UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA TAMPA DIVISION

| BURTON W. WIAND, as Receiver for OA | SIS |
|-------------------------------------|-----|
| INTERNATIONAL GROUP, LTD.; OA | SIS |
| MANAGEMENT, LLC; AND SATELL | ITE |
| HOLDING COMPANY, | |

CIVIL ACTION NO: 8:20-cv-00862-VMC-TGW

Plaintiff.

VS.

DEFENDANT, GREGORY CORCORAN ANSWER AND SEPARATE DEFENSES

CHRIS AND SHELLEY ARDUINI, et al

Defendant.

Defendant, GREGORY CORCORAN, by way of Answer to plaintiff(s)

Complaint, say(s):

INTRODUCTION

- 1. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 2. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 3. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 4. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.

- 5. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 6. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 7. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein but denies receiving "false profits."

JURISDICTION AND VENUE

- 8. This defendant denies each and every allegation contained herein.
- 9. This defendant denies each and every allegation contained herein.
- 10. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 11. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 12. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 13. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
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- 22. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 23. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 24. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 25. This defendant admits residency in Sussex County, but denies the remaining allegations including receipt of "false profits."
- 26. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.

- 27. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 28. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
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- 49. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
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- 81. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.

- 82. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 83. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 84. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 85. This defendant denies the allegation of the paragraph and reserved all jurisdictional defenses.
- 86. This defendant denies the allegations of this paragraph and reserves all jurisdictional and venue defenses.

OTHER PARTIES AND RELATED INDIVIDUALS AND ENTITIES

- 87. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 88. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 89. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 90. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 91. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 92. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.

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- 93. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 94. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 95. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 96. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 97. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 98. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 99. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 100. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.

FACTS COMMON TO ALL CAUSES OF ACTION

- 101. Upon information and belief, investors were defrauded, but this defendant has insufficient knowledge or information to form a belief as to the truth of the balance of the allegations contained therein.
- 102. Upon information and belief, investors were defrauded, but this defendant has insufficient knowledge or information to form a belief as to the truth of the balance of the allegations contained therein other than to deny receiving false profits.

103. Upon information and belief, investors were defrauded, but this defendant has insufficient knowledge or information to form a belief as to the truth of the balance of the allegations contained therein other than to deny receiving false profits.

A. Insiders Operated the Oasis Entities as a Common Enterprise

- 104. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 105. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 106. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 107. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 108. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.

B. The Insiders Operated the Oasis Entities s A Ponzi Scheme

- 109. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 110. Upon information and belief, investors were defrauded and it now appears that misrepresentations were made that this party had no knowledge of, but this defendant has insufficient knowledge or information to form a belief as to the truth of the balance of the allegations contained therein other than to deny receiving false profits.
- 111. Upon information and belief, investors were defrauded and it now appears that misrepresentations were made that this party had no knowledge of, but this defendant

has insufficient knowledge or information to form a belief as to the truth of the balance of the allegations contained therein other than to deny receiving false profits.

- 112. Upon information and belief, investors were defrauded and it now appears that misrepresentations were made that this party had no knowledge of, but this defendant has insufficient knowledge or information to form a belief as to the truth of the balance of the allegations contained therein other than to deny receiving false profits.
- 113. Upon information and belief, investors were defrauded and it now appears that misrepresentations were made that this party had no knowledge of, but this defendant has insufficient knowledge or information to form a belief as to the truth of the balance of the allegations contained therein other than to deny receiving false profits.
- 114. Upon information and belief, investors were defrauded and it now appears that misrepresentations were made that this party had no knowledge of, but this defendant has insufficient knowledge or information to form a belief as to the truth of the balance of the allegations contained therein other than to deny receiving false profits.
- 115. Upon information and belief, investors were defrauded and it now appears that misrepresentations were made that this party had no knowledge of, but this defendant has insufficient knowledge or information to form a belief as to the truth of the balance of the allegations contained therein other than to deny receiving false profits.
- 116. Upon information and belief, investors were defrauded and it now appears that misrepresentations were made that this party had no knowledge of, but this defendant has insufficient knowledge or information to form a belief as to the truth of the balance of the allegations contained therein other than to deny receiving false profits.

- 117. Upon information and belief, investors were defrauded and it now appears that misrepresentations were made that this party had no knowledge of, but this defendant has insufficient knowledge or information to form a belief as to the truth of the balance of the allegations contained therein other than to deny receiving false profits.
- 118. Upon information and belief, investors were defrauded and it now appears that misrepresentations were made that this party had no knowledge of, but this defendant has insufficient knowledge or information to form a belief as to the truth of the balance of the allegations contained therein other than to deny receiving false profits.
- 119. Upon information and belief, investors were defrauded and it now appears that misrepresentations were made that this party had no knowledge of, but this defendant has insufficient knowledge or information to form a belief as to the truth of the balance of the allegations contained therein other than to deny receiving false profits.
- 120. Upon information and belief, investors were defrauded and it now appears that misrepresentations were made that this party had no knowledge of, but this defendant has insufficient knowledge or information to form a belief as to the truth of the balance of the allegations contained therein other than to deny receiving false profits.
- 121. Upon information and belief, investors were defrauded and it now appears that misrepresentations were made that this party had no knowledge of, but this defendant has insufficient knowledge or information to form a belief as to the truth of the balance of the allegations contained therein other than to deny receiving false profits.
- 122. Upon information and belief, investors were defrauded and it now appears that misrepresentations were made that this party had no knowledge of, but this defendant

has insufficient knowledge or information to form a belief as to the truth of the balance of the allegations contained therein other than to deny receiving false profits.

- 123. Upon information and belief, the investment company informed investors they would be conducting foreign exchange trading.
- 124. Upon information and belief, investors were defrauded and it now appears that misrepresentations were made that this party had no knowledge of, but this defendant has insufficient knowledge or information to form a belief as to the truth of the balance of the allegations contained therein other than to deny receiving false profits.
- 125. Upon information and belief, investors were defrauded and it now appears that misrepresentations were made that this party had no knowledge of, but this defendant has insufficient knowledge or information to form a belief as to the truth of the balance of the allegations contained therein other than to deny receiving false profits.

C. Insider Anile's Guilty Plea and Insider DaCorta Indictment

- 126. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.
- 127. This defendant is without sufficient knowledge or information to form a belief as to the truth of the allegations contained therein.

D. Transfers to the Defendants

128. Upon information and belief, investors were defrauded and it now appears that misrepresentations were made that this party had no knowledge of, but this defendant has insufficient knowledge or information to form a belief as to the truth of the balance of the allegations contained therein other than to deny receiving false profits.

- 129. Upon information and belief, investors were defrauded and it now appears that misrepresentations were made that this party had no knowledge of, but this defendant has insufficient knowledge or information to form a belief as to the truth of the balance of the allegations contained therein other than to deny receiving false profits.
- 130. Upon information and belief, investors were defrauded and it now appears that misrepresentations were made that this party had no knowledge of, but this defendant has insufficient knowledge or information to form a belief as to the truth of the balance of the allegations contained therein other than to deny receiving false profits.
- 131. Upon information and belief, investors were defrauded and it now appears that misrepresentations were made that this party had no knowledge of, but this defendant has insufficient knowledge or information to form a belief as to the truth of the balance of the allegations contained therein other than to deny receiving false profits.
- 132. Upon information and belief, investors were defrauded and it now appears that misrepresentations were made that this party had no knowledge of, but this defendant has insufficient knowledge or information to form a belief as to the truth of the balance of the allegations contained therein other than to deny receiving false profits.
- 133. Upon information and belief, investors were defrauded and it now appears that misrepresentations were made that this party had no knowledge of, but this defendant has insufficient knowledge or information to form a belief as to the truth of the balance of the allegations contained therein other than to deny receiving false profits.

COUNT 1

Florida Statutes Section 726: Uniform Fraudulent Transfer Act False Profits

- 134. This defendant realleges each and every response to each allegation contained in Paragraphs 1 through 133.
 - 135. The defendant denies the allegations of this paragraph.
 - 136. The defendant denies the allegations of this paragraph.
 - 137. The defendant denies the allegations of this paragraph.
 - 138. The defendant denies the allegations of this paragraph.
 - 139. The defendant denies the allegations of this paragraph.
 - 140. The defendant denies the allegations of this paragraph.
 - 141. The defendant denies the allegations of this paragraph.
 - 142. The defendant denies the allegations of this paragraph.

COUNT II

UNJUST ENRICMENT-FALSE PROFITS

- This defendant realleges each and every response to each allegation contained in Paragraphs 1 through 133.
 - 144. The defendant denies the allegations of this paragraph.
 - 145. The defendant denies the allegations of this paragraph.
 - 146. The defendant denies the allegations of this paragraph.
 - 147. The defendant denies the allegations of this paragraph.
 - 148. The defendant denies the allegations of this paragraph.
 - 149. The defendant denies the allegations of this paragraph.

FIRST SEPARATE DEFENSE

The accident and damages alleged in the Complaint resulted from the sole negligence or actions of the plaintiff.

SECOND SEPARATE DEFENSE

The plaintiff was guilty of negligence or conduct which proximately contributed to the happening of the accident and damages alleged in the Complaint.

THIRD SEPARATE DEFENSE

The accident and damages alleged in the Complaint resulted from the negligence or actions of third parties over whom this defendant had no control.

FOURTH SEPARATE DEFENSE

The plaintiff and co-defendants were guilty of negligence or actions which proximately contributed to the occurrence of the accident and damages alleged in the Complaint.

FIFTH SEPARATE DEFENSE

The actions and damages alleged in the Complaint resulted from the sole negligence or actions of the plaintiff or the concurrent negligence or actions of the co-defendant and the plaintiff and were not caused or contributed to in any way by this defendant.

SIXTH SEPARATE DEFENSE

The Complaint of the plaintiff fails to state a claim upon which relief may be granted.

SEVENTH SEPARATE DEFENSE

The Summons and Complaint of the plaintiff is defective because of insufficiency of process and/or insufficiency of service of process.

EIGHTH SEPARATE DEFENSE

The Complaint of the plaintiff is defective because of lack of jurisdiction of the Court over the subject matter alleged therein and/or lack of jurisdiction over the person of the defendant.

NINTH SEPARATE DEFENSE

This defendant breached no duty owing to the plaintiff.

TENTH SEPARATE DEFENSE

The cause of action alleged in the Complaint is barred by virtue of the doctrine of res judicata and/or collateral estoppel.

ELEVENTH SEPARATE DEFENSE

The cause of action alleged in the Complaint is barred by virtue of the doctrine of laches.

TWELFTH SEPARATE DEFENSE

The cause of action alleged in the Complaint is barred by virtue of the doctrine of unclean hands.

THIRTEENTH SEPARATE DEFENSE

The cause of action alleged in the Complaint is barred by virtue of the doctrine of accord and satisfaction.

FOURTEENTH SEPARATE DEFENSE

The cause of action alleged in the Complaint is barred by virtue of the doctrine of unclean hands.

FIFTHTEENTH SEPARATE DEFENSE

This defendant at all times acted in good faith.

SIXTEENTH SEPARATE DEFENSE

This defendant reserves the right to assert any viable defense as permissible under

Florida or federal law to any claim made under the Uniform Fraudulent Transfer Act

SEVENTEENTH SEPARATE DEFENSE

This defendant met all obligations to plaintiff pursuant to any agreement in force

between the parties.

EIGHTEENTH SEPARATE DEFENSE

This defendant was not unjustly enriched and did not receive false profits as the

accounting records attached to the Complaint in Exhibit A as applicable to this defendant

contain fraudulent transactions or misrepresented transactions and the plaintiffs are left to

their proofs.

JURY DEMAND

PLEASE TAKE NOTICE: Defendant hereby requests trial by jury as to all issues

as may be permitted under the local federal Rules applicable to this Court.

Dated: 8/20/20

Respectfully submitted,

Gregory Corcoran – Pro se

35 McCloud Road

Lafayette, New Jersey, 07848

(973-600-6386)

gjcor@embarqmail.com

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RECEIVED

Gregory Corcoran 35 McCloud Road Lafayette, New Jersey, 07848

August 20, 2020

United States District Court Middle District of Florida Tampa Division 801 North Florida Ave. Tampa, Florida, 33602 Attention Clerks Office

r Oasis v Arduini

Re: Burton W. Wiand as Receiver for Oasis v Ardum Civil Action 8:20-cv-00862-VMC-TGW

Dear Sir/Madam:

DIST

It has just come to my attention that I am a named defendant in this action and have just received a motion to enter judgment by default against me. I have spoken to an attorney for the receiver indicating that I do not have counsel, nor am I proficient in legal matters. I did sign a waiver which I now understand addressed service of process. I was under the impression that this was some sort of class action against individuals and or entities charged with operating a Ponzi investment scheme. I previously was an investor in the Oasis International Group who I understood was supposed to be investing in the foreign exchange market. I had no idea I was being named as a defendant in this matter as I did not see my name listed on the caption when I received paperwork and merely suspected I was being provided material related to the lawsuit based upon my position as a mere investor.

Please note my objection to any entry of a default against me for failing to Answer. I have no idea when the Court addresses these matters relating to default, but in speaking with the attorney's office for the receiver on August 19, 2020, they advised that I needed to file an Answer to the Complaint. I enclose my Answer for filing to avoid any default being entered against me. I object to default as I have defenses to the allegations that I received false profits as alleged in the accounting document that I see attached to the Complaint. I believe that some or all of the information in that Exhibit represent fraudulent financial transactions as I certainly have no record of receiving the profits attributed to me. I have asked for copies of the documents that the receiver has obtained to support the claim of false profits and will continue to work with the receiver to resolve this matter as it affects my interests.

In the meantime, in order to protect my interests and avoid default, please file this Answer. If you should need anything further, please contact me. I was advised that I needed to

send a copy of this Answer to the Receiver and have copied them on this letter, so they are aware of my request that it be filed. I have to mail the Answer as I do not have access to any Court website to electronically file it, and do not have a lawyer. Can you please send a copy of the Answer back filed so I can confirm that you have received it? I enclose a pre-stamped pre-addressed return envelope for your convenience.

Thank you for your understanding and assistance.

Very truly yours,

Jugory J Corcoran Gregory Corcoran- pro se

cc: England Fischer (John Waechter)

Page 1 of 2 PageID 2087 վովերկեցությունները է երերկերերիկ 7019 2970 0000 4537 7090 Gregory Corcoran-ProSe 35 Mc Cloud Road Lafayette, NJ 07848 United States District Court Middle District of Florida. TAMPA DIVISION 801 North Florida Ave TAMPA, Florida 33602

| 85 | Date D | | Domestic Return Receipt | FIRST CLASS MAIL |
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| COMPLETE | A. Signature X Received by (Printed Name) D. Is delivery address different from item 17 | If YES, enter delivery address to a Service Type Adult Signature Restricted Delivery Certified Mail® Certified Mail® Conclist on Delivery Collect on Delivery Collect on Delivery Hosungd Mail | \$4 Mail Restricted Delivery \$500) | |
| SENDER! COMPLETE THIS SECTION | I' hame and address on the reverse can return the card to you. S card to the back of the mailpiece, front if space permits. | State District Cont Dis of Blorida N. Heriola Ans Les 36 36 36 2 MINIMA MINIMA 9402 5698 9346 9790 34 There (Transfer from service label) | 7019 2970 0000 4537 7090 PS Form 3811, July 2015 PSN 7530-02-000-9053 | FIRST CLASS MAIL |

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