accordance with the motion and order, the Receiver paid a retainer of \$2,000 to the Piper Firm on March 28, 2022.

Pursuant to the Consolidated Order and the aforementioned orders, the Receiver retained (1) Wiand Guerra King P.A., now known as Guerra King

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

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) 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 connection with litigation in against Fundadministration, Inc.; (9) Englander Fischer to assist the Receiver and his counsel with clawback litigation; and (10) Thomas J. Bakas with RPM Financial Markets Group LLC ("RPM") to provide litigation consulting in

⁶ Mary Gura has since the inception of this Receivership provided substantial support to the Receiver. In March 2021, Ms. Gura left Guerra King and joined Johnson Cassidy Newlon and DeCort, a litigation firm with extensive experience in federal court practice. And, as noted in the Receiver's Thirteenth Interim Report, lead counsel Jared Perez left Guerra King and continues to represent the Receiver through his new legal practice. (Doc. 655 at 24.) Other professionals at Guerra King who have also been providing legal services to the Receiver for this matter have remained at Guerra King. Given Ms. Gura's and Mr. Perez's knowledge regarding this matter, the Receiver determined that it is in the best interests of the Receivership that they continue to provide legal services to the Receiver along with the professionals at Guerra King. The Receiver does not anticipate that there will be duplication of services provided by Ms. Gura, Mr. Perez, and Guerra King.

⁷ The Receiver is no longer working with the Godfrey Firm as the firm was ineffective and unresponsive and anticipates that all future legal services related to Belize will be through the Piper Firm.

connection with litigation against ATC (all of the foregoing and the Piper Firm are collectively, the "**Professionals**").⁸

As shown in the Interim Report, the Professionals have provided services and incurred expenses to investigate the affairs of the Receivership Entities, preserve Receivership assets, attempt to locate and recover additional assets, analyze investor information for the claims process and litigation, and 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 and costs incurred from October 1, 2022 through December 31, 2022, in the amount of \$18,675.56. 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

⁸ Sergio Godinho and RPM did not submit any invoices for the time covered by this motion and therefore are not included in this motion.

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. 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

⁹ The Activity Categories set forth by the Commission in the Billing Instructions are as follows: (1) <u>Asset Analysis and Recovery</u>, which is defined as identification and review of potential assets including causes of action and non-litigation recoveries; (2) <u>Asset Disposition</u>, 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) <u>Business Operations</u>, which is defined as issues related to operation of an ongoing business; (4) <u>Case Administration</u>, which is defined as coordination and compliance activities, including preparation of reports to the court, investor inquiries, etc.; and (5) <u>Claims Administration and Objections</u>, 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 his professionals at GK have accounted for time spent on such work but have not charged any amount for that work.

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 October 1, 2022 through December 31, 2022, are as follows:

Receivership
Receiver's Time and Fees for Services Rendered

	Hours	
Activity Category	Expended	Fee Amount
Asset Analysis and		
Recovery	18.80	\$6,768.00
Business Operations	4.60	\$1,656.00
Case Administration	2.30	\$828.00
Claims		
Administration	16.70	\$6,012.00
TOTAL	42.40	\$15,264.00

In addition to legal fees, the Receiver has advanced costs of \$2,511.56 as summarized below. 10

Costs	Total
Web-Related	\$886.40
Other	\$1,625.16
Total	\$2,511.56

B. Discrete Litigation Projects.

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

¹⁰ The costs included in other are for storage unit rental and insurance for storage of furniture obtained from various Receivership properties.

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 presuit 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 29. However, many investors did not take advantage of the opportunity afforded by this process. On March 24, 2020, the Receiver moved the Court for authority to file clawback litigation. Doc. 258. The Court granted the Receiver's motion on April 13, 2020. Doc. 264. Pursuant to the Consolidated Order and the Court's express authorization, on April 14, 2020, the Receiver filed a clawback complaint against numerous non-settling investors. A copy of the statement summarizing the Receiver's services rendered for this project from October 1, 2022 through December 31, 2022 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

	Hours	Fee
Activity Category	Expended	Amount
Asset Analysis and		
Recovery	1.10	\$396.00
TOTAL	1.10	\$396.00

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 October 1, 2022 through December 31, 2022 is attached as **Exhibit 5**. The Receiver's time and fees for services rendered for each Activity Category are as follows:

<u>Litigation Against Raymond Montie</u> Receiver's Time and Fees for Services Rendered

	Hours	Fee
Activity Category	Expended	Amount
Asset Analysis and		
Recovery	1.40	\$504.00
TOTAL	1.40	\$504.00

II. Guerra King P.A.

The Receiver requests the Court award GK fees for professional services rendered and costs incurred from October 1, 2022 through December

31, 2022, in the amounts of \$35,698.50 and \$1,168.48 respectively. A categorization and summary of all costs for which GK seeks reimbursement is attached as **Exhibit 6**.

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 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 October 1, 2022 through December 31, 2022, 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

	Hours	
Activity Category	Expended	Fee Amount
Asset Disposition	0.10	\$32.00
Asset Analysis and		
Recovery	34.10	\$9,737.50
Business Operations	1.70	\$229.50
Case Administration	7.40	\$1,754.00
Claims Administration	108.10	\$23,411.50
TOTAL	151.40	\$35,164.50

The Receiver also requests the Court award Johnson Cassidy Newlon and DeCort fees for professional services rendered by paralegal Mary Gura for her continuation of work on behalf of the Receivership from October 1, 2022 through December 31, 2022, in the amount of \$4,711.50. A copy of the statement summarizing the services rendered and costs incurred by Ms. Gura from October 1, 2022 through December 31, 2022, is attached as **Exhibit 9**.

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 October 1, 2022 through December 31, 2022 for this project is attached as **Exhibit 10**. 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

	Hours	
Activity Category	Expended	Fee Amount
Asset Analysis and		
Recovery	0.40	\$72.50
TOTAL	0.40	\$72.50

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 October 1, 2022 through December 31, 2022 for this project is attached as **Exhibit 11**. 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

	Hours	
Activity Category	Expended	Fee Amount
Asset Analysis and		
Recovery	1.50	\$461.50
TOTAL	1.50	\$461.50

III. Jared J. Perez P.A.

The Receiver requests the Court award Jared Perez fees for professional services rendered from October 1, 2022 through December 31, 2022, in the amount of \$25,824.00. As an accommodation to the Receiver and to conserve the resources of the Receivership Estate, Mr. Perez has agreed to follow the reduced rates provided in the GK fee schedule. Ex. 7. Jared J. Perez P.A. began providing services on July 8, 2022. However, as noted in the Interim Report, Mr. Perez was the lead counsel and senior attorney on this matter from its inception. The activities of Mr. Perez for the time covered by this Motion are set forth in the Interim Report. See Ex. 2. He has billed time for these activities in accordance with the Billing Instructions. A copy of the statement summarizing the services rendered and costs incurred for the pertinent period is attached as Exhibit 12.

IV. <u>Englander Fischer.</u>

The Receiver requests the Court award Englander Fischer fees for professional services rendered and costs incurred from October 1, 2022

through December 31, 2022 in the amount of \$22,925.57. 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 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 October 1, 2022 through December 31, 2022 are attached as **Exhibit 13.**

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.

Professional	Hours	Rate	Total
John Waechter (JWW)	.30	\$335.00	\$100.50
Beatriz McConnell (BM)	3.90	\$335.00	\$1,306.50
Camile Iurillo (CJI)	32.90	\$335.00	\$11,021.50
Julia Kapusta (JK)	0.00	\$300.00	\$0.00
Alex M. Dragovich (AMD)	8.10	\$250.00	\$2,025.00
Pedro Lopez (PJL)	8.60	\$195.00	\$1,677.00
Sam McDougall (SMD)	0.00	\$185.00	\$0.00
April Bogert (ALB)	33.00	\$185.00	\$6,105.00
Tara Dillon (TD)	0.00	\$175.00	\$0.00
Diedre Turner (DT)	0.90	\$175.00	\$157.50
Total Fees			\$22,393.00
Disbursements			\$532.57

Total			\$22,925.57
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V. <u>KapilaMukamal, LLP.</u>

The Receiver requests the Court award KM fees for professional services rendered and costs incurred from October 1, 2022 through December 31, 2022, in the amount of \$731.17. KM is a forensic accounting firm that insolvency and restructuring, specializes in Ponzi schemes, investigations, insolvency taxation, business valuation, and litigation support. At the Receiver's request, KM performed forensic reconstructions of numerous bank accounts, which required the analysis of thousands of transactions involving hundreds of investors. Through this analysis, KM has identified the individualized amounts most investors lost in connection with the scheme as well the amounts certain other investors gained as a result of the scheme. KM's analysis allowed the Receiver to (1) institute a claims process to return money to defrauded investors (with approved claims); and (2) pursue litigation against those that profited from the scheme. As an accommodation to the Receiver and to conserve the resources of the Receivership Estate, Soneet Kapila, a principal of KM, 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. A copy of the statement summarizing the services rendered and costs incurred for this period is attached as **Exhibit 14**.

VI. PDR CPAs.

The Receiver requests the Court award PDR fees for professional services rendered and costs incurred from October 1, 2022 through December 31, 2022, in the amount of \$8,953.75. 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 15**.

VII. E-Hounds, Inc.

The Receiver requests the Court award E-Hounds fees for professional services rendered and costs incurred from October 1, 2022 through December 31, 2022, in the amount of \$7,695.00. 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 16**.

VIII. The RWJ Group, LLC.

The Receiver requests the Court award RWJ fees for professional services rendered from October 1, 2022 through December 31, 2022, in the

amount of \$75.00. 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. A copy of the statement summarizing the services rendered and costs incurred for the pertinent period is attached as **Exhibit 17**.

IX. Maples Group.

The Receiver requests the Court award the Maples Group fees for professional services rendered and costs incurred from October 1, 2022 through December 31, 2022, in the amount of \$11,709.91. The Caymans Islands office of the Maples Group provides local counsel and foreign regulatory compliance services. A copy of the statement summarizing the services rendered and costs incurred for the pertinent period is attached as **Exhibit 18**.

X. Flores Piper LLP.

The Receiver requests the Court award the Piper Firm fees for professional services rendered and costs incurred from October 1, 2022

through December 31, 2022, in the amount of \$6,490.63.¹¹ The Receiver retained Wayne Piper and the Piper Firm, a law firm in Belize, as special foreign counsel in Belize to facilitate the return of funds held by a bank in Belize for Oasis FX as well as the return of Receivership records which were in the possession of Glenn D. Godfrey and the Godfrey Firm also located in Belize. The Piper Firm started providing services for the Receivership on April 1, 2022. A copy of the statement summarizing the services rendered and costs incurred for the pertinent period is attached as composite **Exhibit** 19.

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

¹¹ This amount includes a general sales tax imposed by the Belize government on goods and services.

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 Elliott, 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, GK, and Mr. Perez 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 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. The Receiver is sensitive to the need to conserve the Receivership Entities' assets. He has reviewed the invoices of all professionals and vendors and believes that their fees are reasonable and have provided value to 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:12

Burton W. Wiand, Receiver	\$18,675.56
Guerra King P.A.	\$36,866.98
Johnson Cassidy Newlon & DeCort	\$4,711.50
Jared J. Perez P.A.	\$25,824.00
Englander Fischer	\$22,925.57
KapilaMukamal, LLP	\$731.17
PDR CPAs	\$8,953.75
E-Hounds, Inc.	\$7,695.00
RWJ Group, LLC	\$75.00
Maples Group	\$11,709.91
Flores Piper LLP	\$6,490.63

¹² A proposed order is attached as **Exhibit 20**.

LOCAL RULE 3.01(g) CERTIFICATION

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. The defendants Anile, DaCorta, Montie, and Duran do not oppose the requested relief. The defendant Haas objects to the relief sought by this motion. The undersigned has not consulted with the intervening party United States, because the government has not previously taken a position on the Receiver's fee applications and the stay it earlier obtained expired on July 24, 2022.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 15, 2023, 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 to:

Gerard Marrone
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Counsel for the Receiver, Burton W. Wiand

RECEIVER'S CERTIFICATION

The Receiver has reviewed this Fifteenth 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.

<u>/s/ Burton W. Wiand</u> 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 10/01/2022 to 12/31/2022 Grand Details Subtotal Total Notes Line 1 Beginning Balance (As of 10/01/2022) 12,562,838.02 **Increases in Fund Balance** Line 2 **Business Income** Line 3 Cash and Securities \$ 69,581.90 Line 4 Interest/Dividend Income Interest Income Line 5 Asset Liquidation Third-Party Litigation Income 8,717.68 Line 6 Settlements Line 7 Other Miscellaneous \$ 6,560,994.96 Remitted Funds **Total Funds Available - Totals Line 1 - 7** \$ 6,639,294.54 19,202,132.56 **Decreases in Fund Balance** Line 9 Disbursements to Investors Line 10 Disbursements for Receivership Operations 10.a.1 Receiver \$ 13,505.16 \$ 10.a.2 Guerra King 55,795.27 Professional Fees \$ 10.a.3 KapilaMukamal LLP 1,621.29 Professional Fees 10.a.4 PDR Certified Public Accts \$ 5,975.00 Professional Fees 10.a.5 RPM Financial \$ 3,952.50 Professional Fees \$ 10.a.6 Englander Fisher 46,863.84 Professional Fees \$ 10.a.7 The RWJ Group 150.00 Professional Fees \$ 7,929.00 10.a.8 E-Hounds Professional Fees \$ 10.a.9 Maples Group 2,622.59 Professional Fees 10.a.10 Jared J. Perez PA \$ 9,248.00 Professional Fees 10.a.11 Other Professional Fees \$ 4,228.13 Professional Fees Line 10a Total Disbursements to Receiver/Professionals 151,890.78 10b Third-Party Litigation Expenses 10c Asset Expenses \$ 362.46 Bank Charges 10d Tax Payments Total Disbursements for Receivership Ops. 152,253.24 Line 11 Disbursements Related to Distribution Expenses Line 12 Disbursement to Court/Other Line 13 Other **Total Funds Disbursed - Total Lines 9 - 13** 152,253.24

19,049,879.32

Line 14

Ending Balance (as of 12/31/2022)

Standardized Accounting Report Form

Standardized Accounting Report for Oasis Management LLC Receivership Civil Court Docket No. 8:19-cv-00886-VMC-SPF

	Civil Co		ocket No. 8:19- m Inception to 1	0886-VMC-SPI 1/2022		
			_		Grand	
		<u> </u>	Details	Subtotal	Total	Notes
Line 1	Beginning Balance				-	
	Increases in Fund Balance					
Line 2	Business Income	\$	53,335.13			Rental/Mortgage Income
Line 3	Cash and Securities	\$	8,661,433.46			Cash from Frozen Accts.
Line 4	Interest/Dividend Income	\$	275,587.22			Interest Income
Line 5	Asset Liquidation	\$	7,892,523.41			Sale of Real Estate/Misc.
Line 6	Third-Party Litigation Income	\$	5,107,199.89			Settlements, etc.
Line 7	Other Miscellaneous	\$	6,704,848.97			Remitted Funds & Misc.
	Total Funds Available - Totals Line 1 - 7			\$ 28,694,928.08	\$ 28,694,928.08	
	Decreases in Fund Balance					
Line 9	Disbursements to Investors		_			
Line 10	Disbursements for Receivership Operations					
1	1 Receiver	\$	387,388.35			Professional Fees
l	2 Guerra King	\$	1,840,723.47			Professional Fees
1	3 KapilaMukamal LLP	\$	293,861.55			Professional Fees
	4 PDR Certified Public Accts	\$	71,998.60			Professional Fees
10.a.:	5 RPM Financial	\$	84,036.92			Professional Fees
10.a.	6 Englander Fisher	\$	485,866.62			Professional Fees
	7 The RWJ Group	\$	98,702.58			Professional Fees
10.a.	8 E-Hounds	\$	118,702.47			Professional Fees
10.a.s	9 Maples Group	\$	44,960.57			Professional Fees
10.a.10	0 Jared J. Perez PA	\$	9,248.00			Professional Fees
10.a.1	1 Other Professional Fees	\$	62,208.18			Professional Fees
1	a Total Disbursements to Receiver/Professionals			\$ 3,497,697.31		
1	b Third-Party Litigation Expenses	\$	42,160.00			
10	c Asset Expenses	\$	355,995.31			Condo Fees, Insurance,
						Repairs, Maint. & Utilities
100	d Tax Payments	\$	109,117.36	10010000		County, Sales & Propery Tax
	Total Disbursements for Receivership Ops.			\$ 4,004,969.98		
Line 11	Disbursements Related to Distribution Expenses					
Line 12	Disbursement to Court/Other	\$	5,637,625.12			Remission to USMS
Line 13	Other	\$	2,453.66			Cayman Registration Fee
	Total Funds Disbursed - Total Lines 9 - 13			\$ 5,640,078.78	\$ 9,645,048.76	
Line 14	Ending Balance (as of 12/31/2022)				\$ 19,049,879.32	

Line		
15	Number of Claims	834
	No. of Claims Received This	
15a	Reporting Period	0
	No. of Claims Received Since	
15b	Inception of Estate	834
Line		
16	Number of Claimants/Investors	TBD (some claimants submitted multiple claims)
	No. of Claimants/Investors Paid	
16a	This Reporting period	0
No. of Claimants/Investors Paid		
16b	Since Inception of Estate	0

Receiver:

By: s/Burton W. Wiand Burton W. Wiand, Receiver

Signature Printed Name

Date: <u>2/2/2023</u>

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 FIFTEENTH INTERIM REPORT

Information and Activity from October 1, 2022 through December 31, 2022.

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

Overview of Significant Activities During this Reporting Period

On October 20, 2022, the Honorable William F. Jung sentenced Michael DaCorta to imprisonment of **276 months** (*i.e.*, **23 years**) for his role in the Ponzi scheme underlying this enforcement action. Judge Jung also ordered DaCorta to pay restitution in the amount of **\$53,270,336.08**, jointly and

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 December 31, 2022 (the end of the reporting period) and the date of this filing.

severally with defendant Joseph S. Anile, II (although the Receiver has already recovered and sold both individuals' material assets).²

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

- Filed a motion on December 9, 2022, seeking approval of a first interim distribution of approximately **\$10 million** to claimants with approved claims (*see infra* § VI);
- Obtained remission of **\$6,560,994.96** from the Department of Justice in connection with civil and criminal asset forfeitures for distribution through the claims process and continued efforts to secure remission of additional funds (*see infra* § III.A.);
- Collected \$69,581.90 in interest income on seized funds (see Ex. A);
- Collected litigation income of **\$8,717.68** through settlements and the enforcement of default judgments (*see id.*);
- Continued efforts to repatriate \$500,000 from Belize in cooperation with local counsel (*see infra* § III.B.);
- Continued evaluation of a lawsuit against defendant Raymond P. Montie III, seeking tort damages and the recovery of fraudulent transfers (see infra § V.2.c.); and

_

² In December 2019 and February 2021, a federal grand jury indicted DaCorta on one count of conspiracy to commit wire fraud and mail fraud, one count of engaging in an illegal monetary transaction (*i.e.*, money laundering), and one count of making a false and fraudulent statement on an income tax return. DaCorta's trial commenced on April 18, 2002, and the jury began deliberations on May 4, 2022. After more than two weeks of testimony and argument, the jury required less than four hours to find DaCorta guilty on all counts. Judge Jung described the Oasis Ponzi scheme as "a very good con." He noted that victim-investors lost their money and tended to blame themselves for getting involved. "Their self-esteem was stolen," the judge said. Before imposing the sentence, the judge heard from two of the victims, a couple whose initials are P.K. and K.K. She stated that her family was "emotionally drained" by the loss of money meant for their children's marriages and educations. He called DaCorta "a parasite on society." DaCorta is appealing his conviction, but after the sentencing hearing on October 20, 2022, the United States Marshals Service immediately took DaCorta into custody, and he is currently in prison.

• Continued prosecution of an appeal regarding an order dismissing a second lawsuit against ATC Brokers Ltd., David Manoukian, and Spotex, LLC, seeking compensatory and punitive damages and alleging claims for aiding and abetting fraud, aiding and abetting breaches of fiduciary duties, recovery of fraudulent transfers against ATC, gross negligence, and simple negligence (see infra § V.2.d.).

Overview of Activities Since the Beginning of this Receivership

Since the beginning of this Receivership, the Receiver and his professionals have 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 \$53,335.13 in business income, primarily from mortgages and rentals:
- Liquidated an additional approximately \$7,892,523.41 in assets (net, excluding remitted funds), mostly subject to agreements with the Department of Justice and the United States Marshals Service;
- Collected \$275,587.22 in interest and/or dividend income;
- Collected total litigation income of **\$5,107,199.89** through clawback and other third-party settlements;
- Collected other miscellaneous income of \$143,854.01;
- 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.

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

BACKGROUND

I. <u>Procedure and Chronology</u>

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

40aks LLC ("40aks") (collectively, the "relief defendants"). The 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.³

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

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

directly or indirectly owned, beneficially or otherwise, by the Receivership Defendants." See id. at p. 14, ¶ 32 & p. 15, ¶ 30.b. The SRO also imposed a temporary injunction against the defendants and relief defendants 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"). 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

⁴ 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*.

this litigation to protect an ongoing criminal investigation. Doc. 149. The Court granted the DOJ's motion on July 12, 2019, but exempted the Receiver's activities from the stay. Doc. 179. The Court also required the DOJ to provide periodic status reports during the stay. *Id*.

On August 8, 2019, defendant Anile pled guilty to three counts involving the scheme – (1) conspiracy to commit wire and mail fraud; (2) engaging in an illegal monetary transaction; and (3) filing a false income tax return. See United States of America v. Joseph S. Anile, II, Case No. 8:19-cr-334-T-35CPT (M.D. Fla.) (the "Anile Criminal Action" or "ACA"). A copy of Anile's plea agreement was attached as Exhibit A to the Receiver's Second Interim Report. Doc. 195. 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.

Anile subsequently filed a motion seeking a downward departure (i.e., sentence reduction) due to his cooperation with the government and other relevant factors. On January 24, 2023, the judge presiding over the Anile Criminal Action granted his motion and, in relevant part, reduced his term of imprisonment to "time served" plus 12 months of home confinement and an additional two years of supervised release. See ACA Docs. 76, 77. In the Receiver's opinion, this reduction was due to Anile's cooperation with the

Department of Justice, his assistance to the Receiver in collecting assets, and in large part, his significant health issues.

Similarly, 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 original indictment was attached as Exhibit A to the Receiver's Third Interim Report, and a copy of a superseding indictment, which added an additional count related to tax evasion, was attached as Exhibit D to the Receiver's Eighth Interim Report. See Docs. 229, 393.

On May 4, 2022, after two weeks of testimony and argument before the Honorable William F. Jung and less than four hours of deliberation, a jury found DaCorta guilty on all three counts. DCA Doc. 192. On October 20, 2022, Judge Jung sentenced DaCorta to imprisonment of 276 months (*i.e.*, 23 years) for his role in the Ponzi scheme underlying this enforcement action. DCA Doc. 234. Judge Jung also ordered DaCorta to pay restitution in the amount of \$53,270,336.08, jointly and severally with defendant Anile (although the Receiver has already recovered and sold both individuals' material assets).

On January 14, 2022, the DOJ moved the Court to extend the stay in this enforcement action for an additional six months to protect its ongoing investigation. Doc. 467. The Court granted the motion and extended the stay until July 24, 2022. Doc. 470. After the DOJ declined to further extend the stay, the Court noted its expiration on July 24, 2022, and ordered the parties to confer and file a case management report by August 8, 2022. Doc. 652. Pursuant to that report and the Court's related order, the CFTC's enforcement action against all defendants is currently scheduled for trial in December 2023. On August 19, 2022, DaCorta filed a motion to dismiss the CFTC's complaint (Doc. 663), which the court denied during a hearing on December 22, 2022 (Doc. 701). DaCorta filed an answer to the complaint on December 28, 2022 (Doc. 704), and discovery is now ongoing.

While the Receiver is not a party to the CFTC action, its outcome against individual defendants is important to the Receiver because the CFTC seeks monetary relief from those defendants. The Receiver has tolling agreements with several individuals and may wait for the resolution of the CFTC's claims before pursuing any direct action against them.

II. Overview of the Receiver's 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 obtained and reviewed records from Receivership Entities and third parties. The Receiver has formed certain conclusions based

on his review of a portion of the records received and interviews with employees, lawyers, accountants, and others.

As demonstrated by Anile's 2019 guilty plea and DaCorta's 2022 criminal conviction following a two-week jury trial, 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" (although the entities continue to have shareholders to this day) 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 and DaCorta's conviction.

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. 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 liquid assets of less than \$10 million and was losing money.

⁵ 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 analysis indicates that a total of approximately \$80 million was raised from investors.⁶ 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. Through the claims process discussed below in Section VI, investors and other creditors have submitted hundreds of claims totaling approximately \$70 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 Fifteenth Interim Report is a cash accounting report showing (1) the amount of money on hand from October 1, 2022, less operating expenses plus revenue, through December 31, 2022, 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

⁶ 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.

accounting report. From October 1, 2022, through December 31, 2022, the Receiver collected income of \$6,639,294.54.7

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 in § III.C below (which were already under the Receiver's control pursuant to the Consolidated Order and/or its predecessors). 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");

⁷ As explained in footnote 1, to the extent possible, the Receiver has included in this Fourteenth Interim Report transactions and events occurring after December 31, 2022, 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.

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).

The Forfeiture Action and the FBI's administrative forfeiture proceedings are complete, and the Receiver has sold all material assets. On October 9, 2020, the Receiver transferred \$3,295,119.94 to the USMS pursuant to the MOU. On May 25, 2021, the Receiver transferred an additional \$2,341,505.18 to the USMS pursuant to the MOU. These amounts are listed on Line 12 of Exhibit A (from inception).

In December 2022, portion of these funds were be remitted (*i.e.*, returned) to the Receiver along with additional money that the DOJ repatriated from the United Kingdom. As reflected on Line 7 of Exhibit A, to date, the Receiver has obtained a total of \$6,560,994.96 from the Department of Justice in connection with civil and criminal asset forfeitures for distribution through the claims process.

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"). The Receiver has now deposited the vast majority of the frozen funds into this account. The remaining amount is almost entirely composed of the money from Belize and, potentially, 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, ATC identified and froze one account in the name of Oasis Global FX, S.A., which contained \$2,005,368.28. During October 2021, the DOJ recovered those funds pursuant to certain international agreements, and the agency now has custody of the repatriated money. As noted above, the Receiver has petitioned the government for remission of those and other funds. In December 2022, a portion of the funds was transferred to the Receiver. The money will be distributed to victim-investors through the claims process.

⁸ The Receiver also opened a checking/operating account for making disbursements.

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. During October 2021, the Receiver recovered a total of \$55,960.78 from the liquidator. Those funds are now within the Receivership Estate and included in Exhibit A.

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). To bring finality to this matter, the Receiver has retained new local counsel in Belize with the Court's approval. See Docs. 478, 488. Although the Financial Services Commission sent Heritage Bank a letter on September 1, 2022, authorizing release of the funds, Heritage Bank continues to raise procedural hurdles to the Receiver's receipt of the funds deposited with the bank. The Receiver is continuing to work with his new

counsel to resolve this issue as soon as possible so that the funds can be distributed through the claims process.

C. Securing Real Property

The Receivership Estate contained numerous parcels of real property, including single-family homes, condominiums, and a waterfront office building. 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).

1. All Receivership Real Estate Has Been Sold

The Receiver has sold all real property in the Receivership Estate. The transactions are explained in prior interim reports and summarized in the following chart. The "Net Recovery" column represents the amounts transferred to the Receivership Estate at closing after satisfying any claims against the properties (like mortgages and taxes) and paying closing costs and commissions.

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 matured on December 1, 2021. On January 19, 2022, the mortgage was satisfied in the amount of \$82,324.03, which is now within the Receivership Estate and included in Exhibit A.

PROPERTY	SALE PRICE	NET RECOVERY
444 Gulf of Mexico Drive Longboat Key, Florida	\$2,100,000	\$1,994,155.06
13318 Lost Key Place Lakewood Ranch, Florida	\$1,100,000	\$1,038,704.75
6922 Lacantera Circle Lakewood Ranch, Florida	\$2,050,000	\$372,823.83
4064 Founders Club Drive Sarasota, Florida	\$1,875,000	\$581,712.41
4058 Founders Club Drive Sarasota, Florida	\$195,000	\$186,252.37
7312 Desert Ridge Glen Lakewood Ranch, Florida	\$846,000	\$774,740.08
16804 Vardon Terrace #307 Lakewood Ranch, Florida	\$198,000	\$187,542.50
16804 Vardon Terrace #108 Lakewood Ranch, Florida	\$212,000.	\$204,312.38
16904 Vardon Terrace #106 Lakewood Ranch, Florida	\$184,000	\$177,104.89
17006 Vardon Terrace #105 Lakewood Ranch, Florida	\$198,000	\$187,813.91
6300 Midnight Pass Rd., No. 1002, Sarasota, Florida	\$913,000	\$863,654.69

2. Defendant Montie's Real Property

Defendant Montie owned real estate in Hauppauge, New York. He expressed a desire to sell the property and identified a potential purchaser. The Receiver commissioned an independent appraisal and confirmed that the proposed sale price of \$505,000 reflected 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. After payment of a mortgage and closing costs, the net proceeds of the sale were \$278,274.46. Those funds are being held in escrow pending the resolution of claims against Montie.

Montie also owns property in Jackson, New Hampshire, which he valued at \$1,412,800, based on "local property assessor figures." A recent estimate from Zillow.com was \$1,645,100, but Realtor.com listed the value as \$2,242,400. As of June 15, 2019, the property carried a mortgage of \$845,747. Finally, Montie owns property in Lake Ariel, Pennsylvania, which he valued at \$926,700, based on "local property assessor figures." A recent estimate from Zillow.com was \$1,988,100, and Realtor.com listed the value as \$1,346,800. As of August 1, 2019, the property carried a mortgage of \$658,254. Montie's currently unsold properties thus carried positive net equity of approximately \$835,499 in 2019. The Receiver is in the process of obtaining more accurate, updated valuations and mortgage balances through settlement and other

negotiations. "Montie is responsible for making mortgage, property tax, and insurance payments and for the general upkeep of these residences." Doc. 177 ¶ 20. The Receiver will pursue these properties and any other disclosed (or undisclosed) assets when the circumstances warrant.

3. Defendant Haas's Real Property

Defendant Haas owns a property in New York, which he estimated to be worth approximately \$502,000. As of August 2021, it had a mortgage in the amount of \$97,000. As such, Haas's property carried positive net equity of approximately \$405,000 but might need certain repairs before any liquidation. "Haas is responsible for making mortgage, property tax, and insurance payments and for the general upkeep of this residence." Doc. 177 ¶ 21. The Receiver will 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. 11 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

¹⁰ During a previous reporting period, the Receiver and defendant Montie coordinated to sell his 1996 Mercedes 500SL for \$10,500. Those funds are being held in escrow along with the proceeds from the sale of his New York property.

¹¹ This does not include certain assets in the possession of defendants Haas and Montie, as disclosed in their financial affidavits.

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**. ¹² He has sold most items as set forth in the exhibit. The Receiver is working with the defendants and their counsel to identify additional property that rightfully belongs to the Receivership Estate.

E. Securing the Receivership Entities' Books and Records

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

¹² 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.

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. None 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: Wayne A. Piper and Flores Piper LLP in Belize (D0c. 488) 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., 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, 2010. Doc. 264. As explained in Section V.2.b. below, the Receiver was pursuing litigation against numerous defendants, but that litigation is now substantially complete, and the Receiver has begun collecting the judgments obtained.

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. On July 13, 2021, the Court also granted the Receiver's motion to approve the engagement of Thomas Bakas as a litigation consultant. See Docs. 412, 415.

In 2022, Jared Perez left GK and is now practicing through his own firm, Jared J. Perez P.A. Because Mr. Perez was the lead counsel and senior attorney on this matter, the Receiver intends to continue to use his services.

V. Pending and Contemplated Litigation

The Consolidated Order requires this Fifteenth 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 Department of Justice instituted administrative and civil forfeiture proceedings against certain assets of defendants in the CFTC Action. These actions are essentially complete. Judgments of forfeiture have been entered against all defendant properties in the civil forfeiture action. See FA Docs. 60, 63, 65, 67. The FBI's administrative forfeiture action against certain personal property is also complete. As of the Ninth Interim Report, the Receiver had sold all material, forfeited real and personal property in the Receivership Estate. As a result of the criminal convictions of defendants Anile and DaCorta, the government obtained more than \$53 million in additional forfeiture orders, but the debts are unlikely to be satisfied because those individuals have few, if any, remaining assets.

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. Anile reported to prison on June 1, 2022, in Rochester, Minnesota. Anile subsequently filed a motion seeking a downward departure (*i.e.*, sentence reduction) due to his cooperation with the government and other relevant factors. On January 24, 2023, the judge presiding over the Anile Criminal Action granted his motion and, in relevant part, reduced his term of imprisonment to "time served" plus 12 months of home confinement and an additional two years of supervised release. *See* ACA Docs. 76, 77.

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 was indicted in a separate but related action. DCA Doc. 1. A copy of the initial indictment was attached as Exhibit A to the Receiver's Third Interim Report, and a copy of the superseding

indictment was attached as Exhibit D to the Receiver's Eighth Interim Report. DaCorta stood trial in April 2022, and after two weeks of testimony and argument, a jury found him guilty on all counts, including mail and wire fraud and money laundering. On October 20, 2022, the Honorable William F. Jung sentenced DaCorta to imprisonment of 276 months (*i.e.*, 23 years) for his role in the Ponzi scheme underlying this enforcement action. Judge Jung also ordered DaCorta to pay restitution in the amount of \$53,270,336.08, jointly and severally with defendant Anile (although the Receiver has already recovered and sold both individuals' material assets). Although DaCorta has been taken into custody and is in prison, this matter is still pending because he is appealing his conviction.

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 obtained pre-suit settlements collectively worth \$246,497.09. 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"). Through the Clawback Action, the Receiver obtained post-suit or post-judgment settlements worth approximately \$1,214,917.09, and default judgments worth approximately \$2,145,880.47. The liability portion of the Clawback Action is complete, but the Receiver continues to register default judgments, seek writs of garnishment, and employ other collection mechanisms, including post-judgment discovery.

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. 23. 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 mediated their dispute on April 30, 2021, but did not reach a resolution. On May 25, 2021, the DOJ moved to stay the litigation to protect its ongoing criminal investigation, including the impending trial of defendant DaCorta. The court granted that motion on May 28, 2021. ML Doc. 62. Because DaCorta's criminal trial concluded in 2022 (excluding the appeal), the Montie Litigation will resume, and the Receiver hopes to resolve it by settlement. Should that not be possible, the Receiver will aggressively pursue this action, as it appears a recovery may be possible. Montie's lawyers recently moved to withdraw from their

representation of him in the underlying enforcement action, and the Receiver understands that the lawyers will also move to withdraw from this ancillary litigation. Unless and until Montie retains new counsel, he is required to represent himself in both cases.

d. The Receiver's Litigation Against ATC Brokers Ltd., Spotex LLC, and Affiliates

As explained in Section IV above, the Court approved the engagement of the Sallah Firm to further investigate and prosecute claims against ATC and its affiliates. The Court also approved the engagement of Thomas Bakas as a litigation consultant. On May 28, 2021, the Receiver filed suit against ATC Brokers Ltd., David Manoukian, and Spotex LLC. The complaint asserts claims for aiding and abetting fraud, aiding and abetting breaches of fiduciary duties, recovery of fraudulent transfers from ATC, gross negligence, and simple negligence. The Receiver is seeking both compensatory and punitive damages. A copy of the complaint was attached as Exhibit D to the Receiver's Ninth Interim Report and is also available on the Receiver's website. A mediation occurred in May 2022, but the parties did not resolve their dispute. The court supervising this action recently granted a motion to dismiss with prejudice filed by the defendants based on jurisdictional and standing issues, but the Receiver believes the judge misapplied relevant Eleventh Circuit precedent. The Receiver has filed a notice of appeal. He and his counsel are

considering the appropriate next steps and balancing any possible recovery against the uncertainty of further litigation. A recent appellate mediation was unsuccessful, and the Receiver's brief is currently due on March 3, 2023.

e. The Receiver's Litigation Against Doug Clark

On July 1, 2022, the Receiver filed a complaint against former Oasis sales agent Doug Clark and his entity, Clark Asset Management Co., alleging fraudulent transfers, unjust enrichment, and aiding and abetting breaches of fiduciary duty and seeking the recovery of \$120,000. See Burton W. Wiand, as Receiver for Oasis International Group, Ltd, et al. v. Clark Asset Management Co. & Douglas Clark, Case No. 8:22-cv-01512 (M.D. Fla.). A copy of the complaint is available on the Receiver's website. The complaint alleges that Clark, a former registered investment advisor who had worked with DaCorta on a previous fraudulent scheme, helped onboard Oasis investors. The defendants failed to respond, and on September 26, 2022, the Clerk of the Court entered defaults against Clark and Clark Asset Management Co. On October 31, 2022, the Receiver filed motions for final default judgments against both defendants. Those motions are still pending.

3. Contemplated Litigation

In addition to clawback claims, the Receiver is considering tort and fraudulent conveyance claims against sales agents and others (like Doug

Clark) where the Receiver believes individuals have liability and an action appears to be of economic benefit to the Receivership.

a. Contemplated Litigation Against Insiders

The Receiver is considering litigation against certain OIG insiders, including principals, 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. DaCorta is subject to a forfeiture judgement as part of his criminal conviction in an amount similar the judgment against Anile. To avoid unnecessary expenditures, the Receiver will rely on that judgement to acquire assets DaCorta might still retain.

The Receiver has entered into tolling agreements with defendants Haas and Duran. This will afford the parties additional time to resolve matters and

to reach agreements, establish liability, and recover assets with minimal need for litigation or at least litigation funded by the Receivership Estate. The Receiver will coordinate with the CFTC to avoid the duplication of efforts with respect to these defendants and possibly others.

VI. Claims Process

As explained more fully in prior interim reports, the Receiver – with this Court's approval – has established a claims process though 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 800 proof of claim forms totaling approximately \$70 million. Anyone who did not submit a proof of claim form by that date is barred from participating in a distribution from the Receivership Estate.

On March 7, 2022, the Court granted the Claims Determination Motion.

Doc. 482. The Court also expressly approved and implemented the Receiver's proposed Objection Procedure (see Doc. 439 at pp. 44-45):

The Objection Procedure as set forth in the Motion for objections to the plan of distribution and the Receiver's claim determinations and claim priorities is logical, fair, and reasonable and is approved, and any and all objections to claim determinations and claim priorities as set forth in the Motion or Exhibits 1 through 5, or to the plan of distribution shall be presented to the Receiver in accordance with the Objection Procedure as set forth in the Motion.

Doc. 482 ¶ 5. The Receiver then posted a copy of the Court's Order on the Receivership website. 13 The Receiver also sent substantively identical information to claimants and other interested parties via email. On March 25, 2022, the Receiver mailed more than 1,000 customized letters to claimants, and if applicable, their attorneys. As such, the Court-ordered deadline for submitting objections to the Receiver's claim determinations was April 14, 2022. See Doc. 439 § VIII.A.(c) at p. 45. Many claim determinations also required the associated claimant(s) to submit additional information to the Receiver – most commonly, a Personal Verification Form but, in some instances, supplemental information like bank statements or affidavits.

On December 9, 2022, the Receiver moved the Court for an order (1) approving a first interim distribution of \$10 million; (2) approving the Receiver's final determinations regarding unperfected or incomplete claims; and (3) overruling limited objections to certain claim determinations. Doc. 695. The first interim distribution of \$10 million will satisfy approximately 17.51% of the "Allowed Amounts" (see Doc. 439 at 10) of claims receiving a distribution at this time (as set forth in Exhibits 1 and 2 of the motion). No party or nonparty timely opposed the motion or any of the matters discussed therein.

¹³ See <u>www.oasisreceivership.com</u>.

On January 27, 2023, the presiding Magistrate Judge issued an order recommending that the Receiver's distribution motion be granted. Doc. 705. Parties have 14 days from the date of the order to file objections with the Court. After that time, the Court will determine whether to adopt the Magistrate Judge's report and recommendation and approve the first interim distribution. The Receiver anticipates making multiple distributions, subject to cost/benefit concerns and the Court's orders.

VII. The Next Ninety Days

The Consolidated Order requires this Fifteenth 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) approximately \$500,000 to repatriate from Belize; (2) additional personal property to liquidate; (3) litigation to bring and/or prosecute; and (4) a claims process to complete and funds to distribute.

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

(astephens@guerraking.com) or call Amanda Stephens at 813-347-5100. The

Receiver can be contacted directly by email (Burt@BurtonWWiandPA.com) or

by phone at 727-460-4679.

Dated this 2nd day of February 2023.

Respectfully submitted,

s/ Burton W. Wiand

Burton W. Wiand, Receiver

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 2, 2023, 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

<u>Jared.Perez@JaredPerezLaw.com</u>

Jared J. Perez P.A.

and

Lawrence J. Dougherty, FBN 0068637 ldougherty@guerraking.com cgibson@guerraking.com GUERRA KING P.A. 1408 N. West Shore Blvd., Suite 1010 Tampa, FL 33607 T: (813) 347-5100 F: (813) 347-5198

Attorneys for Receiver, Burton W. Wiand

EXHIBIT 3

Guerra King P.A.

1408 N. Westshore Blvd., Suite 1010 Tampa, FL 33607 Telephone: 813-347-5100

Facsimile: 813-347-5198 Federal Tax ID # 27-0937962

Burton W. Wiand February 14, 2023

Attention:Burton W. Wiand, as ReceiverClient:025305Burton W. Wiand PAMatter:001921114 Turner StreetInvoice #:20809

Page:

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Clearwater, FL 33756

RE: CFTC Oasis Receivership - Receiver Travel is half rate outside of 20 miles.

For Professional Services Rendered Through December 31, 2022

Date ASSET	TKPR Asset	Description of Services Analysis and Recovery	Hours	Amount
10/1/2022	BWW	Review Court's decision dismissing case against ATC and Spotex (.5).	0.5	\$180.00
10/4/2022	BWW	Telephone conference with J. Sallah and J. Katz regarding ATC/Spotex decision, progress of case, and possible appeal (.3).	0.3	\$108.00
10/6/2022	BWW	Meet with J. Perez regarding representation of Receivership (.2).	0.2	\$72.00
10/19/2022	2 BWW	Telephone conferences and emails with R. Bedke of DOJ and A. Auxter of CFTC regarding M. DaCorta's upcoming sentencing hearing (1.5).	1.5	\$540.00
10/20/2022	? BWW	Prepare for and testify at M. DaCorta's sentencing hearing (3.5); telephone conferences and emails with R. Bedke with DOJ and A. Auxter with CFTC regarding same (1.5); confer with L. Dougherty regarding same (.1).	5.1	\$1,836.00
10/24/2022	BWW	Arrange for victim list to be provided to DOJ (.2).	0.2	\$72.00
10/25/2022	2 BWW	Work with J. Sallah on ATC appeal issue (.7); telephone conference with L. Dougherty to schedule case status meeting (.1).	0.8	\$288.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
10/26/202	2 BWW	Review documents regarding ATC appeal issue (.1); prepare emails to P. Rengstl and J. Katz regarding same (.1); telephone conference with NAFER member N. Reid regarding ATC decision (.3); conference call with L. Dougherty, M. Lockwood and J. Perez regarding progress of matter (.4).	0.9	\$324.00
10/27/202	2 BWW	Review pleadings for default judgment in Wiand v. Clark Asset Management and Douglas Clark matter (.5); confer with L. Dougherty regarding same (.1); telephone conference with B. McConnell regarding same (.2).	0.8	\$288.00
10/28/202	2 BWW	Work on motion for default judgment against Clark defendants (.2); telephone conference with L. Dougherty regarding same (.1); communicate with L. Dougherty regarding same (.2); attend to correspondence relating to Belize bank recovery (.2).	0.7	\$252.00
10/31/202	2 BWW	Work on motion for default judgment against Clark defendants (.5); review, revise and execute affidavit (.2); telephone conference with L. Dougherty regarding same (.1); telephone conference with B. McConnell (.2); review prior pleadings (.1).	1.1	\$396.00
11/9/2022	BWW	Examine information from Maples Group regarding OIG corporate matters (1.5); review and revise J. Sallah's draft motion to approve pursuing appeal in ATC/Spotex matter (.8).	2.3	\$828.00
11/10/202	2 BWW	Confer with J. Perez regarding motion for appeal in ATC/Spotex matter (.2); telephone conference with J. Sallah regarding same (.2).	0.4	\$144.00
11/16/202	2 BWW	Telephone conference with A. Auxter of CFTC regarding various issues including appeal (.8).	8.0	\$288.00
11/21/202	2 BWW	Work on motion to approve first distribution, resolution of objections, and additional claim determinations (1.0); communicate with J. Perez regarding same (.5).	0.5	\$180.00
11/22/202	2 BWW	Telephone conference with J. Sallah and J. Perez regarding appeal of ATC/Spotex case (.5).	0.5	\$180.00
12/1/2022	BWW	Work on corporate documents for Oasis Global FX SA (.8); telephone conference with L. Dougherty regarding same (.2).	1.0	\$360.00
12/13/202	2 BWW	Exchange emails with W. Piper regarding Belize refund issues (.2); review issues relating to trial extension (.1).	0.3	\$108.00
12/14/202	2 BWW	Telephone conference with L. Dougherty regarding A. Auxter's inquiry regarding investigation (.1).	0.1	\$36.00
12/15/202	2 BWW	Attend to damages request from CFTC (.5); communicate with L. Dougherty regarding same (.2).	0.7	\$252.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset A	Analysis and Recovery		
12/16/2022	2 BWW	Participate in portion of conference call with L. Dougherty and A. Auxter (.1).	0.1	\$36.00
		Total: Asset Analysis and Recovery	18.80	\$6,768.00
BUSIN	Busine	ess Operations		
11/9/2022	BWW	Review and approve invoices (1.0); telephone conference with L. Dougherty regarding third-quarter invoices (.1); prepare email to L. Dougherty and M. Lockwood regarding approval of and additional edits to fees motion (.1).	1.2	\$432.00
12/2/2022	BWW	Work on bank accounts and make payments on approved invoices (2.0).	2.0	\$720.00
12/5/2022	BWW	Work on making additional payments (.5); work on completing revised corporate documents for Oasis Global FX (.5).	1.0	\$360.00
12/7/2022	BWW	Retrieve utility bill for L. Dougherty to submit with registered agent documents for Oasis Global FX S.A. (.2).	0.2	\$72.00
12/27/2022	2 BWW	Work on setting up eServer for Oasis bank accounts (.2).	0.2	\$72.00
		Total: Business Operations	4.60	\$1,656.00
CASE	Case A	Administration		
10/20/2022	2 BWW	Review and revise release for Receivership website regarding M. DaCorta's sentencing (.4); confer with L. Dougherty regarding same (.1).	0.5	\$180.00
10/21/2022	2 BWW	Review DOJ's release regarding M. DaCorta's conviction (.2); further revise release for Receivership website (.3).	0.5	\$180.00
10/31/2022	2 BWW	Review draft of 14th interim report (1.0).	1.0	\$360.00
11/1/2022	BWW	Complete review of and comments on draft interim report (.3).	0.3	\$108.00
		Total: Case Administration	2.30	\$828.00
CLAIM	Claims	Administration and Objections		
10/2/2022	BWW	Telephone conference with M. Lockwood regarding resolving numerous claims issues (.4).	0.4	\$144.00
10/20/2022	2 BWW	Review status of remission of DOJ funds (.4); review email to Assistant US Attorney A. Cream regarding same (.1).	0.5	\$180.00
10/24/2022	2 BWW	Review spreadsheets in preparation for telephone conference with M. Lockwood (.3); telephone call with M. Lockwood regarding status of claims motion and distributions (.2).	0.5	\$180.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
10/25/2022	2 BWW	Work on remission transfer (.1); telephone conference with R. Bedke regarding same (.1).	0.2	\$72.00
10/27/2022	2 BWW	Telephone conference with M. Lockwood regarding claims determinations (.6).	0.6	\$216.00
10/31/2022	2 BWW	Attend to remission of funds from DOJ (.3); research history of remission request (.3); communicate with W. Newbold of US Marshals Service (.2); prepare email to A. Cream regarding same (.2); prepare emails to J. Perez and L. Dougherty regarding same (.2).	1.2	\$432.00
11/1/2022	BWW	Exchange emails with M. Lockwood regarding investor L.J. and responding to same (.1).	0.1	\$36.00
11/1/2022	BWW	Work with M. Lockwood regarding provision of information to DOJ to support remission (.2); telephone conference with assistant US attorney S. Nebesky regarding same (.1); prepare response to assistant US attorney A. Cream regarding claimants list from Receivership (.6); prepare email to A. Cream regarding same (.1); prepare emails to M. Lockwood regarding same (.1); communicate with M. Lockwood regarding same (.2).	1.3	\$468.00
11/2/2022	BWW	Prepare email to M. Lockwood and J. Perez regarding claims motion (.1).	0.1	\$36.00
11/9/2022	BWW	Work on motion for determination of claims and distribution (.5).	0.5	\$180.00
11/10/2022	2 BWW	Work on motion for claims determinations and distribution (.7); telephone conference with J. Perez regarding same (.2); prepare email to J. Perez regarding same (.1); work on completion of form for remission (1.0).	2.0	\$720.00
11/11/2022	2 BWW	Continue working on documentation for remission of funds from DOJ (1.0).	1.0	\$360.00
11/14/2022	2 BWW	Work on remission of funds from DOJ (.3); telephone calls with P. Truong with U.S. Marshals office (.2); telephone calls to J. Lee of DOJ (.2); review remissions documentation (.4); exchange emails with E. Tate regarding same (.1).	1.2	\$432.00
11/15/2022	2 BWW	Work on issues regarding DOJ remission of funds (.3); exchange emails with J. Lee (.1); telephone conference with US Marshals Service regarding same (.1); telephone conference with M. Lockwood regarding claims motion (.1).	0.6	\$216.00
11/16/2022	2 BWW	Work on motion to approve first distribution, resolution of objections, and additional claim determinations (1.0); communicate with J. Perez regarding same (.5).	1.5	\$540.00
11/21/2022	2 BWW	Work on remission of funds from DOJ (.3).	0.3	\$108.00
11/25/2022	2 BWW	Exchange emails with claimant R.R. (.1).	0.1	\$36.00

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	s Administration and Objections		
12/1/2022	BWW	Telephone conference with L. Dougherty regarding distribution (.1).	0.1	\$36.00
12/4/2022	BWW	Review distribution letters (.3).	0.3	\$108.00
12/5/2022	BWW	Attend to agenda for distribution prior to meeting with J. Perez and M. Lockwood (.7); attend Zoom conference with M. Lockwood and J. Perez regarding completion of distribution motion and various claim decisions (.8).	1.5	\$540.00
12/7/2022	BWW	Telephone conference with investor regarding claims process (.4); review and approve distribution motion (1.0); communicate with W. Price regarding IRS issue concerning distributions of qualified money (.2); attend to remission payment (.2); attend to matters relating to distribution (.1); email to J. Perez regarding same (.1).	2.0	\$720.00
12/9/2022	BWW	Exchange emails with M. Lockwood regarding approval of revised cover letters for distribution (.1).	0.1	\$36.00
12/13/2022	2 BWW	Review procedures for initial distribution (.2).	0.2	\$72.00
12/14/2022	2 BWW	Review final distribution documents from J. Perez (.3).	0.3	\$108.00
12/19/2022	2 BWW	Exchange emails with A. Stephens regarding call from investor (.1).	0.1	\$36.00
		Total: Claims Administration and Obj	16.70	\$6,012.00
		Total Professional Services	42.4	\$15,264.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
E123 Web-Related E	xpenses	
10/1/2022	GoDaddy - Web Hosting Plus Renewal (1 month) oasisgloballimited.com	\$29.99
10/2/2022	Amazon Web Services - Web Services	\$254.34
11/1/2022	GoDaddy - Web Hosting Plus Renewal (1 month) oasisgloballimited.com	\$29.99
11/2/2022	Amazon Web Services - Web Services	\$257.59
12/1/2022	GoDaddy - Web Hosting Plus Renewal (1 month) oasisgloballimited.com	\$29.99
12/2/2022	Amazon Web Services - Web Services	\$254.34
12/15/2022	GoDaddy - oigconsulting.com - domain renewal, full domain privacy and protection (1 year)	\$30.16

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DISBURSEMENTS

Date	Description of Disbursements	
E124 Other		
10/20/2022	Xpress Storage - storage unit rental and insurance	\$541.72
11/20/2022	Xpress Storage - storage unit rental and insurance	\$541.72
12/20/2022	Xpress Storage - storage unit rental and insurance	\$541.72
	Total Disbursements	\$2,511.56
	Total Services	\$15,264.00
	Total Disbursements	\$2,511.56
	Total Current Charges	\$17,775.56
	Previous Balance	\$73,302.22
	PAY THIS AMOUNT	\$91,077.78

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Client: 025305 Matter: 001921 20809 Invoice #:

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TASK RECAP

Services Disbursements

Project No.	Hours	Amount	Project No.	Amount
ASSET - ASSET	18.80	\$6,768.00	Web-Related Expenses	\$886.40
BUSIN - BUSIN	4.60	\$1,656.00	Other	\$1,625.16
CASE - CASE	2.30	\$828.00		\$0.00
CLAIM - CLAIM	16.70	\$6,012.00		\$0.00
	42.40	\$15,264.00		\$2,511.56

BREAKDOWN BY PERSON

Person		Project No.	Hours	Amount
BWW	Burton W. Wiand	ASSET - ASSET	18.80	\$6,768.00
BWW	Burton W. Wiand	BUSIN - BUSIN	4.60	\$1,656.00
BWW	Burton W. Wiand	CASE - CASE	2.30	\$828.00
BWW	Burton W. Wiand	CLAIM - CLAIM	16.70	\$6,012.00
			42.40	\$15,264.00

EXHIBIT 4

Guerra King P.A.

1408 N. Westshore Blvd., Suite 1010 Tampa, FL 33607 Telephone: 813-347-5100

Facsimile: 813-347-5198 Federal Tax ID # 27-0937962

Burton W. Wiand February 14, 2023

Attention:Burton W. Wiand, as ReceiverClient:025305Burton W. Wiand PAMatter:002096114 Turner StreetInvoice #:20813

Clearwater, FL 33756

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RE: Oasis Receiver – Recovery from Investors

For Professional Services Rendered Through December 31, 2022

Date ASSET	TKPR Asset A	Description of Services Analysis and Recovery	Hours	Amount
10/5/2022	BWW	Confer with attorney C. Iurillo regarding R. Garbellano's bankruptcy matters (2); gather R. Garbellano discovery materials (.3).	0.5	\$180.00
10/19/2022	BWW	Prepare email to C. Iurillo regarding case against Kerrigan defendants (.1).	0.1	\$36.00
10/24/2022	BWW	Review various orders and filings regarding R. Garbellano and K. Kerrigan's bankruptcy dismissals (.5).	0.5	\$180.00
		Total: Asset Analysis and Recovery	1.10	\$396.00
		Total Professional Services	1.1	\$396.00
		Total Services	\$396.0	
		Total Current Charges		\$396.00
		Previous Balance		\$7,236.00
		PAY THIS AMOUNT		\$7,632.00

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Client: 025305 Matter: 002096 20813 Invoice #:

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TASK RECAP

Services Disbursements

Project No.	<u>Hours</u>	Amount	Project No.	Amount
ASSET - ASSET	1.10	\$396.00		\$0.00
	1.10	\$396.00		\$0.00

BREAKDOWN BY PERSON

Person		Project No.	Hours	Amount
BWW	Burton W. Wiand	ASSET - ASSET	1.10	\$396.00
			1.10	\$396.00

EXHIBIT 5

Guerra King P.A. 1408 N. Westshore Blvd., Suite 1010

1408 N. Westshore Blvd., Suite 1010 Tampa, FL 33607 Telephone: 813-347-5100

Facsimile: 813-347-5198 Federal Tax ID # 27-0937962

Burton W. Wiand February 14, 2023

Attention:Burton W. Wiand, as ReceiverClient:025305Burton W. Wiand PAMatter:002097114 Turner StreetInvoice #:20814

Clearwater, FL 33756

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RE: Oasis Receiver - Raymond Montie, III.

For Professional Services Rendered Through December 31, 2022

Date ASSET	TKPR	Description of Services Analysis and Recovery	Hours	Amount
AGGET	ASSEL	Analysis and Necovery		
10/28/2022	BWW	Communicate with L. Dougherty regarding status of stay (.2).	0.2	\$72.00
11/10/2022	BWW	Telephone conference with R. Montie regarding case (.4); telephone conference with J. Sallah regarding telephone conference with R. Montie (.2).	0.6	\$216.00
11/11/2022	BWW	Telephone conference with R. Montie regarding letter from his lawyer regarding communicating directly with Receiver (.2).	0.2	\$72.00
12/13/2022	BWW	Telephone conference with R. Montie (.1); telephone conference with L. Dougherty regarding same and status (.2); review R. Montie's financial forms (.1).	0.4	\$144.00
		Total: Asset Analysis and Recovery	1.40	\$504.00
		Total Professional Service	1.4	\$504.00
		Total Services	\$504.0	0
		Total Current Charges		\$504.00
		Previous Balance		\$540.00
		PAY THIS AMOUNT		\$1,044.00

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TASK RECAP

Services Disbursements

Project No.	<u>Hours</u>	Amount	Project No.	Amount
ASSET - ASSET	1.40	\$504.00		\$0.00
	1.40	\$504.00		\$0.00

BREAKDOWN BY PERSON

Person		Project No.	Hours	Amount
BWW	Burton W. Wiand	ASSET - ASSET	1.40	\$504.00
			1.40	\$504.00

EXHIBIT 6

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

Receivership				
Expense Type Am				
Photocopies (3,877 pages)	\$	581.55		
Telephone	\$	7.89		
Postage	\$	173.61		
Online Research	\$	180.43		
Subpoena Fees	\$	-		
Web-Related Expenses	\$	225.00		
TOTAL	<u>,</u>	4 460 40		

TOTAL \$ 1,168.48

EXHIBIT 7



5505 W. GRAY STREET I TAMPA, FL 33609 I PHONE: 813.347.5100

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.

1408 N. Westshore Blvd., Suite 1010 Tampa, FL 33607 Telephone: 813-347-5100

Facsimile: 813-347-5198
Federal Tax ID # 27-0937962

Burton W. Wiand February 14, 2023

Attention:Burton W. Wiand, as ReceiverClient:025305Burton W. Wiand PAMatter:001922114 Turner StreetInvoice #:20827

Clearwater, FL 33756

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RE: CFTC Oasis Receivership - Legal Team Travel is half rate outside of 20 miles.

For Professional Services Rendered Through December 31, 2022

Date ASDIS	TKPR Asset [Description of Services Disposition	Hours	Amount
12/19/2022	LD	Review statement for escrow account for proceeds of R. Montie's residence (.1).	0.1	\$32.00
		Total: Asset Disposition	0.10	\$32.00
ASSET	Asset A	Analysis and Recovery		
10/2/2022	LD	Review and reply to email from W. Piper regarding latest exchanges with Heritage Bank and G. Godfrey (.1).	0.1	\$32.00
10/4/2022	JR	Review E-Hounds database for sales agent related information per request of Receiver (.4).	0.4	\$54.00
10/6/2022	JR	Prepare memorandum regarding status (.5).	0.5	\$67.50
10/10/2022	LD	Review and respond to email from W. Piper regarding correspondence with Heritage Bank (.1).	0.1	\$32.00
10/17/2022	LD	Review M. DaCorta motion for downward variance (.1).	0.1	\$32.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
10/19/2022	2 LD	Meet with C. Innocent regarding drafting of applications for default judgments against D. Clark and Clark Asset Management Co. (.1); review government's unopposed motion for victim-investors to appear by telephone at sentencing of M. DaCorta (.1); review and respond to email from W. Piper regarding status of Belize transfer (.1); review documents provided by W. Piper relating to same (.1); email M. Lockwood regarding sentencing of M. DaCorta (.2).	0.6	\$192.00
10/19/2022	2 CI	Confer with L. Dougherty regarding motion for default judgment (.1).	0.1	\$24.00
10/19/2022	2 MML	Revise investor analysis and claims analysis for Receiver for testimony at M. DaCorta's sentencing (1.0); prepare correspondence to Receiver regarding same (.2); exchange correspondence with L. Dougherty regarding additional information requested by Receiver (.1).	1.3	\$312.00
10/20/2022	2 LD	Attend sentencing of M. DaCorta (1.4); confer with Receiver regarding sentence (.1); review case dockets for M. DaCorta and J. Anile (.3); review judgment of sentence, sentencing minutes, and order of forfeiture (.2).	2.0	\$640.00
10/21/2022	2 LD	Review M. DaCorta notice of appeal (.1).	0.1	\$32.00
10/21/2022	2 CI	Draft motion for default judgment against Clark Asset Management Co. and D. Clark (2.0).	2.0	\$480.00
10/24/2022	2 LD	Meet with C. Innocent regarding drafting of motions for final judgments against Clark defendants (.1); review correpondence with Belize Financial Services Commission regarding Heritage Bank deposit (.3); review Belize evidence code (.2); review and respond to message from W. Piper forwarding letter from counsel for Heritage Bank objecting to release of deposit (.3).	0.9	\$288.00
10/24/2022	2 CI	Revise motion for default judgment (1.0); revise Receiver's affidavit (1.0); calculate pre-judgment interest (1.2).	3.2	\$768.00
10/25/2022	2 LD	Call Receiver to set up meeting regarding case status and next tasks (.1); update J. Perez regarding status of Belize negotiations (.1); review case notes, case status, and pending tasks (.3); update J. Perez and M. Lockwood regarding meeting with Receiver (.1).	0.6	\$192.00

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Date 1	TKPR	Description of Services	Hours	Amount
ASSET	Asset A	Analysis and Recovery		
10/26/2022 L	LD	Meet with C. Innocent regarding motion for default judgments against Clark defendants (.1); review same and spreadsheet of prejudgment interest (.2); call with Receiver, M. Lockwood, and J. Perez regarding Clark motion, Belize status, status of Montie counsel, and other pending case tasks (.4); review notice of appeal of ATC ruling (.1); review docket and filings in case against Clark and Clark Asset Management Co. (.3); revise motion seeking final judgment against same (.6); revise Receiver's affidavit in support of same (.3); direct C. Innocent regarding next steps regarding same (.3).	2.3	\$736.00
10/26/2022 N	MML	Call with Receiver, L. Dougherty, and J. Perez regarding status (.4).	0.4	\$96.00
10/27/2022 L	LD	Review email from W. Piper and draft letter to Heritage Bank regarding return of license deposit (.2); revise draft letter (.2); confer with Receiver and W. Piper regarding same (.1); review emails and research from C. Innocent regarding motion for default judgments against D. Clark and Clark Asset Management Co. and supporting affidavit (.3); revise same (.2); confer separately with Receiver and C. Innocent regarding same (.2).	1.2	\$384.00
10/27/2022 (CI	Revise motion for default judgment (2.0); revise supporting affidavit (.2).	2.2	\$528.00
10/28/2022 L	LD	Telephone call with Receiver regarding default judgments against D. Clark and Clark Asset Management Co. (.1); email C. Innocent regarding same (.1); meet with C. Innocent regarding edits to motion and affidavit (.2); review and respond to email from Receiver regarding same (.1); review and respond to email from Receiver regarding Belize (.1); review and respond to email from W. Piper regarding same (.3); review and revise draft affidavit and motion for default judgments against D. Clark and Clark Asset Management Co. per edits from C. Innocent, (.4); confer with Receiver regarding same (.1).	1.4	\$448.00
10/28/2022 (CI	Revise motion for default (1.0); revise affidavit in support (.3); revise spreadsheet of interest (.3).	1.6	\$384.00
10/29/2022 L	LD	Review and respond to email from C. Innocent regarding affidavits required for motion to dismiss on basis of lack of personal jurisdiction (.2).	0.2	\$64.00
10/31/2022 L	LD	Review and respond to email from E. Tate regarding affidavit of Receiver for Clark default judgment motion (.1); review emails regarding same (.2); review exemplar pleadings for same (.3); telephone conference with Receiver regarding same (.1); telephone conference with C. Innocent regarding same (.1); revise same and direct filing and service of same (2.7).	3.5	\$1,120.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset A	Analysis and Recovery		
10/31/2022	2 CI	Amend Receiver's affidavit in support of default judgment against D. Clark and Clark Asset Management Co. (1.8).	1.8	\$432.00
11/9/2022	LD	Review status of service of motions for default judgments against D. Clark and Clark Asset Management Co. (.2); direct C. Gibson in follow-up on service and call with D. Clark (.2); review next steps for same (.1); telephone call with D. Clark regarding same (.2).	0.7	\$224.00
11/11/2022	2 LD	Review and respond to email from W. Piper regarding his response letter to counsel for Heritage Bank (.1).	0.1	\$32.00
11/13/2022	2 LD	Review email response from W. Piper (.1).	0.1	\$32.00
11/14/2022	2 LD	Review and respond to email from J. Haas regarding financial disclosures (.1).	0.1	\$32.00
11/21/2022	2 LD	Review email from D. Clark and direct C. Gibson to provide response materials (.1); draft response to same after reviewing case filings and previous correspondence with D. Clark (.4).	0.5	\$160.00
11/28/2022	2 LD	Update E. Tate and C. Gibson regarding ServisFirst escrow account with proceeds from R. Montie's house (.1); review correspondence from W. Piper regarding documentation requirements for new registered agent for Oasis Global FX, S.A. (.1); research past Belize filings for same (.5); update Receiver regarding same (.1).	0.8	\$256.00
11/29/2022	2 LD	Respond to J. Perez's email regarding Local Rule 3.01(g) conference (.1).	0.1	\$32.00
12/1/2022	LD	Review documentation and correspondence from W. Piper in preparation for call with Receiver (.3); telephone call with Receiver regarding documentation requested by new Belize registered agent for Oasis Global FX, S.A. (.2); review corporate documents provided by former registered agent (.2); revise accounting form (.1); direct E. Tate regarding revisions to documents (.2); email W. Piper regarding documents (.1).	1.1	\$352.00
12/5/2022	LD	Review execution of M. DaCorta sentence (.1).	0.1	\$32.00
12/6/2022	LD	Review revised Belize documents executed by Receiver (.1); review email correspondence with Receiver, E. Tate, and W. Piper regarding records requested by new registered agent for Belize trading entity Oasis Global FX, S.A. (.3); email Receiver and E. Tate regarding same (.1).	0.5	\$160.00
12/7/2022	LD	Review letter from counsel for Heritage Bank regarding conditions to withdraw trading deposit for Oasis Global FX, S.A. (.1); review final set of Know-Your-Customer documents for new registered agent including utility bill forwarded by Receiver (.2); forward same to W. Piper (.1).	0.4	\$128.00

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SERVICES

Date TKPR	Description of Services	Hours	Amount
ASSET Asse	et Analysis and Recovery		
12/12/2022 LD	Review email from A. Auxter enclosing CFTC draft motion to continue trial (.1); review Sunbiz notice regarding 6300 Midnight Pass Road No. 1002, LLC and confer with J. Perez regarding same (.1).	0.2	\$64.00
12/13/2022 LD	Review and respond to email from W. Piper regarding registered agent documents for Oasis Global FX, S.A. (.1); review notes on Belize transfer of funds and next steps (.2).	0.3	\$96.00
12/14/2022 LD	Review and respond to email from A. Auxter of CFTC regarding investigation (.1); telephone call with Receiver regarding same (.1); review list of next tasks including claims against insiders (.5).	0.7	\$224.00
12/15/2022 LD	Exchange emails with Receiver regarding requests from CFTC (.1); confer with CFTC regarding same (.1); review update from J. Perez regarding pending appeal in ATC case (.1).	0.3	\$96.00
12/16/2022 LD	Telephone conference with A. Auxter of CFTC and Receiver (.3).	0.3	\$96.00
12/19/2022 LD	Review endorsed order denying motion to continue trial date of CFTC action (.1); review final motion for approval of continued prosecution of appeal of dismissal of ATC action (.2).	0.3	\$96.00
12/21/2022 LD	Review motion for Receiver to appear telephonically at hearing tomorrow on motion to dismiss CFTC action and order denying same (.1); email Receiver and J. Perez regarding same (.1).	0.2	\$64.00
12/22/2022 LD	Review minutes of hearing on motions to dismiss and to continue prosecution of appeal (.1); review and respond to email from W. Piper regarding corporate resolutions effecting transfer of Belize funds (.1).	0.2	\$64.00
12/26/2022 LD	Review resolutions of directors and shareholders executed by Receiver for transfer of Belize funds (.1).	0.1	\$32.00
12/28/2022 LD	Review answer of M. DaCorta (.2); email Receiver regarding same (.1).	0.3	\$96.00
12/31/2022 LD	Review email of monthly financial data from J. Haas and respond to same (.1).	0.1	\$32.00
	Total: Asset Analysis and Recovery	34.10	\$9,737.50

BUSIN Business Operations

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Date	TKPR	Description of Services	Hours	Amount
BUSIN	Busin	ess Operations		
10/3/2022	JR	Review online accounts for balances and recent transactions (.2); update account ledger (.2); prepare check for deposit and memorandum to PDR regarding same (.2); retrieve and review September 2022 bank statements (.2); communicate with PDR regarding same (.1); review GoDaddy web hosting renewal notification related to oasisgloballimited.com (.1); communicate with Receiver, E. Tate and E-Hounds regarding same (.1); review correspondence from Amazon Web Services with billing statement (.1); communicate with Receiver, E. Tate and E-Hounds regarding same (.1); communicate with ServisFirst Bank regarding September 2022 escrow account statement (.1); communicate with Receiver regarding status and closing (.2).	1.6	\$216.00
10/4/2022	JR	Review correspondence from PDR with bank balances (.1).	0.1	\$13.50
		Total: Business Operations	1.70	\$229.50
CASE	Case A	Administration		
10/20/2022	2 LD	Draft and revise summary of sentence and restitution for Receivership website (1.2); confer with Receiver regarding summary and next steps (.1).	1.3	\$416.00
10/20/2022	2 MML	Review draft release regarding M. DaCorta sentencing (.1); exchange correspondence regarding same (.1).	0.2	\$48.00
10/21/2022	2 LD	Confer with J. Perez regarding next interim report (.1); revise summary of sentencing (.3); confer with team regarding posting same on Receivership website (.1).	0.5	\$160.00
10/21/2022	2 AS	Review announcement regarding M. DaCorta sentencing and forward to R. During for website updates. (.2).	0.2	\$27.00
10/23/2022	2 LD	Review Receivership website posting regarding sentencing of M. DaCorta (.1).	0.1	\$32.00
10/24/2022	2 LD	Review R. Montie financial disclosure and property records for interim report (.4); review Belize trading deposit for interim report (.2); review case documents and case dockets for interim report (.3); make revisions to interim report (.3).	1.2	\$384.00
10/31/2022	2 MML	Review draft interim report's claims section (.1); communicate with J. Perez regarding same (.1); provide updates for claims numbers in the interim report (.2); communicate with M. Gura regarding claims numbers for fund accounting report (.2); review correspondence regarding same (.1).	0.7	\$168.00
11/1/2022	LD	Review final interim report and exhibits (.3).	0.3	\$96.00

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Date	TKPR	Description of Services	Hours	Amount
CASE	Case A	dministration		
11/1/2022	AS	Exchange emails with J. Perez and M. Lockwood regarding Receiver's Interim Report (.2).	0.2	\$27.00
11/3/2022	MML	Review communications with R. During regarding website update (.1).	0.1	\$24.00
11/7/2022	AS	Review Receiver's Fourteenth Interim Report (.5).	0.5	\$67.50
11/7/2022	MML	Exchange correspondence with A. Stephens regarding posting interim report to website (.1).	0.1	\$24.00
12/9/2022	AS	Review motion for distribution and forward to R. During with instructions for website announcement (.5).	0.5	\$67.50
12/13/2022	AS	Exchange emails with R. During and M. Lockwood regarding posting distribution motion and announcement on website (.8).	0.8	\$108.00
12/14/2022	AS	Review and revise website blurb and provide same to R. During for website updates (.3).	0.3	\$40.50
12/14/2022	MML	Review correspondence regarding website updates (.1).	0.1	\$24.00
12/19/2022	AS	Review court filings and forward to R. During for website updates (.3).	0.3	\$40.50
		Total: Case Administration	7.40	\$1,754.00
CLAIM	Claims	Administration and Objections		
10/1/2022	LD	Review research on late-filed claims (.3); review update from M. Lockwood regarding objections (.2); review and respond to email from T.D. regarding declaration (.1); confer with Receiver and team regarding motion on objections and initial distribution (.1).	0.7	\$224.00
10/1/2022	MML	Review correspondence history for claim 759 (.1); prepare correspondence to claimant for same (.1); review correspondence history for claim 782-V and prepare correspondence to claimant for same (.1); update summary of objections (.1); prepare correspondence to A. Stephens and K. Paulson regarding outstanding tasks for claims in preparation for distribution motion (.1).	0.5	\$120.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
10/2/2022	MML	Call with Receiver regarding resolution of objections and distribution plan (.4); revise summary of objections (.2); prepare correspondence to Receiver and J. Perez regarding same and proposed determinations regarding objections (.2); exchange correspondence with L.D. regarding revised determination (.2); prepare correspondence to E.F. regarding revised determination (.1); prepare correspondence to J.P. regarding Receiver's determination on objections (.1); revise master claims spreadsheet for revised determinations in preparation for motion to distribute (1.0); prepare correspondence to M. Gura regarding preparation of exhibits (.1).	2.3	\$552.00
10/3/2022	AS	Exchange emails with M. Lockwood regarding investor inquiries and address changes (.2).	0.2	\$27.00
10/3/2022	MML	Work on exhibits for distribution (1.3); review correspondence from L.Z. (.1); exchange correspondence with K. Paulson regarding assistance with outstanding claims matters (.1).	1.5	\$360.00
10/4/2022	AS	Exchange emails with M. Lockwood regarding outstanding investor tasks (.3); prepare emails to three investors regarding same (.6); review investor files and previous email exchanges (.6); telephone calls with two investors (.3); exchange emails with K. Paulson regarding B.R. (.2).	2.0	\$270.00
10/4/2022	KAP	Review email from A. Stephens regarding unanswered question in R.R.'s claim form and attached claim form (.1); prepare email to A. Stephens with instructions for obtaining answer to same (.1).	0.2	\$27.00
10/4/2022	MML	Communicate with A. Stephens regarding resolving outstanding claims questions (.1); review correspondence between A. Stephens and D.A. and B.R. (.1); review new master claims spreadsheet for distribution (.1); communicate with M. Gura regarding same (.1); review documents from J.B. and communicate with A. Stephens regarding same (.1); review correspondence from A. Stephens to M.S. and communicate with A. Stephens regarding same (.1).	0.6	\$144.00
10/5/2022	MML	Exchange correspondence with D.A. (.1); update distribution spreadsheet for same (.1); review correspondence from B.R. (.1); update distribution spreadsheet for same (.1); exchange correspondence with J. Perez regarding objections (.1); communicate with J. Perez regarding claims motion (.2).	0.7	\$168.00
10/6/2022	AS	Telephone calls with two investors regarding case updates (.5).	0.5	\$67.50
10/7/2022	AS	Telephone calls with two investors regarding case updates (.4).	0.4	\$54.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
10/9/2022	MML	Prepare correspondence to G.Z. regarding proof of investment (.1); review correspondence from A.J. and update master spreadsheet regarding same (.1); review correspondence from N.G. and update master spreadsheet for same (.1); exchange correspondence with J.P. (.1); update summary of remaining outstanding issues and review documents for same (.2); prepare correspondence to A. Stephens regarding additional follow-up (.1); exchange correspondence with E.F. regarding objection (.1).	0.8	\$192.00
10/10/2022	2 MML	Telephone call with E.F. regarding objection (.1); exchange correspondence with E.F. regarding D.F. (.1); exchange correspondence with J.B. (.1); begin preparing motion to approve first interim distribution and additional determinations of claims (1.3); conduct research for same (.5).	2.1	\$504.00
10/11/2022	2 LD	Take call from W.O. regarding status (.1).	0.1	\$32.00
10/11/2022	2 MML	Exchange correspondence with K.P. regarding objection (.1).	0.1	\$24.00
10/12/2022	2 MML	Continue drafting motion to approve additional determinations of claims, first interim distribution, and resolution of objections (3.5); review documents for same (.5).	4.0	\$960.00
10/13/2022	2 AS	Exchange emails with M. Lockwood regarding outstanding investor issues (.3); telephone calls with two investors regarding case updates (.2); exchange emails with two investors regarding same (.2); exchange emails with M. Gura regarding investor calls (.1).	0.8	\$108.00
10/13/2022	2 MML	Continue work on claims motion (2.0); prepare correspondence to J. Perez regarding same (.1); prepare correspondence to J.B. (.1); exchange correspondence with A. Stephens regarding claimant inquiries (.1).	2.3	\$552.00
10/14/2022	2 AS	Exchange emails with two investors regarding case updates (.2); telephone calls with two investors regarding same (.3).	0.5	\$67.50
10/14/2022	2 MML	Exchange correspondence with E.F. regarding D.F. objection (.1).	0.1	\$24.00
10/16/2022	2 LD	Respond to email from G.C. regarding status (.1).	0.1	\$32.00
10/19/2022	2 LD	Review voicemail from L.T. (.1); review case records on L.T. (.1); call L.T. and answer his questions regarding status (.1).	0.3	\$96.00
10/23/2022	2 LD	Review and respond to email from S.H. (.1).	0.1	\$32.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
10/24/2022	AS	Exchange email with investor regarding case updates (.1); telephone calls with two investors regarding same (.3).	0.4	\$54.00
10/24/2022	MML	Call with Receiver regarding status of claims motion and new claim determinations (.2); prepare spreadsheet of claims for Receiver's review for distribution motion (.7); prepare correspondence to Receiver regarding same (.1); revise spreadsheet of claimants and investors for request from DOJ (.5); prepare correspondence to Receiver regarding same (.1).	1.6	\$384.00
10/25/2022	AS	Exchange emails with investor M.S. (.2); telephone calls with three additional investors regarding case updates (.9).	1.1	\$148.50
10/27/2022	MML	Prepare for claims call with Receiver (.3); attend call with Receiver regarding additional determinations for claims (.6).	0.9	\$216.00
10/28/2022	AS	Telephone calls with two investors regarding case updates and distribution (.3).	0.3	\$40.50
10/28/2022	MML	Exchange correspondence with M. Gura regarding claims information for interim report (.1).	0.1	\$24.00
11/1/2022	AS	Telephone calls with four investors regarding case updates (.8).	8.0	\$108.00
11/1/2022	MML	Communicate with Receiver regarding claimants receiving a distribution and spreadsheet for same (.2); prepare spreadsheet for same (1.0); work on distribution spreadsheets in preparation for motion to approve distribution (2.0).	3.2	\$768.00
11/2/2022	LD	Review and respond to email from J. Waechter regarding claims status (.1); review update on objections/distribution (.2).	0.3	\$96.00
11/2/2022	MML	Communicate with J. Perez regarding claims motion (.1); review correspondence from Receiver regarding same (.1); exchange correspondence with J. Waechter regarding timing of distribution (.1).	0.3	\$72.00
11/7/2022	AS	Telephone calls with three investors regarding potential distribution (.8); exchange emails with investor regarding same (.1).	0.9	\$121.50
11/8/2022	MML	Work on distribution exhibits (2.5); communicate with M. Gura regarding same and reconciliation to prior spreadsheets (.5).	3.0	\$720.00
11/9/2022	MML	Continue work on exhibits for motion to distribute (1.0); call with R. Weiss regarding same (.2); review revised spreadsheets from R. Weiss for distribution (.2); exchange correspondence with R. Weiss and M. Gura regarding same (.1).	1.5	\$360.00

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Date 1	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
11/10/2022 N	MML	Exchange correspondence with R. Weiss regarding distribution exhibits (.1); call with M. Gura regarding same (.2); revise determinations for 14 claims to include reversion amount for related false profits (1.0); communicate with M. Gura regarding same (.2); review Receiver's edits to the claims motion (.1); prepare correspondence to Receiver and J. Perez regarding same and distribution exhibits (.1).	1.7	\$408.00
11/14/2022 N	MML	Prepare correspondence to L.D. in response to his inquiry (.1).	0.1	\$24.00
11/15/2022 A	AS	Exchange email with investor I.H. (.1); telephone calls with two investors regarding case updates (.5).	0.6	\$81.00
11/15/2022 M	MML	Call with Receiver regarding claims motion (.1).	0.1	\$24.00
11/16/2022 N	MML	Review Receiver's comments to claims motion (.1); review correspondence from J. Perez regarding same (.1).	0.2	\$48.00
11/17/2022	AS	Telephone call with investor regarding case updates (.3).	0.3	\$40.50
11/18/2022 A	AS	Exchange emails with Receivership team regarding plan for distribution (.6).	0.6	\$81.00
11/18/2022 N	MML	Review revised draft claims motion and provide comments (.5); prepare correspondence to Receiver and J. Perez regarding same (.1); exchange correspondence with team regarding upcoming filing and mail-out (.2); review correspondence from Receiver regarding remission status (.1).	0.9	\$216.00
11/20/2022 N	MML	Perform research regarding reversion of claim distributions (.5); prepare summary of same and 14 claims with distributions reverting to the Receivership (.3); prepare correspondence to J. Perez regarding same (.1); calculate difference in objection versus allowed amount for the two remaining objections (.2); prepare correspondence to J. Perez regarding same (.1).	1.2	\$288.00
11/21/2022 L	LD	Telephone call with M. Lockwood regarding distribution motion and next steps (.4).	0.4	\$128.00
11/21/2022 N	MML	Communicate with M. Gura regarding revisions to exhibits for claims motion (.5); review revised exhibits (.2); communicate with J. Perez and M. Gura regarding same (.1); call with M. Gura regarding additional revisions to third exhibit (.3); review correspondence between J. Perez and CFTC regarding motion (.1); call with L. Dougherty regarding preparation and supervision of distribution mail-out (.4); communicate with M. Gura regarding preparation for mailing of distribution checks (.2).	1.8	\$432.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
11/22/2022	2 LD	Review correspondence from M.S. (.1); telephone conference with A. Stephens regarding initial distribution (.2); meet with C. Gibson regarding same (.1); meet with B. Nguyen regarding same (.1); confer with M. Lockwood regarding same (.1); review draft motion to approve first interim distribution and resolve objections (.7); confer with Receiver, M. Lockwood, and J. Perez regarding same (.1).	1.4	\$448.00
11/22/2022	2 AS	Exchange emails with two investors regarding case updates (.2); exchange emails with M. Lockwood regarding same (.1).	0.3	\$40.50
11/22/2022	2 MML	Review correspondence from M.S. (.1); exchange correspondence with J. Perez regarding same (.1); review revised denied claims exhibit from M. Gura (.1); prepare correspondence regarding same (.1); review communications between L. Dougherty and J. Perez regarding motion preparation (.1); communicate with legal team regarding preparation for distribution (.1).	0.6	\$144.00
11/23/2022	2 AS	Exchange emails with legal team regarding distribution and mail out (.3); telephone calls with three investors regarding same (.7).	1.0	\$135.00
11/25/2022	2 MML	Review correspondence between Receiver and R.R. (.1).	0.1	\$24.00
11/27/2022	2 MML	Review correspondence from Receiver and J. Perez regarding status of motion (.1); exchange correspondence with M. Gura regarding further revised exhibits (.1).	0.2	\$48.00
11/28/2022	2 LD	Take call from L.V. and provide update on status (.2); update team and send note to file regarding same (.1); review next tasks and staffing for upcoming initial distribution (.4); respond to email from J. Perez regarding same (.1); review and respond to message from S.O. regarding case status and initial distribution (.2).	1.0	\$320.00
11/28/2022	2 AS	Exchange emails with S.G. regarding case updates (.1); telephone calls with two investors regarding same (.5); review address updates and exchange emails with M. Gura and M. Lockwood regarding same (.3).	0.9	\$121.50
11/28/2022	2 MML	Prepare correspondence to R. During regarding MailChimp (.1); prepare correspondence to R. Weiss regarding schedules for objecting claimants (.1); exchange correspondence with M. Gura regarding L.V. (.1); review communications between CFTC and J. Perez regarding motion (.1).	0.4	\$96.00
11/29/2022	2 AS	Exchange emails with J. Perez regarding exhibits to distribution motion (.5); exchange emails with two investors regarding case updates (.2); prepare email to M. Lockwood (.1).	0.8	\$108.00

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Date 1	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
11/29/2022 M	MML	Review multiple communications between J. Perez and A. Stephens regarding exhibits for claims motion (.1); exchange correspondence with J. Perez and R. During regarding same (.1); review schedules prepared by R. Weiss for three claimants (.2); review correspondence from A. Stephens regarding J.P. (.1); prepare correspondence to M. Gura regarding same (.1).	0.6	\$144.00
11/30/2022 L	LD	Review Receiver's correspondence with R.R. (.1); review M. Lockwood's update regarding initial distribution (.1); review M. Lockwood's edits to claims motion (.2); review preparations for check distributions (.3); telephone conference with A. Avery regarding same (.1); review correspondence with N.L. and confer with M. Gura regarding same (.1); review and respond to email from N.L. (.1); review and respond to email from T.D. regarding Midland account (.1); confer with team regarding same (.1).	1.2	\$384.00
11/30/2022 A	AS	Telephone calls with two investors regarding case updates (.5).	0.5	\$67.50
11/30/2022 M	MML	Exchange correspondence with L. Dougherty regarding T.D. (.1); exchange correspondence with M. Gura regarding attorney representation for J.P. (.1).	0.2	\$48.00
12/1/2022 L	LD	Meet with D. Roush regarding envelopes for initial distribution (.1); review list of next tasks for intial distribution and email team regarding same (.3); confer with team and Receiver regarding next steps in initial distribution (.2).	0.6	\$192.00
12/1/2022 <i>F</i>	AS	Exchange emails with legal team regarding distribution and mailing (.5); telephone calls with two investors regarding case updates (.5).	1.0	\$135.00
12/1/2022 M	MML	Review correspondence from claims team and Receiver regarding distribution logistics (.2); calls with M. Gura regarding same (.2); review draft spreadsheet with distribution amounts for PDR (.1).	0.5	\$120.00
12/2/2022 L	LD	Review updates regarding team preparations for calls to investor-victims in advance of initial distribution (.4); review emails from J. Perez regarding initial distribution (.1).	0.5	\$160.00
12/2/2022 <i>A</i>	AS	Telephone call with M. Lockwood regarding distribution (.5); prepare email to B. Nguyen regarding details for mass mailing and plan for distribution (.3); telephone calls with three investors regarding case updates (.7).	1.5	\$202.50

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
12/2/2022	MML	Call with M.Gura regarding distribution amounts, reconciliation, and spreadsheet for PDR (.3); work on same (.3); call with A. Stephens regarding logistics and address issues (.5); exchange correspondence with A. Stephens and B. Nguyen regarding same (.2); prepare draft letter to claimants enclosing distribution check (.5); prepare draft letter to claimants who need address confirmation (.5); prepare draft letter enclosing distribution check after receipt of address confirmation (.3); prepare confirmation of address form (.5); prepare correspondence to Receiver, J. Perez and A. Stephens regarding same (.3); prepare correspondence to J. Perez regarding suggested revision to motion (.1); exchange correspondence with E. Tate regarding processing of distribution checks (.1); exchange correspondence with S. O'Brien regarding same (.1); exchange correspondence with B. Price regarding same (.1).	3.8	\$912.00
12/4/2022	LD	Review correspondence regarding Local Rule 3.01(g) conference for distribution motion (.1).	0.1	\$32.00
12/4/2022	MML	Review Receiver's declaration in support of motion (.1); call with J. Perez regarding outstanding issues for the motion and exhibits (.5); search for additional documents submitted by J.H. (.1); prepare correspondence to A. Stephens regarding same (.1); review and revise agenda for call with Receiver (.2).	1.0	\$240.00
12/5/2022	LD	Take call from R.Z. regarding claim (.1); confer with team regarding same (.1); reply to email from R.Z. regarding same (.1); review draft distribution letters and distribution plan drafted by M. Lockwood (.3); confer with M. Lockwood regarding same (.1); review team email correspondence and list of next tasks (.1); email team regarding same (.1); review and respond to email from T.D. regarding distribution (.1); review and respond to M. Lockwood email regarding initial distribution (.2).	1.2	\$384.00
12/5/2022	AS	Telephone calls with three investors regarding case updates (.6); exchange emails with investor and M. Lockwood regarding distribution (.3); review investor files for A.H and prepare email to J. Perez (.3); communicate with M. Gura regarding same (.3); exchange emails with legal team and E. Tate regarding letters for investors with address updates (.3).	1.8	\$243.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
12/5/2022	MML	Attend Zoom meeting with Receiver and J. Perez regarding distribution motion (.8); communicate with M. Gura regarding revisions to exhibits and other distribution matters (.5); review correspondence and documents regarding J.H. (.1); prepare spreadsheet of addresses for service (.2); review additional documents for M.S. (.2); prepare correspondence to J. Perez regarding same and update spreadsheet for same (.2); exchange correspondence with L. Dougherty, J. Perez, and A. Stephens regarding distribution logistics (.2); review revised exhibits (.1).	2.3	\$552.00
12/6/2022	LD	Respond to emails from M. Lockwood and A. Stephens regarding preparations for initial distribution of checks (.2).	0.2	\$64.00
12/6/2022	AC	Telephone call with J. Perez regarding drafting of declaration in support of distribution motion (.1); review and analyze investor documents in preparation for drafting Receiver's declaration in support of same (.9); draft and revise declaration (1.2).	2.2	\$528.00
12/6/2022	AS	Exchange emails with investor regarding case updates (.2); telephone calls with four investors regarding same (.9); review court order and forward to J. Perez (.2).	1.3	\$175.50
12/6/2022	MML	Communicate with M. Gura regarding revised distribution amounts for PDR and other spreadsheets (.4); review correspondence to S. O'Brien regarding same (.1); exchange correspondence with L. Dougherty regarding checks and letters to claimants (.1); review correspondence with I.M. (.1); review revised exhibit adding A.H. (.1); exchange correspondence with M. Gura regarding same (.1); prepare correspondence to R. Weiss regarding formulas for exhibits (.1).	1.0	\$240.00
12/7/2022	AS	Exchange emails with legal team regarding mailing distribution checks and requests for confirmation of address (.3); telephone calls with two investors regarding case updates (.4); telephone call with M. Gura regarding mailing (.3); review J.W. and other investors' files (.5); exchange emails with M. Lockwood regarding outstanding issues (.5).	2.0	\$270.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
12/7/2022	MML	Review revised spreadsheet for distribution from R. Weiss (.1); exchange correspondence with R. Weiss regarding same (.1); call with M. Gura regarding same and preparation of exhibits and merge spreadsheets (.4); revise determinations for M.S. and A.H. (.6); review correspondence from J. Perez regarding M.S. and A.H. (.2); review correspondence from A. Stephens regarding preparation for distribution (.1); review documents and correspondence from A. Stephens regarding R.U. and others (.1); exchange correspondence with J. Perez regarding A.H. (.1); review correspondence from S. O'Brien and E. Tate regarding bank balances (.1); review notes from J. Perez regarding motion and correspondence from Receiver regarding same (.1); review correspondence between J. Perez and R. Montie (.1); review, revise, and provide requested information for claims motion (1.0).	3.0	\$720.00
12/8/2022	LD	Review update from J. Perez regarding distribution motion and team emails regarding same (.1); review emails from team regarding motion and provide answers after reviewing case records (.2); confer with J. Perez regarding same (.1); direct preparations for filing of motion (.1); confer with A. Cruz regarding D.F. (.1); review correspondence involving M.S. and confer with A. Cruz regarding same (.1); review revised motion and exhibits (.7).	1.4	\$448.00
12/8/2022	AC	Locate sample Beneficiary's Notice And Objection To Receiver's Continued Operations In The Absence Of Discovery, Hearing, And Final Judgment in connection with preparation of distribution motion (.1); review case docket to determine whether same has been stricken (.1); review docket to determine notices stricken in connection with same (.3); review and revise distribution motion (.8); prepare exhibits and certificate of service for same (3.5).	4.8	\$1,152.00
12/8/2022	AS	Exchange emails with J. Perez and M. Lockwood regarding Claim 404 (.3); perform research regarding contact information for defendants and B. Winters (.6); exchange emails with A. Cruz regarding same (.1); prepare exhibits for declaration, including redactions to required information (.7); exchange emails with investor regarding case updates (.2); telephone calls with two investors regarding same (.3).	2.2	\$297.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	s Administration and Objections		
12/8/2022	MML	Work on claims exhibits to motion to distribute (1.5); review and provide additional comments on revised draft of motion (.7); review other exhibits for same (.1); review draft revised declaration for Receiver (.1); prepare correspondence to J. Perez regarding same (.1); work with M. Gura on preparation of spreadsheets for merge and labels (1.0); exchange correspondence with claims team regarding logistics for distribution (.2); review sample check from PDR (.1); communicate with M. Gura and S. O'Brien regarding same (.1); review correspondence regarding service questions (.1); exchange correspondence with R. Weiss regarding distribution calculations (.1).	4.1	\$984.00
12/9/2022	LD	Direct C. Gibson regarding service of motion and declaration (.1); review final motion for first distribution and exhibits (.3); review final declaration and exhibits (.7); confer with C. Gibson regarding service issues (.3); confer with team regarding posting of filings on Receivership website (.1); email R.Z. regarding motion (.1).	1.6	\$512.00
12/9/2022	AS	Exchange emails with J. Perez (.2); communicate with C. Gibson regarding exhibits (.4); review and revise exhibits to declaration (.5).	1.1	\$148.50
12/9/2022	MML	Exchange correspondence with J. Perez and M. Gura regarding revised exhibits (.1); communicate with M. Gura regarding same (.1); review revised exhibit 1 (.1); call with J. Perez regarding service issues (.1); create spreadsheet for email service on new denied claimants (.1); prepare correspondence to C. Gibson and J. Perez regarding same (.1); exchange correspondence with S. O'Brien regarding check reorder for distribution (.1); exchange correspondence with Receiver and E. Tate regarding same (.1); exchange correspondence with Receiver regarding revised cover letters to claimants and approval of same (.2); review correspondence from team regarding filing, service, and web posting (.1); review revised declaration (.1).	1.2	\$288.00
12/12/2022	2 LD	Email Receiver for final approval of initial distribution letters to claimants (.1); review and respond to emails from team regarding preparation of mailing labels (.2); review list of tasks completed, pending tasks, and next steps and email team regarding same (.3); respond to emails from M. Gura and E. Tate regarding same (.1).	0.7	\$224.00
12/12/2022	2 AS	Telephone calls with eight investors regarding case updates. (1.7).	1.7	\$229.50

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
12/12/2022	MML	Prepare correspondence to R. Weiss regarding A.H. (.1); exchange correspondence with team regarding preparations for mail-out (.1); work with M. Gura on same (.3); reconcile mailing lists for claimants who receive checks and claimants who will receive address verification form (.7); review correspondence from E. Tate regarding check review (.1).	1.3	\$312.00
12/13/2022	LD	Review and respond to emails from M. Lockwood and A. Stephens regarding responses to motion for initial distribution (.2); review Receivership website posting regarding initial distribution and list of next steps (.2); meet separately with A. Stephens and N. Cook regarding same (.2); review proposed summary of distribution motion filings for receivership website (.1).	0.7	\$224.00
12/13/2022	AS	Prepare envelopes and labels in preparation for order from Court on distribution motion (1.8); call with M. Gura and M. Lockwood regarding preparation for mail-out (.2); exchange emails with investor regarding case updates (.2).	2.2	\$297.00
12/13/2022	MML	Call with M. Gura and A. Stephens regarding mail merge and preparation for mail-out (.2); communicate with M. Gura regarding formatting of distribution checks and letter merge (.3); exchange correspondence with legal team regarding website postings (.1); review draft from J. Perez regarding same (.1); review inquiry from D.D. (.1); communicate with J. Perez regarding same (.1); prepare draft template response for same (.1); exchange correspondence with R. Weiss regarding A.H. (.1).	1.1	\$264.00
12/14/2022	AS	Telephone calls with three investors regarding distribution (.7); exchange emails with M. Gura and M. Lockwood regarding master spreadsheet and questions regarding distribution (.5).	1.2	\$162.00
12/14/2022	MML	Communicate with A. Stephens regarding proposed distribution (.2); review correspondence from L.D. (.1).	0.3	\$72.00
12/15/2022	LD	Review and respond to email regarding B. Winters (.1).	0.1	\$32.00
12/15/2022	AS	Exchange emails with two investors regarding case updates (.3); review master spreadsheet and confer with M. Gura regarding address updates (.3); telephone calls with three investors regarding case updates (.4).	1.0	\$135.00
12/15/2022	MML	Review sample correspondence sent by B. Winters to claimants (.1).	0.1	\$24.00
12/16/2022	AS	Exchange emails with two investors regarding case updates (.2); telephone calls with three investors regarding same (.7); prepare email to M. Lockwood regarding investor death (.1); review master spreadsheet (.5).	1.5	\$202.50

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	s Administration and Objections		
12/19/2022	2 AS	Telephone calls with investor regarding case updates (.1); exchange emails with Receiver (.1).	0.2	\$27.00
12/20/2022	2 LD	Exchange emails with team regarding tasks for initial distribution of checks (.2).	0.2	\$64.00
12/20/2022	2 AS	Prepare additional distribution envelopes (1.3).	1.3	\$175.50
12/20/2022	2 MML	Exchange correspondence with M. Gura regarding distribution checks and samples (.1); review correspondence from S. O'Brien regarding same (.1).	0.2	\$48.00
12/22/2022	2 LD	Confer with Receiver, J. Perez, and M. Lockwood regarding hearing and procedural posture of distribution motion (.1).	0.1	\$32.00
12/22/2022	2 MML	Review correspondence regarding information from judge regarding status of motion (.1).	0.1	\$24.00
12/26/2022	2 LD	Exchange emails with D.M. (.1).	0.1	\$32.00
12/27/2022	2 MML	Exchange correspondence with A. Stephens regarding address change for mail-out (.1).	0.1	\$24.00
12/28/2022	2 AS	Exchange emails with investor (.2); exchange emails with M. Lockwood and C. Gibson (.3); telephone calls with three investors regarding case updates (.5).	1.0	\$135.00
12/28/2022	2 MML	Review correspondence from J. Perez regarding status (.1).	0.1	\$24.00
		Total: Claims Administration and Obj	108.10	\$23,411.50
WFEE	Work o	on Fees Motions		
10/5/2022	MML	NO CHARGE: Review correspondence from E-Hounds regarding September invoice (.1).	0.1	\$0.00
10/9/2022	KAP	NO CHARGE: Revise Receiver's August time entries (.5); send same to M. Lockwood (.1); review and revise Receiver's September time entries (.1).	0.7	\$0.00
10/10/2022	2 MML	NO CHARGE: Exchange correspondence with R. Jernigan regarding invoices (.1).	0.1	\$0.00
10/11/2022	2 KAP	NO CHARGE: Review and revise September prebills (1.5); scan and send revisions to A. Avery (.1).	1.6	\$0.00
10/11/2022	2 MML	NO CHARGE: Exchange correspondence with R. Jernigan regarding third-quarter invoices (.1).	0.1	\$0.00
10/12/2022	2 KAP	NO CHARGE: Review edited September prebills (.5); forward same to M. Lockwood (.1); scan and send to M. Lockwood additional edits to same (.1); prepare email to M. Lockwood regarding same (.1); update Receiver's time entries for September (.3).	1.1	\$0.00

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Date	TKPR	Description of Services	Hours	Amount
WFEE	Work o	on Fees Motions		
10/12/2022	MML	NO CHARGE: Review correspondence from J. Waechter regarding third-quarter invoices (.1); exchange correspondence with K. Paulson regarding same (.1).	0.2	\$0.00
10/13/2022	KAP	NO CHARGE: Update Receiver's September time entries (.1).	0.1	\$0.00
10/14/2022	MML	NO CHARGE: Review and edit July and August prebills (1.7).	1.7	\$0.00
10/19/2022	LD	NO CHARGE: Confer with M. Lockwood and J. Perez regarding third-quarter fee motion (.1).	0.1	\$0.00
10/24/2022	MML	NO CHARGE: Review invoice from M. Gura (.1); prepare correspondence to M. Gura regarding same (.1).	0.2	\$0.00
10/25/2022	LD	NO CHARGE: Respond to email from M. Lockwood regarding fees motion (.1).	0.1	\$0.00
10/25/2022	MML	NO CHARGE: Edit September time entries (.1); exchange correspondence with L. Dougherty regarding review of September prebills (.1).	0.2	\$0.00
10/27/2022	MML	NO CHARGE: Review Receiver's September time entries (.1); prepare correspondence to K. Paulson regarding same (.1).	0.2	\$0.00
10/28/2022	KAP	NO CHARGE: Revise Receiver's third-quarter time entries per M. Lockwood's edits (.1); send same to C. Gibson (.1).	0.2	\$0.00
10/31/2022	MML	NO CHARGE: Review correspondence from E. Tate and L. Dougherty regarding storage cost (.1).	0.1	\$0.00
11/1/2022	MML	NO CHARGE: Review correspondence and invoices from W. Piper (.1); update spreadsheet for same (.1); prepare correspondence to L. Dougherty regarding costs on same (.1); exchange correspondence with E. Henderson regarding revisions to invoices (.1); review revised invoices (.1); exchange correspondence with J. Perez regarding invoice (.1); review and analysis of Englander Fischer invoices for July, August, and September (.3); prepare summary for fees motion (.1); prepare correspondence to J. Waechter regarding questions and possible revisions (.2).	1.2	\$0.00
11/2/2022	LD	NO CHARGE: Review W. Piper invoices at request of M. Lockwood and respond to her questions regarding same (.3).	0.3	\$0.00

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Date	TKPR	Description of Services	Hours	Amount
WFEE	Work o	on Fees Motions		
11/2/2022	MML	NO CHARGE: Review correspondence from E. Tate regarding Receiver's invoices (.1); exchange correspondence with S. O'Brien and L. Dougherty regarding claimed outstanding balance by W. Piper (.1); exchange correspondence with P. Rengstl regarding T. Bakas' invoice (.1); review Maples invoice (.1); prepare correspondence to R. Sonlin regarding same (.1); analyze possible outstanding third-party invoices (.2); prepare correspondence to L. Dougherty regarding same (.1); review correspondence from L. Dougherty regarding same and other fees matters (.1).	0.9	\$0.00
11/3/2022	MML	NO CHARGE: Work on motion for fees (1.0); review communications regarding prior invoices for Receiver (.1).	1.1	\$0.00
11/4/2022	MML	NO CHARGE: Review correspondence regarding Amazon Web Services and GoDaddy (.1); prepare correspondence to S. O'Brien regarding G. Godfrey payment (.1); review multiple correspondence and activity report from S. O'Brien regarding same (.1).	0.3	\$0.00
11/6/2022	LD	NO CHARGE: Confer with M. Lockwood regarding G. Godfrey invoice (.1).	0.1	\$0.00
11/6/2022	KAP	NO CHARGE: Review and revise Receiver's third-quarter prebills (.2); scan and send edits to M. Lockwood (.1).	0.3	\$0.00
11/6/2022	MML	NO CHARGE: Review G. Godfrey invoices and related correspondence (.3); review T. Bakas' invoice (.1); review and revise September prebills (1.0); revise Receiver's time entries per correspondence from K. Paulson (.1); work on motion for fees (2.0); prepare correspondence to J. Perez and L. Dougherty regarding same (.1).	3.6	\$0.00
11/7/2022	LD	NO CHARGE: Review and revise fourteenth interim fee motion (1.4); review bills for same (.6); review invoices for same (.3); review PACER dockets for same (.2).	2.5	\$0.00
11/8/2022	LD	NO CHARGE: Telephone conference with J. Waechter regarding attorney bills (.1); telephone conference with M. Lockwood regarding same (.2); email J. Waechter and M. Lockwood regarding same (.2).	0.5	\$0.00
11/8/2022	MML	NO CHARGE: Review correspondence from L. Dougherty regarding Englander Fischer's invoices (.1); call with L. Dougherty regarding same (.2).	0.3	\$0.00
11/9/2022	LD	NO CHARGE: Telephone conference with Receiver regarding prebills and invoices (.1).	0.1	\$0.00

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Date	TKPR	Description of Services	Hours	Amount
WFEE	Work	on Fees Motions		
11/9/2022	MML	NO CHARGE: Review correspondence from Receiver regarding approval of and edits to motion (.1); exchange correspondence with B. Nguyen regarding final invoices (.1); review same and compare to motion (.4); review correspondence from J. Waechter regarding invoices (.1); review revised invoice for September (.2); revise fees motion for Receiver's edits and new invoice and information from Englander Fischer (.5); prepare categorization of costs (.2); prepare proposed order (.1); prepare correspondence to L. Dougherty and Receiver regarding revised motion and final invoices (.1).	1.8	\$0.00
11/10/2022	2 LD	NO CHARGE: Review correspondence from Receiver and M. Lockwood regarding Receiver's 14th fees motion (.1); revise same (.3); confer with CFTC regarding same (.2); direct C. Gibson in initiating Local Rule 3.01(g) conferences with J. Anile, M. DaCorta, R. Montie, F. Duran, and J. Haas regarding same (.3); call C. Gibson regarding same (.1); direct C. Gibson in drafting motion for extension to file fees motion after reviewing case files (.2).	1.2	\$0.00
11/10/2022	2 MML	NO CHARGE: Exchange correspondence with L. Dougherty regarding fees motion (.1).	0.1	\$0.00
11/11/2022	2 LD	NO CHARGE: Review and respond to email from W. Piper regarding payment of invoices after reviewing case records (.2).	0.2	\$0.00
11/13/2022	2 LD	NO CHARGE: Revise motion for extension of time to file 14th fee application (.6); review correspondence with other parties (.2); direct C. Gibson regarding next steps (.1).	0.9	\$0.00
11/14/2022	2 LD	NO CHARGE: Review emails and response to Local Rule 3.01(g) request regarding motion for extension of time (.2); edit same (.1); direct C. Gibson regarding filing of same and follow up with defendant J. Haas regarding same (.2); telephone conference with J. Haas (.2); revise motion for extension and direct filing and service of same (.2); revise fees motion to reflect no position taken by M. DaCorta (.1).	1.0	\$0.00
11/15/2022	2 MML	NO CHARGE: Review correspondence from Maples regarding invoices (.1).	0.1	\$0.00
11/16/2022	2 MML	NO CHARGE: Exchange correspondence with C. Gibson regarding Wayne Piper (.1).	0.1	\$0.00
11/17/2022	2 MML	NO CHARGE: Review correspondence from Englander Fischer regarding October invoice (.1).	0.1	\$0.00
11/18/2022	2 LD	NO CHARGE: Confer with A. Auxter at CFTC regarding questions on fee motion (.1); direct C. Gibson in follow-up relating to Local Rule 3.01(g) conferral regarding same (.1).	0.2	\$0.00
11/18/2022	2 MML	NO CHARGE: Review correspondence from CFTC regarding invoices (.1).	0.1	\$0.00

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Date	TKPR	Description of Services	Hours	Amount
WFEE	Work	on Fees Motions		
11/19/2022	LD	NO CHARGE: Draft answers to CFTC questions regarding bills and invoices for 14th fee motion, after reviewing case filings and case records (2.2); email J. Waechter and B. McConnell regarding questions regarding Englander Fischer invoices (.1); communicate with J. Rizzo regarding time entry questioned by CFTC (.2); confer with B. Nguyen regarding same (.1).	2.6	\$0.00
11/20/2022	LD	NO CHARGE: Review emails sent and received by J. Rizzo in connection with responding to CFTC's question regarding time entry (.3); draft response to same (.1); confer with Receiver and team regarding same (.1); telephone call with Receiver regarding same (.1).	0.6	\$0.00
11/20/2022	MML	NO CHARGE: Review correspondence from CFTC and L. Dougherty regarding fees motion questions (.1).	0.1	\$0.00
11/21/2022	LD	NO CHARGE: Telephone call with Receiver regarding questions from CFTC regarding fee motion (.1); call Maples associate regarding same (.1); review and respond to emails from CFTC regarding same (.2); telephone conference with M. Lockwood regarding same (.1).	0.5	\$0.00
11/21/2022	MML	NO CHARGE: Review communications from L. Dougherty and Englander Fischer regarding responses to CFTC's inquiries (.2); review revised invoice from J. Perez (.1); communicate with L. Dougherty regarding same (.1).	0.4	\$0.00
11/22/2022	LD	NO CHARGE: Call with J. Haas for Local Rule 3.01(g) conference on 14th motion for fees (.1); revise same (.2); perform final quality-control check on motion and exhibits (.6); direct filing and service of same (.1).	1.0	\$0.00
11/22/2022	MML	NO CHARGE: Review correspondence from L. Dougherty regarding filing of fees motion (.1).	0.1	\$0.00
11/23/2022	LD	NO CHARGE: Review and respond to email from Maples regarding R. Montie passport (.1).	0.1	\$0.00
11/23/2022	MML	NO CHARGE: Review correspondence from Maples Group (.1).	0.1	\$0.00
11/29/2022	MML	NO CHARGE: Review correspondence regarding Maples Group's November invoice (.1).	0.1	\$0.00
12/1/2022	KAP	NO CHARGE: Review and revise October team prebills (1.4); scan and send edits to C. Gibson (.1).	1.5	\$0.00
12/1/2022	MML	NO CHARGE: Review correspondence from E-Hounds regarding November invoice (.1); review entries from J. Rizzo (.1); respond to correspondence from K. Paulson regarding same (.1); review correspondence from E. Tate regarding Maples Group (.1).	0.4	\$0.00

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SERVICES

Date	TKPR	Description of Services	Hours	Amount
WFEE	Work o	on Fees Motions		
12/2/2022	LD	NO CHARGE: Meet with B. Nguyen regarding payment on 14th fee motion (.1); telephone call with Receiver regarding same (.1).	0.2	\$0.00
12/2/2022	LD	NO CHARGE: take telephone call from Receiver regarding fee order (.1); review case records (.3); update E. Tate and B. Nguyen regarding payments already made and payments outstanding (.2).	0.6	\$0.00
12/2/2022	KAP	NO CHARGE: Review and revise edited October team prebills (.5); scan edits and send same to M. Lockwood (.1).	0.6	\$0.00
12/2/2022	MML	NO CHARGE: Review communications from L. Dougherty and E. Tate regarding payment of invoices (.1).	0.1	\$0.00
12/5/2022	LD	NO CHARGE: Confer with Receiver, E. Tate, and GK team regarding wire transfers to GK and Flores Piper (.2).	0.2	\$0.00
12/5/2022	KAP	NO CHARGE: Review and revise Receiver's time entries for October (1.0).	1.0	\$0.00
12/6/2022	KAP	NO CHARGE: Review and revise Receiver's November time entries (.8); send same to M. Lockwood (.1).	0.9	\$0.00
12/6/2022	MML	NO CHARGE: Review correspondence from J. Waechter regarding November invoice (.1).	0.1	\$0.00
12/7/2022	MML	NO CHARGE: Review correspondence from Weiss Brown regarding November invoice (.1).	0.1	\$0.00
12/13/2022	2 MML	NO CHARGE: Review correspondence from N. O'Donnell regarding November invoice (.1).	0.1	\$0.00
		Total: Work on Fees Motions	35.20	\$0.00
		Total Professional Service	186.6	\$35,164.50

DISBURSEMENTS

Date		Description of Disbursements	Amount
E101	Photocopies		
12/13/20	022	Photocopies @ .15 each (3877 @ \$0.15)	\$581.55
E105	Telephone		
10/26/20	022	Conference Call Charges	\$7.89

E106 On Line Research

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DISBURSEMENTS

Date	Description of Disbursements	Amount
E106 C	On Line Research	
10/31/2022	2 Westlaw	\$68.73
11/1/2022	PACER Service Center- PACER printing costs for month of- PACER charges for July 1, 2022 to September 30, 2022 (412 @ \$0.10)	\$41.20
11/1/2022	PACER printing costs for month of July 1, 2022 to September 30, 2022 (705 @ \$0.10)	\$70.50
E108 P	Postage	
10/31/2022	Lawrence Dougherty- Postage- Priority mail to D. Clark service	\$19.80
12/9/2022	Postage	\$153.81
E123 V	Veb-Related Expenses	
10/1/2022	K. Tek Systems, Inc Web-related expenses- Business website monthly	\$50.00
11/1/2022	K. Tek Systems, Inc Web-related expenses- Business web site	\$50.00
11/1/2022	K. Tek Systems, Inc Web-related expenses- Monthly service work order	\$37.50
12/1/2022	K. Tek Systems, Inc Web-related expenses- Business website monthly	\$50.00
12/1/2022	K. Tek Systems, Inc Web-related expenses- Monthly service work order	\$37.50
	Total Disbursements	\$1,168.48
	Total Services	\$35,164.50
	Total Disbursements	\$1,168.48
	Total Current Charges	\$36,332.98
	Previous Balance	\$54,423.47 (\$54,423.47)
	Less Payments PAY THIS AMOUNT	(\$54,423.47) \$36,332.98
	I AT THIS AMOUNT	Ψ30,332.90

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TASK RECAP

Services Disbursements

Project No.	<u>Hours</u>	Amount	Project No.	Amount
ASDIS - ASDIS	0.10	\$32.00	Photocopies	\$581.55
ASSET - ASSET	34.10	\$9,737.50	Telephone	\$7.89
BUSIN - BUSIN	1.70	\$229.50	On Line Research	\$180.43
CASE - CASE	7.40	\$1,754.00	Postage	\$173.61
CLAIM - CLAIM	108.10	\$23,411.50	Subpoena Fees	\$0.00
WFEE - WFEE	35.20	\$0.00	Web-Related Expenses	\$225.00
	186.60	\$35,164.50		\$1,168.48

BREAKDOWN BY PERSON

Person		Project No.	Hours	Amount
AC	Ailen Cruz	CLAIM - CLAIM	7.00	\$1,680.00
LD	Larry J. Dougherty	ASDIS - ASDIS	0.10	\$32.00
LD	Larry J. Dougherty	ASSET - ASSET	20.60	\$6,592.00
LD	Larry J. Dougherty	CASE - CASE	3.40	\$1,088.00
LD	Larry J. Dougherty	CLAIM - CLAIM	13.10	\$4,192.00
LD	Larry J. Dougherty	WFEE - WFEE	13.00	\$0.00
CI	Cindy Innocent	ASSET - ASSET	10.90	\$2,616.00
JR	Jeffrey Rizzo	ASSET - ASSET	0.90	\$121.50
JR	Jeffrey Rizzo	BUSIN - BUSIN	1.70	\$229.50
AS	Amanda Stephens	CASE - CASE	2.80	\$378.00
AS	Amanda Stephens	CLAIM - CLAIM	33.90	\$4,576.50
KAP	Kimberly A. Paulson	CLAIM - CLAIM	0.20	\$27.00
KAP	Kimberly A. Paulson	WFEE - WFEE	8.00	\$0.00
MML	Maya M. Lockwood	ASSET - ASSET	1.70	\$408.00
MML	Maya M. Lockwood	CASE - CASE	1.20	\$288.00
MML	Maya M. Lockwood	CLAIM - CLAIM	53.90	\$12,936.00

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Client: 025305 Matter: 001922

Matter: 001922 Invoice #: 20827

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BREAKDOWN BY PERSON

Person		Project No.	Hours	Amount	
MML	Maya M. Lockwood	WFEE - WFEE	14.20	\$0.00	
			186.60	\$35,164.50	

EXHIBIT 9



INVOICE

Invoice # 6615 Date: 01/17/2023

Johnson, Cassidy, Newlon & DeCort, P.A.

3242 Henderson Boulevard, Suite 210 Tampa, FL 33609

Burton Webb Wiand 114 Turner Street Clearwater, Florida 33756

Wiand-00005-Oasis Receivership

Oasis Receivership - Claims Process

Type	Date	Description	Attorney	Quantity	Rate	Total
Service	10/03/2022	Draft and review exhibits in preparation for filing the distribution motion (3.9)	MG	3.90	\$135.00	\$526.50
Service	10/13/2022	Communicate with an investor regarding the status of the claims process (.3); communicate with M. Lockwood regarding the status of the claim distribution motion (.2).	MG	0.50	\$135.00	\$67.50
Service	10/28/2022	Review claim numbers for the interim report (.2).	MG	0.20	\$135.00	\$27.00
Service	10/31/2022	Review and update the claim numbers in preparation for filing the interim report (.4).	MG	0.40	\$135.00	\$54.00
Service	11/08/2022	Revise and reconcile the master distribution spreadsheet in preparation for filing the distribution motion (4.4).	MG	4.40	\$135.00	\$594.00
Service	11/17/2022	Communicate with an investor regarding the status of the claims process (.4).	MG	0.40	\$135.00	\$54.00
Service	11/21/2022	Review and revise the exhibits to the motion for distribution (3.3); call with M. Lockwood regarding additional edits to third exhibit (.3).	MG	3.60	\$135.00	\$486.00
Service	11/22/2022	Communicate with two investors regarding the status of the claims process (.4).	MG	0.40	\$135.00	\$54.00
Service	11/28/2022	Revise the exhibits to the distribution motion (.2).	MG	0.20	\$135.00	\$27.00

Invoice # 6615 - 01/17/2023

Service	11/30/2022	Communicate with an investor regarding his submitted claim form (.2); revise the distribution spreadsheet in preparation for preparing checks (1.5).	MG	1.70	\$135.00	\$229.50
Service	12/01/2022	Review and prepare the list of initial distribution checks for PDR (1.3); call with M. Lockwood regarding distribution logistics (.2).	MG	1.50	\$135.00	\$202.50
Service	12/02/2022	Call with M. Lockwood regarding distribution amounts and spreadsheet for PDR (.3); continue to revise the list of distribution checks for PDR (1.1); communicate with an investor regarding the status of the claims process (.1).	MG	1.50	\$135.00	\$202.50
Service	12/05/2022	Revise the exhibits to the distribution motion (.4).	MG	0.40	\$135.00	\$54.00
Service	12/06/2022	Continue to revise the motion to distribute exhibits (1.2).	MG	1.20	\$135.00	\$162.00
Service	12/07/2022	Continue to revise the claim determination exhibits and reconcile changes (2.0); communicate with M. Lockwood regarding mail merge for distribution mailing (.2).	MG	2.20	\$135.00	\$297.00
Service	12/08/2022	Continue to revise the exhibits to the distribution motion (3.0); communicate with M. Lockwood regarding distribution exhibits and reconciliation of same (.5); communicate with R. Weiss regarding totals and formatting formulas (.4); draft the mail merge in preparation for the distribution mailing (1.5); revise the list of checks for PDR (.5).	MG	5.90	\$135.00	\$796.50
Service	12/09/2022	Revise the exhibits to the initial distribution motion (.3).	MG	0.30	\$135.00	\$40.50
Service	12/12/2022	Revise the list of checks for PDR according to their naming requirements (1.5); draft an initial merge of mailing labels (1.5); communicate with E. Tate regarding initial check review (.2); draft an email to the claims team regarding procedures for the mailout (.4).	MG	3.60	\$135.00	\$486.00
Service	12/13/2022	Draft mail merge of labels for additional investors (1.0); call with A. Stephens and M. Lockwood regarding mail merge (.2).	MG	1.20	\$135.00	\$162.00
Service	12/20/2022	Communicate with three investors regarding the claims process (.5); communicate with two investors regarding their divorce and future distributions (.4);	MG	1.10	\$135.00	\$148.50

Invoice # 6615 - 01/17/2023

		communicate with an investor regarding wire instructions for her distribution (.1); communicate with PDR regarding a sample of initial distribution checks (.1).				
Service	12/22/2022	Review of sample distribution checks from PDR (.2).	MG	0.20	\$135.00	\$27.00
Service	12/23/2022	Communicate with an investor regarding the status of the claims process (.1).	MG	0.10	\$135.00	\$13.50

Time Keeper	Quantity	Rate	Total
Mary Gura	34.9	\$135.00	\$4,711.50
		Subtotal	\$4,711.50
		Total	\$4,711.50

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
6615	01/17/2023	\$4,711.50	\$0.00	\$4,711.50
			Outstanding Balance	\$4,711.50
			Total Amount Outstanding	\$4,711.50

Please make all amounts payable to: Johnson, Cassidy, Newlon & DeCort, P.A.

Payment is due upon receipt.

EXHIBIT 10

Guerra King P.A. 1408 N. Westshore Blvd., Suite 1010

1408 N. Westshore Blvd., Suite 1010 Tampa, FL 33607 Telephone: 813-347-5100 Facsimile: 813-347-5198

Federal Tax ID # 27-0937962

Burton W. Wiand February 14, 2023

Attention:Burton W. Wiand, as ReceiverClient:025305Burton W. Wiand PAMatter:002094114 Turner StreetInvoice #:20811

Clearwater, FL 33756

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RE: Oasis Legal Team - Recovery from Investors

For Professional Services Rendered Through December 31, 2022

Date ASSET	TKPF As:	R Description of Services set Analysis and Recovery	Hours	Amount
10/3/2022	JR	Receipt and review of clawback settlement payment (.1); update clawback settlement tracking spreadsheet (.2).	0.3	\$40.50
11/18/2022	LD	Respond to email from J. Waechter regarding payment by A. Johnston and direct follow-up regarding same (.1).	0.1	\$32.00
		Total: Asset Analysis and Recovery	0.40	\$72.50
		Total Professional Services	0.4	\$72.50
		Total Services	\$72.5	0
		Total Current Charges		\$72.50
		Previous Balance		\$933.50
		Less Payments		(\$933.50)
		PAY THIS AMOUNT		\$72.50

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Client: 025305 Matter: 002094 20811 Invoice #:

2 Page:

TASK RECAP

Services Disbursements

Project No.	<u>Hours</u>	Amount	Project No.	Amount
ASSET - ASSET	0.40	\$72.50		\$0.00
	0.40	\$72.50		\$0.00

BREAKDOWN BY PERSON

Person		Project No.	Hours	Amount	
LD	Larry J. Dougherty	ASSET - ASSET	0.10	\$32.00	
JR	Jeffrey Rizzo	ASSET - ASSET	0.30	\$40.50	
			0.40	\$72.50	

EXHIBIT 11

Guerra King P.A.

1408 N. Westshore Blvd., Suite 1010 Tampa, FL 33607 Telephone: 813-347-5100

Facsimile: 813-347-5198 Federal Tax ID # 27-0937962

Burton W. Wiand February 14, 2023

Attention: Burton W. Wiand, as ReceiverClient:025305Burton W. Wiand PAMatter:002095114 Turner StreetInvoice #:20812

Clearwater, FL 33756

Page: 1

RE: Oasis Legal Team - Raymond Montie, III.

For Professional Services Rendered Through December 31, 2022

Date ASSET	TKPR Asset A	Description of Services Analysis and Recovery	Hours	Amount
10/5/2022	JR	Review correspondence and September 2022 financial documents from R. Montie and transfer same to system (.1).	0.1	\$13.50
10/27/2022	LD	Email M. Horwitz and V. Citro regarding possibility of their withdrawal from the action (.1).	0.1	\$32.00
10/28/2022	LD	Review and respond to email from counsel for R. Montie regarding motion to withdraw and stay of case (.1); email Receiver regarding same (.1).	0.2	\$64.00
11/30/2022	LD	Review R. Montie's October financial disclosure and direct filing of same (.3).	0.3	\$96.00
12/13/2022	LD	Telephone conference with Receiver regarding status of R. Montie matter (.2); review case files and correspondence relating to R. Montie's financial disclosure (.5); email Receiver regarding same (.1).	0.8	\$256.00
		Total: Asset Analysis and Recovery	1.50	\$461.50
		Total Professional Services	1.5	\$461.50

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Client: 025305 Matter: 002095 Invoice #: 20812

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Total Services \$461.50

Total Current Charges \$461.50
Previous Balance \$438.30
Less Payments (\$438.30)

PAY THIS AMOUNT \$461.50

Case 8:19-cv-00886-VMC-SPF Document 724-11 Filed 02/15/23 Page 4 of 4 PageID 11522 February 14, 2023

Client: 025305 Matter: 002095

Invoice #: 20812

Page: 3

TASK RECAP

Services Disbursements

Project No.	Hours	Amount	Project No.	Amount
ASSET - ASSET	1.50	\$461.50		\$0.00
	1.50	\$461.50		\$0.00

BREAKDOWN BY PERSON

Person		Project No.	Hours	Amount	
LD	Larry J. Dougherty	ASSET - ASSET	1.40	\$448.00	
JR	Jeffrey Rizzo	ASSET - ASSET	0.10	\$13.50	
			1.50	\$461.50	

EXHIBIT 12



Law Office Jared.Perez@JaredPerezLaw.com•727.641.6562

DATE	MATTER	CODE	DESCRIPTION	HOURS	RATE	TOTAL
11/1/2022	MAIN	CASE	Revise, finalize, and file interim report and exhibits, including communications with team and Receiver (1.5).	1.5	\$ 320.00	\$ 480.00
11/2/2022	MAIN	CLAIMS	Draft motion to overrule objections and to make first interim distribution (5.8).	5.8	\$ 320.00	\$ 1,856.00
11/3/2022	MAIN	CLAIMS	Draft motion to overrule objections and to make first interim distribution (5.5).	5.5	\$ 320.00	\$ 1,760.00
11/4/2022	MAIN	CLAIMS	Complete and circulate first draft of motion to overrule objections and to make first interim distribution (6.0).	6	\$ 320.00	\$ 1,920.00
11/15/2022	MAIN	CLAIMS	Revise motion to overrule objections and to make first interim distribution (2.7).	2.7	\$ 320.00	\$ 864.00
11/15/2022	MAIN	AAR	Review preliminary filings in ATC appeal and communicate with team (1.2).	1.2	\$ 320.00	\$ 384.00
11/16/2022	MAIN	CLAIMS	Revise motion to overrule objections and to make first interim distribution (3.9); send to CFTC per Local Rule 3.01(g) (.2).	4.1	\$ 320.00	\$ 1,312.00
11/16/2022	MAIN	AAR	Draft motion to continue prosecution of ATC appeal and send comments to team (3.3).	3.3	\$ 320.00	\$ 1,056.00
11/21/2022	MAIN	AAR	Draft and revise motion to continue prosecution of ATC appeal (4.0); telephone conference with Receiver and team (.5).	4.5	\$ 320.00	\$ 1,440.00
11/21/2022	MAIN	CLAIMS	Communicate with CFTC and team regarding motion to overrule objections and to make first interim distribution (.5).	0.5	\$ 320.00	\$ 160.00
11/22/2022	MAIN	AAR	Telephone conference with Receiver and team regarding ATC appeal (.5).	0.5	\$ 320.00	\$ 160.00
11/28/2022	MAIN	AAR	Revise motion to continue prosecution of ATC appeal, including legal research, and communicate with team (1.5).	1.5	\$ 320.00	\$ 480.00

11/28/2022	MAIN	CLAIMS	Revise and recirculate motion to overrule objections and to make first interim distribution (2.1); draft Receiver's declaration in support of motion, including exhibits (3.9).	6	\$ 320.00	\$ 1,920.00
11/29/2022	MAIN	CLAIMS	Draft Receiver's declaration in support of motion, including exhibits (2.7).	2.7	\$ 320.00	\$ 864.00
11/30/2022	MAIN	AAR	Communicate with mediator and team regarding extension, mediation, and other issues regarding ATC appeal (.8).	0.8	\$ 320.00	\$ 256.00
12/1/2022	MAIN	CLAIMS	Continue revisions and Local Rule 3.01(g) communications regarding motion to overrule objections and to make first interim distribution (1.8).	1.8	\$ 320.00	\$ 576.00
12/2/2022	MAIN	CLAIMS	Continue revisions and Local Rule 3.01(g) communications regarding motion to overrule objections and to make first interim distribution (1.0).	1	\$ 320.00	\$ 320.00
12/4/2022	MAIN	CLAIMS	Continue Local Rule 3.01(g) communications regarding motion to overrule objections and to make first interim distribution, including telephone conferece with J. Haas and related factual research (1.1); draft detailed agenda for call with Receiver and team in preparation for filing motion (1.3).	2.4	\$ 320.00	\$ 768.00
12/5/2022	MAIN	CLAIMS	Telephone conference with Receiver and M. Lockwood regarding distribution issues (.8).	0.8	\$ 320.00	\$ 256.00
12/6/2022	MAIN	CLAIMS	Continue revisions and Local Rule 3.01(g) communications regarding motion to overrule objections and to make first interim distribution (4.5); circulate updated draft to Receiver and team (.2).	4.7	\$ 320.00	\$ 1,504.00
12/7/2022	MAIN	CLAIMS	Continue revisions and Local Rule 3.01(g) communications regarding motion to overrule objections and to make first interim distribution (4.4).	4.4	\$ 320.00	\$ 1,408.00
12/8/2022	MAIN	CLAIMS	Continue revisions and Local Rule 3.01(g) communications regarding motion to overrule objections and to make first interim distribution as well as Receiver's declaration in support and exhibits (7.5).	7.5	\$ 320.00	\$ 2,400.00

12/9/2022	MAIN	CLAIMS	Finalize and file motion to overrule objections and to make first interim distribution as well as Receiver's declaration in support and exhibits (3.3); coordinate complex service issues (1.1).	4.4	\$ 320.00	\$ 1,408.00
12/13/2022	MAIN	CLAIMS	Draft anouncement for website regarding distribution motion (.5).	0.5	\$ 320.00	\$ 160.00
12/13/2022	MAIN	AAR	Attend NAFER telephone conference regarding amicus brief for ATC appeal and communicate with team (1.0).	1	\$ 320.00	\$ 320.00
12/15/2022	MAIN	AAR	Begin Local Rule 3.01(g) communications regarding motion to approve continued prosecution of ATC appeal (.3).	0.3	\$ 320.00	\$ 96.00
12/19/2022	MAIN	AAR	Revise, finalize, and file motion to approve continued prosecution of ATC appeal (.5).	0.5	\$ 320.00	\$ 160.00
12/21/2022	MAIN	AAR	Communicate with Receiver, CFTC, and L. Dougherty regarding hearing on motion to dismiss filed by M. DaCorta (.8); draft and file motion for Receiver to appear by telephone (.7); prepare for hearing (1.5); communicate with team regarding ATC appeal and mediation (.3).	3.3	\$ 320.00	\$ 1,056.00
12/22/2022	MAIN	AAR	Prepare for and attend hearing on motion to dismiss filed by M. DaCorta (1.5).	1.5	\$ 320.00	\$ 480.00
			2022 Q4 Totals:	80.7	\$ 320.00	\$ 25,824.00

EXHIBIT 13



November 17, 2022

John Waechter as Counsel

E-Mailed to: jperez@wiandlaw.com

Please remit with payment

INVOICE FOR LEGAL SERVICES RENDERED THROUGH 10/27/2022

Client Name: Wiand Guerra King and Burton W. Wiand

Client Matter No. 2450

Matter Name: Burton W. Wiand v. Chris Arduini, et al.

Invoice Date: November 17, 2022

Invoice No. 80543

TOTAL AMOUNT DUE THIS BILL \$65,741.93

TOTAL DUE IF PAID IN FULL WITHIN 15 DAYS* \$65,177.32

Payment Options:

Remittance by credit card:

You may pay by credit card online here.

Remittance by check: Remittance by wire:

Englander Fischer, LLP

Bank: Republic Bank & Trust Company

721 First Avenue North

Address: 601 West Market Street, Louisville, KY

St. Petersburg, FL 33701 40202-2700

Routing # 083001314

For credit to: Englander Fischer, LLP

Account # 59436581

Phone: 727-898-7210

Fax: 727-898-7218

eflegal.com

Please reference matter number

*3% Discount on fees only applied to invoices paid in full within 15 days from the invoice date



Invoice Date: November 17, 2022

FEES

Date	Staff	Description	Hours	Amount
10/01/2022	CJI	Review and analysis of Detrano decision regarding Res Judicata. Review of supreme court decision regarding same.	0.60	\$201.00
10/02/2022	CJI	Review and revise response to objection to claim. Kerrigan.	0.50	\$167.50
10/02/2022	CJI	Draft e mail to Attorney Dragovich regarding status of research and draft of response to MTD	0.20	\$67.00
10/02/2022	AMD	Draft Plaintiff's Response in Opposition to Garbellano's Motion to Dismiss.	2.60	\$650.00
10/03/2022	CJI	Review of defendants initial disclosures	0.40	\$134.00
10/03/2022	CJI	IOC with attorney McConnel re: Garbellano and Kerrigan bankruptcy matters and future action.	0.10	\$33.50
10/03/2022	CJI	Review and revise response to motion to dismiss adversary proceeding, review of motion to dismiss, identify additional issues that must be responded to for response. Garbellano	1.30	\$435.50
10/03/2022	AMD	Finish drafting Plaintiff's Response in Opposition to Garbellano's Motion to Dismiss.	3.50	\$875.00
10/03/2022	PJL	Research re: Bankruptcy code 523(a)(4) and securities broker	0.50	\$97.50
10/03/2022	PJL	Research re: violations of Securities law as unlicensed broker	0.80	\$156.00
10/03/2022	ALB	Review attorney Iurillo's revisions and notes Response in Opposition to Debtor's Omnibus Obj to Claim No. 19 Kerrigan Mgmt (.30), review corresponding bankruptcy pleadings (.50) - Kerrigan Bankruptcy	0.80	\$148.00
10/03/2022	PJL	Research re: 523(a)(4) fiduciary duty and unlicensed broker	0.70	\$136.50
10/03/2022	CJI	Draft instructions to paralegal Bogert regarding essential action necessary on file to meet court deadlines. Garbellano	0.30	\$100.50
10/03/2022	ALB	Review and revise Response in Opposition to Debtor's Omnibus Obj to Claim No. 19 Kerrigan Mgmt - Kerrigan	0.90	\$166.50



10/03/2022	CJI	Draft instructions to paralegal Bogert regarding	0.30	\$100.50
10/03/2022	CJI	court deadlines and action necessary as well as NY	0.50	Ψ100.50
		court requirements. Kerrigan		
10/03/2022	ALB	Research of Southern District of New York	0.80	\$148.00
		Adversary Proceedings re Plaintiff's Initial Disclosures Pursuant to Fed. R. Bankr. P. 7026		
		and Fed. R. Civil P. 26(a) - Garbellano		
10/03/2022	BM	IOC with attorney Iurillo re: Garbellano and	0.10	\$33.50
- 3, 33, - 3, - 3		Kerrigan bankruptcy matters and future action.		722.53
10/03/2022	AMD	IOC w/attorney Iurillo and paralegal Bogert re: re	0.80	\$200.00
		Kerrigan Response to Objection to Claim (.30) and		
		Garbellano's Review of case (.20), response to		
		Motion to Dismiss (.10) and Disclosures (.20)		
10/03/2022	ALB	Further review and revise Response in Opposition	0.70	\$129.50
10/02/2022	AID	to Debtor's Omnibus Objection to Claim No. 19	0.90	¢1.40.00
10/03/2022	ALB	Conference with attorney Iurillo and Dragovich re Kerrigan Response to Objection to Claim (.30) and	0.80	\$148.00
		Garbellano's Review of case (.20), response to		
		Motion to Dismiss (.10) and Disclosures (.20)		
10/03/2022	CJI	IOC w/attorney Dragovich and paralegal Bogert	0.80	\$268.00
10,00,202	201	re: re Kerrigan Response to Objection to Claim	0.00	Ψ=00.00
		(.30) and Garbellano's Review of case (.20),		
		response to Motion to Dismiss (.10) and		
		Disclosures (.20)		
10/04/2022	AMD	Revise Plaintiff's Response in Opposition to	1.00	\$250.00
		Garbellano's Motion to Dismiss per CI		
10/04/2022	CII	suggestions.	0.40	#124.00
10/04/2022	CII	Finalize response to motion to dismiss. Garbellano	0.40 0.20	\$134.00
10/04/2022	CJI	Draft e mail to Receiver Wiand regarding additional information needed for initial	0.20	\$67.00
		disclosures		
10/04/2022	ALB	Draft Plaintiff's Initial Disclosures Pursuant to	1.20	\$222.00
10,0 ., 2022	1122	Fed. R. Bankr. P. 7026 and Fed. R. Civil P. 26(a) -	1.20	Ψ===:00
		Garbellano Adversary Bankruptcy Proceeding		
10/04/2022	AMD	Revise and finalize Plaintiff's Response to	0.20	\$50.00
		Garbellano's Motion to Dismiss to be filed.		
10/04/2022	ALB	Review and revise Plaintiff's Response in	0.70	\$129.50
		Opposition to Defendant's MTD Adversary		
		Proceeding - Garbellano		



10/05/2022	CJI	Review and revise initial disclosures, review of affidavits, review of charts of damages. telephone call with receiver Wiand regarding same. Garbellano	0.80	\$268.00
10/05/2022	CJI	Address further issues surrounding response to objection to claim and court requirements. Kerrigan	0.40	\$134.00
10/05/2022	CJI	Review of motion to dismiss and complaint in preparation for hearing. Garbellano	0.80	\$268.00
10/05/2022	ALB	Further review and revise Draft Plaintiff's Initial Disclosures Pursuant to Fed. R. Bankr. P. 7026 and Fed. R. Civil P. 26(a) - Garbellano Adversary Bankruptcy	0.30	\$55.50
10/05/2022	ALB	Draft electronic correspondence to debtor's counsel re Response in Opposition to Objection to Claim No. 19 - Kerrigan	0.20	\$37.00
10/06/2022	ALB	Review and analysis of Defendant's Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a) - Garbellano Adversary Proceeding	0.20	\$37.00
10/06/2022	ALB	Review and analysis of DOC 34 Debtor's Reply to Wiand's Response in Opposition to Obj to Claim & Exhibits, draft electronic correspondence to attorney Iurillo re same	0.20	\$37.00
10/09/2022	CJI	Review of reply to Receiver's motion to dismiss. Review of voluminous attachments and affidavits.	0.60	\$201.00
10/10/2022	CJI	Prepare for hearing on motion to dismiss case, prepare presentation to the court, review relevant pleadings and documents (Garbellano)	2.80	\$938.00
10/10/2022	ALB	Further assist attorney Iurillo re research on Wiand's Motion to Dismiss or Convert Garbellano's Bankruptcy Case, and Debtor's Response in Opposition to Wiand's Motion to Dismiss or Convert Garbellano's Bankruptcy Case- Garbellano Bankruptcy Proceeding	0.70	\$129.50
10/10/2022	ALB	Review and analysis of Debtor's Opposition to Wiand's MTD Ch 13 BK or Convert to Ch 7	0.30	\$55.50
10/10/2022	ALB	Review and analysis of DOC 39 Debtor's Declaration in Support of his Opposition to Wiand's MTD Ch 13 BK or Convert to Ch 7	0.30	\$55.50



10/10/2022	CJI	Prepare for hearing on debtor's motion to dismiss adversary proceeding, additional research on Res	1.90	\$636.50
		Judicata. Review and analysis of reply to Receivers response to motion to dismiss.(Garbellano)		
10/10/2022	ALB	Review and analysis of AP 12 Reply to Motion - Plaintiff's Opposition to Motion to Dismiss Adversary Proceeding	0.20	\$37.00
10/10/2022	PJL	IOC w/ CI re: MTD caselaw research - Kerrigan	0.20	\$39.00
10/10/2022	ALB	Assist attorney Iurillo in preparation for hearing on Garbellano's Pre-trial Conference, Defendant's Motion to Dismiss Adversary Case, Plaintiff's Response to Defendant's Motion to Dismiss Adversary Case, Defendant's Reply to Plaintiff's Response to Defendant's Motion to Dismiss Adversary Case - Garbellano Adversary	1.10	\$203.50
		Bankruptcy Proceeding		
10/10/2022	PJL	Review of MTD and potential issues with transactional approach and res judicata	2.00	\$390.00
10/10/2022	CJI	Review of objection to claim, response to objection, reply to response, prepare for hearing on objection. (Kerrigan)	1.20	\$402.00
10/10/2022	ALB	Assist attorney Iurillo in preparation for hearing on Debtor's Objection to Wiand's Claim No. 19 for Kerrigan Management, Wiand's Response in Opposition to Debtor's Objection to Wiand's Claim No. 19 for Kerrigan Management, and Debtor's Reply in Opposition Wiand's Response in Opposition to Debtor's Objection to Wiand's Claim No. 19 for Kerrigan Management- Kerrigan Bankruptcy Proceeding	0.80	\$148.00
10/10/2022	PJL	Research and review of: final judgment definition under NY law	1.00	\$195.00
10/10/2022	PJL	Call with attorney Iurillo re: MTD OC's caselaw	0.10	\$19.50
10/10/2022	CJI	IOC w/attorney Lopez re: MTD caselaw research - Kerrigan	0.20	\$67.00
10/10/2022	CJI	Call with attorney Lopez re: MTD OC's caselaw	0.10	\$33.50
10/11/2022	CJI	Attend hearing on Receiver's motion to dismiss case and debtor's motion to dismiss adversary proceeding (Garbellano)	3.20	\$1,072.00



10/11/2022	BM	Directives re: Ambit garnishment judgment and IOC with paralegal Turner re: Garbellano and	0.40	\$134.00
		Kerrigan bk hearings.		
10/11/2022	ALB	Review and analysis of Southern District of New	0.40	\$74.00
		York Bankruptcy for local rules and procedures on		
		Orders to Dismiss and requesting transcripts of		
10/11/2022	CH	hearings - Garbellano	2.20	Φ727.00
10/11/2022	CJI DT	Attend hearing on objection to claim. Kerrigan	2.20 0.40	\$737.00
10/11/2022	DI	In office discussion with attorney Bea McConnell regarding finding corporate counsel for Ambit	0.40	\$70.00
		Energy Holdings LLC (.1); Research regarding		
		finding corporate counsel for Ambit Energy		
		Holdings LLC (.2); Correspondence to attorneys		
		Bea McConnell and John Waechter with research		
10/11/2022	AID	findings (.1)	0.40	ф 7.4.0 0
10/11/2022	ALB	Further aid of attorney in hearing preparation - Garbellano	0.40	\$74.00
10/11/2022	ALB	Further aid of attorney in preparation of hearing -	0.30	\$55.50
		Kerrigan		
10/11/2022	ALB	Review and analysis of Southern District of New	0.30	\$55.50
		York Bankruptcy for local rules and procedures on		
		Orders to Allowing Claim and requesting		
10/12/2022	CJI	transcripts of hearings - Kerrigan Draft detailed e mail regarding results of hearing	0.50	\$167.50
10/12/2022	CJI	and effects of same, garbellano	0.50	\$107.50
10/12/2022	CJI	Review of notice of termination of each matter and	0.40	\$134.00
		contested matters for Garbellano and Kerrigan		
10/13/2022	CJI	Telephone call with with court regarding	0.30	\$100.50
		procedural matters associated with courts rulings.		
10/13/2022	ALB	Garbellano Research and analysis of elements required in the	1.30	\$240.50
10/13/2022	ALD	Southern District of New York Bankruptcy Court	1.50	Ψ2+0.30
		for proposed orders dismissing cases - Garbellano		
10/13/2022	ALB	Research and analysis of elements required in the	0.90	\$166.50
		Southern District of New York Bankruptcy Court		
		for proposed orders denying debtor's objection to		
10/14/2022	AID	claim - Kerrigan	0.60	¢111 00
10/14/2022	ALB	Further review and analysis of orders denying objection to claims in aid of attorney, draft	0.60	\$111.00
		electronic correspondence to attorney re same		



10/17/2022	ALB	Draft Proposed Order Granting Motion to Dismiss - Garbellano	0.80	\$148.00
10/17/2022	ALB	Conference with attorney Iurillo re draft order on motion to dismiss - Garbellano	0.30	\$55.50
10/17/2022	ALB	Review and analysis of Objection to Claim hearing transcript in support of drafting proposed order denying objection to claim - Kerrigan	0.70	\$129.50
10/17/2022	BM	Review correspondence re: Nagel settlement payment; note file re: same; correspondence with attorney Waecther.	0.20	\$67.00
10/17/2022	ALB	Draft Proposed Order Denying Debtor's Objection to Receiver's Claim No. 19	0.70	\$129.50
10/17/2022	ALB	Review and analysis of transcript from hearing on Motion to Dismiss Case in support of drafting Order Granting Motion to Dismiss - Garbellano	0.60	\$111.00
10/17/2022	CJI	Conference with paralegal Bogert re draft order on motion to dismiss - Garbellano	0.30	\$100.50
10/17/2022	JWW	IOC with attorney McConnell re: collection status.	0.10	\$33.50
10/18/2022	CJI	Initial draft of order, initial review of excerpts of hearing, review and identify missing excerpts, request copies of same. Garbellano	0.60	\$201.00
10/18/2022	ALB	Review and revise draft proposed Order on Motion to Dismiss - Garbellano	0.50	\$92.50
10/18/2022	CJI	Initial review of draft of order, review of excerpts of hearing transcripts, identify missing portions of the ruling, request complete transcript (Kerrigan)	0.60	\$201.00
10/18/2022	BM	IOC with attorney Waechter (.10) and correspondence with Jeffrey Rizzo (.10) re: collection status.	0.20	\$67.00
10/18/2022	ALB	Further review and revise details of proposed Order on Motion to Dismiss, review and analysis of CFTC Action, DeCorta and Anile conviction, Middle District of Florida civil suit and other documents in support of same- Garbellano	0.80	\$148.00
10/18/2022	PJL	Review CI's 2nd Draft cites	1.00	\$195.00
10/19/2022	CJI	Draft detailed e mail to Receiver Wiand. explained ruling of court on objection to claim. Advise on legal and practical effect of same. Advise on recommended course of action to maximize recovery for receivership estate. Kerrigan	0.80	\$268.00



10/10/2022	AID	Desires and anotherized statements assumed and	0.20	¢27.00
10/19/2022	ALB	Review and analysis of electronic correspondence from debtor's attorney re debt cap and total	0.20	\$37.00
		unsecured debt - Kerrigan		
10/19/2022	ALB	Review and revise correspondence to Mr. Wiand	0.30	\$55.50
		re debt cap, total unsecured debt and strategy for		
10/10/2022	CH	moving forward - Kerrigan	0.20	ф <i>(</i> 7,00
10/19/2022	CJI	Review response from Receiver Wiand, Confirm	0.20	\$67.00
		action to be taken in the Kerrigan case to pursue dismissal of the case. Kerrigan		
10/19/2022	PJL	Check citations for BR caselaw + review	0.30	\$58.50
10/19/2022	ALB	Further review and revise proposed Order on	0.60	\$111.00
		Motion to Dismiss Case - Garbellano		
10/19/2022	CJI	Review of hearing transcript. Further draft and	2.40	\$804.00
		revise Order on Motion to Dismiss accordingly.		
		Review of applicable court rulings cited by the		
10/10/2022	AID	court at the hearing. Further revise Order	0.20	Φ <i>EE</i> 50
10/19/2022	ALB	Review and respond to electronic correspondence from attorneys Iurillo and Jimenez-Lopez re	0.30	\$55.50
		proposed Motion to Dismiss - Garbellano		
10/19/2022	ALB	Review and respond to electronic correspondence	0.20	\$37.00
10,19,2022	1122	from attorneys Iurillo re proposed Motion to	0.20	φ27.00
		Dismiss - Kerrigan		
10/19/2022	BM	Correspondence with client and attorney Iurillo re:	0.30	\$100.50
		bankruptcy matters (0.10); review checks re:		
		Johnston and Wilkerson and note file re: same		
10/20/2022	CII	(0.20)	1.50	\$502.50
10/20/2022	CJI	Review court transcript from hearing. Insert applicable provisions, review and revise order	1.50	\$502.50
		consistent with court ruling. Review of cases cited		
		by the judge at the hearing. Further review and		
		revise order. Kerrigan		
10/20/2022	PJL	Review of complex bank. caselaw from court's	1.00	\$195.00
		ruling		
10/20/2022	ALB	Further review and revise draft Order Denying	0.40	\$74.00
10/20/2022	ЪТ	Objection to Receiver's Claim No. 19 - Kerrigan	0.20	¢50.50
10/20/2022	DT	Review correspondence from attorney Beatriz McConnell regarding letter to Wilkerson (.1); Edit	0.30	\$52.50
		letter to Wilkerson (.1); Correspondence to		
		Wilkerson with copy of letter regarding		
		completion of settlement payments (.1)		



Invoice Date: November 17, 2022

10/20/2022	ALB	Further review and revise proposed Order	0.50	\$92.50
		Granting Wiand's Motion to Dismiss - Garbellano		
10/20/2022	PJL	Draft opinion on court's cited case	0.50	\$97.50
10/20/2022	CJI	Final review, revision and approval of order for submission to the court. Garballeno	0.60	\$201.00
10/20/2022	BM	Draft letter to Wilkerson re: settlement; directives re: same.	0.30	\$100.50
10/24/2022	ALB	Review and analysis of Order Granting Motion to Dismiss Bankruptcy, and all other relevant pleadings filed by Bankruptcy Court terminating deadlines, note file re same - Garbellano	0.60	\$111.00
10/24/2022	ALB	Review and analysis of Order Denying Objection to Claim entered by court - Kerrigan	0.20	\$37.00
10/24/2022	BM	Review order dismissing Garbellano bankruptcy; correspondence with counsel.	0.20	\$67.00
10/25/2022	BM	Directives re: notice of dismissal in Garbellano bankruptcy.	0.10	\$33.50
10/25/2022	JWW	Phone conference w/ Defendant Gladman re possible revised Settlement Agreement.	0.20	\$67.00
10/25/2022	ALB	Research Debt Limit Chapter 13, basis for dismissal of bankruptcy cases - Kerrigan	1.90	\$351.50
10/25/2022	ALB	Draft MTD for Kerrigan Bankruptcy Case - Kerrigan	2.30	\$425.50
10/25/2022	BM	Edit interim report and correspondence with attorney Perez re: same.	0.40	\$134.00
10/27/2022	ALB	Telephone conference with attorney Innocent re Rocco Garbellano's Motion to Set Aside Default Judgment and status of Bankruptcy case, review and analysis of documents filed in relation to same, draft electronic correspondence to attorney Innocent providing those documents for her review	0.40	\$74.00
10/27/2022	BM	IOC with paralegal Bogert re: Garbellano and directives re: same.	0.20	\$67.00
10/27/2022	ALB	IOC with attorney McConnell re: Garbellano and directives re: same.	0.20	\$37.00
Total Fees			74.00	\$18,820.50

EXPENSES

Invoice No. 80543 John Waechter as Counsel Burton W. Wiand v. Chris Arduini, et al.



Invoice Date: November 17, 2022

Date	Qty.	Description	Each	Amount
10/11/2022	1	UPS - Overnight Delivery to Registered Agent for Ambit Energy Holdings LLC	\$20.64	\$20.64
10/17/2022	1	Veritext - Inv. 6107328 10/17/2022 - Kevin A. Kerrigan v.	\$87.20	\$87.20
Total Expen	ses			\$107.84
Total Fees and Previous Balantess: Paymen TOTAL DU	ance nts Appli			\$18,928.34 \$46,813.59 (\$0.00) \$65,741.93

\$65,741.93 TOTAL LEGAL SERVICES



December 6, 2022

John Waechter as Counsel

E-Mailed to: jperez@wiandlaw.com

Please remit with payment

INVOICE FOR LEGAL SERVICES RENDERED THROUGH 11/28/2022

Client Name: Wiand Guerra King and Burton W. Wiand

Client Matter No. 2450

Matter Name: Burton W. Wiand v. Chris Arduini, et al.

Invoice Date: December 06, 2022

Invoice No. 80804

TOTAL AMOUNT DUE THIS BILL \$67,512.28

TOTAL DUE IF PAID IN FULL WITHIN 15 DAYS* \$67,466.89

Payment Options:

Remittance by credit card:

St. Petersburg, FL 33701

You may pay by credit card online here.

Remittance by check: Remittance by wire:

Englander Fischer, LLP

721 First Avenue North

Bank: Republic Bank & Trust Company
601 West Market Street, Louisville, KY

40202-2700

Routing # 083001314

For credit to: Englander Fischer, LLP

Account # 59436581

Please reference matter number

*3% Discount on fees only applied to invoices paid in full within 15 days from the invoice date

Phone: 727-898-7210 Fax: 727-898-7218 Invoice No. 80804 John Waechter as Counsel Burton W. Wiand v. Chris Arduini, et al.



Invoice Date: December 6, 2022

FEES

Date	Staff	Description	Hours	Amount
11/01/2022	CJI	review and revise motion to dismiss, identify key facts to be included in motion.	0.70	\$234.50
11/02/2022	BM	IOC with attorney Iurillo re: motion to dismiss Kerrigan bk.	0.20	\$67.00
11/02/2022	ALB	IOC with attorney McConnell re: motion to dismiss - Kerrigan Bankruptcy	0.20	\$37.00
11/03/2022	CJI	Review of action available now that dismissal is final (Garbellano)	0.20	\$67.00
11/04/2022	ALB	Review and analysis of Amended Schedules E/F for Kerrigan, draft electronic correspondence to attorney Iurillo re same	0.50	\$92.50
11/08/2022	BM	Correspondence with Alan Johnston.	0.10	\$33.50
11/11/2022	CJI	Draft internal electronic correspondence to attorney McConnell regarding ability to proceed with federal case against Garbellano	0.10	\$33.50
11/14/2022	BM	Correspondence with attorney Iurillo re: Garbellano.	0.10	\$33.50
11/17/2022	DT	Review correspondence from attorney Beatriz McConell (.1); Draft Notice of Filing of Notice of Filing Order Granting Receiver's Motion to Dismiss Garbellano's Bankruptcy Case (.1)	0.20	\$35.00
11/17/2022	BM	Edit notice of filing re: Garbellano and dismissal of bk.	0.40	\$134.00
11/18/2022	ALB	Review and revise draft MTD for Kerrigan Bankruptcy Case with updated debt limit language and civil case background (.90), research bankruptcy rules and regulations re same (.40), review and analysis of Kerrigan's Amended Schedules and Amended Chapter 13 Plan (.50), draft electronic correspondence to attorney Iurillo and note file re same (.10) - Kerrigan	1.90	\$351.50
11/21/2022 11/28/2022	BM ALB	Correspondence with co-counsel. Review and analysis of draft Motion to Dismiss, conference with attorney Iurillo re same - Kerrigan	0.40 0.50	\$134.00 \$92.50

Invoice No. 80804 John Waechter as Counsel Burton W. Wiand v. Chris Arduini, et al.



Invoice Date: December 6, 2022

11/28/2022	CJI	Review and analysis of draft Motion to Dismiss, conference with paralegal Bogert re same - Kerrigan	0.50	\$167.50
Total Fees			6.00	\$1,513.00
<u>EXPENSES</u>				
Date	Qty.	Description	Each	Amount
11/02/2022	1	Veritext _ Rocco Garbellano Inv. 6145320 , 11-02-2022	\$207.10	\$207.10
Total Expen	ses			\$207.10
Total Fees a	_	enses		\$1,720.10
Previous Bala				\$65,792.18
Less: Paymer		ied		(\$0.00)
TOTAL DU	\mathbf{E}			\$67,512.28

\$67,512.28 TOTAL LEGAL SERVICES



January 6, 2023

John Waechter as Counsel

E-Mailed to: jperez@wiandlaw.com

Please remit with payment

INVOICE FOR LEGAL SERVICES RENDERED THROUGH 12/19/2022

Client Name: Wiand Guerra King and Burton W. Wiand

Client Matter No. 2450

Matter Name: Burton W. Wiand v. Chris Arduini, et al.

Invoice Date: January 06, 2023

Invoice No. 81090

TOTAL AMOUNT DUE THIS BILL \$22,925.57

TOTAL DUE IF PAID IN FULL WITHIN 15 DAYS* \$22,863.79

Payment Options:

Remittance by credit card:

You may pay by credit card online here.

Remittance by check: Remittance by wire:

Englander Fischer, LLP

Bank: Republic Bank & Trust Company

721 First Avenue North

Address: 601 West Market Street, Louisville, KY

St. Petersburg, FL 33701 40202-2700

Routing # 083001314

For credit to: Englander Fischer, LLP

Account # 59436581

Phone: 727-898-7210

Fax: 727-898-7218

eflegal.com

Please reference matter number

*3% Discount on fees only applied to invoices paid in full within 15 days from the invoice date

Invoice No. 81090 John Waechter as Counsel Burton W. Wiand v. Chris Arduini, et al.



Invoice Date: January 6, 2023

FEES

Date	Staff	Description	Hours	Amount
12/01/2022	CJI	Further draft of Motion to dismiss Kerrigan case, review of court ruling on objection to claim and and other related pleadings.	1.70	\$569.50
12/01/2022	ALB	Review and revise Motion to Dismiss detail further events in civil case- Kerrigan Bankruptcy	2.20	\$407.00
12/02/2022	PJL	Research re: 11USC 109(e)	0.50	\$97.50
12/05/2022	CJI	Review applicable caselaw on dismissal, revise and finalize Motion to dismiss for Kerrigan	1.50	\$502.50
12/05/2022	CJI	Conference with paralegal Bogert re draft Motion to Dismiss - Kerrigan Bankruptcy	0.30	\$100.50
12/09/2022	CJI	Draft e mail to receiver Wiand advising on judge presiding over the Kerrigan MTD	0.10	\$33.50
12/13/2022	ALB	Call to Courtroom Deputy, re MTD Notice of Hearing requirements, note file re same - Kerrigan	0.20	\$37.00
12/14/2022	CJI	Review and revise Notice of hearing, Kerrigan	0.30	\$100.50
12/19/2022	ALB	Review and analysis of Motion to Dismiss, Order on Motion to Dismiss, draft electronic correspondence to attorneys and note file re same - Lipinczyk (1-21-mc-14)	0.60	\$111.00
12/19/2022	BM	Review Lipincyzk motion to dismiss correspondence with client re: same.	0.30	\$100.50
Total Fees			7.70	\$2,059.50

EXPENSES

Date	Qty.	Description	Each	Amount
12/15/2022	1	Postage	\$0.81	\$0.81
12/14/2022	1	Service of Process - Motion To Dismiss - Kevin Kerrigan	\$175.75	\$175.75
12/14/2022	1	Service of Process - Notice of Hearing Motion to Dismiss - Kerrigan, Kevin A.	\$41.07	\$41.07
Total Expens	ses			\$217.63

Invoice No. 81090 John Waechter as Counsel Burton W. Wiand v. Chris Arduini, et al.



Invoice Date: January 6, 2023

 Total Fees and Expenses
 \$2,277.13

 Previous Balance
 \$67,512.28

 Less: Payments Applied
 (\$46,863.84)

 TOTAL DUE
 \$22,925.57

\$22,925.57 TOTAL LEGAL SERVICES

EXHIBIT 14



CPAs, Forensic and Insolvency Advisors

EIN #46-5394135

CFTC V. OASIS INTERNATIONAL GROUP, LIMITED, ET AL Client ID: 90141 Invoice #9449 - 11/30/22

TIME SUMMARY BY STAFF

<u>Staff</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
RLW - RACHEL WEISS - CONSULTANT CPA, CFE	1.00	374.00	374.00
TOTAL	1.00	_	\$374.00
	BLENDED RATE	\$374.00	
	DISCOUNT		(56.10)
		_	
TOTAL AMOUNT OF THIS INVOICE			\$317.90
	ADJUSTED	=	
	BLENDED RATE	\$317.90	

Verille Duilding 1000 Courth Forders I Ulaharan Cuite 200 Fort Londondelle FL 2021/





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: 9449

11/30/2022

Client ID: 90141

For Professional Services Rendered Through November 30, 2022

<u>DATE</u>	<u>STAFF</u>	DESCRIPTION	<u>HRS</u>	AMOUNT
LITIGATION S	SUPPORT	Г		
11/09/2022	RLW	PREPARE DISTRIBUTION CALCULATION	0.40	149.60
11/29/2022	RLW	PREPARE INVESTOR TRANSACTION DETAIL SCHEDULES	0.60	224.40
				374.00
				374.00
		Courtesy Discount		(56.10)
		Total amount of this	invoice	\$317.90



CPAs, Forensic and Insolvency Advisors

EIN #46-5394135

CFTC V. OASIS INTERNATIONAL GROUP, LIMITED, ET AL Client ID: 90141 Invoice #9559 - 12/31/22

TIME SUMMARY BY STAFF

<u>Staff</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
RLW - RACHEL WEISS - CONSULTANT CPA, CFE	1.30	374.00	486.20
TOTAL	1.30	_	\$486.20
	BLENDED RATE	\$374.00	
	15% DISCOUNT		(72.93)
		_	
TOTAL AMOUNT OF THIS INVOICE			\$413.27
	ADJUSTED	Ξ	
	BLENDED RATE	\$317.90	



Kapila Building • 1000 South Federal Highway • Suite 200 • Fort Lauderdale FL 33316





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: 9559

12/31/2022

Client ID: 90141

<u>DATE</u>	<u>STAFF</u>	DESCRIPTION		<u>HRS</u>	AMOUNT
LITIGATION	SUPPOR [*]	Г			
12/07/2022	RLW	UPDATE DISTRIBUTION CALCULATION		0.30	112.20
12/08/2022	RLW	TC WITH M. GURA RE: DISTRIBUTIONS S	CHEDULE	0.30	112.20
12/08/2022	RLW	CONTINUE TO PREPARE DISTRIBUTION	ANALYSIS	0.40	149.60
12/13/2022	RLW	INVESTIGATE TRANSFERS TO AMANDA	HAAS	0.30	112.20
					486.20
					486.20
			15% Discount		(72.93)
		٦	Total amount of this invoice		\$413.27

EXHIBIT 15

Case 8:19-cv-00886-VMC-SPF Document 724-15 Filed 02/15/23 Page 2 of 4 PageID 11550



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

OASIS MANAGEMENT October 1, 2022 - October 31, 2022

Date	Activity Category	Timekeeper	Description	Hours	Rate	Α	mount
			Recorded deposits, updated accounting records, prepared quarterly reports,				
10/3/2022	Accounting & Auditing	SAO	reconciled bank statements #4299, #3838 and #2728	2.50	\$ 125.00	\$	312.50
10/4/2022	Accounting & Auditing	GAH	Reviewed 3rd Quarter report	0.75	\$ 155.00	\$	116.25
10/4/2022	Accounting & Auditing	SAO	Updated accounting records	0.30	\$ 125.00	\$	37.50
10/12/2022	Accounting & Auditing	SAO	Reviewed Quickbooks for any reoccuring payments per the attorney	0.25	\$ 125.00	\$	31.25
10/17/2022	Accounting & Auditing	SAO	Recorded bank activity	0.30	\$ 125.00	\$	37.50
			Updated investor spreadsheet for attorney, updated accounting records, prepared				
10/18/2022	Accounting & Auditing	SAO	report of clawback settlements for attorney	1.10	\$ 125.00	\$	137.50
10/19/2022	Accounting & Auditing	SAO	Recorded bank activity, updated quarterly report	1.00	\$ 125.00	\$	125.00
10/19/2022	Accounting & Auditing	WEP	Updated 3rd Quarter Fund Accounting Report	1.00	\$ 320.00	\$	320.00
10/20/2022	Accounting & Auditing	GAH	Reviewed 3rd Quarter Fund Accounting Report	0.25	\$ 125.00	\$	31.25
10/20/2022	Accounting & Auditing	SAO	Updated accounting records	0.50	\$ 125.00	\$	62.50
10/21/2022	Accounting & Auditing	SAO	Updated accounting records	0.30	\$ 125.00	\$	37.50
10/24/2022	Accounting & Auditing	SAO	Updated quarterly reports, updated accounting records	0.75	\$ 125.00	\$	93.75
10/24/2022	Accounting & Auditing	GAH	Updated and reviewed final 3rd Quarter Report	0.75	\$ 155.00	\$	116.25
10/31/2022	Accounting & Auditing	SAO	Updated accounting records	0.30	\$ 125.00	\$	37.50
	Total Accounting & Auditing			10.05	•	\$ 1	1,496.25

Total Burton Wiand as Receiver, Oasis Management

<u>10.05</u>

\$ 1,496.25

Case 8:19-cv-00886-VMC-SPF Document 724-15 Filed 02/15/23 Page 3 of 4 PageID 11551



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

OASIS MANAGEMENT November 1, 2022 - November 30, 2022

Date	Activity Category	Timekeeper	Description	Hours	Rate	-	Amount
11/1/2022	Accounting & Auditing	SAO	Reviewed accounts payable for attorney	0.30	\$ 125.00	\$	37.50
11/2/2022	Accounting & Auditing	GAH	Entered September expenses	0.25	\$ 155.00	\$	38.75
11/2/2022	Accounting & Auditing	SAO	Recorded deposits, discusses storage invoices, updated accounting records, reviewed fee payments, reconciled #3838 and #4299 bank statements	2.00	\$ 125.00	\$	250.00
			Updated Quickbooks records, updated accounting records, reviewed bank activity,				
11/4/2022	Accounting & Auditing	SAO	researched vendor payments for attorney	1.20	\$ 125.00	\$	150.00
11/7/2022	Accounting & Auditing	SAO	Updated accounting records	0.30	\$ 125.00	\$	37.50
11/11/2022	Accounting & Auditing	SAO	Reviewed Quickbooks for 2022 1099s	0.30	\$ 125.00	\$	37.50
11/29/2022	Accounting & Auditing	SAO	Updated accounting records, recorded bank activity, reconciled #2728 bank statement	1.10	\$ 125.00	\$	137.50
11/29/2022	Accounting & Auditing	GAH	Reviewed accounting for transactions paid by Wiand PA	0.50	\$ 155.00	\$	77.50
	Total Accounting & Auditing			5.95		\$	766.25

Total Burton Wiand as Receiver, Oasis Management

<u>5.95</u>

\$ 766.25



4023 Tampa Road, Suite 2000 Oldsmar, FL 34677 Phone (727) 785-4447 Fax (727) 784-5491

OASIS MANAGEMENT December 1, 2022 - December 31, 2022

Date	Activity Category	Timekeeper	Description	Hours	Rate	Amount
			Recorded bank activity, updated accounting records, recorded deposits, reconciled			
12/1/2022	Accounting & Auditing	SAO	#4299 and #3838 bank statements	1.80	\$ 125.00	225.00
40/0/000		0.10	Reviewed accounting records, discussed upcoming distributions with attorney,	0.05	A 405.00	440 ==
12/2/2022	Accounting & Auditing	SAO	discussed procedures for distributions with CPA, prepared claimant distributions	3.35	\$ 125.00	418.75
12/3/2022	Accounting & Auditing	SAO	Prepared checkes for claimant distributions	2.30	\$ 125.00	287.50
12/5/2022	Accounting & Auditing	SAO	Prepared distribution checks	6.00	\$ 125.00	750.00
12/6/2022	Accounting & Auditing	TNJ	Processed distribution checks for proofing	0.25	\$ 125.00	31.25
12/6/2022	Accounting & Auditing	SAO	Prepared distribution checks, recorded distribution checks	3.40	\$ 125.00	425.00
12/7/2022	Accounting & Auditing	SAO	Reviewed and sent bank statements to attorney, updated vendor records	0.70	\$ 125.00	87.50
12/8/2022	Accounting & Auditing	SAO	Prepared updated claimaint distribution checks	1.00	\$ 125.00	125.00
			Placed order for new Quickbooks checks, processed claims disbursements with			
12/9/2022	Accounting & Auditing	SAO	updated amount per attorney	7.30	\$ 125.00	912.50
12/9/2022	Accounting & Auditing	TNJ	Printed distribution checks to verify format	0.50	\$ 125.00	62.50
12/10/2022	Accounting & Auditing	SAO	Prepared distribution checks	2.25	\$ 125.00	281.25
12/12/2022	Accounting & Auditing	TNJ	Researched abbreviations for distributions checks	0.25	\$ 125.00	31.25
12/12/2022	Accounting & Auditing	GAH	Processed claimant checks	0.25	\$ 155.00	38.75
			Reconciled #2728 bank statement, called Intuit regarding Quickbooks check order,			
12/12/2022	Accounting & Auditing	SAO	reviewed & discussed formatting in Quickbooks for disbursements with attorney	1.10	\$ 125.00	137.50
			Reviewed and discussed formatting for disbursement checks, prepared distribution			
12/13/2022	Accounting & Auditing	SAO	checks	7.70	\$ 125.00	962.50
			Researched how to batch change the date on 750 checks, emailed instructions to			
12/14/2022	Accounting & Auditing	DMM	internal staff on how to export to excel, change dates and batch imported	1.00	\$ 155.00	155.00
			Researched old invoices for asset manager, called Quickbooks regarding date on			
12/14/2022	Accounting & Auditing	SAO	disbursement checks, discussed changes in disbursement checks and balance	1.80	\$ 125.00	225.00
12/14/2022	Accounting & Auditing	TNJ	Reviewed checks in Quickbooks, deleted duplicate and added missing check	1.25	\$ 125.00	156.25
12/14/2022	Accounting & Auditing	GAH	Processed claimant checks	0.25	\$ 155.00	38.75
12/15/2022	Accounting & Auditing	SAO	Researched old invoices for payment dates	0.40	\$ 125.00	50.00
12/15/2022	Accounting & Auditing	GAH	Reviewed claimant checks	0.25	\$ 155.00	38.75
12/15/2022	Accounting & Auditing	MKM	Reviewed report list	3.50	\$ 125.00	437.50
12/15/2022	Accounting & Auditing	TNJ	Exported transaction report, started reviewing checks	1.00	\$ 125.00	125.00
12/16/2022	Accounting & Auditing	TNJ	Reviewed distribution checks, made corrections in Quickbooks	1.50	\$ 125.00	187.50
12/20/2022	Accounting & Auditing	SAO	Updated accounting records	0.30	\$ 125.00	37.50
			Prepared sample checks of distributions for attorney, tested Quickbooks batch			
12/21/2022	Accounting & Auditing	SAO	entry for distribution checks	0.90	\$ 125.00	112.50
12/22/2022	Accounting & Auditing	SAO	Reviewed check formatting for disbursement checks	0.25	\$ 125.00	31.25
	Total Accounting & Auditing			50.55		6,371.25
12/5/2022	Consulting	WEP	Responded to inquiry by claimant regarding IRA ownership	1.00	\$ 320.00	320.00
	Total Consulting			1.00		\$ 320.00

EXHIBIT 16

Case 8:19-cv-00886-VMC-SPF Document 724-16 Filed 02/15/23 Page 2 of 4 PageID 11554 E-Hounds, Inc.

Invoice for Services

All funds payable to:

32815 US 19 North Suite 100 Palm Harbor, Florida 34684 support@ehounds.com (727) 726-8985

Open Date	Close Date	Invoice #	Balance Due	Case Reference (E9295)	Terms
10/01/2022	10/31/2022	39455	\$2565.00	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
2	10/01/2022	E-Hounds	s Review Platform (Courtesy Rate Monthly)		\$595.00	\$1190.00
4	10/01/2022	E-Hounds	s Review Platform Add'l Users (per user) Courtesy Rate Sallahlaw users		\$125.00	\$500.00
1	10/01/2022	E-Hounds	s Review Platform Add'l Users (per user) Courtesy Rate Eflegal user		\$125.00	\$125.00
1	10/01/2022	E-Hounds	s Review Platform Add'l Users (per user) Courtesy Rate bwiand		\$125.00	\$125.00
5	10/01/2022	E-Hounds	s Review Platform Add'l Users (per user) Courtesy Rate GK users		\$125.00	\$625.00

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

\$2565.00

Payments Applied

TOTAL

\$2565.00

Balance Due

\$2565.00

Retainer Amount Remaining

Please note: Our fees are subject to change annually. Last change: 2/1/2022

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 storage of recovered data in mote than 30 days intenses offerwise specified in Willing 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 responsibility of that 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: Venmo: @ehounds







support@ehounds.com





venmo

Case 8:19-cv-00886-VMC-SPF Document 724-16 Filed 02/15/23 Page 3 of 4 PageID 11555 **Invoice for Services**

All funds payable to:

E-Hounds, Inc.

32815 US 19 North Suite 100 Palm Harbor, Florida 34684 support@ehounds.com (727) 726-8985

Open Date	Close Date	Invoice #	Balance Due	Case Reference (E9295)	Terms
11/01/2022	11/30/2022	40247	\$2565.00	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
2	11/01/2022	E-Hounds Review Platform (Courtesy Rate Monthly)		\$595.00	\$1190.00
4	11/01/2022	E-Hounds Review Platform Add'l Users (per user) Courtesy Rate Sallahlaw users		\$125.00	\$500.00
1	11/01/2022	E-Hounds Review Platform Add'l Users (per user) Courtesy Rate Eflegal user		\$125.00	\$125.00
1	11/01/2022	E-Hounds Review Platform Add'l Users (per user) Courtesy Rate bwiand		\$125.00	\$125.00
5	11/01/2022	E-Hounds Review Platform Add'l Users (per user) Courtesy Rate GK users		\$125.00	\$625.00

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

\$2565.00

Payments Applied

TOTAL

\$2565.00

Balance Due

\$2565.00

Retainer Amount Remaining

Please note: Our fees are subject to change annually. Last change: 2/1/2022

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 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 finding/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 responsibility of that 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:







Venmo: @ehounds







venmo

Case 8:19-cv-00886-VMC-SPF Document 724-16 Filed 02/15/23 Page 4 of 4 PageID 11556 **Invoice for Services**

All funds payable to:

E-Hounds, Inc.

32815 US 19 North Suite 100 Palm Harbor, Florida 34684 support@ehounds.com (727) 726-8985

Open Date	Close Date	Invoice #	Balance Due	Case Reference (E9295)	Terms
12/01/2022	12/31/2022	41094	\$2565.00	CFTC v. Oasis, et al.	Due on Receipt

Invoice to: Burton W Wiand PA 114 Turner Street Clearwater, Fl 33756

Case Contact: Burton W Wiand PA **Burt Wiand** 813-347-5100

Q	Date	Expedited	All quantities are based Hourly unless otherwise noted	Tech	Price	Ext
2	12/01/2022	E-Hound	s Review Platform (Courtesy Rate Monthly)		\$595.00	\$1190.00
4	12/01/2022	E-Hound	s Review Platform Add'l Users (per user) Courtesy Rate Sallahlaw users		\$125.00	\$500.00
1	12/01/2022	E-Hound	s Review Platform Add'l Users (per user) Courtesy Rate Eflegal user		\$125.00	\$125.00
1	12/01/2022	E-Hound	s Review Platform Add'l Users (per user) Courtesy Rate bwiand		\$125.00	\$125.00
5	12/01/2022	E-Hound	s Review Platform Add'l Users (per user) Courtesy Rate GK users		\$125.00	\$625.00

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

\$2565.00

Payments Applied

TOTAL

\$2565.00

Balance Due

\$2565.00

Retainer Amount Remaining

Please note: Our fees are subject to change annually. Last change: 2/1/2022

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 storage of recovered data in mote than 30 days intenses offerwise specified in Willing 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 responsibility of that 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:







Venmo: @ehounds







EXHIBIT 17

The RWJ Group,LLC

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



Law Office of Burton W. Wiand

114 Turner Street Clearwater, FL 33756

Invoice 20304

Date	Dec 31, 2022
Terms	
Service Thru	Dec 31, 2022

In Reference To: Oasis (Time)

Date	Services	Hours
10/10/2022	Prepared an inventory for the 2 storage units in Sarasota for Mr. Rizzo.	0.60
11/01/2022	Communications with Mr. Perez regarding remaining assets in this case (.2). Communications with Mr. Wiand regarding same (.2).	0.40
	Total Hours	1.00 hrs
	Total Time	\$ 75.00
	Total Invoice Amount	\$ 75.00

The RWJ Group,LLC

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



Law Office of Burton W. Wiand

114 Turner Street Clearwater, FL 33756 Invoice 20304

Date	Dec 31, 2022
Terms	
Service Thru	Dec 31, 2022

User Hours Summary

Billing Period: 10/01/2022 - 12/31/2022

User Hour Totals

User	Hours Billed	Rate/Hour	Amount Billed
Roger Jernigan	1.00	\$ 75.00	\$ 75.00

EXHIBIT 18



Oasis International Group, Ltd.

PO Box 309

Ugland House

Grand Cayman

KY1-1104

Invoice No.

Date

Client No.

Contact

3551591 03-Nov-22 679481 Finn OHegarty

INVOICE

Page

Legal Fees (see below)	
To our charges for professional services rendered by this firm for the period ending on 31 October 2022.	3,912.50
Total Fees	3,912.50
Total Current Invoice	3,912.50
Total Credits Applied	(3,912.50)
TOTAL BALANCE DUE	US\$0.00

Thank you for instructing Maples and Calder (Cayman) LLP. Please send us payment within 30 days of receiving this invoice and confirm payment details by email to accountshelp@maples.com. All of the services provided by this firm were performed outside of the United States of America. The provision of services by Maples and Calder (Cayman) LLP to you are governed by our standard terms of engagement available at www.maples.com.

USD Wire transfer instructions (must be sent as a SWIFT MT103 international wire transfer AND not as a MT202 or Fedwire):

Beneficiary Bank: Butterfield Bank (Cayman) Ltd, PO Box 705, 12 Albert Panton Street, Grand Cayman KY1-1107

SWIFT BIC: BNTBKYKYXXX | Beneficiary: Maples and Calder (Cayman) LLP | Beneficiary Account: 0110103434400

Intermediary Bank: BNY Mellon, One Wall Street, New York, NY 10286 | SWIFT BIC: IRVTUS3NXXX

Remitter and Beneficiary account number, name and address details must be included within wire transfer instructions.

Please instruct your bank to remit the amount in full. Local and overseas bank charges are borne by the remitter.

Or

Cayman Islands

A USD draft drawn on a United States bank which should be couriered to our address quoting our reference 679481 - 3551591

Cybercrime and Fraud Warning & Disclaimer: We will not email you to tell you that our bank account details have changed. Please check our bank account details with us in person or by telephone if you are in any doubt. We shall not accept any responsibility or liability for funds that are sent by anyone to an incorrect bank account.

Case 8:19-cv-00886-VMC-SPF Document 724-18 Filed 02/15/23 Page 3 of 10 PageID 11562

Invoice No.

Client No.

Date

3551591

679481

03-Nov-22

	Contact Page	Finn OHegarty 2
Fee Detail		
24-Oct-22 Alves, Mariana	Email correspondence with Receiver and issue Restrictions Notice.	970.00
25-Oct-22 OHegarty, Finn	Internal discussions. E-mail correspondence.	595.00
25-Oct-22 Alves, Mariana	Internal discussions with F. O'Hegarty. Email correspondence with client re: Restrictions Notice.	485.00
26-Oct-22 OHegarty, Finn	Phone conference with B Wiand. Internal discussions. E-mail correspondence. Further internal discussions. Review company records.	892.50
26-Oct-22 Alves, Mariana	Internal discussions with F. O'Hegarty. Call with Receiver. Email correspondence.	970.00
Total	- -	US\$ 3,912.50
Fee Earner Summary		
	Hrs	Amount
OHegarty, Finn (FWO)	1.25	1,487.50
Alves, Mariana (MAA)	2.50	2,425.00
Totals	3.75	US\$ 3,912.50



Oasis International Group, Ltd. 444 Gulf of Mexico Drive No.3 Longboat Key 34228 FL

15 November 2022

Dear Sir/Madam

Oasis International Group, Ltd. (the "Client")

2023 Annual Fees for Cayman Entities (each entity, the "Client")

The Client is next required to pay annual fees and make annual filings in the Cayman Islands in January 2023.

We enclose an invoice for the 2023 calendar year for the provision of registered office services and related Government fees. Where appropriate, we have also included any unbilled fees and disbursements previously incurred by the Client.

The enclosed invoice (and any earlier invoices which remain outstanding) must be settled by **31 December 2022** to enable us to pay Government fees on the Client's behalf by the due date.

The Government imposes penalties for late payment of Government fees and annual filings, and may ultimately strike defaulters formed in the Cayman Islands from its register whereupon any remaining assets of such defaulters may vest with the Government and any unauthorised dealing will be illegal. In addition, following the introduction of the Monetary Authority (Administrative Fines) Regulations (the "Administrative Fines Regime"), if the Client is a fund that is registered with the Cayman Islands Monetary Authority ("CIMA"), it may be subject to an additional administrative fine by CIMA of more than US\$6,000 for late payment of its annual CIMA registration fee.

Please note that it is our policy not to advance Government or CIMA fees on behalf of the Client.

Payment is Urgent and Important

We look forward to receiving payment by 31 December 2022. To assist us in applying funds sent by wire transfer, please send an email to accountshelp@maples.com confirming (a) the date that the funds were sent; (b) the amount transferred; (c) the invoice number(s); and (d) the name of the Client. The funds received may be applied in settlement of outstanding invoices in date order. We will then effect the required annual Government filings on behalf of the Client unless instructed not to do so.

Regulatory and other important information

We attach a schedule detailing important information about matters that the Client should review including (i) the Administrative Fines Regime; (ii) Ownership, Registers and Records of the Client; (iii) the Economic Substance Regime; (iv) New Registry Information and Inspection; (v) FATCA and CRS; (vi) AML Obligations; and (vii) the Fund Annual Return. If any actions are required following such review, please contact any of the Client's usual Maples Group contacts.

Terms and Conditions

Each member of the Maples Group provides their services to clients under the applicable standard terms, which are available at www.maples.com/terms. These may be amended from time to time. A copy of the current schedule of fees for Maples Corporate Services Limited ("MCSL") and/or MaplesFS Limited ("MaplesFS") is also available on the Maples e-Services site (www.mapleseservices.com). For an explanation of why and how we handle personal data, please visit www.maples.com/privacy.

The continued use of these services constitutes acceptance of our current terms and confirmation that the information on the Client's owners (including beneficial owners), voting shareholders, directors, officers, managers, voting members, trustee(s), general partners and/or limited partners that have previously been provided to us by the Client remain current.

Yours faithfully

Invoice No. 3576574
Date 15-Nov-22
Client No. 679481
Contact Finn OHegarty
Page 2

Maples and Calder (Cayman) UP

Maples and Calder (Cayman) LLP For itself and on behalf of Maples Corporate Services Limited and MaplesFS Limited

Schedule 1

Administrative Fines Regime

The Client should note that if it is regulated by CIMA that CIMA now has the ability to levy administrative fines for a breach of any applicable regulatory measure. As noted above, by way of example, where the Client is a fund registered with CIMA then administrative fines can apply for the late payment of fees due to CIMA. For further advice on the relevant regulatory compliance obligations applicable to the Client please contact any of the Client's usual Maples Group contacts.

Ownership, Registers and Records of the Client

In our capacity as registered office provider, we have an obligation to obtain documents to identify and, where necessary, verify the identity of the Client's owners, operators, controllers and ultimate beneficial owners. Separately, the Client must maintain certain statutory registers with MCSL as its registered office and notify MCSL of the address at which other statutory registers are maintained.

Unless we hear otherwise from the Client by 31 December 2022, we will assume that the owners (including beneficial owners), voting shareholders, directors, officers, managers, voting members, trustee(s), general partners and/or limited partners of the Client remain as previously notified to us. As a reminder, the Client must also inform us of any changes or expiration of any passport or government identification document that has previously been provided to us in order to continue to comply with applicable regulatory obligations.

Register of Members - Limited Liability Companies

MCSL, in its capacity as registered office, either maintains a limited liability company's statutory register of members or, where we do not maintain the statutory register of members (for example, if the Client maintains the register at its principal place of business or uses another service provider to maintain the register), the Client is required to provide us with the information contained in the statutory register of members and advise of any change in its contents within 21 days of such change – a copy may be sent to registers@maples.com.

Cayman Islands Economic Substance Regime ("ESR")

Information about the Cayman Islands ESR is available from the Client's usual contact. The Government recently released updated Guidance Notes (v. 3.2) on the ESR (the "Guidance Notes"), which will be relevant to Clients. The ESR requires certain entities to make an annual notification to the Cayman Islands Department for International Tax Cooperation ("DITC") confirming whether such entity is carrying on a "relevant activity" or relying on an exemption from being a "relevant entity" under the ESR. If an ESR notification was made in the 2022 calendar year, the Client may be required to file (i) an ESR report with the DITC within the prescribed period where the Client indicated on such notification that it was a "relevant entity" carrying on a "relevant activity"; or (ii) separate information with DITC where the Client indicated that it was not a "relevant entity" due to being "tax resident outside the Islands".

As notification is an annual requirement, an ESR notification may be required to be filed with the DITC at the beginning of the 2023 calendar year to confirm whether the Client is conducting a "relevant activity" or is relying on an exemption from being a "relevant entity" under the ESR. Given that the Client's business and activities may have changed, we would encourage the Client to discuss with its usual Maples Group contact whether any existing ESR notification needs to be updated. Where MCSL or MaplesFS is making a repeat ESR notification, if not instructed differently by or on behalf of the

Invoice No. 3576574
Date 15-Nov-22
Client No. 679481
Contact Finn OHegarty
Page 3

Client by 31 December 2022, MCSL or MaplesFS will assume that the details filed with DITC for the ESR notification in the 2022 calendar year remain unchanged. Please note that it is a statutory offence knowingly or wilfully to supply false or misleading information to the DITC under the ESR.

New Registry Information and Inspection

The Cayman Islands Registrar now requires that certain additional information is provided on the Client, including the "nature of business" of the Client and its financial year end date. The "nature of business" is also required to be included in the annual filing for the Client. Unless instructed otherwise by 31 December 2022, we will designate a "nature of business" in the Client's annual filing that is consistent with information provided to us as to the Client's business and we will assume that this has not changed. The "nature of business" along with other prescribed information in relation to companies, limited liability companies and exempted limited partnerships shall be available at the Cayman Islands Registrar for inspection by any person subject to certain conditions.

FATCA and CRS

We assume that, where the Client has not separately instructed us to do so, the Client has conducted its own analysis to determine whether or not it has any obligations under the Cayman Islands regulations which implement the US Foreign Account Tax Compliance Act ("FATCA") and the OECD Common Reporting Standard ("CRS") (collectively, "AEOI").

A copy of our AEOI overview containing information relating to entity registration, classification and due diligence obligations, the requirement for CRS written policies and procedures, the CRS annual declaration, the CRS Compliance Form and penalties for non-compliance can be accessed from the following link: www.maples.com/Services/Regulatory-and-Compliance/AEOI---FATCA-and-CRS. Our affiliate, MaplesFS, can provide assistance with these procedures and the related functions, if required.

It is important that the Client confirms whether it is subject to the AEOI regime, as the DITC has the ability to impose significant fines for non-compliance.

AML Obligations

We also remind the Client that the scope of the Cayman Islands' anti-money laundering and combating of terrorist and proliferation financing regime (collectively, "AML") is not limited to CIMA-regulated entities, but extends to (amongst other activities) entities in the business of "otherwise investing, administering or managing funds or money on behalf of other persons". This means that certain entities not licensed by, or registered with, CIMA may be subject to the Anti-Money Laundering Regulations (As Revised) (the "AML Regulations") and will be required to maintain AML procedures, including the designation of an AML Compliance Officer, Money Laundering Reporting Officer and Deputy. Our affiliate, MaplesFS, can provide assistance with these procedures and functions, if required.

It is important that the Client determines whether it is subject to the AML Regulations, as CIMA has the ability to impose significant fines for non-compliance.

Fund Annual Return

If the Client is a fund regulated by CIMA, a Fund Annual Return ("FAR") filing fee will be payable upon filing of the fund's audited accounts. We have not included the FAR filing fee as a disbursement as it is more common for this filing fee to be paid to CIMA directly by the fund or by other service providers to the fund. However, if the Client would like us to pay the FAR filing fee on its behalf, please contact us and we will issue the Client with a separate invoice for the fee. Our affiliate, MaplesFS, can also provide assistance with both the preparation and filing of the FAR and payment of the FAR filing fee, if required.



Oasis International Group,	Ltd.
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 PO Box 309
 Invoice No.
 3576574

 Ugland House
 Date
 15-Nov-22

 Grand Cayman
 Client No.
 679481.000000

 KY1-1104
 Contact
 Finn OHegarty

 Cayman Islands
 Page
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INVOICE

Corporate Services Fees (see below)	2,050.00
Total Fees	2,050.00
Disbursements (see below)	853.66
Total Fees and Disbursements	2,903.66
Total Current Invoice	2,903.66
Total Credits Applied	(281.07)
TOTAL BALANCE DUE	US\$2,622.59

Thank you for instructing Maples and Calder (Cayman) LLP. Please send us payment within 30 days of receiving this invoice and confirm payment details by email to accountshelp@maples.com. All of the services provided by this firm were performed outside of the United States of America. The provision of services by Maples and Calder (Cayman) LLP to you are governed by our standard terms of engagement available at www.maples.com.

USD Wire transfer instructions (must be sent as a SWIFT MT103 international wire transfer AND not as a MT202 or Fedwire):

Beneficiary Bank: Butterfield Bank (Cayman) Ltd, PO Box 705, 12 Albert Panton Street, Grand Cayman KY1-1107

SWIFT BIC: BNTBKYKYXXX | Beneficiary: Maples and Calder (Cayman) LLP | Beneficiary Account: 0110103434400

Intermediary Bank: BNY Mellon, One Wall Street, New York, NY 10286 | SWIFT BIC: IRVTUS3NXXX

Remitter and Beneficiary account number, name and address details must be included within wire transfer instructions.

Please instruct your bank to remit the amount in full. Local and overseas bank charges are borne by the remitter.

Or

A USD draft drawn on a United States bank which should be couriered to our address quoting our reference 679481 - 3576574

Cybercrime and Fraud Warning & Disclaimer: We will not email you to tell you that our bank account details have changed. Please check our bank account details with us in person or by telephone if you are in any doubt. We shall not accept any responsibility or liability for funds that are sent by anyone to an incorrect bank account.

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Invoice No.

3576574

	Date Client No. Contact Page	15-Nov-22 679481.000000 Finn OHegarty 5
Corporate Services Fees To providing the registered office of the Company during 2023; to properties to maintaining statutory records Recording ES Classification: Filing with DITC of ES Notification 2023 Registered office compliance fee 2023 Update Beneficial Ownership Register Totals		1,600.00 150.00 250.00 50.00 US\$2,050.00
Disbursement Details 09-Nov-22 – Annual Return for Exempt Company (share capit Total Disbursements	tal 0-42000)	Amount 853.66 US\$853.66



Oasis International Group, Ltd.

 PO Box 309
 Invoice No.
 3667266

 Ugland House
 Date
 15-Nov-22

 Grand Cayman
 Client No.
 679481.000001

 KY1-1104
 Contact
 Finn OHegarty

 Cayman Islands
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INVOICE

INVOICE	
Legal Fees (see below)	
To our charges for professional services rendered by this firm for the period ending on 15 November 2022.	4,643.75
Corporate Services Fees (see below)	250.00
Total Fees	4,893.75
TOTAL BALANCE DUE	US\$4,893.75

Thank you for instructing Maples and Calder (Cayman) LLP. Please send us payment within 30 days of receiving this invoice and confirm payment details by email to accountshelp@maples.com. All of the services provided by this firm were performed outside of the United States of America. The provision of services by Maples and Calder (Cayman) LLP to you are governed by our standard terms of engagement available at www.maples.com.

USD Wire transfer instructions (must be sent as a SWIFT MT103 international wire transfer AND not as a MT202 or Fedwire):

Beneficiary Bank: Butterfield Bank (Cayman) Ltd, PO Box 705, 12 Albert Panton Street, Grand Cayman KY1-1107

SWIFT BIC: BNTBKYKYXXX | Beneficiary: Maples and Calder (Cayman) LLP | Beneficiary Account: 0110103434400

Intermediary Bank: BNY Mellon, One Wall Street, New York, NY 10286 | SWIFT BIC: IRVTUS3NXXX

Remitter and Beneficiary account number, name and address details must be included within wire transfer instructions.

Please instruct your bank to remit the amount in full. Local and overseas bank charges are borne by the remitter.

Or

A USD draft drawn on a United States bank which should be couriered to our address quoting our reference 679481 - 3667266

Cybercrime and Fraud Warning & Disclaimer: We will not email you to tell you that our bank account details have changed. Please check our bank account details with us in person or by telephone if you are in any doubt. We shall not accept any responsibility or liability for funds that are sent by anyone to an incorrect bank account.

Case 8:19-cv-00886-VMC-SPF Document 724-18 Filed 02/15/23 Page 10 of 10 PageID 11569

Invoice No.	3667266
Date	15-Nov-22
Client No.	679481.000001
Contact	Finn OHegarty
Page	2

Fee Detail	
03-Nov-22 Mourginos, Anthony	Consider withdrawal of BOR Restriction NOtice; review file and phone call with F OHegarty; prepare email response
03-Nov-22 Carroll, Christopher	Advising on Companies Act 273 (a) and (c) as grounds for lifting restrictions notice where BO is incarcerated.
03-Nov-22 OHegarty, Finn	Internal discussions re Beneficial Ownership Register. Email correspondence.
03-Nov-22 Alves, Mariana	Internal discussions with F. O'Hegarty and Chris Carroll.
04-Nov-22 Mourginos, Anthony	Consider withdrawal of BOR Restriction NOtice; review file and phone call with F OHegarty; prepare email response
04-Nov-22 Alves, Mariana	Internal discussions with F. O'Hegarty and Reg Team related to Restrictions Notice.
07-Nov-22 Alves, Mariana	Email correspondence with Burt in respect of transfer of shares. Internal discussions and arrange for restrictions notice to be lifted.
08-Nov-22 Alves, Mariana	Email correspondence with Burton related to withdrawal of restrictions notice.
10-Nov-22 Alves, Mariana	Attend to ROM and BOR update.
Total	US\$ 4,643.75
Corporate Services Fees Update Register of Members/Regist Totals	er of Partnership Interests 250.00 US\$250.00
Disbursement Details	Amount
Total Disbursements	US\$0.00

EXHIBIT 19

FLORES PIPER LLP

7 Craig Street Belize, Belize 00000 BZ 501 223 0878 info@florespiper.com www.florespiper.com GST Registration No.: 255146 Govt. UID TIN# 255146



Estimate 22/1154PI

ADDRESS

Burton W Wiand (Receiver for Oasis International Group)

DATE 31/10/2022

TOTAL **USD 2,019.38**

ATTORNEY-AT-LAW

Wayne A Piper

DATE		TAX	QTY	RATE	AMOUNT
07/10/2022	Legal Assistance Re: OASIS GLOBAL FX, S.A Request for Release of Paid-up Capital Deposit	GST	0.40	300.00	120.00
	Email correspondence with client and P. Mena (Heritage Bank) between 7/10 and 12/10 relating to the release of the paid up capital				
14/10/2022	Legal Assistance Professional fees for receipt and review of letter and package of documents from Godfrey Firm, including "No objection" letter to registered agent transfer, email to client communicating the same.	GST	1.30	300.00	390.00
20/10/2022	Legal Assistance Re: OASIS GLOBAL FX, S.A Request for Release of Paid-up Capital Deposit	GST	0.50	300.00	150.00
	Professional fees for receipt and review of letter from Barrow & Co. Attorneys for Heritage bank and email to client advising				
21/10/2022	Legal Assistance Professional fees for registration of transfer of agent with the International Business Companies registry	GST	1	275.00	275.00
24/10/2022	Legal Assistance RE: OASIS GLOBAL FX, S.A Request for Release of Paid-up Capital Deposit	GST	0.50	300.00	150.00
	Professional fees for receipt and review of email from client.				

Important information for your payments:

DATE		TAX	QTY	RATE	AMOUNT
26/10/2022	Legal Assistance Re: OASIS GLOBAL FX, S.A Request for Release of Paid-up Capital Deposit	GST	1.20	300.00	360.00
	Professional fees for preparation of letter in response to bank's Attorney at law and email advice to client in relation to the same				
28/10/2022	Legal Assistance Re: OASIS GLOBAL FX, S.A Request for Release of Paid-up Capital Deposit	GST	1	300.00	300.00
	Professional fees for further email correspondence with client ending with email to client advising in relation to Conversion claim				
31/10/2022	Sales Office administrative fee for legal services in month of October 2022	GST	1	50.00	50.00
LOCAL PAYMENTS: Please make payment by wire or deposit as follows:		SUBTOTAL TAX			1,795.00 224.38
BELIZE BANK LI Account name: FLO Account No: 23271	DRES PIPER LLP	TOTAL		U	SD 2,019.38
Please reference Company Name & Invoice #					THANK YOU

Please reference Company Name & Invoice #

Accepted By Accepted Date

FLORES PIPER LLP

7 Craig Street Belize, Belize 00000 BZ 501 223 0878 info@florespiper.com www.florespiper.com GST Registration No.: 255146 Govt. UID TIN# 255146



Estimate 23/0016PI

ADDRESS

Burton W Wiand (Receiver for Oasis International Group)

DATE 01/02/2023

TOTAL **USD 4,471.25**

ATTORNEY-AT-LAW

Wayne A Piper

DATE		TAX	QTY	RATE	AMOUNT
28/10/2022	Corporate Resolutions Professional Fees for drafting corporate resolutions for members and directors	GST	3	150.00	450.00
22/12/2022	Legal Assistance Professional fees for communication with Heritage Bank and Attorneys for Heritage Bank for update of account for period October to December 2022	GST	1.50	300.00	450.00
22/12/2022	Legal Assistance Professional fees for communication with client advising for the period October to December 2022	GST	1	300.00	300.00
22/12/2022	Legal Assistance Professional fees for filing the 2023 annual return for OASIS GLOBAL FX, S.A.	GST	1	1,500.00	1,500.00
22/12/2022	General Client Disbursement Reimbursable disbursement paid on behalf of client for filing of 2023 Annual Return for OASIS GLOBAL FX, S.A.	Zero Rated	1	1,400.00	1,400.00
30/12/2022	Admin Fee Office Administrative fee on invoice for banking and administrative charges	GST	1	30.00	30.00
LOCAL PAYMEN Please make payme	NTS: ent by wire or deposit as follows:	SUBTOTAL TAX			4,130.00 341.25
BELIZE BANK LA Account name: FL Account No: 2327	ORES PIPER LLP	TOTAL			USD 4,471.25
ACCOUNT NO. 232/14010120020		-			THE AND TO LE

Please reference Company Name & Invoice #

THANK YOU.

Accepted By

Accepted Date

Important information for your payments:

International Wiring Instructions attached