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 TWENTIETH INTERIM MOTION FOR ORDER AWARDING FEES, COSTS, AND REIMBURSEMENT OF <u>COSTS TO RECEIVER AND HIS PROFESSIONALS</u>

Burton W. Wiand, the Court-appointed receiver over the assets of the above-captioned defendants and relief defendants (the "**Receiver**" and the "**Receivership**" or "**Receivership Estate**") pursuant to the Court's order dated July 11, 2019 (the "**Consolidated Order**"¹), respectfully moves the Court for the entry of an order awarding fees and the reimbursement of costs to the Receiver and his professionals. *See* Doc. 98 (approving retention of professionals). This motion covers all fees and costs incurred from January 1, 2024 through March 31, 2024. 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¹ On July 11, 2019, the Court entered the Consolidated Order (Doc. 177), which combined and superseded two prior orders (Docs. 7 and 44) and is the operative document governing the Receiver's activities.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 40
aks LLC. 3

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

On May 1, 2024, the Receiver filed his Nineteenth Interim Report (Doc. 813) (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 <u>Exhibit 2</u> 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).

Pursuant to the Consolidated Order and the aforementioned orders, the Receiver retained (1) Wiand Guerra King P.A., now known as Guerra & Partners, P.A. ("**G&P**"), to provide legal services;⁶ (2) KapilaMukamal, LLP

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 is not regularly included in interim fee motions.

⁶ Mary Gura has since the inception of this Receivership provided substantial support to the Receiver. In March 2021, Ms. Gura left Guerra King, now known as G&P, and joined Johnson 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

("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 (7) Maples Group to provide legal services in the Cayman Islands; (8) Sergio Godinho with SEDA Experts, LLC to provide consulting connection litigation litigation in with 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 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

Perez also left Guerra King and continues to represent the Receiver through his new legal practice. (Doc. 655 at 24.) Other professionals at G&P who have also been providing legal services to the Receiver for this matter have remained at G&P. 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 G&P. The Receiver does not anticipate that there will be duplication of services provided by Ms. Gura, Mr. Perez, and G&P.

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

⁸ Englander Fischer, Maples Group, Sergio Godinho, the Piper Firm, and RPM did not submit any invoices for the time covered by this motion and therefore are not included in this motion.

Entities, preserve Receivership assets, attempt to locate and recover additional assets, analyze investor information for the claims process and litigation, and administer the claims process. These services are for the benefit of aggrieved investors, creditors, and other interested parties.

I. <u>The Receiver.</u>

The Receiver requests the Court award him fees for the professional services rendered and costs incurred from January 1, 2024 through March 31, 2024, in the amount of \$20,272.33. The standard hourly rate the Receiver charges clients in private litigation is \$500. However, the Receiver agreed, for purposes of his appointment as the Receiver, that his hourly rate would be reduced to \$360, representing a twenty-eight percent discount off the standard hourly rate that he charges clients in comparable matters. This rate was set forth in the Receiver's submission to the CFTC. *See* Doc. 87, Ex. A.

The Receiver commenced services immediately upon his appointment. The Receiver has billed his time for these activities in accordance with the Billing Instructions, which request that this motion contain a narrative of each "business enterprise or litigation matter" for which outside professionals have been employed. The Billing Instructions identify each such business enterprise or litigation matter as a separate "project." Further, the Billing Instructions request that time billed for each project be allocated to one of several Activity Categories.⁹ 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 G&P focused on investigating the fraud and related activities, locating and taking control of Receivership assets, investigating and pursuing additional assets for the Receivership, analyzing investor information for the claims process and litigation, and administering the claims process. These activities of the Receiver are set forth in detail in the Interim Report. Ex. 2. A copy of the statement summarizing the Receiver's services rendered for the Receivership is attached as **Exhibit 3**. The Receiver's time and fees for services rendered for each Activity Category from January 1, 2024 through March 31, 2024, are as follows:

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 G&P have accounted for time spent on such work but have not charged any amount for that work.

	Hours	
Activity Category	Expended	Fee Amount
Asset Disposition	0.70	\$252.00
Asset Analysis and		
Recovery	30.20	10,872.00
Business Operations	4.80	\$1,728.00
Case Administration	2.20	\$792.00
Claims		
Administration	6.20	\$2,232.00
TOTAL	44.10	\$15,876.00

<u>Receivership</u> Receiver's Time and Fees for Services Rendered

The Receiver also utilized paralegal services by his paraprofessional, Edwina Tate. During the time covered by this Application, Ms. Tate spent 10.0 hours assisting the Receiver with Receivership matters. The Receiver requests the Court award him fees for the professional services rendered by Ms. Tate from January 1, 2024 through March 31, 2024, in the amount of \$1,250.00. A copy of the statement summarizing Ms. Tate's services rendered for the Receivership is attached as <u>Exhibit 4</u>.

In addition to legal fees, the Receiver has advanced costs of \$1,922.33 as summarized below.¹⁰

Costs	Total
Web-Related	\$1,907.33
Other	\$15.00
Total	\$1,922.33

¹⁰ The cost included in other is for notary services.

B. Discrete Litigation Projects.

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

1. Recovery of False Profits from Investors.

This is a project involving the Receiver's efforts to recover false profits from investors whose purported accounts received monies in an amount that exceeded their investments. (See also Ex. 2 § V.2.b.) These purported profits were false because they were not based on any trading or investment gain, but rather were fruits of a Ponzi scheme that consisted of funds from new and existing investors. Pursuant to the Consolidated Order and the Court's express authorization, on April 14, 2020, the Receiver filed a clawback complaint against numerous investors. The liability portion of these actions is complete, but the Receiver continues to register default judgments, seek writs of garnishment, and employ other collection mechanisms, including post-judgment discovery. A copy of the statement summarizing the Receiver's services rendered for this project from January 1, 2024 through March 31, 2024 is attached as Exhibit 5. The Receiver's time and fees for services rendered for each Activity Category are as follows:

	Hours	Fee
Activity Category	Expended	Amount
Asset Analysis and		
Recovery	0.20	\$72.00
TOTAL	0.20	\$72.00

<u>Recovery from Investors</u> Receiver's Time and Fees for Services Rendered

2. Litigation Against Raymond P. Montie.

This is a project involving the Receiver's clawback litigation against Raymond P. Montie for fraudulent transfers and abetting or personally committing breaches of fiduciary duty. (*See also* Ex. 2 § V.1.e.) The Receiver has settled this litigation for \$549,410.88 after evaluation of the Receiver's claims and prospects of collection. A copy of the statement summarizing the Receiver's services rendered for this project from January 1, 2024 through March 31, 2024 is attached as **Exhibit 6**. 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	3.20	\$1,152.00
TOTAL	3.20	\$1,152.00

II. <u>Guerra & Partners, P.A.</u>

The Receiver requests that the Court award G&P a total of \$51,301.97, which includes \$47,815.00 in fees for professional services rendered and

\$3,486.97 in costs incurred from January 1, 2024 through March 31, 2024. A categorization and summary of all costs for which G&P seeks reimbursement is attached as **Exhibit 7**.

As an accommodation to the Receiver and to conserve the resources of the Receivership Estate, G&P'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 8**. G&P began providing services immediately upon the appointment of the Receiver. The activities of G&P for the time covered by this motion are set forth in the Interim Report. *See* Ex. 2. G&P has billed time for these activities in accordance with the Billing Instructions.

A. The Receivership.

As discussed above, the work of the Receiver and G&P 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 G&P from January 1, 2024 through March 31, 2024, is attached as **Exhibit 9**. G&P's time and fees for services rendered on this matter for each Activity Category are as follows:

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	Hours	
Activity Category	Expended	Fee Amount
Asset Analysis and		
Recovery	133.20	\$33,548.00
Case Administration	5.70	\$1,189.50
Claims Administration	57.80	\$10,367.00
TOTAL	196.70	\$45,104.50

<u>Receivership</u> G&P's Time and Fees for Services Rendered

In addition to legal fees, G&P has advanced costs of \$3,486.97. The Receiver also requests the Court award Johnson Newlon and DeCort fees for professional services rendered by paralegal Mary Gura for her continuation of work on behalf of the Receivership from January 1, 2024 through March 31, 2024, in the amount of \$3,820.50. A copy of the statement summarizing the services rendered and costs incurred by Ms. Gura from January 1, 2024 through March 31, 2024, is attached as **Exhibit 10**.

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. G&P did not charge fees for services rendered or incur any costs for this matter during the time covered by this Motion.

2. Litigation Against Raymond P. Montie.

This is a project involving the Receiver's clawback litigation against Raymond P. Montie for fraudulent transfers and abetting or personally committing breaches of fiduciary duty. (*See also* Ex. 2 § V.1.e.) A copy of the statement summarizing the services rendered and costs incurred by G&P from January 1, 2024 through March 31, 2024 for this project is attached as **Exhibit 11**. G&P's time and fees for services rendered for each Activity Category are as follows:

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G&	P's Time	e and Fe	es for S	Services	Rendered

Litigation Against Raymond P Montia

	Hours	
Activity Category	Expended	Fee Amount
Asset Analysis and		
Recovery	11.80	\$2,710.50
TOTAL	11.80	\$2,710.50

III. Jared J. Perez P.A.

The Receiver requests the Court award Jared Perez fees for professional services rendered and costs incurred from January 1, 2024 through March 31, 2024, in the amount of \$24,564.95. 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 G&P fee schedule. Ex. 8. 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 <u>Exhibit 12</u>.

IV. <u>KapilaMukamal, LLP.</u>

The Receiver requests the Court award KM fees for professional services rendered from January 1, 2024 through March 31, 2024, in the amount of \$77.18. KM is a forensic accounting firm that specializes in insolvency and restructuring, Ponzi schemes, fraud investigations, insolvency taxation, business valuation, and litigation support. At the Receiver's request, KM performed forensic reconstructions of numerous bank accounts, which required the analysis of thousands of transactions involving hundreds of investors. Through this analysis, KM 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 for this period is attached as **Exhibit 13**.

V. <u>PDR CPAs.</u>

The Receiver requests the Court award PDR fees for professional services rendered from January 1, 2024 through March 31, 2024, in the amount of \$5,850.00. 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 for the pertinent period are attached as composite **Exhibit 14**.

VI. <u>E-Hounds, Inc.</u>

The Receiver requests the Court award E-Hounds fees for professional services rendered and costs incurred from January 1, 2024 through March 31, 2024, in the amount of \$6,745.00. 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 <u>Exhibit 15</u>.

VII. <u>The RWJ Group, LLC.</u>

The Receiver requests the Court award RWJ fees for professional services rendered and costs incurred from January 1, 2024 through March 31, 2024, in the amount of \$52.50. 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 16**.

MEMORANDUM OF LAW

It is well settled that this Court has the power to appoint a receiver and to award the receiver and those appointed by him fees and costs for their services. *See, e.g., S.E.C. v. Elliott*, 953 F.2d 1560 (11th Cir. 1992) (receiver is entitled to compensation for faithful performance of his duties); *Donovan v.* Robbins, 588 F. Supp. 1268, 1272 (N.D. Ill. 1984) ("[T]he receiver diligently and successfully discharged the responsibilities placed upon him by the Court and is entitled to reasonable compensation for his efforts."); S.E.C. v. Custable, 1995 WL 117935 (N.D. Ill. Mar. 15, 1995) (receiver is entitled to fees where work was of high quality and fees were reasonable); S.E.C. v. Mobley, 2000 WL 1702024 (S.D.N.Y. Nov. 13, 2000) (court awarded reasonable fees for the receiver and his professionals); see also Doc. 7 ¶ 40 & Doc. 44 ¶ 58. The determination of fees to be awarded is largely within the discretion of the trial court. See Monaghan v. Hill, 140 F.2d 31, 34 (9th Cir. 1944). In determining reasonable compensation for the services rendered by the Receiver and his Professionals, the Court should consider the circumstances surrounding the Receivership. See 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, G&P, 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:¹¹

Burton W. Wiand, Receiver	20,272.33
Guerra & Partners, P.A.	\$51,301.97
Johnson Newlon & DeCort	\$3,820.50
Jared J. Perez P.A.	\$24,564.95
KapilaMukamal, LLP	\$77.18
PDR CPAs	\$5,850.00
E-Hounds, Inc.	6,745.00
RWJ Group, LLC	\$52.50

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

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 Receiver has made reasonable efforts to confer with Defendant DaCorta (who is in prison and appealing the Court's entry of summary judgment against him) by contacting Ronald Kurpiers, counsel of record for DaCorta, who advised he no longer represents DaCorta in this action. No other counsel has appeared on DaCorta's behalf and the Receiver does not have contact information for DaCorta in prison. The Receiver has not consulted with defendants Anile, Duran, Haas, and Montie because they have either defaulted or settled the SEC's claims against them through the entry of consent orders and judgments and are thus no longer active participants in this litigation. The Receiver 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.

/s/ Chemere K. Ellis

Ailen Cruz Florida Bar Number 105826 <u>acruz@guerrapartners.law</u> <u>aavery@guerrapartners.law</u> Chemere K. Ellis Florida Bar Number 125069 cellis@guerrapartners.law droush@guerrapartners.law GUERRA & PARTNERS, P.A. The Towers at Westshore 1408 N. West Shore Blvd., Ste 1010 Tampa, FL 33607 Tel.: (813) 347-5100 Fax: (813) 347-5198 Attorney for Burton W. Wiand, Receiver

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 22, 2024, 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 Law Office of Gerard Marrone, P.C. 66-85 73rd Place Second Floor Middle Village, NY 11379 <u>gmarronelaw@gmail.com</u> *Counsel for Defendant Joseph S. Anile, II*

John J. Haas <u>xlr8nford@yahoo.com</u>

Raymond P. Montie, III RayMontie7@yahoo.com

> <u>/s/ Chemere K. Ellis</u> Chemere K. Ellis

<u>RECEIVER'S CERTIFICATION</u>

The Receiver has reviewed this Twentieth 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 8. 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

Case 8:19-cv-00886-VMC-SPF Document 817-1 Filed 05/22/24 Page 1 of 4 PageID 18469

EXHIBIT 1

			Accounting I					
	Standardized Accounting Re					ece	vership	
	Civil Court Doc							
	Reporting Pe	riod	1 01/01/2024	to 0	3/31/2024			
							Grand	
			Details		Subtotal		Total	Notes
Line 1	Beginning Balance (As of 01/01/2024)					\$	10,609,860.58	
	Increases in Fund Balance							
Line 2	Business Income]						
Line 2 Line 3	Cash and Securities]						
Line 3 Line 4	Interest/Dividend Income	¢	79,680.04					Interest Income
		\$ ¢	/9,080.04					
Line 5	Asset Liquidation	\$	-					Items Auctioned
Line 6	Third-Party Litigation Income	\$	194,036.05					Settlements
Line 7	Other Miscellaneous	\$	-					Remitted Funds
	Total Funds Available - Totals Line 1 - 7			\$	273,716.09	\$	10,883,576.67	
	Decreases in Fund Balance	l						
Line 9	Disbursements to Investors	l						
Line 10	Disbursements for Receivership Operations	l						
10.a.1	Receiver	\$	-					
10.a.2	Guerra King	\$	-					Professional Fees
10.a.3	KapilaMukamal LLP	\$	-					Professional Fees
10.a.4	PDR Certified Public Accts	\$	-					Professional Fees
10.a.5	RPM Financial]						Professional Fees
10.a.6	Englander Fisher	\$	758.03					Professional Fees
10.a.7	The RWJ Group	\$	-					Professional Fees
10.a.8	E Hounds	\$	-					Professional Fees
10.a.9	Maples Group	\$	-					Professional Fees
10.a.10	Jared J Perez PA	\$	-					Professional Fees
10.a.11	Other Professional Fees	\$	-					Professional Fees
Line 10	Total Disbursements to Receiver/Professionals			\$	758.03			
10b	Third-Party Litigation Expenses]						
	Asset Expenses	l			322.46			Check Order
	Tax Payments	l						
	Total Disbursements for Receivership Ops.			\$	1,080.49			
Line 11	Disbursements Related to Distribution Expenses	3						
Line 12	Disbursement to Court/Other							
Line 13	Other							
	Total Funds Disbursed - Total Lines 9 - 13					\$	1,080.49	
Line 14	Ending Balance (as of 03/31/2024)					\$	10,882,496.18	

	Stan Standardized Accoun		ting Report Form		
			9-cv-00886-VMC	•	
		From Inception to		-511	
		From meeption a	0 03/31/2024	Grand	
		Details	Subtotal	Total	Notes
		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	\$ 9,158,582.33			Cash from Frozen Accts.
Line 4	Interest/Dividend Income	\$ 734,691.35			Interest Income
Line 5	Asset Liquidation	\$ 7,899,358.91			Sale of Real Estate/Misc.
Line 6	Third-Party Litigation Income	\$ 5,324,235.94			Settlements, etc
Line 7	Other Miscellaneous	\$ 7,787,274.26			Remitted Funds & Misc.
	Total Funds Available - Totals Line 1 - 7		\$30,957,477.92	\$ 30,957,477.92	
	Decreases in Fund Balance				
Ling	Disbursements to Investors		\$ 9,860,956.99		
Line 9			\$ 9,860,956.99		
	Disbursements for Receivership Operations Receiver	¢ 175 225 16			Professional Fees
		\$ 475,335.46 \$ 2054 411 24			Professional Fees
	Guerra King	\$ 2,054,411.24			Professional Fees
	KapilaMukamal LLP PDR Certified Public Accts	\$ 320,375.26 \$ 04,025,60			Professional Fees
		\$ 94,925.60 \$ 84,026,02			Professional Fees
	RPM Financial	\$ 84,036.92 \$ 524.401.18			Professional Fees
	Englander Fisher	\$ 534,401.18			
	The RWJ Group E Hounds	\$ 100,008.80 \$ 150,502.97			Professional Fees Professional Fees
		· ·			Professional Fees
	Maples Group- Jared J. Perez	\$ 54,811.60 \$ 104,893.11			Professional Fees
	Other Professional Fees	\$ 104,893.11 \$ 92,028.06			Professional Fees
	Total Disbursements to Receiver/Professionals		\$ 4,065,730.20		Professional Fees
	Third-Party Litigation Expenses		\$ 4,065,730.20 \$ 42,160.00		
	Asset Expenses		\$ 356,938.41		Condo Fees, Insurance
100	Asser Expenses		φ 550,950.41		Repairs, Maint & Utilities
104	Tax Payments		\$ 109,117.36		County Sales & Propery Tax
100	Total Disbursements for Receivership Ops.		\$ 4,573,945.97		county Sales & Hopery Tax
			. ,,		
Line 11	Disbursements Related to Distribution Expense	es			
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			\$ 20,074,981.74	
Line 14	Ending Balance (as of 03/31/2024)			\$ 10,882,496.18	

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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	827
	No. of Claimants/Investors Paid	
16a	This Reporting period	Second Interim Distribution Checks In Process
	No. of Claimants/Investors Paid	732 First Interim Distribution Checks Issued;
16b	Since Inception of Estate	Second Interim Distribution Checks In Process

Receiver:

By: Burton Wiand

Signature

Burton W. Wiand, Receiver Printed Name

Date: 5/1/2024

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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 TWENTIETH INTERIM REPORT

Information and Activity from January 1, 2024 through March 31, 2024.

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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 Twentieth 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, <u>www.oasisreceivership.com</u>, 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 Interim Report, as well as all other reports, will be posted on the website.¹

Overview of Significant Activities During this Reporting Period

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

- Participated in oral argument and preserved, at minimum, fraudulent transfer claims worth more than **\$20 million** by obtaining an order from the United States Court of Appeals for the Eleventh Circuit that <u>reversed</u>, <u>vacated</u>, <u>and remanded</u> a lower court's order dismissing the Receiver's lawsuit against ATC Brokers Ltd., David Manoukian, and Spotex, LLC with prejudice (*see infra* § V.2.c.);
- Obtained Court approval of a second interim distribution of approximately **\$9 million** to claimants with approved claims 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 March 31, 2024 (the end of the reporting period) and the date of this filing.

mailed distribution checks to such claimants at their designated addresses on April 30, 2024 (*see infra* § VI);

- Drafted and filed a Supplemental Interim Report Regarding the Continuing Obstruction of the Receivership and Possible Recovery Scam Targeting Investor Victims (*see* Doc. 811), which was submitted to law enforcement and is also available on the <u>Receivership website</u>;
- Collected litigation income of **\$194,036.05** through settlements and/or the enforcement of default judgments (*see id.*); and
- Collected **\$79,680.04** in interest income on seized funds (*see* Ex. A).

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:

- Seized approximately **\$9,158,582.33** from frozen bank accounts at numerous financial institutions, including two Belizean banks;
- Generated **\$53,335.13** in business income, primarily from mortgages and rentals;
- Liquidated an additional approximately **\$7,899,358.91** in assets (net, excluding remitted funds), mostly subject to agreements with the Department of Justice and the United States Marshals Service;
- Collected **\$734,691.35** in interest and/or dividend income;
- Collected total litigation income of **\$5,324,235.94** through clawback and other third-party settlements; and
- Collected other miscellaneous income of **\$7,787,274.26**, including funds remitted by the Department of Justice.

The above activities are discussed in more detail in the pertinent sections

of this 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 4Oaks LLC ("4Oaks") (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.²

On the same day the CFTC filed its complaint, April 15, 2019, the Court entered an order appointing Burton W. Wiand as temporary Receiver for the Receivership Entities (Doc. 7) (the "**SRO**"). The Court directed him, in relevant part, to "[t]ake exclusive custody, control, and possession of the Receivership Estate," which includes "all the funds, properties, premises, accounts, income, now or hereafter due or owing to the Receivership Defendants, and other assets directly or indirectly owned, beneficially or otherwise, by the Receivership 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,

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

85, 172, 174-77. On July 11, 2019, the Court entered a Consolidated Receivership Order, which is now the operative document governing the Receiver's activities. Doc. 177 (the "**Consolidated Order**").³ Pursuant to the Consolidated Order and its predecessors (*see* Docs. 7, 44), the Receiver has the duty and authority to (1) administer and manage the business affairs, funds, assets, and any other property of the Receivership Entities; (2) marshal and safeguard the assets of the Receivership Entities; and (3) investigate and institute legal proceedings for the benefit of the Receivership Entities and their investors and other creditors as the Receiver deems necessary.

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

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

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 twocount 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 was 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).

On June 13, 2023, the CFTC entered into a consent order with defendant Montie, and on June 28, 2023, the agency entered into a consent order with defendant Haas. The CFTC also entered into consent orders with defendants Anile, Duran, OIG, Oasis Management, and Satellite Holdings. On December 15, 2023, the Court granted the CFTC's motion for entry of the consent orders. *See* Docs. 783, 786-90. The orders require the defendants to disgorge their illgotten gains and to pay a civil penalty. The Receiver will collect the disgorgement amounts and distribute the money through the claims process. As further explained in Section V.1., the Receiver also entered into parallel settlement agreements with defendants Montie and Haas.

On July 17, 2023, the CFTC filed a motion for summary judgment against defendant DaCorta (Doc. 749), and on the same day, DaCorta filed a motion for summary judgment against the CFTC (Doc. 750).⁴ Mediation between the CFTC and DaCorta was unsuccessful. On December 6, 2023, the Court granted the CFTC's motion for summary judgment and denied DaCorta's motion. Doc. 780. The Court found that DaCorta had no evidence to

⁴ Because DaCorta's assets are frozen, the Receiver served a subpoena on the attorney representing DaCorta in the enforcement action to determine the source of the funds being used to pay his legal expenses. *See infra* § II.A.

contest any material claim of the CFTC. *Id.* The Court entered judgment against DaCorta in the amount of \$53,270,336.08 plus post-judgment interest and a civil penalty of \$8,453,628.48. DaCorta is appealing the Court's order, but he has not yet filed his appellate brief and has sought to extend the pertinent deadline multiple times, including as recently as April 29, 2024.

II. <u>Overview of the Receiver's Findings</u>

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, DaCorta's 2022 criminal conviction following a two-week jury trial, and the Court's order granting the CFTC's motion for summary judgment, 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, 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

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the scheme's trading entity.⁵ 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.

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

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.

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.

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.

A. The Receiver's Investigation into Defendant DaCorta's Assets, the Ongoing Obstruction of the Receivership, and a Potential Recovery Scam Targeting Defrauded Investors

Through the Consolidated Order and its predecessors, the Court directed the Receiver to implement the asset freeze and to marshal and safeguard all property belonging to the defendants and relief defendants. Pursuant to this mandate and as explained in prior interim reports, the Receiver seized and liquidated luxury real estate, sports cars, and precious metals, among other things. The Court has never exempted any cash or other property from the asset freeze for the payment of defendant DaCorta's legal expenses. Indeed, the Office of the Federal Public Defender represented DaCorta during his criminal trial and subsequent conviction and sentencing.

On July 29, 2022, Ronald J. Kurpiers, II, a private attorney, entered a notice of appearance in this action on DaCorta's behalf.⁷ Doc. 654. Kurpiers

⁷ On February 10, 2023, Kurpiers also filed notices of appearance and substantively identical objections to the report and recommendation issued by the presiding Magistrate Judge approving the first interim distribution on behalf of six claimants: Casey Utter (Docs. 709, 723); Michelle Utter (Docs. 710, 718); Robert Parker Utter (Docs. 711, 722); Henry Fuksman (Docs. 712, 717, 721); John Paniagua (Docs. 713, 716, 720); and Lance Wren (Docs. 714, 715, 719). According to an engagement agreement the Receiver has obtained, Winters retained Kurpiers and paid him \$10,000 to file those frivolous documents. As the Court is aware, DaCorta was convicted of defrauding Oasis investors, including the aforementioned objectors, and sentenced to 23 years in prison. As such, Kurpiers simultaneously represents both the (footnote cont'd)

has since filed a motion for summary judgment, opposed the CFTC's motion for summary judgment, taken the Receiver's deposition, and otherwise prepared this case for trial. These activities raise a question central to the Receiver's mandate: With his assets frozen, who is paying DaCorta's legal expenses? The answer is troubling.

On July 25, 2023, the Receiver served a subpoena on Kurpiers, and in response, he produced an Attorney Retainer Agreement (the "**Retainer Agreement**"), effective July 29, 2022. According to that Retainer Agreement, <u>Brent Winters is an "Attorney" for his "Client/Defendant[,] Michael J.</u> <u>DaCorta</u>." (Emphasis added.) As explained on prior occasions, however, Winters has represented himself to be an attorney-in-fact pursuant to certain power of attorney agreements (and sometimes an attorney-at-law) for more than 400 victim-investors.⁸ Determining the nature and scope of Winters'

convicted mastermind of the Oasis scheme and certain of his adjudicated victims. The Receiver has not attempted to determine whether that conflict is waivable, and if so, whether Kurpiers has obtained the requisite waivers, but pertinent rules of professional conduct are certainly implicated.

Winters is also acting as co-counsel for DaCorta while also purporting to represent more than 400 claimants. As explained in this section, he has ghostwritten or otherwise taken numerous positions adverse to the claimants' interests, including seeking the dismissal of the Receivership and baselessly asserting that Anile and DaCorta committed no wrongdoing. The Receiver has found no evidence indicating that this glaring conflict of interest has been disclosed to or waived by the claimants.

⁸ Winters appears to have been recruited by a small number of Oasis investors that identify themselves as the "Oasis Helpers." The group has its own website (<u>oasisreplevin.net</u>), which is rife with false and misleading information as well as personal attacks against the Receiver, his professionals, the CFTC, and prosecutors. As further explained below, this website and group bear all the hallmarks of recovery fraud.

representation has been difficult because of gamesmanship and inconsistent positions. The Receiver has reviewed or engaged in numerous conversations with investors associated with Winters, and they simply do not draw or understand any distinction between an "attorney-at-law" and an "attorney-infact."

- As early as April 16, 2020, investors began to raise money for their "attorney," Brent Winters. *See, e.g.*, email from Michele Utter to investors, dated 4/16/23 ("Greg will be preparing a list of all of the donors for Brent. Brent will send a letter to the Receiver notifying him that he is now representing these people, and all future correspondence regarding them should be sent to him.").
- Winters required investors to sign a "Power of Attorney" form, which stated that Winters would act as each investor's "<u>Counsel</u> and Agent" (emphasis added) and listed numerous types of legal services he would provide, including (1) "[t]o commence, prosecute, discontinue, or defend all actions or other legal proceedings touching upon my property;" (2) "[t]o defend, settle, adjust, make allowances, compound, submit to arbitration, and compromise all accounts, reckonings, claims, and demands whatsoever;" and (3) "[t]o appear, cross-examine witnesses, take deposition(s), offer evidence in my defense, submit [a]ffidavits and other pertinent paperwork, plead or defend on my behalf before any competent court of [j]urisdiction respecting the aforesaid case and any derivative thereof."
- Winters moved the Court in the Clawback Action for admission *pro hac vice* (CA Doc. 585), but on November 9, 2020, Magistrate Judge Thomas G. Wilson denied the motion for failure to comply with pertinent requirements (CA Doc. 648).
- Winters again moved the Court in the Clawback Action for admission *pro hac vice* (CA Doc. 652), but on November 19, 2020, Magistrate Judge Wilson again denied the motion for failure to comply with pertinent requirements (CA Doc. 659).
- Despite the foregoing, in an undated letter to the Receiver's counsel in the Clawback Action, Winters wrote, "I do not represent, as attorney at law, any clients in the United States District Court for the Middle District of Florida, Case No: 8:20-cv-00862: *Burton Wiand, as Receiver*

for Oasis International Group, Ltd.; Oasis Management, LLC; and Satellite Holdings Company, Plaintiff v. Chris and Shelley Arduini, et al., Defendants. Therefore, please direct no communication to me as though I represent, as an attorney-at-law, or have otherwise entered an appearance for any client in the above-referenced case; I have not."

- In April 2022, approximately 342 of the claimants associated with Proof of Claim Forms submitted by Winters indicated on their Personal Verification Forms that Winters does <u>**not**</u> represent them in connection with the claims process.
- Since then, Winters has continued to claim in communications with the Receiver that he "represents" more than 400 claimants.

In any event, as an attorney-at-law, an attorney-in-fact, or both depending on whether it suits him, Winters has adopted a fiduciary position with respect to hundreds of investors, but he also represents defendant DaCorta – the criminally (and now civilly) convicted architect of the Oasis fraud. In the Receiver's opinion, this obfuscation is a ruse intended to induce victims to entrust their claims to Winters while avoiding the jurisdiction of this Court and its ability to impose sanctions and other discipline.

According to the Retainer Agreement, Winters paid Kurpiers <u>\$100,000</u> to act as "Co-Counsel" with Winters on DaCorta's behalf in this CFTC enforcement action and in the Receiver's Clawback Action (*see infra* § V.2.b.). Kurpiers was also supposed to sponsor Winters for admission *pro hac vice* in both cases, but they have never filed the requisite motions.

Who is Paying Winters and Kurpiers to Simultaneously Represent Both DaCorta and His Adjudicated Victims? The Receiver is aware of attempts to extract additional money from victim-investors beginning as early as 2019. These attempts are usually premised on the false assertion that an individual can help the investors recover <u>all</u> of their money if the investor only pays the self-proclaimed white knight a few thousand dollars to procure his or her services. This is known as recovery fraud.⁹ For example, in August 2019, a GoFundMe campaign was created to retain an individual named Abe Cofnas, who the "Oasis Helpers" and presumably Winters used to discredit the Receivership process by falsely claiming to know the location of recoverable money. A second round of funding was solicited in November 2019.

Similarly, the "Oasis Helpers" began soliciting "donations" from investors for Winters as early as April 2020. The amount of money that Winters has charged investors for his purported services is unknown at this time, but the Receiver has prepared a subpoena, which he is attempting to serve. Winters has not responded to communications asking if he will accept service of the subpoena. As such, the Receiver has attempted to serve Winters at least four times at four separate addresses across three states. To date, efforts at service have been unsuccessful because Winters apparently has no discernable residence, and his published office address is a UPS store.

⁹ See <u>www.cftc.gov/LearnAndProtect/AdvisoriesAndArticles/RecoveryFrauds.html</u>.

In addition, the Receiver has subpoenaed and received documents from the bank that transferred \$100,000 to Kurpiers and has uncovered that those funds were derived from deposits made by certain Oasis investors who have claimed to be represented by Winters. The bank account is controlled by Winters, his wife, and certain Oasis investors. The Receiver has also served a subpoena on Intermountain Precious Metals, which received more than \$190,000 in funds from the account. That company has refused to comply with the subpoena. The Receiver has obtained local counsel in Idaho and filed a motion to compel the company's compliance and for sanctions. *See Wiand, as Receiver v. Intermountain Precious Metals LLC*, Case No. 1:24-mc-00086-AKB (D. Idaho). Through one of its owners, the company has improperly opposed the motion to compel. The Receiver is scheduled to file a reply to the company's opposition on May 3, 2024.

Winters and the "Oasis Helpers" Have Disrupted this Receivership. Aside from the conflicts of interest and unaccounted funds discussed above, Winters and his affiliates have repeatedly disrupted this Receivership and imposed unnecessary fees and costs on the Receivership Estate. For example, in mid-April 2022, approximately 150 individuals filed a substantively identical document entitled "Beneficiary's Notice And Objection To Receiver's Continued Operations In The Absence Of Discovery, Hearing, And Final Judgment" (the "Notices"). See Docs. 489-586, 588-636 (stricken filings). The Notices asked the Court to prohibit the Receiver from making <u>any</u> distributions to <u>any</u> claimants until a final judgment has been entered in this action.¹⁰ On April 18, 2022, the Court *sua sponte* struck the documents from the docket as a "scheme" to undermine the Receivership. *See* Doc. 638 at 7 ("[T]he deluge of identical filings seems to the Court merely to be a scheme — clearly led and directed by one person or a group of people — to disrupt the orderly administration of this Receivership case."). The Court was correct. It now appears that Winters and the Oasis Helpers created a PDF template that automatically generated the frivolous Notices.

As another example, Kurpiers filed a second motion to dismiss the CFTC's complaint in this action on August 19, 2022, seeking, among other things, to dissolve the Receivership. Doc. 663. The Court held a hearing on December 22, 2022, which the Receiver's counsel attended along with the CFTC's attorneys from Kansas City, but during the hearing, Kurpiers immediately abandoned all his arguments and conceded that his motion should be denied. Winters never appeared nor presented any arguments. *See* Doc. 701. Kurpiers nevertheless complained about the fees charged by the Receiver and his professionals, but bad-faith filings like DaCorta's second motion to dismiss,

¹⁰ Claimants had no legitimate reason to obstruct the first interim distribution. The Notices continue a pattern of behavior by Winters and others, which seeks to advance defendant DaCorta's interests at the expense of his victims.

the Notices, and the untimely, irrelevant objections to the Magistrate Judge's report and recommendation approving the first interim distribution only increase costs to the Receivership, lessen recoveries for all claimants, and waste judicial and governmental resources.¹¹

Winters and the "Oasis Helpers" Have Disrupted the Claims

Process and the First Interim Distribution. Winters and his affiliates

have also repeatedly disrupted the claims process and imposed unnecessary

costs on the Receivership Estate.

- Winters submitted more than 400 Proof of Claim Forms on behalf of investors, all of which failed to comply with the Court-approved rules governing the claims process. For example, Winters signed the Proof of Claim Forms even though the rules required personal verification under penalty of perjury by each claimant. Winters also materially altered the Proof of Claim Forms by striking important language, and he often sought payment for unrecoverable items like false profits and interest. The Receiver could have denied all these claims, but instead, he afforded Winters and the claimants several opportunities to cure the deficiencies. This delayed the claims process and caused the Receivership Estate to incur unnecessary fees and costs.
- To cure the claimants' failure to execute their Proof of Claim Forms, the Receiver developed, and the Court approved, a <u>Personal Verification</u> <u>Form</u>. In April 2022, approximately 342 of the claimants associated with Proof of Claim Forms submitted by Winters indicated on their Personal Verification Forms that Winters does <u>not</u> represent them in connection with the claims process. Such reoccurring gamesmanship also delayed the first interim distribution and increased Receivership costs.

¹¹ Defendants in the Clawback Action have filed similarly obstructive documents, including baseless motions to quash service and an appeal of the Court's order denying those motions that the Eleventh Circuit dismissed *sua sponte* for lack of jurisdiction. They then refused to participate in the case, and default judgments were entered against them. They asserted their Fifth Amendment privilege against self-incrimination in response to post-judgment discovery and have generally refused to pay the amounts owed. The Receiver believes these actions and filings were coordinated by Winters and the "Oasis Helpers."

- Contrary to the Court's instructions, Winters materially altered and submitted 29 Personal Verification Forms (along with frivolous declarations) to the Receiver that were, once again, not executed by the associated claimants. This resulted in the otherwise avoidable denial of approximately 14 claims. These claimants are now confused about why they have not received a first interim distribution check, but at this point, the Receiver can only ask them to direct their questions to Winters.
- Winters listed his contact information on Address Confirmation Forms, but those forms often conflicted with other instructions from claimants. When the Receiver's professionals contacted certain claimants to clarify the situation, the claimants directed the Receiver <u>not</u> to send their distribution checks to Winters, as indicated on their Address Confirmation Forms. This raised concerns about whether checks were being diverted.
- Most recently, Winters claimed the Receiver failed to send first interim distribution checks to certain claimants and also sent checks to others that purportedly bounced or were invalid. The Receiver's professionals investigated the allegation and determined that all the "bad" checks were deposited by claimants and cleared the pertinent account(s).

Winters and the "Oasis Helpers" Have Also Disrupted The

Second Interim Distribution. During this reporting period, the Receiver obtained the Court's approval of a second interim distribution of \$ 9 million. On April 10, 2024, the Receiver and several of his professionals began receiving by email so-called "Final Address Confirmation Forms" from claimants represented by Winters. *See* Doc. 811-4. The forms claim to prevent the Receiver from wasting resources by purportedly requiring the Receiver to send distribution checks and related communications <u>only</u> to Winters. To the contrary, the Final Address Confirmation Forms unnecessarily caused significant expense to the Receivership and delayed the second interim

distribution. The forms were sent to four emails associated with the Receivership, copying <u>winterslaw@nym.hush.com</u> and <u>info@oasisreplevin.net</u>. This means each form was received in quadruplicate. The Receiver's professionals were forced to review these unnecessary forms to confirm that there was no change to the mailing information for a distribution check. Despite these unnecessary obstacles, the Receiver mailed checks to claimants with approved claims on April 30, 2024. These and related matters are further explained in the Receiver's Supplemental Interim Report Regarding the Continuing Obstruction of the Receivership and Possible Recovery Scam Targeting Investor Victims (*see* Doc. 811), which was submitted to law enforcement and is also available on the <u>Receivership website</u>

The Receiver continues to bring these matters to the Court's attention because he believes they present serious conflicts of interest and will only result in additional damages to victim-investors. The Receiver also continues to investigate possible violations of the asset freeze and will likely request a status conference to further discuss these issues with the Court. Finally, as mentioned above, the Receiver is pursuing contempt sanctions against Intermountain Precious Metals and will continue to pursue Winters and his purported "helpers" regarding their most questionable conduct.

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 \P 56.A.

III. <u>Securing The Receivership Estate</u>

Attached as **Exhibit A** to this Interim Report is a cash accounting report showing (1) the amount of money on hand from January 1, 2024, less operating expenses plus revenue, through March 31, 2024, 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 any uncollected or unsold property discussed below is not included in the accounting report. From January 1, 2024, through March 31, 2024, the Receiver collected \$273,716.09.¹²

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

¹² As explained in footnote 1, to the extent possible, the Receiver has included in this Interim Report transactions and events occurring after March 31, 2024, 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.

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"); 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 and February 2023, a portion of these funds were remitted (*i.e.*, returned) to the Receiver along with additional money that the DOJ repatriated from the United Kingdom. To date, the Receiver has obtained a total of \$7,643,420.25 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**").¹³ The Receiver has now deposited all the frozen funds into this account. A list of bank or other financial accounts organized by defendant, relief defendant, and/or affiliated entity is attached as **Exhibit B**.¹⁴

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.,

¹³ The Receiver also opened a checking/operating account for making disbursements.

¹⁴ Prior to this reporting period, defendants Montie and Haas were required to provide the CFTC and the Receiver with monthly financial statements for certain accounts. The Receiver would then update Exhibit B every quarter to reflect the most recent monthly balances. Due to their settlements with the CFTC and the Receiver, Montie and Haas are no longer required to provide the monthly statements. Exhibit B now labels the accounts "Settlement" with a frozen balance of \$0.00 and a liquidated balance of \$0.00.

which contained \$2,005,368.28. During October 2021, the DOJ recovered those funds pursuant to certain international agreements. As noted above, the Receiver petitioned the government for remission of those and other funds. In December 2022 and February 2023, portions of the funds were transferred to the Receiver. The funds will be distributed to victim-investors through the claims process.

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.

The Receiver also learned that Oasis Global FX, S.A. had 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 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 continued to raise procedural hurdles to such an extent that the Receiver began to question the bank's good faith and solvency. Finally, on June 16, 2023, the bank wired \$497,148.87 to the Receiver. That money is now within the Receivership Estate and will be distributed through the claims process. While the bank's actions were irregular, if not dishonest, the Receiver has determined not to pursue this matter further due to the expense and complications inherent in litigating in Belize.

C. Securing Real Property

The Receivership Estate contained numerous parcels of real property, including single-family homes, condominiums, and a waterfront office building.¹⁵ 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

¹⁵ In addition to the properties discussed below, relief defendant 444 Gulf of Mexico Drive, LLC held 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.

Defendants, wherever located, including but not limited to all ownership and leasehold interests and fixtures" (Doc. $44 \ \mbox{\ \ }19$; Doc. $177 \ \mbox{\ \ }19$).

1. All Receivership Real Estate Has Been Sold

The Receiver has sold all real property in the Receivership Estate. These properties included the Oasis office, DaCorta's and Anile's personal residences, and other properties used by DaCorta's relatives or others assisting him in the operation of Oasis scheme. 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.

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 were being held in escrow, but pursuant to the Court-approved settlement agreement between Montie and the Receiver (*see infra* § V.1.e.), the money was released from escrow and has been applied to the settlement amount. The funds have been or will be distributed through the claims process. In total, Montie has paid or will pay \$549,410.88 into the Receivership.

3. Defendant Haas's Real Property

Defendant Haas owns (jointly with his wife) a property in New York, which he estimated to be worth approximately \$502,000. An evaluation by the Receiver indicates he has few assets that could be subject to collection efforts. As mentioned in Section V.1.d., the Receiver settled claims against Haas for \$50,000, to be paid in monthly installments beginning on January 11, 2024, with the final installment due in October 2025. Haas has already paid the first installment. This was done because it was unlikely that any other collection efforts would produce more than the cost of collection.

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 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 sold all forfeited vehicles and collected all related funds.¹⁶ For more information, please see the Receiver's prior interim reports.

2. Cash and Precious Metals

Law enforcement agents also seized cash, gold, and silver from DaCorta and Anile that was hidden in 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 sold all forfeited metals and collected all related funds.¹⁷ 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

¹⁶ During a previous reporting period, the Receiver and defendant Montie coordinated to sell his 1996 Mercedes 500SL for \$10,500. Those funds were being held in escrow along with the proceeds from the sale of his New York property. The escrow agent has been authorized to release those funds so they can be applied toward the satisfaction of the settlement between Montie and the Receiver.

 $^{^{17}\,}$ This does not include certain assets in the possession of defendants Haas and Montie, as disclosed in their financial affidavits.

valuable items, including art, antiques, collectibles, sports memorabilia, and jewelry. The defendants have been instructed that all such personal property is subject to the asset freeze, and they are not to sell, transfer, or otherwise dispose of anything without the Receiver's authorization. To date, the Receiver has identified and/or seized the property listed in **Exhibit C**.¹⁸ He has sold most items as set forth in the exhibit.

E. Securing the Receivership Entities' Books and Records

As explained in prior interim reports, the Receiver and his professionals have taken significant 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. At this point, document collection and preservation are substantially complete.

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. In fact, Roar of the Lion was a failed venture DaCorta created for the benefit of his son.

¹⁸ Importantly, the values identified in Exhibit C were and are only estimates. Actual recoveries have been and will be subject to market conditions and other factors.

IV. Retention of Professionals

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

On May 30, 2019, the Receiver moved the Court to approve his engagement of the following legal, accounting, and other professionals: (1) f/k/a Wiand Guerra King P.A. f/k/a Guerra King P.A. n/k/a Guerra & Partners, P.A. ("WGK" or "GK" or "G&P"), 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 (Doc. 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

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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 G&P 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 has continued to use his services.

Finally, as referenced above, the Receiver has retained Jed W. Manwaring of Evans Keane LLP as local counsel in Idaho to enforce the subpoena served on Intermountain Precious Metals as part of the Receiver's continuing investigation into the activities of Winters and his associates.

V. Pending and Contemplated Litigation

The Consolidated Order requires this 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

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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

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. Anile's significant health problems were important considerations in the reduction of his sentence.

d. Settled Pre-Litigation Claims Against Haas

On June 28, 2023, the Receiver entered into a mediated settlement agreement with defendant Haas, pursuant to which Haas will pay \$50,000 to the Receivership Estate. The Receiver based the settlement amount largely on Haas's limited income and assets. Haas anticipates paying the settlement amount by selling certain auto parts, which became exempt from the asset freeze upon execution of the settlement agreement. The Court has approved the Receiver's settlement with Haas. *See* Doc. 793. Upon satisfaction of the settlement agreement and the CFTC's consent order, the asset freeze will be lifted with respect to Haas's remaining property.

e. Settled Litigation Against Montie

The Receiver sued Raymond P. Montie, III for 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 has settled this litigation for \$549,410.88. The settlement was reached after the evaluation of the Receiver's claims and the prospects of collection. Certain escrowed funds as well as monies already seized by the Receiver have been credited to the settlement amount. Montie must pay the remainder pursuant to a negotiated schedule. The Court has approved the Receiver's settlement with Montie. *See* Doc. 793. Upon satisfaction of the settlement agreement and the CFTC's consent order, the asset freeze will be lifted with respect to Montie's remaining property.

f. Settled Pre-Litigation Claims Against Portela, Marchiony, and Dribusch

During the prior reporting period, the Receiver reached pre-litigation settlement agreements with Leo Portela, Rob Marchiony, and Stephen Dribusch. Pursuant to the agreements, Portela will pay the Receiver \$5,000, Marchiony will pay \$139,657, and Dribusch will pay \$30,000. The Receiver reached these settlement amounts through careful consideration of the individuals' roles in the scheme and their respective financial resources, including the need for expensive collection efforts. The Court has approved the Receiver's settlement with Portela, Marchiony, and Dribusch. *See* Doc. 793.

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.* \P 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 <u>Receiver's website</u> (the "**Clawback Action**"). Through the Clawback Action, the Receiver obtained post-suit or postjudgment 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 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 <u>Receiver's website</u>.

Mediation occurred in May 2022, but the parties did not resolve their dispute. The district court supervising this action granted motions to dismiss with prejudice filed by the defendants based on standing issues, but the Receiver believed the judge misapplied relevant Eleventh Circuit precedent. As such, the Receiver filed a notice of appeal. An appellate mediation was unsuccessful. The Receiver filed his opening brief on March 3, 2023. The Eleventh Circuit also authorized the filing of an *amicus curiae* brief in support of the Receiver's position by the National Association of Federal Equity Receivers. The appellees filed their responses, and the Receiver submitted a reply. Oral argument occurred on March 5, 2024. On March 19, 2024, a threejudge panel of the Eleventh Circuit issued an opinion written by Chief Judge William Pryor Jr. vacating, reversing, and remanding the district court's order dismissing the Receiver's claims with prejudice. See Wiand v. ATC Brokers Ltd., et al., Case No. 22-13658 (11th Cir.). The appellate court found that the Receiver has standing to pursue his fraudulent transfer claims worth more than \$20 million against ATC Brokers Ltd. The appellate court also ruled that the trial court's dismissal of the Receiver's tort claims should have been without prejudice. As such, the Receiver intends to replead those claims. The Receiver and his counsel are considering the appropriate next steps and balancing any possible recovery against the uncertainty of further litigation. Currently, the Receiver intends to aggressively pursue this case on remand before the district court.

d. 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 default judgments against both defendants. On April 18, 2023, the Receiver obtained a default judgment against the defendants in the amount of \$146,092.90 plus prejudgment

interest. C. Doc. 20. Collection efforts are underway, including depositions in aid of execution scheduled for early May 2024.

3. Contemplated Litigation

As mentioned above, the Receiver is asserting claims against sales agents and others (like Doug Clark, Portela, Marchiony, and Dribusch) 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 judgment as part of his criminal conviction in an amount similar to the judgment against Anile. To avoid unnecessary expenditures, the Receiver will rely on that judgment to acquire assets DaCorta might still retain.

The Receiver has entered into tolling agreements with several parties and nonparties. This affords the Receiver 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 sent several demand letters, which resulted in the recent settlements described above. *See supra* § V.1.d-f. The Receiver will continue to issue demand letters and bring litigation when and if necessary.

VI. <u>Claims Process</u>

As explained more fully in prior interim reports, the Receiver – with the Court's approval – has established a claims process though which he is distributing 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.¹⁹ 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 <u>Personal Verification Form</u> but, in some instances, supplemental information like bank statements or affidavits.

¹⁹ See <u>www.oasisreceivership.com</u>.

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.

On January 27, 2023, the presiding Magistrate Judge issued an order recommending that the Receiver's distribution motion be granted. Doc. 705. Certain investors objected to the Magistrate Judge's order, but those objections were both untimely and without merit. On March 15, 2023, the Court overruled the objections, adopted the report and recommendation, and authorized the first interim distribution. Doc. 730.

On April 6, 2023, the Receiver mailed distribution checks by U.S. Mail to those who were entitled to receive one and did not require address confirmation. For more information, please see the Receiver's status report on the first interim distribution, which was filed on July 13, 2023. Doc. 747. Importantly, the distribution checks, as stated both on the check itself and in the accompanying letter, <u>were required to have been negotiated within</u> <u>120 days – *i.e.*, by August 4, 2023</u>. After 120 days, unnegotiated checks became null and void, and the money would have reverted to the Receivership. Fortunately, no checks have reverted to the Receivership at this time.

The Court's orders regarding distribution provide specific procedures that claimants must follow. On previous occasions, Mr. Winters and/or a "Helpers' Group" have advised claimants to not follow the Receiver's and the Court's instructions. At this point, following the advice of Mr. Winters or the "Helpers' Group" that is inconsistent with the Court's prior orders will not be excused and such conduct may result, and in some cases has resulted, in the forfeiture of distributions.

On February 28, 2024, the Receiver moved the Court to approve a second interim distribution of \$9,000,000 to approved claimants. Doc. 805. On March 22, 2024, the Magistrate Judge recommended that the Court approve the distribution. Doc. 808. This time, no one objected to the Magistrate Judge's report and recommendation. On April 8, 2024, the Court approved the second interim distribution. Doc. 810. Despite the unnecessary obstacles created by Winters and the Oasis Helpers (*see* Doc. 811), the Receiver mailed distribution checks to claimants with approved claims on April 30, 2024. Pursuant to certain claimants' instructions, the Receiver is sending approximately 283 checks worth approximately \$3.2 million to a designated mailing address associated with Winters, which the Receiver has learned is a UPS Store. As expressly approved by the Court (*see* Doc. 812), the Receiver also mailed courtesy copies of the pertinent checks and correspondence to each associated claimant. Additional funds on hand will be retained for continued operation of the Receivership and potential exposure from ongoing litigation.

VII. <u>The Next Ninety Days</u>

The Consolidated Order requires this 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 litigation to bring and/or prosecute, 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 Edwina Tate at <u>Edwina@BurtonWWiandPA.com</u>. The Receiver can be contacted directly by phone at 727-460-4679 or by email (<u>Burt@BurtonWWiandPA.com</u>).

Dated this 1st day of May 2024.

Respectfully submitted,

<u>s/ Burton W. Wiand</u> Burton W. Wiand, Receiver

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 1, 2024, I electronically filed the

foregoing with the Clerk of the Court by using the CM/ECF system.

<u>s/ Jared J. Perez</u> Jared J. Perez, FBN 0085192 <u>Jared.Perez@JaredPerezLaw.com</u> Jared J. Perez P.A.

and

Ailen Cruz, FBN 105826 <u>acruz@guerrapartners.law</u> Chemere Ellis, FBN 125069 <u>cellis@guerrapartners.law</u> GUERRA & PARTNERS, P.A. The Towers at Westshore 1408 N. West Shore Blvd., Suite 1010 Tampa, FL 33607 Tel. (813) 347-5100

Attorneys for Receiver, Burton W. Wiand

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EXHIBIT 3

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Burton W. Wiand P.A.

114 Turner Street Clearwater, FL 33756

Burton W. Wiand	May 08, 2024	4
Attention: Burton W. Wiand, as Receiver	Client:	025305
Burton W. Wiand PA	Matter:	001921
114 Turner Street	Invoice #:	21475
Clearwater, FL 33756		
	Page:	1

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

For Professional Services Rendered Through March 31, 2024

Date	TKPR	Description of Services	Hours	Amount
ASDIS	Asset	Disposition		
1/8/2024	BWW	Review statement for escrow account with funds from sale of R. Montie's house (.1); attention to transfer of R. Montie's funds from escrow (.4).	0.5	\$180.00
1/11/2024	BWW	Attend to issues relating to transfer of R. Montie's escrow funds (.2).	0.2	\$72.00
		Total: Asset Disposition	0.70	\$252.00
ASSET	Asset	Analysis and Recovery		
1/2/2024	BWW	Review order granting motion to approve settlements (.1); correspond with C. Ellis regarding settlement agreement and issues serving subpoena (.2); review correspondence from C. Ellis to J. Haas confirming court approval of settlement agreement (.1); review correspondence from E. Tate confirming receipt of wire settlement funds (.1); review correspondence from E. Tate providing copy of court order approving settlement and status of transfer of settlement funds (.1).	0.6	\$216.00
1/3/2024	BWW	Review correspondence from J. Haas regarding wiring instructions for settlement funds and request for notification of receipt of same (.1).	0.1	\$36.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
1/5/2024	BWW	Correspond with C. Ellis regarding first installment of settlement funds from J. Haas and status of subpoena to precious metals dealer (.2); review incoming wire of settlement funds from J. Haas (.1).	0.3	\$108.00
1/6/2024	BWW	Review settlement check (.1); review and approve letter to bank for deposit (.1).	0.2	\$72.00
1/8/2024	BWW	Exchange emails with C. Ellis (.2); review receipts of settlement funds (.2).	0.4	\$144.00
1/9/2024	BWW	Communicate with C. Ellis regarding progress on investigation matters (.2); review information from C. Ellis regarding lack of response to subpoena issued to metals dealer (.1); review notice of appeal by M. DaCorta (.1).	0.4	\$144.00
1/11/2024	BWW	Review confirmation of deposit of S. Dribusch's settlement payment (.1).	0.1	\$36.00
1/12/2024	BWW	Review correspondence from C. Ellis to J. Haas regarding settlement payments (.1).	0.1	\$36.00
1/16/2024	BWW	Attend to J. Haas settlement terms (.2); review information regarding ATC/Spotex appellate argument (.2); review video from S. Batch and research other videos (.6); review transmittal of initial appeal package to USCA regarding M. DaCorta appeal (.1).	1.1	\$396.00
1/23/2024	BWW	Review civil docketing notice regarding M. DaCorta's appeal (.1).	0.1	\$36.00
1/25/2024	BWW	Review and respond to correspondence from C. Ellis regarding response to subpoena served on Intermountain Precious Metals and status of other subpoenas (.2).	0.2	\$72.00
1/26/2024	BWW	Correspond with C. Ellis regarding status of M. DaCorta's asset freeze (.2); correspond with C. Ellis regarding status of requirement for J. Haas and R. Montie to submit financial reports (.2).	0.4	\$144.00
1/30/2024	BWW	Work with C. Ellis regarding subpoenas (.3); work with C. Ellis regarding judgment (.3).	0.6	\$216.00
2/12/2024	BWW	Review notice from the clerk regarding status of record for purposes of appeal by M. DaCorta (.1).	0.1	\$36.00
2/12/2024	BWW	Review correspondence from C. Ellis regarding status of motion (.1).	0.1	\$36.00
2/19/2024	BWW	Telephone conference with J. Sallah regarding appellate argument and new case law (.5).	0.5	\$180.00
2/20/2024	BWW	Review information from J. Sallah and J. Perez regarding judges for ATC oral argument (.1).	0.1	\$36.00
2/23/2024	BWW	Correspond with C. Ellis regarding subpoena to metals dealer (.2).	0.2	\$72.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
3/1/2024	BWW	Send Zoom link for upcoming status call (.1); review correspondence from A. Cruz regarding status of settlement agreement and settlement funds (.1); communicate with A. Cruz and C. Ellis regarding progress of case (.2).	0.4	\$144.00
3/4/2024	BWW	Correspond with E. Tate regarding ATC appellate pleadings (.1); correspond with J. Perez and schedule pre-argument Zoom meeting (.1); review briefs (.7); attend meeting with J. Perez to prepare for argument (.8); review response to A. Cruz regarding status of settlement funds (.1).	1.8	\$648.00
3/5/2024	BWW	Correspond with A. Cruz regarding issuing subpoena to M. DaCorta's new attorney (.1); research and provide additional contact information for service of subpoena (.5); work on subpoenas (.4); review briefs and notes for ATC oral argument (.8); telephone conference with J. Perez and J. Sallah regarding argument (.6); review transactions calculations record for insider and correspondence from A. Cruz to KapilaMukamal regarding same (.1); review correspondence from A. Cruz to S. Batsch regarding insider (.1).	2.6	\$936.00
3/6/2024	BWW	Review article regarding oral argument in ATC appeal and provide copy to J. Sallah, P. Rengstl, J. Katz, A. Cruz, and C. Ellis (.3); work on hiring Idaho attorney to pursue subpoena enforcement (.2); telephone conference with M. Christinsen regarding same (.2); telephone conferences with A. Cruz regarding same (.2); distribute Law 360 article to CFTC and NAFER (.2); correspond with A. Cruz and J. Perez regarding status meeting (.1); prepare for and participate in Zoom meeting with J. Perez, A. Cruz, and C. Ellis (2.0).	3.2	\$1,152.00
3/7/2024	BWW	Review email from A. Cruz regarding notes from telephone conference with insider (.1); correspond with S. Batsch regarding assistance locating subpoena target (.1); review declaration provided by A. Cruz (.1); review bank statement showing wire transfer from insider provided by KapilaMukamal (.1); correspond with A. Cruz regarding same (.2); review documents stored on U-drive regarding same (1.2); review reply from S. Batsch regarding request for information on insider (.1); review broker check report for same (.1); review correspondence from A. Cruz regarding insider's settlement agreement (.1).	2.1	\$756.00
3/8/2024	BWW	Exchange emails with A. Cruz and C. Ellis regarding personal jurisdiction issues pertaining to potential action against insider (.2).	0.2	\$72.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
3/11/2024	BWW	Review correspondence from A. Cruz to E-Hounds requesting list of active users (.1); review follow up correspondence from A. Cruz to Idaho counsel requesting availability to assist with subpoena (.1); correspond with A. Cruz regarding Idaho attorney (.1); telephone call with A. Cruz regarding insider complaints (.1); review correspondence and draft settlement agreement (.1).	0.5	\$180.00
3/13/2024	BWW	Correspond with A. Cruz and P. McMillan regarding service of process (.2); conduct research for same and provide to A. Cruz and P. McMillan (.3); review responses to same (.1); telephone call with A. Cruz regarding settlements (.1); telephone conference with P. McMillan (.2); communicate with A. Cruz regarding subpoenas (.2).	1.1	\$396.00
3/14/2024	BWW	Exchange emails with K. Paulson regarding contact information (.2); correspond with A. Cruz requesting new information for same (1); review correspondence from A. Cruz to B. Winters regarding representation of insider (.1); prepare correspondence to A. Cruz regarding same (.1); telephone call with A. Cruz regarding same (.2); review information from P. McMillan regarding same (.1); review information regarding utility search and skip trace provided by A. Cruz (.2); review proofs of service on attempts to serve provided by A. Cruz (.1); review attachment to subpoena to S. Preziosi provided by A. Cruz (.1); review correspondence from A. Cruz regarding deposition dates (.1); work with P. McMullen and J. Anderson regarding target's location (1.9); telephone conferences with A. Cruz regarding same and other third-party subpoenas (.6); work on deposition (.1).	3.9	\$1,404.00
3/15/2024	BWW	Correspond with A. Cruz and P. McMillan regarding subpoena and efforts to locate target (.3); review correspondence from A. Cruz to R. Kurpiers regarding representation (.1); review response from R. Kurpiers regarding same (.1).	0.5	\$180.00
3/16/2024	BWW	Work with A. Cruz regarding judgment payment issues (.2); work with McMillan and Associates regarding subpoena (.3).	0.5	\$180.00
3/18/2024	BWW	Attend to issues regarding subpoenas (1.0); review subpoena and notice of taking deposition (.1); correspond with A. Stephens regarding same (.1); correspond with A. Cruz and C. Ellis regarding status of additional subpoenas (.1); correspond with A. Cruz regarding message from B. Winters confirming non-representation (.1); review correspondence from Idaho attorney to A. Cruz confirming availability to work on subpoena enforcement (.1).	1.5	\$540.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset /	Analysis and Recovery		
3/19/2024	BWW	Review 11th Circuit opinion in ATC appeal (.2); telephone conference with J. Sallah regarding same (.4); exchange emails with J. Perez regarding same (.1); review correspondence from A. Cruz to P. McMillan regarding failed attempts to locate subpoena target (.1); telephone call with A. Cruz regarding Idaho attorney's assistance with enforcing subpoena (.1).	0.9	\$324.00
3/20/2024	BWW	Review appellate opinion (.2); participate in Zoom call with J. Sallah, J. Katz, P. Rengstl, and J. Perez (1.0); communicate with A. Auxter regarding appellate decision and related issues (.2); review historical documents provided by P. Rengstl and J. Perez (.3); review correspondence from P. McMillan regarding attempts for service of process and options for service (.2); review correspondence from A. Cruz regarding same (.1). review correspondence from R. Kurpiers regarding insider (.1); review correspondence from A. Cruz regarding same (.1).	2.2	\$792.00
3/21/2024	BWW	Review additional contact information provided for service of subpoena (.2); telephone call with A. Cruz regarding same (.1).	0.3	\$108.00
3/22/2024	BWW	Work with A. Cruz regarding status of settlements, discovery, Intermountain Precious Metals discovery, status of R. Montie's case, and related matters (.4); review and approve settlement agreement (.2); review correspondence from A. Cruz regarding status of settlement agreement (.1); review correspondence to process server from A. Stephens regarding notices of taking deposition to be served (.1).	0.8	\$288.00
3/23/2024	BWW	Review correspondence from P. McMillan regarding service of subpoena (.1).	0.1	\$36.00
3/25/2024	BWW	Review draft report provided by P. McMillan (.2); work with A. Cruz on retaining Idaho law firm to enforce subpoena (.3); review and respond to correspondence from potential Idaho attorney (.2); correspond with A. Cruz regarding same (.1); telephone call with A. Cruz regarding same (.1).	0.9	\$324.00
3/26/2024	BWW	Telephone call with A. Cruz regarding retaining Idaho counsel to assist in enforcement of subpoena (.1).	0.1	\$36.00
3/28/2024	BWW	Review correspondence from A. Cruz to Intermountain Precious Metals regarding subpoena (.1); review email to Idaho counsel from A. Cruz regarding same (.1); review and approve engagement letter with Idaho attorney for subpoena enforcement (.1); correspond with A. Cruz regarding same (.1); review draft subpoena to UPS Store (.1).	0.5	\$180.00

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			Page:	6
SERVICES	5			
Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
3/29/2024	BWW	Review motion to compel to Intermountain Precious Metals from A. Cruz and respond with edits (.2); review email from A. Cruz to Idaho counsel with finalized motion to compel and exhibits from A. Cruz regarding request to move forward with enforcement action (.1); review correspondence from A. Cruz to Intermountain Precious Metals regarding same (.1); telephone call with A. Cruz regarding same (.1).	0.5	\$180.00
		Total: Asset Analysis and Recovery	30.20	\$10,872.00
BUSIN	Busin	ess Operations		
1/2/2024	BWW	Review bank account statements (.2); correspond with E. Tate and C. Ellis regarding transfer of settlement funds from trust account to Oasis money market account (.2).	0.4	\$144.00
1/9/2024	BWW	Review confirmation of receipt of second wire from J. Haas (.1); authorize bank transfer of funds to Oasis money market account (.1).	0.2	\$72.00
1/26/2024	BWW	Attend to reviewing and approving letter to ServisFirst Bank for transfer of funds from escrow account to money market account (.1); review confirmation from bank of same (.1).	0.2	\$72.00
2/1/2024	BWW	Review bank statements (.1).	0.1	\$36.00
2/6/2024	BWW	Review 1099 document from ServisFirst Bank (.1).	0.1	\$36.00
2/8/2024	BWW	Review fees and invoices (.7).	0.7	\$252.00
2/15/2024	BWW	Review and approve invoices (.7).	0.7	\$252.00
2/21/2024	BWW	Review correspondence from E. Tate regarding status of GoDaddy renewals (.1); correspond with R. Rohr regarding same (.1).	0.2	\$72.00
2/26/2024	BWW	Review follow-up correspondence from E. Tate regarding GoDaddy renewals and response from R. Rohr (.1).	0.1	\$36.00
3/1/2024	BWW	Review bank statements provided by E. Tate (.1).	0.1	\$36.00
3/11/2024	BWW	Review correspondence from E. Tate and R. Rohr regarding GoDaddy renewals (.1); respond approving retention of same (.1).	0.2	\$72.00
3/12/2024	BWW	Meet with E. Tate to discuss status of Roar of the Lion account with GoDaddy (.1).	0.1	\$36.00
3/18/2024	BWW	Review and prepare deposit of settlement check (.1); prepare email to ServisFirst Bank regarding deposit (.1); correspond with ServisFirst Bank regarding same (.2); review notices regarding GoDaddy renewals (.1); correspond with R. Rohr regarding cancellation of same (.1).	0.6	\$216.00

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Date	TKPR	Description of Services	Hours	Amount
BUSIN	Busine	ess Operations		
3/22/2024	BWW	Review order approving payments to vendors, accountants, and counsel (.1); exchange emails with J. Perez regarding same (.1); process payments to all vendors, accountants and counsel (.6).	0.8	\$288.00
3/25/2024	BWW	Review GoDaddy renewal notice and response from R. Rohr regarding same (.1); communicate with E. Tate regarding payment of Maples & Calder fees invoice (.1).	0.2	\$72.00
3/27/2024	BWW	Review correspondence from E. Tate to R. Rohr regarding renewing domain for Roar of the Lion (.1).	0.1	\$36.00
		Total: Business Operations	4.80	\$1,728.00
CASE	Case A	Administration		
1/29/2024	BWW	Review and revise interim report (1.0).	1.0	\$360.00
1/30/2024	BWW	Attend to issues in final draft of interim report (.2); review and execute financial document for same (.3).	0.5	\$180.00
2/29/2024	BWW	Review correspondence from A. Stephens confirming that motion for second interim distribution has been posted to website (.1).	0.1	\$36.00
3/12/2024	BWW	Provide information to and correspond with A. Stephens regarding posting on website information from 11th Circuit hearing (.2).	0.2	\$72.00
3/21/2024	BWW	Attend to website posting regarding appellate decision (.3).	0.3	\$108.00
3/28/2024	BWW	Review and approve update to website regarding second distribution (.1).	0.1	\$36.00
		Total: Case Administration	2.20	\$792.00
CLAIM	Claims	Administration and Objections		
1/12/2024	BWW	Communicate with claimant regarding status of next distribution (.2).	0.2	\$72.00
1/30/2024	BWW	Correspond with M. Lockwood and J. Perez regarding timeline for next distribution (.2).	0.2	\$72.00
2/7/2024	BWW	Work with M. Lockwood on issues relating to claimant checks (.2).	0.2	\$72.00
2/8/2024	BWW	Correspond with M. Lockwood regarding status of first distribution checks and timing for next distribution (.2); review email from M. Lockwood regarding second distribution and remaining reissue pending (.1).	0.3	\$108.00

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				Client: Matter: Invoice #:	025305 001921 21475
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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	s Administration and Objections		
2/9/2024	BWW	Review information provided by claimant regarding request received to send money (.1); review emails from A. Stephens responding to same (.2); review email from K. Paulson regarding same (.1).	0.4	\$144.00
2/22/2024	BWW	Review and revise motion for second distribution (.6); telephone conference with M. Lockwood regarding same (.1).	0.7	\$252.00
2/23/2024	BWW	Review and edit draft motion for second interim distribution provided by M. Lockwood (.5); correspond with C. Ellis regarding same (.1).	0.6	\$216.00
2/24/2024	BWW	Review and approve claims motion (1.0).	1.0	\$360.00
2/28/2024	BWW	Review, revise, and approve details for second distribution to Oasis claimants (1.0).	1.0	\$360.00
3/6/2024	BWW	Review requests for custodial changes for two claimants from B. Winters (.1); correspond with K. Paulson regarding same (.1).	0.2	\$72.00
3/20/2024	BWW	Attend to distribution to investors (1.0).	1.0	\$360.00
3/22/2024	BWW	Communicate with M. Lockwood regarding Court's report and recommendation granting second distribution motion (.1).	0.1	\$36.00
3/28/2024	BWW	Review revised letter to claimants for second distribution provided by M. Lockwood (.1); correspond with M. Lockwood regarding status of next distribution (.1).	0.2	\$72.00
3/29/2024	BWW	Review email from claimant requesting update on next distribution (.1).	0.1	\$36.00
		Total: Claims Administration and Obj	6.20	\$2,232.00
		Total Professional Service	44.1	\$15,876.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
E123 Web-Related E	Expenses	
1/2/2024	Web-related expenses - Amazon Web Services - Web Services	\$257.61
2/1/2024	Web-related expenses - GoDaddy - Web Hosting Plus Renewal - 1 month - oasisgloballimited.com	\$36.99
2/2/2024	Web-related expenses - Amazon Web Services - Web Services	\$257.59
2/23/2024	Web-related expenses - GoDaddy - Oasis Consulting	\$491.55

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DISBURSEMENTS			
Date	Description of Disbursements		Amount
E123 Web-Related E	xpenses		
3/1/2024	Web-related expenses - GoDaddy - Web Hosting Plus Renewal - 1 month - oasisgloballimited.com		\$36.99
3/2/2024	Web-related expenses - GoDaddy - Microsoft Email Essentials Basics		\$191.40
3/2/2024	Web-related expenses - Amazon Web Services - Web Services		\$275.44
3/28/2024	Web-related expenses - GoDaddy -Microsoft 365 Email Plus renewal and advanced email security (Original charge of \$959.04 MINUS \$239.52 REFUND AND \$359.76 REFUND)		\$359.76
E124 Other			
2/5/2024	Miscellaneous - NotaryCam - notarize Montie signature		\$15.00
	Total Disbursements		\$1,922.33
	Total Services Total Disbursements	\$15,876.00 \$1,922.33	\$17,798.33
	Total Current Charges		

Case 8:19-cv-00886-VMC-SPF	Document 817-3	Filed 05/22/24	Page 11 of 11 Page May 08, 202	
			Client: Matter: Invoice #:	025305 001921 21475
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TASK RECAP

Services

Project No.	Hours	Amount
ASDIS - ASDIS	0.70	\$252.00
ASSET - ASSET	30.20	\$10,872.00
BUSIN - BUSIN	4.80	\$1,728.00
CASE - CASE	2.20	\$792.00
CLAIM - CLAIM	6.20	\$2,232.00
	44.10	\$15,876.00

Disbursements

Project No.	Amount
Web-Related Expenses	\$1,907.33
Other	\$15.00
	\$0.00
	\$0.00
	\$0.00
	\$1,922.33

BREAKDOWN BY PERSON

Person		Project No.	Hours	Amount
BWW	Burton W. Wiand	ASDIS - ASDIS	0.70	\$252.00
BWW	Burton W. Wiand	ASSET - ASSET	30.20	\$10,872.00
BWW	Burton W. Wiand	BUSIN - BUSIN	4.80	\$1,728.00
BWW	Burton W. Wiand	CASE - CASE	2.20	\$792.00
BWW	Burton W. Wiand	CLAIM - CLAIM	6.20	\$2,232.00
			44.10	\$15,876.00

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EXHIBIT 4

Burton W. Wiand PA

114 Turner Street Clearwater, FL 33756 Phone: (727) 235-3769 Fax: (727) 447-7196

INVOICE

Matter: CFTC Oasis Receivership - Legal Team Responsible: Burton W. Wiand

For Professional Services Rendered 01/1/2024 Through 03/31/2024

Date	Timekeeper	Description of Services	Hours	Amount
	ASSET -	Asset Analysis and Recovery		
1/17/24	EPT	Review instructions from Receiver regarding R. Montie's settlement agreement (.1); review settlement agreement and exhibits provided by C. Ellis (.1); edit notary language and convert documents to a single PDF format (.1); communicate with R. Montie regarding same (.1); create transaction in NotaryCam (.1); manage participant and tag for signing (.2); provide link to R. Montie (.1); attend online signing to witness and notarize R. Montie's signature (.1); finalize transaction (.1); download, save, and email finalized document to the Receiver, R. Montie, and C. Ellis (.1); communicate with R. Montie acknowledging receipt of finalized agreement (.1).	1.2	\$150.00
3/4/24	EPT	Review request from Receiver regarding ATC appellate briefs (.1); correspond with J. Perez regarding same (.1); update record and provide requested information (.1).	0.3	\$37.50
3/19/24	EPT	Review email from J. Perez regarding entry of opinion in ATC appeal matter (.1); access Pacer, download, rename, and save opinion and email to Receiver (.2).	0.3	\$37.50
		Total: Asset Analysis and Recovery	1.8	\$225.00
	BUSIN -	Business Operations		
1/2/24	EPT	Download, review, and send December bank statements to the Receiver, M. Lockwood, and PDR (.2); review emails from PDR requesting additional information (.1); research file for requested information and respond (.1); review correspondence from the Receiver regarding order approving settlements and status of R. Marchiony settlement funds held in trust (.1); email copy of court order to R. Marchiony (.1); prepare and provide request for transfer of settlement funds to ServisFirst Bank (.1); correspond with Receiver regarding wiring instructions for future settlement payments (.1); review email from R. Marchiony requesting confirmation of funds received and respond (.1); correspond with Receiver regarding transfer of settlement funds (.1).	1.0	\$125.00
1/6/24	EPT	Review and process deposit of settlement check from S. Dribusch in Oasis money market account at ServisFirst Bank (.3); provide copy of same to the Receiver, C. Ellis, M. Lockwood, and PDR (.1).	0.4	\$50.00
1/8/24	EPT	Review and send statement for Hauppage House escrow account to Receiver, M. Lockwood, and PDR (.1); review and confirm incoming wire from J. Haas (.1); update record and provide information regarding same to A. Stephens and C. Ellis (.1).	0.3	\$37.50
1/9/24	EPT	Prepare letter to ServisFirst Bank for transfer of R. Marchiony settlement funds held in escrow to Oasis money market account (.1); correspond with C. Ellis regarding Receiver's preference for wiring settlement funds going forward and process for the transfer of R. Montie's escrow funds (.1).	0.2	\$25.00

1/11/24	EPT	Review request from C. Ellis regarding status of S. Dribusch settlement check (.1); access bank site and provide requested information (.1).	0.2	\$25.00
1/17/24	EPT	Review notice from Amazon Web Services regarding changes (.1); provide same to R. Rohr for further action (.1).	0.2	\$25.00
1/26/24	EPT	Review and process joint release certificate for review by Receiver (.1); update record and prepare letter to ServisFirst Bank with instructions for transfer (.2); provide same to Receiver for approval (.1); review approval from Receiver and provide ServisFirst Bank with instructions and release certificate (.1); review confirmation of transfer of funds, update record, and provide to Receiver, C. Ellis, and PDR (.1).	0.6	\$75.00
2/1/24	EPT	Download, review, and send January money market and checking account statements to PDR, Receiver, and M. Lockwood (.2); review request from PDR for additional information (.1); research file for same and provide requested information (.1).	0.4	\$50.00
2/6/24	EPT	Review, scan, and save 1099-S document (.1); update record regarding same and send copies to Receiver and PDR (.1).	0.2	\$25.00
2/21/24	EPT	Review GoDaddy renewals for March (.1); access site and download billing information (.1); correspond with Receiver and R. Rohr regarding items to cancel (.1).	0.3	\$37.50
2/26/24	EPT	Correspond with Receiver and R. Rohr regarding GoDaddy automatic renewals (.1).	0.1	\$12.50
3/1/24	EPT	Download and save February bank account statements and provide to PDR, Receiver, and M. Lockwood (.2).	0.2	\$25.00
3/11/24	EPT	Review GoDaddy renewal alerts and communicate Receiver and R. Rohr regarding same (.3); review price increase notice from Amazon Web Services and forward to Receiver and R. Rohr (.1); review GoDaddy renewal alert for Roar of the Lion and forward same to Receiver and R. Rohr (.2); review communications between Receiver and R. Rohr regarding same (.1).	0.7	\$87.50
3/12/24	EPT	Meet with Receiver regarding GoDaddy subscription for Roar of the Lion (.1); review email regarding expiration of payment method for same (.1); correspond with R. Rohr regarding Receiver's request for renewal and request that payment method be updated (.1); review request from A. Stephens regarding status of L. Portela payment (.1); search bank records and respond to same (.3).	0.7	\$87.50
3/14/24	EPT	Review and verify incoming wire of R. Montie's frozen funds released from First Seacoast Bank (.1); update record and provide same to Receiver, A. Cruz, A. Stephens, A. Avery, and PDR (.1); meet with Receiver regarding check from R. Montie (.1); process and mail same for deposit in money market account at ServisFirst Bank (.6).	0.9	\$112.50
3/18/24	EPT	Review notice of C. Huckabee deposition and add date to Receiver's calendar (.1); review upcoming GoDaddy renewals and provide to Receiver and R. Rohr for further instruction (.1); communicate with Receiver regarding deposit of J. Portela settlement check (.1); review Amazon Web Services upcoming changes email and provide to R. Rohr (.1).	0.4	\$50.00
3/26/24	EPT	Meet with Receiver to pick up check for deposit (.1); prepare correspondence to ServisFirst Bank and process check for deposit (.5); provide copies of same to Receiver, PDR, A. Cruz and C. Ellis (.1).	0.7	\$87.50
		Total: Business Operations	7.5	\$937.50

	CLAIM -	Claims Administration and Objections		
1/22/24	EPT	Run cleared checks report and provide to M. Lockwood (.1).	0.1	\$12.50
2/8/24	EPT	Review request from K. Paulson requesting status of distribution check (.1); perform search on bank site and provide requested information (.1).	0.2	\$25.00
2/12/24	EPT	Review email from M. Lockwood requesting information regarding bank fees for wire to claimants living in Spain (.1); research file and provide copy of August 2023 bank statement showing same (.1).	0.2	\$25.00
2/20/24	EPT	Run cleared checks report and provide to M. Lockwood (.1).	0.1	\$12.50
3/20/24	EPT	Run cleared checks report and provide to M. Lockwood (.1).	0.1	\$12.50
		Total: Claims Administration and Objections	0.7	\$87.50

Total Professional Services \$1,250.00

April 22, 2024 Page 5 of 5 PageID 18542 Invoice #19676

TASK RECAP

<u>Person</u>		<u>Rate</u>
EPT	Edwina P. Tate	\$125.00
Category	Hours	
ASSET BUSIN CLAIM	1.8 7.5 <u>0.7</u>	
TOTAL	10.0	
TOTAL AMOUNT	\$1,250.00	

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EXHIBIT 5

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Burton W. Wiand P.A.

114 Turner Street Clearwater, FL 33756

Burton W. Wiand	May 08, 2024	Ļ
Attention: Burton W. Wiand, as Receiver	Client:	025305
Burton W. Wiand PA	Matter:	002096
114 Turner Street	Invoice #:	21478
Clearwater, FL 33756		
	Page:	1

RE: Oasis Receiver - Recovery from Investors

For Professional Services Rendered Through March 31, 2024

Date ASSET	TKPR Asset	Description of Services Analysis and Recovery	Hours	Amount
AUGEI	A0001			
2/12/2024	BWW	Review order on default judgments (.2).	0.2	\$72.00
		Total: Asset Analysis and Recovery	0.20	\$72.00
		Total Professional Service	0.2	\$72.00
		Total Services	\$72.00)
		Total Current Charges		\$72.00
		C C		
		Total Services Total Current Charges PAY THIS AMOUNT	\$72.00	

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			Client:	025305
			Matter:	002096
			Invoice #:	21478
			Page:	2

TASK RECAP

Services			Disbursements	
Project No.	Hours	Amount	Project No.	Amount
ASSET - ASSET	0.20	\$72.00		\$0.00
	0.20	\$72.00		\$0.00

BREAKDOWN BY PERSON

Person		Project No.	Hours	Amount	
BWW	V Burton W. Wiand ASSET - ASSET		0.20	\$72.00	
			0.20	\$72.00	

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EXHIBIT 6

Case 8:19-cv-00886-VMC-SPF Document 817-6 Filed 05/22/24 Page 2 of 4 PageID 18547

Burton W. Wiand P.A. 114 Turner Street

114 Turner Street Clearwater, FL 33756

Burton W. Wiand	May 08, 2024	1
Attention: Burton W. Wiand, as Receiver	Client:	025305
Burton W. Wiand PA	Matter:	002097
114 Turner Street	Invoice #:	21479
Clearwater, FL 33756		
	Page:	1

RE: Oasis Receiver - Raymond Montie, III.

For Professional Services Rendered Through March 31, 2024

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
1/17/2024	BWW	Attend to execution of R. Monte affidavit and joint release certificate (.2); request online notarization of same by E. Tate (.1); review final signed and notarized affidavit and forward copy of same to J. Perez, J. Sallah, J. Katz, and P. Rengstl (.2).	0.5	\$180.00
2/7/2024	BWW	Correspond with C. Ellis regarding request of status from R. Montie (.1); review correspondence from C. Ellis and J. Perez regarding frozen and liquidated funds from R. Montie's bank accounts that have been applied to his settlement (.1).	0.2	\$72.00
2/14/2024	BWW	Review issues regarding Ambit Energy frozen funds relating to R. Montie's settlement (.4).	0.4	\$144.00
3/7/2024	BWW	Review draft letter to Ambit Energy regarding R. Montie's funds (.1); telephone call with A. Cruz regarding same (.1); review email from A. Cruz regarding communication with R. Montie and procedure for providing funds (.1); telephone call with A. Cruz regarding same (.1).	0.4	\$144.00
3/13/2024	BWW	Telephone conference with A. Cruz regarding R. Montie negotiations (.1); review and deposit check from R. Montie (.3); review frozen funds agreement signed by R. Montie and correspondence from R. Montie, A. Cruz, and A. Stephens regarding same (.3).	0.7	\$252.00

Case 8:19-cv-00886-VMC-SPF	Document 817-6	Filed 05/22/24	Page 3 of 4 PageID May 08, 2024	
			Client:	025305
			Matter:	002097
			Invoice #:	21479
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Date ASSET	TKPR Asset	Description of Services Analysis and Recovery	Hours	Amount
3/14/2024	BWW	Review correspondence from A. Stephens to First Seacoast Bank regarding release of R. Montie's frozen funds (.1); review incoming wire for same (.1); correspond with PDR regarding source of funds (.1); review bank emails for R. Montie provided by A. Stephens (.1); meet with E. Tate regarding processing separate check received from R. Montie (.1); review and approve correspondence to ServisFirst Bank regarding same (.1).	0.6	\$216.00
3/18/2024	BWW	Exchange emails with C. Ellis regarding R. Montie's settlement payments (.1).	0.1	\$36.00
3/26/2024	BWW	Exchange emails with E. Tate regarding method for depositing R. Montie's check (.1); meet with E. Tate regarding additional check from R. Montie (.1); review correspondence from E. Tate regarding sending check for deposit at ServisFirst Bank (.1).	0.3	\$108.00
		Total: Asset Analysis and Recovery	3.20	\$1,152.00
		Total Professional Service	3.2	\$1,152.00
		Total Services Total Current Charges PAY THIS AMOUNT	\$1,152.00	\$1,152.00 \$1,152.00

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			Client:	025305
			Matter:	002097
			Invoice #:	21479
			Page:	3

TASK RECAP

Services			Disbursements	
Project No.	Hours	Amount	Project No.	Amount
ASSET - ASSET	3.20	\$1,152.00		\$0.00
	3.20	\$1,152.00		\$0.00

BREAKDOWN BY PERSON

Person		Project No.	Hours	Amount
BWW	Burton W. Wiand	ASSET - ASSET	3.20	\$1,152.00
			3.20	\$1,152.00

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EXHIBIT 7

Receivership					
Expense Type		Amount			
Photocopies	\$	121.05			
Online Research	\$	1,980.71			
Court Fees	\$	40.00			
Subpoena Fees	\$	541.25			
Web-Related Expenses	\$	675.00			
Other	\$	128.96			
TOTAL	\$	3,486.97			

Categorization and Summary of All Costs Incurred by Guerra & Partners, P.A.

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EXHIBIT 8

Case 8:19-cv-00886-VMC-SPF Document 817-8 Filed 05/22/24 Page 2 of 2 PageID 18553



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.

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EXHIBIT 9

Case 8:19-cv-00886-VMC-SPF Document 817-9 Filed 05/22/24 Page 2 of 29 PageID 18555

Guerra & Partners, P.A. 1408 N. Westshore Blvd., Suite 1010

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

Federal Tax ID # 27-0937962

Burton W. Wiand	May 08, 2024	4
Attention: Burton W. Wiand, as Receiver	Client:	025305
Burton W. Wiand PA	Matter:	001922
114 Turner Street	Invoice #:	21480
Clearwater, FL 33756		
	Page:	1

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

For Professional Services Rendered Through March 31, 2024

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
1/3/2024	CE	Exchange emails with J. Haas regarding payment of settlement (.2).	0.2	\$48.00
1/5/2024	CE	Review and analyze emails from J. Haas regarding settlement payment (.2); review and analyze email from Receiver regarding service of subpoena on third party (.1); exchange emails with A. Stephens regarding spreadsheet to track settlement payments (.1); review and analyze spreadsheet and direct A. Stephens regarding same (.3).	0.7	\$168.00
1/5/2024	AS	Review insider settlement agreements and order and prepare spreadsheet identifying payment details (1.5).	1.5	\$202.50
1/6/2024	CE	Exchange emails with G. Heinold regarding amortization schedule for insider's settlement payments (.3); review and analyze same (.1); review and analyze email from E. Tate regarding settlement check from insider (.1); direct A. Stephens to reflect receipt of same (.1).	0.6	\$144.00
1/8/2024	CE	Exchange emails with Receiver regarding status of third party subpoena (.2); exchange emails with Receiver regarding release of frozen bank accounts to satisfy insider's settlement (.1).	0.3	\$72.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
1/8/2024	AS	Review payment information for insider and update master spreadsheet (.2); telephone call with J. Haas regarding problem with wire of settlement payment (.4); prepare email to J. Haas, Receiver, and legal team regarding same (.2).	0.8	\$108.00
1/9/2024	CE	Exchange emails with A. Avery regarding service of subpoena on third party (.2); exchange emails with Receiver regarding same (.2); exchange emails with E. Tate regarding settlement payments (.1); draft email to A. Stephens regarding wire transfer from insider (.1).	0.6	\$144.00
1/9/2024	AS	Exchange emails with J. Haas regarding confirmation of receipt of additional settlement payment (.1).	0.1	\$13.50
1/10/2024	CE	Exchange emails with A. Cruz regarding settlement payment from insider (.2); review and analyze settlement agreement (.1); draft email regarding settlement payment (.2); review and analyze J. Haas settlement agreement (.2); review and analyze J. Haas amortization schedule (.2); draft email to J. Haas regarding settlement payments and amortization schedule (.1); review and assess multiple emails from J. Haas regarding amortization schedule and settlement payments (.3); phone call with J. Haas regarding same (.1); draft email to Receiver and J. Perez regarding J. Haas amortization (.3); review email from J. Perez regarding same (.1); review notice of appeal of summary judgment order by M. DaCorta (.1).	1.9	\$456.00
1/11/2024	CE	Draft email to Receiver regarding revised amortization scheduled for J. Haas' settlement payments (.1); exchange emails with insider regarding settlement payment and release (.3); draft email to J. Perez regarding satisfaction of judgment for same (.1); research release and satisfaction provision of settlement agreement (.2); exchange emails with A. Stephens regarding payments and updating records of same (.1); exchange emails with E. Tate regarding settlement check (.1).	0.9	\$216.00
1/11/2024	AS	Review payment information and update insider spreadsheet (.2).	0.2	\$27.00
1/12/2024	CE	Review and analyze multiple emails from insider regarding settlement payment and amortization (.3); draft email to Receiver and J. Perez regarding same (.1); phone call to Receiver regarding same (.1).	0.5	\$120.00
1/16/2024	CE	Perform research regarding third party in connection with issuing third party subpoena (.6); phone call with Receiver regarding J. Haas amortization schedule (.1); exchange emails with J. Haas regarding same (.2).	0.9	\$216.00
1/17/2024	CE	Exchange emails with Receiver regarding research website (.1).	0.1	\$24.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset /	Analysis and Recovery		
1/18/2024	CE	Review and analyze J. Haas proposed amortization schedule for payment of settlement proceeds (.1); exchange emails with J. Haas regarding same (.3); direct A. Stephens regarding same (.1).	0.5	\$120.00
1/18/2024	EF	Perform research regarding basis for personal jurisdiction for potential clawback claims against out-of-country residents (2.4).	2.4	\$576.00
1/18/2024	AS	Review J. Haas' revised payment schedule and update spreadsheet for same (.3).	0.3	\$40.50
1/23/2024	CE	Exchange emails with E. Feld regarding research regarding personal jurisdiction and complaints against possible insiders (.2); review and analyze civil docketing notice from Eleventh Circuit Court of Appeal (.2).	0.4	\$96.00
1/24/2024	EF	Draft affidavit in support of recording federal judgment in Seminole County regarding real property (.8); research Florida Enforcement of Foreign Judgments Act for same (.9); review documents and communications involving insider for analysis of potential clawback claims against same (3.9).	5.6	\$1,344.00
1/25/2024	CE	Phone call to Intermountain Precious Metals regarding third-party subpoena (.1); research Idaho state and federal rules and statutes regarding subpoenas (1.3); research third-party entity and its owner (.8); draft email to Receiver summarizing findings (.3); phone conference with Receiver regarding same (.2); research insider (.4); exchange emails with J. Naclerio regarding pending subpoena to insider (.2); exchange emails with R. Montie regarding insider (.2); review and analyze email from E. Feld regarding procedure for enforcing judgment lien and draft affidavit in support of recording judgment (.3).	3.8	\$912.00
1/26/2024	CE	Exchange emails with A. Stephens regarding identification of members of Oasis Helpers Group publishing misinformation about Receivership (.2); exchange emails with Receiver regarding same (.2); exchange emails with J. Perez regarding monthly financial reports from insiders (.2); exchange emails with J. Haas regarding December 2023 financial report (.2); phone conference with A. Cruz regarding financial reports (.3); review and analyze client files from insiders to identify financial reports (.3); perform legal research regarding judgment liens (1.5).	2.9	\$696.00
1/26/2024	EF	Continue review of documents/communications involving possible insider for analysis of potential clawback claims against same (4.1).	4.1	\$984.00

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SERVICES	6			
Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
1/29/2024	CE	Exchange emails with J. Haas regarding December 2023 financial reporting (.1); exchange emails with R. Montie regarding December 2023 financial reports (.1); prepare emails to J. Perez regarding J. Haas and R. Montie financial reports (.1); review and analyze judgment (.2); review and analyze research regarding recording federal judgment (.3); review applicable statutes and the Secretary of State's website to confirm procedure for recording judgment and seizing assets (1.8).	2.6	\$624.00
1/29/2024	EF	Continue review of documents and communications for analysis of potential clawback claims (4.4).	4.4	\$1,056.00
1/30/2024	CE	Review and analyze research regarding recording Florida federal judgment and potential changes to law (.5); draft memorandum to Receiver regarding same (1); revise affidavit in support of recording judgment (.4); direct A. Stephens regarding recording judgment (.2); draft email to Receiver regarding third-party subpoena (.1); review and revise letter to Middle District regarding certified copies of judgment (.1); exchange emails with Receiver regarding recording judgment (.4); conference call with Receiver regarding same (.2); research and analyze statutes regarding domestic and foreign judgments and analyze the judgment lien certificate (.5); draft email to E. Feld	2.6	\$624.00

	regarding same (.1).		
1/30/2024 EF	Continue review of documents/communications for analysis of potential clawback claims (4.1); research additional bases for personal jurisdiction under Florida long-arm statute and effect of consent to personal jurisdiction in connection with potential clawback claims against out-of-country residents (1.2); draft memorandum regarding findings (.6).	5.9	\$1,416.00
1/30/2024 AS	Review default judgment and email from C. Ellis (.2); communicate with the Middle District regarding requesting certified copy of judgment (.4); prepare letter to clerk with check request (.2); research Receiver's files for social security number for judgment (.5); telephone call with C. Ellis regarding same (.2); review master spreadsheet (.1).	1.6	\$216.00
1/31/2024 CE	Review and analyze email and law from Receiver regarding enforcing judgments (.2); exchange emails with E. Feld	2.0	\$480.00

enforcing judgments (.2); exchange emails with E. Feld regarding same (.4); review and analyze case law regarding enforcing foreign judgments and judgments against real and personal property (.7); draft email to Receiver summarizing same (.4); revise affidavit supporting recording final judgment (.2); draft email to Receiver regarding settlement agreement with insiders (.1).

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
1/31/2024	EF	Perform research regarding potential Florida collection enforcement methods for federal judgments against insiders (1.1); continue review of documents/communications for analysis of potential clawback claims (4.3).	5.4	\$1,296.00
1/31/2024	AS	Review emails from legal team regarding enforcement of Receivership judgment (.3).	0.3	\$40.50
2/3/2024	CE	Draft email to A. Auxter regarding insider asset freeze (.1); draft email to A. Auxter regarding financial reports from insiders (.1).	0.2	\$48.00
2/5/2024	AS	Review certified judgment and affidavit (.1); research e-recording for Seminole County for same (.1); telephone call with Seminole County Clerk (.1); prepare letter requesting recording of documents with check request (.2).	0.5	\$67.50
2/6/2024	CE	Review and revise letter to Seminole County Clerk to record judgment, review and execute affidavit in support of recording final judgment, and review recorded judgment (.3).	0.3	\$72.00
2/8/2024	CE	Review email from insider regarding frozen funds (.1).	0.1	\$24.00
2/8/2024	CE	Review correspondence from R. Montie regarding third party subpoena (.1).	0.1	\$24.00
2/14/2024	CE	Exchange emails with Receiver, A. Auxter, and J. Perez regarding insider's frozen assets (.7).	0.7	\$168.00
2/19/2024	AS	Review certified copy of default judgment.	0.1	\$13.50
2/23/2024	CE	Review email from Receiver regarding third party subpoena to Intermountain Precious Metals (.1).	0.1	\$24.00
3/1/2024	AC	Telephone call with Receiver regarding actions against insiders (.1); telephone call with C. Ellis regarding same (.4); prepare email to insider regarding same (.1); prepare emails to J. Perez regarding motion to compel regarding subpoena (.2); prepare email to Receiver regarding same (.1).	0.9	\$288.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
3/1/2024	CE	Prepare for phone conference with A. Cruz regarding pending Receivership tasks (.5); participate in same (.4); draft email to A. Cruz regarding settlement agreement (.1); draft email to A. Cruz regarding subpoena to Intermountain Precious Metals (.1); review and revise insider subpoena (.2); review and analyze research regarding judgment liens to determine next steps for enforcing judgment against insider (.3); direct A. Stephens regarding subpoena and judgment lien against insider (.2); review and analyze correspondence regarding judgment and deposition in aid of execution (.3); draft email regarding same (.1); revise and update memorandum to Receiver regarding outstanding and pending tasks (.4).	2.6	\$624.00
3/1/2024	AS	Review TD Bank account information for R. Montie and update settlement spreadsheet (.6); update settlement spreadsheet regarding J. Haas payment (.1).	0.7	\$94.50
3/4/2024	AC	Prepare emails to E. Feld regarding research on basis for complaint against insider (.2); confer with C. Ellis regarding exhibits to subpoena to insider (.2); prepare email to Receiver regarding same (.1); prepare email to M. Lockwood regarding access to E-Hounds database (.2); prepare email to insider regarding settlement (.1); review and revise memorandum to Receiver outlining pending tasks (.9); instruct A. Stephens regarding review of insider emails (.2).	1.9	\$608.00
3/4/2024	CE	Review and analyze exhibits for subpoena (.4); communicate with A. Cruz regarding same (.2); direct A. Avery on updating third party subpoena (.2); revise memorandum to Receiver regarding status of Receivership projects (.5); exchange emails with A. Stephens regarding judgment (.2).	1.5	\$360.00
3/4/2024	EF	Continue review of documents and email correspondence for assessing potential claims against insider (4.4).	4.4	\$1,056.00
3/4/2024	AA	Prepare notice of issuance of subpoena to produce documents and subpoena to insider M.U. (.6); communicate with court reporter and process server regarding same (.3).	0.9	\$121.50
3/4/2024	AS	Review and gather exhibits to subpoena (.3); prepare judgment lien certificate (.3); telephone call with Seminole County Clerk regarding filing requirements (.2); confer with C. Ellis regarding same (.2).	1.0	\$135.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
3/5/2024	AC	Prepare emails to Receiver regarding subpoenas to insider and insider's attorney (.4); review and revise subpoena to insider (.2); prepare emails to Receiver regarding same (.2); instruct C. Ellis regarding research on perfecting judgment against insider (.1); telephone call with E. Feld regarding basis for complaint against insider (.3); conduct research regarding factual basis for same (1.1); communicate with A. Stephens regarding same (.4); prepare email to Receiver regarding service of subpoena on insider (.1); conduct research regarding same (.1).	2.9	\$928.00
3/5/2024	CE	Exchange emails with R. Green, counsel for insiders, regarding settlement (.1); review and analyze research regarding enforcing judgment against insider (.4); conduct additional research regarding same (.2).	0.7	\$168.00
3/5/2024	AS	Telephone call with A. Cruz regarding factual research needed (.1); exchange emails with E. Tate regarding same (.1); research information regarding insider (.3); prepare email to A. Cruz with findings (.2); perform E-Hounds database search for emails with M. DaCorta and insider and download for attorney review (.5).	1.2	\$162.00
3/6/2024	AC	Attend Zoom meeting with Receiver, C. Ellis and J. Perez regarding status of tasks (1.0); prepare email to J. Perez regarding same (.1); telephone calls with Receiver regarding enforcement of Idaho subpoena (.2); prepare email to M. Christensen regarding same (.2); prepare email to R. Weiss regarding documentation supporting claim against insider (.1); telephone calls with C. Ellis regarding same (.2); review records regarding same (.2); prepare emails to S. Batch and A. Auxter regarding basis for claims against insider (.2).	2.2	\$704.00
3/6/2024	CE	Attend video conference with Receiver, A. Cruz, and J. Perez regarding outstanding Receivership tasks and collection efforts (1.0); telephone calls with A. Cruz regarding same (.2); review and analyze research from E. Feld regarding personal jurisdiction (.3); supplement research regarding same (.5); draft email to E. Feld regarding personal jurisdiction over potential insider residing internationally (.2); draft outline of case law for personal jurisdiction of out of state insider under Florida's long arm statute (.8); update memorandum to Receiver regarding pending and/or outstanding Receivership tasks and draft email to A. Cruz regarding same (.3); perform legal research regarding causes of action for potential insider residing internationally (.3).	3.6	\$864.00
3/6/2024	EF	Communicate with A. Cruz regarding complaint against insider (.3).	0.3	\$72.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
3/7/2024	AC	Confer with C. Ellis regarding claim against insider (.2); prepare emails to S. Batsch regarding basis for same (.2); review documents regarding same (.4); prepare emails to Receiver regarding same (.3); prepare emails to A. Auxter regarding scheduling telephone call to discuss status of matter (.2); participate in telephone call with A. Auxter regarding same (.1); prepare email to Receiver regarding draft settlement agreement with insider (.1).	1.5	\$480.00
3/7/2024	CE	Review and analyze Florida's long arm statute (.2); review and analyze jurisdiction section of clawback complaint (.3); exchange emails with E. Feld regarding potential action against insider living internationally and additional research necessary to support personal jurisdiction over same (.3); multiple phone calls with A. Cruz regarding same (.2); review Receiver's notes from interview with potential insider (.2); review and analyze email from R. Weiss regarding potential insider's minimum contacts (.1).	1.3	\$312.00
3/7/2024	EF	Perform additional research and analysis of personal jurisdiction for potential claims (3.8).	3.8	\$912.00
3/8/2024	AC	Confer with C. Ellis regarding basis for claim against insider (.6); prepare email to Receiver regarding same (.1); review documents in connection with same (.3); prepare email to R. Weiss regarding same (.1).	1.1	\$352.00
3/8/2024	CE	Review email from A. Cruz to Receiver regarding personal jurisdiction over insider living internationally (.1); review and analyze email and attachments from Receiver regarding potential insider's minimum contacts with Florida (.3); exchange emails with A. Cruz regarding analyzing attachments and minimum contacts and addressing issue of jurisdiction (.3); phone call to J. Perez regarding same (.2); review and analyze personal jurisdiction issue in appeal in ATC action regarding personal jurisdiction (.3).	1.2	\$288.00
3/8/2024	AS	Review case filings and locate documents for C. Ellis review in the ATC/Spotex matter (.3).	0.3	\$40.50

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
3/11/2024	AC	Participate in telephone call with insider regarding settlement (.1); review and revise same (.1); prepare email to insider regarding same (.1); prepare email to M. Christensen regarding assistance with compelling out of state subpoena (.1); instruct A. Stephens regarding preparation of documents for depositions of insiders and research regarding insider (.3); conduct research regarding same (.2); participate in telephone call to E-Hounds regarding access to document platform (.1); prepare emails to E-Hounds regarding same (.1); prepare email to Receiver regarding same (.1); prepare email to Receiver regarding retention of local counsel to enforce out of state subpoena (.1); participate in telephone call with Receiver regarding drafting of complaints against insiders (.1); instruct E. Feld regarding same (.2).	1.6	\$512.00
3/12/2024	AC	Prepare email to insider regarding settlement payment (.1); draft and revise subpoenas and notices of deposition to insiders (.5).	0.6	\$192.00
3/12/2024	AS	Prepare two notices of taking deposition and subpoenas (.9); communication with A. Cruz regarding same (.1); exchange emails with E. Tate and A. Cruz regarding settlement payment (.2).	1.2	\$162.00
3/13/2024	AC	Prepare emails to insider regarding payment on settlement amount (.2); participate in telephone call with Receiver regarding settlement payments (.1); instruct A. Stephens regarding depositions in aid of execution of insiders (.2); prepare summary to P. McMillan regarding service attempts on target of subpoena (.2); draft and revise multiple subpoenas and related notices of deposition to insiders (.9).	1.6	\$512.00
3/13/2024	AS	Prepare notice of taking deposition with subpoena (.5); communicate with A. Cruz regarding same. (.1); revise same (.3).	0.9	\$121.50
3/14/2024	AC	Prepare emails to insiders regarding conducting depositions in aid of execution (.4); prepare emails to Receiver regarding same (.1); instruct A. Stephens regarding same (.1); prepare email to Receiver regarding target of subpoena (.1); prepare email to investigator regarding location of subpoena target (.1); review and revise subpoenas in aid of execution to insiders (1.0); participate in telephone calls with Receiver regarding locating target of subpoena and additional subpoenas (.6); prepare emails to P. McMillan regarding same (.3).	2.7	\$864.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
3/15/2024	AC	Prepare emails to P. McMillan and Receiver regarding locating target of subpoena (.4); participate in telephone call with P. McMillan regarding same (.1); conduct research regarding insider in preparation for taking deposition in aid of execution (.3); instruct A. Stephens regarding receipt of settlement payments from insider (.1); review emails from E. Tate regarding same (.1); prepare email to R. Kurpiers regarding representation of M. Utter (.2).	1.2	\$384.00
3/15/2024	AS	Revise subpoena and notice of taking deposition (.4); exchange emails with A. Cruz regarding same (.3) prepare of draft email to all parties (.3).	1.0	\$135.00
3/18/2024	AC	Prepare email to insider regarding scheduling of deposition (.1); draft and revise notice of appearance (.1); draft and revise notice to parties and subpoena in connection with same (.2); instruct A. Stephens regarding same (.2); attempt telephone calls to numerous individuals and phone numbers in connection with locating target of subpoena (1.3); prepare emails to P. McMillan regarding same (.4); prepare email to Receiver regarding enforcement of subpoena (.1); prepare email to B. Winters regarding representation of individual (.1); prepare email to Receiver regarding same (.1); prepare email to insider regarding scheduling of deposition (.1); prepare email to K. Hogle regarding enforcement of Idaho subpoena (.1); prepare email to insider regarding execution of settlement agreement (.1).	2.9	\$928.00
3/18/2024	AS	Revise notice and subpoena to C. Huckabee (.2); prepare email to Bolter and Carr regarding service (.1); make email service of Receiver's notice of taking deposition (.2).	0.5	\$67.50
3/19/2024	AC	Prepare emails to K. Hogle regarding assistance with enforcement of Idaho subpoena (.2); participate in telephone call with same (.3); participate in telephone call with Receiver regarding same (.1).	0.6	\$192.00
3/20/2024	AC	Prepare emails to P. McMillan regarding location of target of subpoena (.3); prepare email to R. Kurpiers regarding acceptance of subpoena on client's behalf (.1); draft and revise Receiver's motion to compel compliance with subpoena to IPM (2.3).	2.7	\$864.00
3/21/2024	AC	Telephone call with P. McMillan regarding location of subject of subpoena (.1); prepare email to P. McMillan regarding same (.1); prepare emails to individual with knowledge regarding same (.2); participate in telephone call with Receiver regarding same (.2); continue to draft and revise Receiver's motion to compel IPM's compliance with subpoena (.5).	1.1	\$352.00
3/21/2024	CE	Communicate with A. Cruz regarding depositions (.1).	0.1	\$24.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
3/22/2024	AC	Participate in telephone call with N. Young (.1); prepare meet and confer communication to same regarding subpoena to IPM (.4); instruct A. Stephens regarding subpoenas to insiders (.2); continue to draft and revise motion to compel IPM's compliance with subpoena (3.1); review and revise subpoena to insider (.1); prepare email to insider regarding settlement agreement (.1); prepare email to R. Green regarding settlement agreement (.1).	4.1	\$1,312.00
3/22/2024	AS	Revise and finalize notice of taking deposition and forward to service list and Bolter and Carr for service (.5).	0.5	\$67.50
3/25/2024	AC	Conduct research in support of Receiver's motion to compel IPM's compliance with subpoena (2.2); instruct E. Feld regarding same (.2); prepare email to Receiver regarding same (.1); participate in telephone call with Receiver regarding same (.1); instruct A. Avery regarding process of service of subpoena on nonparty (.1); prepare email to K. Hogle regarding local counsel work to enforce subpoena (.1).	2.8	\$896.00
3/26/2024	AC	Research and contact various Idaho law firms regarding retention of local counsel to enforce subpoena on Idaho LLC (.4); participate in telephone call with Receiver regarding same (.1); instruct A. Avery regarding funds received from NBT Bank (.1); instruct A. Stephens regarding same (.1).	0.7	\$224.00
3/26/2024	EF	Draft complaint for fraudulent transfers (2.8).	2.8	\$672.00
3/27/2024	AC	Conduct research regarding electronic signature on Rule 45 subpoena (.8); prepare email to N. Young regarding enforceability of subpoena (.2); participate in telephone call with J. Manwaring regarding assistance as local counsel in enforcement of subpoena (.1); prepare email to J. Manwaring regarding same (.1); draft and revise subpoena to UPS Store (1.2).	2.4	\$768.00
3/27/2024	EF	Draft motion to compel compliance with subpoena to Intermountain Precious Metals and research Idaho law for same (4.7).	4.7	\$1,128.00
3/28/2024	AC	Draft and revise subpoena to insider (.9); prepare email to Receiver regarding same (.1); instruct A. Avery regarding service of subpoena on non-party (.1); review and revise Receiver's motion to compel non-party's compliance with subpoena (.5); review and analyze local rules applicable to same (.1).	1.7	\$544.00
3/28/2024	EF	Draft motion to compel compliance with subpoena to Intermountain Precious Metals and research and analyze Idaho law for same (2.8); continue drafting complaint for fraudulent transfers against insider (1.4).	4.2	\$1,008.00

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SERVICES	6			
Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
3/29/2024	AC	Prepare emails to J. Manwaring regarding local counsel role for action to enforce subpoena in Idaho (.2); prepare email to Receiver regarding draft of same (.1); telephone call with Receiver regarding same (.1).	0.4	\$128.00
		Total: Asset Analysis and Recovery	133.20	\$33,548.00
CASE	Case A	Administration		
1/10/2024	AS	Review M. DaCorta's notice of appeal and forward to R. During for website updates (.2).	0.2	\$27.00
1/22/2024	MML	Review correspondence from S. O'Brien regarding fourth-quarter accounting reports (.1).	0.1	\$24.00
1/23/2024	CE	Draft email to J. Perez regarding Receiver's nineteenth interim report (.1).	0.1	\$24.00
1/26/2024	CE	Exchange emails with J. Perez regarding Receiver's nineteenth interim report (.2); review and revise same (1.6).	1.8	\$432.00
1/29/2024	MML	Review draft interim report (.2); provide comments to J. Perez regarding claims section of same (.1); communicate with Receiver and J. Perez regarding additional edits and actions (.1).	0.4	\$96.00
1/30/2024	CE	Make additional revisions to nineteenth interim report (.4); draft email to J. Perez regarding same (.1).	0.5	\$120.00
1/31/2024	MML	Review notice of filing interim report (.1).	0.1	\$24.00
2/28/2024	MML	Review correspondence regarding website posting (.1); communicate with M. Gura regarding same (.1).	0.2	\$48.00
3/4/2024	MML	Communicate with A. Cruz regarding platform fees and users (.1).	0.1	\$24.00
3/12/2024	AS	Review court filings, communicate with Receiver regarding same, and post same to website (.6).	0.6	\$81.00
3/20/2024	AS	Review 11th Circuit Court of Appeals decision in ATC/Spotex case and post to website (.3).	0.3	\$40.50
3/25/2024	MML	Communicate with M. Gura regarding website updates (.1).	0.1	\$24.00
3/26/2024	MML	Review draft website update for report and recommendation (.1).	0.1	\$24.00
3/28/2024	AS	Review Court's report and recommendation regarding second distribution and website post regarding same (.2); confer with R. During and legal team regarding same (.3).	0.5	\$67.50
3/28/2024	MML	Prepare website update for report and recommendation (.3); prepare correspondence to Receiver regarding same (.1); communicate with A. Stephens regarding same (.1).	0.5	\$120.00
3/29/2024	AS	Telephone call with R. During (.1).	0.1	\$13.50

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SERVICES	6			
Date	TKPR	Description of Services	Hours	Amount
CASE	Case A	Administration		
		Total: Case Administration	5.70	\$1,189.50
CLAIM	Claims	Administration and Objections		
1/2/2024	AS	Exchange emails with two investors regarding second distribution (.2); telephone calls with three investors regarding same (.3).	0.5	\$67.50

		Total: Case Administration	5.70	\$1,189.50
CLAIM	Claims	Administration and Objections		
1/2/2024	AS	Exchange emails with two investors regarding second distribution (.2); telephone calls with three investors regarding same (.3).	0.5	\$67.50
1/4/2024	AS	Telephone calls with four investors regarding additional distributions (.5).	0.5	\$67.50
1/5/2024	AS	Telephone calls with two investors regarding future distribution questions (.2).	0.2	\$27.00
1/8/2024	AS	Telephone calls with three investors regarding future distribution questions (.5).	0.5	\$67.50
1/9/2024	MML	Review bank statement for additional cleared distribution checks (.1).	0.1	\$24.00
1/16/2024	AS	Telephone calls with three investors regarding second distribution (.2).	0.2	\$27.00
1/17/2024	AS	Telephone calls with two investors (.2).	0.2	\$27.00
1/22/2024	MML	Review cleared check report (.1).	0.1	\$24.00
1/29/2024	CE	Review email from M. Lockwood regarding distribution checks (.1).	0.1	\$24.00
1/29/2024	AS	Exchange emails with investor J.B. and M. Lockwood regarding expiration date of distribution check (.1); telephone call to investor (.1); telephone calls with two investors regarding second distribution questions (.3).	0.5	\$67.50
1/29/2024	MML	Communicate with A. Stephens regarding remaining outstanding distribution checks (.1); review correspondence to J.B. regarding same (.1); follow up with A. Stephens regarding same (.1); communicate with K. Paulson and M. Gura regarding planning for second distribution (.1).	0.4	\$96.00
1/30/2024	AS	Exchange emails with L.D. regarding additional distribution (.1); telephone calls with two investors regarding same (.2).	0.3	\$40.50
1/31/2024	AS	Review Receiver's interim report in preparation for communicating with investors (.2); exchange emails with two investors regarding same (.2); telephone call with C.B. regarding custodian change (.1); prepare email to K. Paulson regarding same (.1); exchange emails with legal team regarding late claim (.1); communicate with M.R. regarding same (.3).	1.0	\$135.00
1/31/2024	MML	Communicate with A. Stephens regarding M.R. (.1); review correspondence from A. Stephens to M.R. regarding failure to file a claim (.1).	0.2	\$48.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	s Administration and Objections		
2/1/2024	AS	Telephone call with investor and prepare email to K. Paulson regarding custodial change (.1); telephone calls with two investors regarding status of distribution and case (.3).	0.4	\$54.00
2/1/2024	KAP	Telephone call with C.B. regarding changing IRA custodians and update claims spreadsheet per same (.2).	0.2	\$0.00
2/2/2024	AS	Telephone calls with two investors regarding second distribution and general questions (.3).	0.3	\$40.50
2/5/2024	AS	Telephone calls with two investors regarding distribution status (.2).	0.2	\$27.00
2/6/2024	AS	Telephone calls with three investors regarding distribution questions (.5).	0.5	\$67.50
2/6/2024	KAP	Search internet for alternative phone number for claimant J.B. per request of M. Lockwood (.1); call and leave voicemail message at J.B.'s alternative phone number regarding expiring distribution check and communicate with M. Lockwood regarding same (.1).	0.2	\$27.00
2/6/2024	MML	Communicate with A. Stephens and K. Paulson regarding outstanding distribution checks (.1); communicate with K. Paulson regarding J.B. (.2).	0.3	\$72.00
2/7/2024	AS	Exchange emails with two investors regarding address updates (.1); prepare email to K. Paulson regarding same (.1); exchange emails with investor M.D. (.1); telephone calls with two investors (.1).	0.4	\$54.00
2/7/2024	MML	Prepare correspondence to Receiver regarding two outstanding distribution checks (.1); review documents for same (.1); call with Receiver regarding same (.2); prepare correspondence to K. Paulson with Receiver's instructions for same (.1).	0.5	\$120.00
2/8/2024	AS	Telephone calls with three investors regarding second distribution (.4).	0.4	\$54.00
2/8/2024	КАР	Prepare email to B. Winters regarding uncleared check to J.B. (.1); exchange emails with W.B. regarding same (.1); review emails between W.B. and Equity Trust regarding same, forward to M. Gura and M. Lockwood, and update claims spreadsheet per same (.1); prepare email to B. Winters regarding failure to confirm custodian for C.C.'s IRA (.1); telephone call with M. Lockwood regarding checking bank records to confirm status of check to J.B. (.1); exchange emails with E. Tate regarding same (.1); forward cleared check information to M. Gura and M. Lockwood (.1).	0.7	\$94.50

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
2/8/2024	MML	Review correspondence to B. Winters regarding J.B. (.1); review correspondence to B. Winters regarding C.C. (.1); communicate with K. Paulson regarding J.B. and custodian (.1); communicate with Receiver regarding second interim distribution (.1); prepare correspondence to M. Gura and K. Paulson regarding same (.1).	0.5	\$120.00
2/9/2024	AS	Exchange emails with investor R.L. and legal team (.3); telephone calls with three investors regarding case updates (.3).	0.6	\$81.00
2/9/2024	КАР	Exchange emails with A. Stephens regarding claimant's communication regarding request for money for attorneys' fees (.1); review correspondence from M. Lockwood with questions regarding certain claimants (.1); review claims spreadsheet for same and respond to M. Lockwood (.2).	0.4	\$54.00
2/9/2024	MML	Work on master spreadsheet for preparation of second interim distribution, including calculation of proposed distribution amounts and preparation of additional determinations for motion (3.0); exchange correspondence with K. Paulson regarding certain claimants (.3); review correspondence from R.L. regarding request for payment of fees (.1); review related correspondence regarding same (.1).	3.5	\$840.00
2/12/2024	AS	Telephone calls with two investors regarding case updates (.2).	0.2	\$27.00
2/12/2024	MML	Communicate with K. Paulson regarding review for any outstanding issues (.2); communicate with M. Gura regarding same (.1); review documents relating to wire to Spain (.1); prepare correspondence to E. Tate regarding same (.1); review bank statement for same and correspondence from E. Tate (.1).	0.6	\$144.00
2/13/2024	AS	Exchange emails with three investors (.2); update addresses in master spreadsheet (.3); review investor documents for T.B. and exchange emails with legal team regarding same (.3); telephone calls with two investors regarding case updates (.2).	1.0	\$135.00
2/13/2024	KAP	Exchange emails with M. Lockwood regarding number of checks being sent to B. Winters per review of claims spreadsheet (.1).	0.1	\$13.50
2/13/2024	MML	Work on motion to approve second distribution (2.0); exchange correspondence with K. Paulson regarding same (.1).	2.1	\$504.00
2/14/2024	AS	Review L.V.'s emails and confer with K. Paulson regarding same (.5); telephone calls with three investors regarding second distribution (.5).	1.0	\$135.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
2/14/2024	КАР	Telephone call with M. Lockwood regarding identifying and resolving outstanding claimant issues prior to filing distribution motion (.2); review estate documentation for G.D. to determine wife's authority to receive second distribution check (.1); prepare email to daughter regarding need for additional authorization for same (.1); telephone call to C.M. regarding status of co-claimants' divorce (.1); review spreadsheet notes for H.H. regarding estate documentation and prepare email to M. Gura regarding same (.1); telephone call with M. Gura regarding outstanding issues for second distribution (.5); prepare email to wife of deceased claimant regarding status of his IRA (.1); prepare email to A. Stephens regarding updated contact info for L.V. (.1); telephone call with L.V. regarding name on second distribution check (.1); update claims spreadsheet per numerous communications with claimants (.1); review claims spreadsheet to identify unresolved claimant issues prior to second distribution and attend to resolution of same (1.2).	2.7	\$364.50
2/14/2024	MML	Call with K. Paulson regarding preparation for second distribution (.2); continue work on motion for second distribution (1.5); communicate with M. Gura regarding same (.2).	1.9	\$456.00
2/15/2024	AS	Review investor file for E.M. and email findings to K. Paulson (.3); telephone calls with two investors regarding second distribution (.2).	0.5	\$67.50
2/15/2024	KAP	Exchange emails with C.M. regarding divorce settlement agreement, review agreement, and forward same to A. Stephens and M. Gura (.1); telephone call with M. Lockwood regarding same and other claimant issues (.1); add new column to claims spreadsheet for internal notes for second distribution and populate for certain claims (.1); exchange emails with A. Stephens regarding E.M.'s custodian change (.1); continue review of claims spreadsheet to identify unresolved claimant issues prior to second distribution and attend to resolution of same (1.4).	1.8	\$243.00
2/15/2024	MML	Review correspondence from K. Paulson regarding J.S. and J.P.'s claims (.1); communicate with K. Paulson regarding second distribution (.1).	0.2	\$48.00
2/16/2024	KAP	Exchange emails with J.P. regarding manner in which to prepare and send second distribution check (.1).	0.1	\$13.50
2/16/2024	MML	Review correspondence from divorced claimants (.1); exchange correspondence with K. Paulson regarding C.C. (.1).	0.2	\$48.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
2/20/2024	AS	Telephone calls with two investors regarding address verifications (.3); review and update master spreadsheet for same (.2).	0.5	\$67.50
2/21/2024	КАР	Exchange emails with attorney for corporate claimant regarding manner of issuance of second distribution check and update claims spreadsheet per same (.1); review spreadsheet notes to determine if any additional claimant follow-up is necessary prior to second distribution (.1).	0.2	\$27.00
2/22/2024	AS	Review emails and voicemails and forward to K. Paulson for follow up (.3).	0.3	\$40.50
2/22/2024	КАР	Review claimant communications forwarded by A. Stephens and communicate with M. Lockwood regarding responding to same (.1); exchange emails with D.D. regarding timing of second distribution (.1); telephone call to M.Y. regarding same (.1).	0.3	\$40.50
2/22/2024	MML	Continue to work on motion for second distribution and exhibit (2.5); prepare correspondence to Receiver and J. Perez regarding drafts of same (.1); call with Receiver regarding same (.1).	2.7	\$648.00
2/23/2024	КАР	Telephone call with M. Lockwood regarding M.S. (.1); attend to creating summary of M.S.'s claim, objections, and correspondence for M. Lockwood (.7); telephone calls with M. Gura and M. Lockwood regarding same (.4).	1.2	\$162.00
2/23/2024	MML	Communicate with S. O'Brien regarding second distribution (.1); telephone call with K. Paulson regarding M.S. (.1); communicate with K. Paulson regarding research for same (.2); revise motion for second distribution per comment from Receiver (.2); prepare correspondence to Receiver and J. Perez regarding same (.1); make further revision per Receiver's comment and recirculate (.1).	0.8	\$192.00
2/26/2024	MML	Communicate with PDR regarding preparation for upcoming distribution (.2); prepare draft letter to claimants for second distribution (.4); communicate with M. Gura regarding same (.1).	0.7	\$168.00
2/27/2024	CE	Conduct research regarding status of defendants to identify those who have resolved their claims with Receiver in connection with sending meet and confer correspondence regarding Receiver's motion for second interim distribution (.6); exchange emails with J. Perez regarding same (.3); review and revise Receiver's motion for second interim distribution (.4); draft meet and confer email to R. Kurpiers regarding same (.1).	1.4	\$336.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
2/27/2024	MML	Review correspondence from J. Perez regarding motion for second distribution (.1); work on distribution exhibit for same (1.0); prepare correspondence to Receiver and J. Perez regarding exhibit and draft letter to claimants (.1); review J. Perez's revisions to motion (.1); review correspondence from C. Ellis regarding 3.01(g) conferral (.1).	1.4	\$336.00
2/28/2024	CE	Review and revise Receiver's motion for second interim distribution (.5); exchange emails with J. Perez regarding same (.2).	0.7	\$168.00
2/28/2024	KAP	Communicate with M. Gura regarding documentation received from claimant's widow (.1); exchange emails with M. Gura regarding current addresses for divorced claimants and update addresses for same in claims spreadsheet (.1).	0.2	\$27.00
2/28/2024	MML	Review correspondence from J. Perez regarding motion for second distribution (.1).	0.1	\$24.00
2/29/2024	AS	Telephone calls with three investors regarding second distribution (.3); review master spreadsheet for address confirmations (.2).	0.5	\$67.50
2/29/2024	MML	Communicate with A. Stephens regarding second distribution (.1); work on second distribution timing and logistics (1.0); review correspondence to PDR regarding same (.1); communicate with J. Perez regarding same (.1); review claims posting for website (.1).	1.4	\$336.00
3/1/2024	AS	Communicate with legal team regarding second distribution procedures (.3); telephone calls with two investors regarding second distribution (.2).	0.5	\$67.50
3/1/2024	MML	Communicate with M. Gura and A. Stephens regarding preparation for second distribution (.4); communicate with B. Nguyen regarding procedure for claimant communications post-mailout (.1); revise letter for same (.1).	0.6	\$144.00
3/4/2024	MML	Review correspondence from S. O'Brien regarding distribution checks (.1).	0.1	\$24.00
3/6/2024	MML	Review correspondence regarding reissuance of check for custodian change (.1).	0.1	\$24.00
3/7/2024	AS	Telephone calls with three investors regarding second distribution (.3); review master spreadsheet to confirm addresses (.1).	0.4	\$54.00
3/7/2024	KAP	Review B. Winters' letter regarding new custodian for claimant's IRA and update claims spreadsheet per same (.1); prepare email to M. Lockwood and M. Gura regarding reissuing check for same (.1).	0.2	\$27.00

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CLAIM	Claims	Administration and Objections		
3/13/2024	MML	Review correspondence from M. Gura and A. Stephens regarding preparation for second distribution (.1); communicate with M. Gura regarding same (.2).	0.3	\$72.00
3/14/2024	AS	Communicate with M. Gura regarding preparation for distribution (.3); exchange emails with C.G. regarding motion for distribution and timeline (.2); telephone call with investor C.G. (.1).	0.6	\$81.00
3/14/2024	MML	Correspond with K. Paulson regarding C.C. (.2).	0.2	\$48.00
3/18/2024	AS	Telephone calls with three investors regarding second distribution (.5).	0.5	\$67.50
3/18/2024	MML	Review inquiry from R.Z. (.1); review correspondence from M. Gura and PDR regarding status of checks and questions regarding same (.1); review label update for second distribution (.1).	0.3	\$72.00
3/19/2024	AC	Prepare email to claimant R.Z. regarding status of next distribution (.1).	0.1	\$32.00
3/19/2024	AS	Exchange emails with two investors regarding second distribution (.2); telephone calls with two additional investors regarding same (.2).	0.4	\$54.00
3/20/2024	AS	Prepare 500 envelopes for second distribution (4.6); exchange emails with two investors regarding distribution (.1).	4.7	\$634.50
3/20/2024	KAP	Exchange emails with claims team regarding proper custodian for T.G.'s claim (.1).	0.1	\$13.50
3/20/2024	MML	Review mailing specifics for second distribution (.2); communicate with M. Gura regarding same (.2); review draft check run from PDR (.1); review correspondence regarding T.G. (.1).	0.6	\$144.00
3/21/2024	AS	Prepare 250 envelopes for second distribution (2.0); prepare address labels and affix them to envelopes (2.8); exchange multiple emails with M. Gura regarding same (.2); exchange emails with two investors (.1).	5.1	\$688.50
3/21/2024	MML	Review correspondence regarding new addresses and preparation for distribution (.2); review draft correspondence for PDR regarding second distribution checks (.1); communicate with A. Stephens regarding preparation for distribution (.1).	0.4	\$96.00
3/22/2024	MML	Review report and recommendation granting motion for second distribution (.1); communicate with Receiver regarding same (.1); communicate with M. Gura regarding same (.2).	0.4	\$96.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
3/25/2024	MML	Communicate with B. Nguyen regarding preparation for second distribution (.1); review draft checks from PDR (.3); review proposed edits to same from M. Gura (.2); prepare comments on same and draft checks (.2); review follow-up comments from M. Gura regarding same (.1); review correspondence to PDR for same (.1).	1.0	\$240.00
3/26/2024	AS	Exchange emails with legal team and L.D. (.3); telephone calls with two investors regarding case updates (.2).	0.5	\$67.50
3/27/2024	AS	Telephone calls with three investors regarding second distribution (.4).	0.4	\$54.00
3/27/2024	KAP	Review email from M. Gura regarding E.M.'s requested change of custodian and telephone call to E.M. regarding same (.1); telephone call with E.M. regarding change of custodians (.3).	0.4	\$54.00
3/28/2024	KAP	Telephone call with M. Lockwood regarding logistics of upcoming distribution (.3).	0.3	\$40.50
3/28/2024	MML	Call with K. Paulson regarding second distribution and outstanding claims matters (.3); revise letter to claimants for second distribution (.2); prepare correspondence to Receiver regarding same (.1).	0.6	\$144.00
3/29/2024	AS	Telephone calls with two investors regarding second distribution (.3).	0.3	\$40.50
		Total: Claims Administration and Obj	57.80	\$10,367.00
WFEE	Work	on Fees Motions		
1/2/2024	KAP	NO CHARGE: Review and revise edited November team prebills (.7).	0.7	\$0.00
1/3/2024	KAP	NO CHARGE: Continue review and revision of edited November team prebills and send same to A. Avery (4).	0.4	\$0.00
1/4/2024	KAP	NO CHARGE: Review second version of edited November prebills, make additional edits, and send to M. Lockwood (.3).	0.3	\$0.00
1/9/2024	MML	NO CHARGE: Review correspondence from R. Jernigan regarding fourth-quarter invoice (.1); review correspondence from J. Perez regarding fourth-quarter invoice (.1); review correspondence from E-Hounds regarding fourth-quarter invoice (.1); review correspondence from K. Paulson regarding November prebills (.1); review fourth-quarter invoice from M. Gura (.1); prepare correspondence to M. Gura regarding same (.1); review correspondence from PDR regarding December invoice (.1).	0.7	\$0.00

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Date	TKPR	Description of Services	Hours	Amount
WFEE	Work o	on Fees Motions		
1/10/2024	MML	NO CHARGE: Review and edit team and Receiver October prebills (1.6).	1.6	\$0.00
1/11/2024	MML	NO CHARGE: Communicate with K. Paulson regarding Receiver's November and December time (.1).	0.1	\$0.00
1/12/2024	MML	NO CHARGE: Review and edit November prebills (1.0).	1.0	\$0.00
1/17/2024	KAP	NO CHARGE: Review and revise December team prebills (1.4); send same to A. Avery (.1); review and revise E. Tate's October and November time entries (.8).	2.3	\$0.00
1/18/2024	KAP	NO CHARGE: Prepare E. Tate's invoice through November (.3).	0.3	\$0.00
1/19/2024	KAP	NO CHARGE: Finalize E. Tate's fourth-quarter invoice and forward to M. Lockwood (.7); review edited December team prebills and send same to M. Lockwood (.3).	1.0	\$0.00
1/23/2024	CE	NO CHARGE: Phone call with M. Lockwood regarding pending motion for fees (.2).	0.2	\$0.00
1/29/2024	KAP	NO CHARGE: Review and revise Receiver's November time entries and send same to A. Avery (1.3).	1.3	\$0.00
1/29/2024	MML	NO CHARGE: Communicate with B. Nguyen regarding time entries for E. Feld (.1).	0.1	\$0.00
1/30/2024	CE	NO CHARGE: Exchange emails with M. Lockwood regarding motion for fees (.1).	0.1	\$0.00
1/30/2024	KAP	NO CHARGE: Revise E. Tate's fourth-quarter invoice per M. Lockwood's comments and send to M. Lockwood (.5).	0.5	\$0.00
1/30/2024	MML	NO CHARGE: Communicate with D. Bukas regarding platform fee charges (.2); review revised invoices from E-Hounds for three months for reduction of same (.1); communicate with B. McConnell regarding Englander Fischer's invoices (.2); review, edit, and re-format invoice for E. Tate (.6); review and edit prebills for December (.8); communicate with N. O'Donnell regarding invoices for KapilaMukamal (.1); communicate with M. Gura regarding fourth-quarter invoice (.1); prepare correspondence to C. Ellis regarding prebills and third-party invoices (.2); review correspondence from E. Tate regarding costs (.1).	2.4	\$0.00
1/31/2024	CE	NO CHARGE: Draft and revise motion for extension of time to file 19th interim fees motion (1.0); review meet and confer correspondence regarding same (.1); draft email to Receiver regarding same (.1); exchange emails with A. Auxter regarding same (.1).	1.3	\$0.00
1/31/2024	КАР	NO CHARGE: Review and edit Receiver's November prebills and send same to A. Avery (.2); review and edit Receiver's December time entries (1.2); prepare email to M. Lockwood regarding additional invoices (.1).	1.5	\$0.00

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Date	TKPR	Description of Services	Hours	Amount
WFEE	Work	on Fees Motions		
1/31/2024	MML	NO CHARGE: Review correspondence from K. Paulson regarding prebills (.1).	0.1	\$0.00
2/1/2024	CE	NO CHARGE: Exchange correspondence with Receiver regarding nineteenth interim motion for fees (.1); revise and finalize motion for extension of time to file same (.2); draft meet and confer email to defendants regarding same (.2); review email from J. Haas regarding same (.1).	0.6	\$0.00
2/1/2024	KAP	NO CHARGE: Review invoices from J. Perez and compare to Receiver's time entries (.2).	0.2	\$0.00
2/1/2024	MML	NO CHARGE: Review correspondence from E-Hounds regarding January invoice (.1); communicate with K. Paulson regarding Receiver's entries and J. Perez (.2); communicate with J. Waechter regarding January billings for Englander Fischer (.1).	0.4	\$0.00
2/2/2024	CE	NO CHARGE: Review email from R. Montie regarding motion for fees (.1); review email from G. Marrone regarding same (.1); review email from R. Kurpiers regarding same (.1); review email from J. Haas regarding same (.1); draft email to F. Duran regarding same (.1).	0.5	\$0.00
2/2/2024	KAP	NO CHARGE: Review Receiver's finalized December time entries and send to A. Avery for entry (.1).	0.1	\$0.00
2/2/2024	MML	NO CHARGE: Review correspondence from K. Paulson regarding Receiver's time entries (.1); communicate with K. Paulson regarding costs (.1).	0.2	\$0.00
2/5/2024	CE	NO CHARGE: Draft email to A. Avery regarding revised motion for extension (.1); revise local rule 3.01(g) certification for same (.4).	0.5	\$0.00
2/5/2024	KAP	NO CHARGE: Review Receiver's November prebills and forward same to M. Lockwood (.1); review and edit Receiver's December prebills and send to A. Avery for revisions (.3).	0.4	\$0.00
2/5/2024	MML	NO CHARGE: Review correspondence from PDR regarding January invoice (.1).	0.1	\$0.00
2/6/2024	CE	NO CHARGE: Review Court's order granting extension of deadline to file Receiver's nineteenth motion for fees (.1).	0.1	\$0.00
2/6/2024	KAP	NO CHARGE: Review Receiver's edited December prebills and revised team prebills and send same to M. Lockwood (.1).	0.1	\$0.00
2/6/2024	MML	NO CHARGE: Review and edit Receiver's November time entries (.7); communicate with K. Paulson regarding December time entries (.1); communicate with J. Perez regarding fourth-quarter invoice (.1).	0.9	\$0.00

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WFEE	Work	on Fees Motions		
2/7/2024	KAP	NO CHARGE: Communicate with M. Lockwood regarding certain entries moved from Receiver's bills to team bills (.1).	0.1	\$0.00
2/7/2024	MML	NO CHARGE: Review additional time entries for C. Ellis (.1).	0.1	\$0.00
2/8/2024	CE	NO CHARGE: Exchange emails with M. Lockwood regarding Receiver's interim motion for fees (.2).	0.2	\$0.00
2/8/2024	MML	NO CHARGE: Further revise E. Tate's invoice (.3); communicate with K. Paulson regarding same (.1); continue drafting of motion for fees (1.0); prepare correspondence to Receiver and C. Ellis regarding same and exhibits (.2).	1.6	\$0.00
2/9/2024	CE	NO CHARGE: Draft email to A. Cruz regarding Receiver's 19th interim motion for fees (.1); review and revise same (.5).	0.6	\$0.00
2/10/2024	CE	NO CHARGE: Review and revise Receiver's 19th interim motion for fees and exhibits (2.0).	2.0	\$0.00
2/12/2024	CE	NO CHARGE: Review email from A. Cruz regarding Receiver's nineteenth interim motion for fees (.1); exchange emails with M. Lockwood regarding same (.2); direct A. Avery regarding exhibits for same (.1); review and revise Receiver's nineteenth interim motion for fees and analyze invoices for Receiver's attorneys and vendors (1.9).	2.3	\$0.00
2/12/2024	MML	NO CHARGE: Communicate with A. Avery regarding fees motion (.1); communicate with Receiver regarding approval of prebills (.1); communicate with C. Ellis regarding same (.1).	0.3	\$0.00
2/14/2024	KAP	NO CHARGE: Telephone call with M. Lockwood regarding fourth-quarter 2023 and January 2024 prebills (.1).	0.1	\$0.00
2/15/2024	CE	NO CHARGE: Review and finalize exhibits to Receiver's 19th interim motion for fees (2.2).	2.2	\$0.00
2/15/2024	MML	NO CHARGE: Communicate with Receiver regarding approval of prebills (.1); communicate with B. Nguyen regarding final bills (.1); review same and compare to motion (.2); correspond with C. Ellis regarding same (.1).	0.5	\$0.00
2/16/2024	CE	NO CHARGE: Exchange emails with A. Auxter regarding Receiver's nineteenth interim motion for fees (.4).	0.4	\$0.00
2/19/2024	MML	NO CHARGE: Communicate with A. Avery regarding fees motion and exhibits (.1).	0.1	\$0.00
2/21/2024	KAP	NO CHARGE: Review and revise January team prebills (2.2).	2.2	\$0.00

Case 8:19-c	v-00886-VMC-SPF	Document 817-9	Filed 05/22/24	Page 25 of 29 Page May 08, 2024	
				Client: Matter:	025305 001922
				Invoice #:	21480
				Page:	24

Date	TKPR	Description of Services	Hours	Amount
WFEE	Work	on Fees Motions		
2/22/2024	KAP	NO CHARGE: Continue to review and revise January team prebills and send same to A. Avery (.3).	0.3	\$0.00
2/23/2024	CE	NO CHARGE: Exchange emails with A. Auxter regarding Receiver's nineteenth interim motion for fees (.4); review email from Receiver regarding conferral with defendants for same (.1).	0.5	\$0.00
2/23/2024	MML	NO CHARGE: Review communication from CFTC regarding fees motion and C. Ellis' response to same (.1).	0.1	\$0.00
2/25/2024	CE	NO CHARGE: Draft email to Receiver regarding conferral with defendants regarding Receiver's nineteenth interim motion for fees (.1); direct A. Avery regarding same (.1).	0.2	\$0.00
2/27/2024	CE	NO CHARGE: Draft email to R. Kurpiers regarding Receiver's nineteenth interim motion for fees (.1); review email from G. Marrone regarding same (.1); review email from F. Duran regarding same (.1).	0.3	\$0.00
2/27/2024	MML	NO CHARGE: Review proposed order (.1); review categorization of costs (.1); communicate with A. Avery and C. Ellis regarding same and E-Hounds (.1).	0.3	\$0.00
2/28/2024	CE	NO CHARGE: Review, revise, and finalize Receiver's nineteenth interim motion for fees and exhibits (.6).	0.6	\$0.00
3/1/2024	AC	NO CHARGE: Review and analyze Receiver's nineteenth interim motion for fees (.1).	0.1	\$0.00
3/1/2024	MML	NO CHARGE: Review invoice from E-Hounds (.1); prepare correspondence to A. Cruz regarding user fees (.1).	0.2	\$0.00
3/5/2024	MML	NO CHARGE: Review correspondence from PDR regarding February invoice (.1).	0.1	\$0.00
3/7/2024	MML	NO CHARGE: Communicate with K. Paulson regarding time entries (.1); review correspondence regarding Receiver's invoice (.1).	0.2	\$0.00
3/12/2024	MML	NO CHARGE: Review correspondence regarding platform fees (.1).	0.1	\$0.00
3/13/2024	MML	NO CHARGE: Correspond with J. Perez regarding billing inquiry (.1).	0.1	\$0.00
3/21/2024	KAP	NO CHARGE: Review and revise February team prebills and send to A. Avery (.9).	0.9	\$0.00
3/22/2024	AC	NO CHARGE: Review and analyze order granting Receiver's nineteenth interim motion for fees (.1).	0.1	\$0.00
3/22/2024	MML	NO CHARGE: Review order granting motion for fees (.1).	0.1	\$0.00
3/25/2024	KAP	NO CHARGE: Review edited team prebills (.2); prepare email to B. Nguyen regarding additional edits to same (.1).	0.3	\$0.00

Cas	se 8:19-cv-008	86-VMC-SPF Document 817-9 Filed 05/22/24	Page 26 of 29 Pa May 08, 2	
			Client:	025305
			Matter: Invoice #:	001922 21480
				21400
			Page:	25
SERVIC	ES			
Date	TKPR De	escription of Services	Hours	Amount
WFEE	Work on F	ees Motions		
		Total: Work on Fees Motions	37.20	\$0.00
		Total Professional Service	233.9	\$45,104.50
DISBUR	SEMENTS			
Date		Description of Disbursements		Amount
E101	Photocopies			
3/21/202	24	Photocopies @ .15 each (807 @ \$0.15)		\$121.05
E106	On Line Resea	rch		
1/1/2024	l	PACER printing costs for month of October 1, 2023 to De 31, 2023 (60 @ \$0.10)	ecember	\$6.00
2/1/2024	Ļ	PACER printing costs for month of January 2024 (2 @ \$	0.10)	\$0.20
3/20/202	24	PACER printing costs for month of March 2024 (30 @ \$0	0.10)	\$3.00
3/28/202	24	Westlaw		\$1,971.51
E112	Court Fees			
1/30/202	24	Clerk, U.S. District Court- Clerk of Court- Certified copy or Judgment for Clark.	f Default	\$13.00
2/5/2024	Ļ	Seminole County Clerk of Court- Clerk of Court- Recordin Affidavit and D. Clark Default Judgment.	ng of	\$27.00
E113	Subpoena Fee	s		
1/12/202	24	Bolter & Carr Investigations- Service of Process- Service subpoena - CA to be served on Brent Allan Winters	fee for	\$486.25
3/29/202	24	Bolter & Carr Investigations- Service of Process- Service subpoena to be served on Charles Huckabee	fee for	\$55.00
E123	Web-Related E	xpenses		
1/1/2024	Ļ	Rad Technology Consulting LLC- Web-related expenses- hosting for January 2024	Website	\$50.00
2/1/2024	ļ	Rad Technology Consulting LLC- Web-related expenses- hosting	Monthly	\$50.00
2/1/2024	ŀ	Rad Technology Consulting LLC- Web-related expenses- order	Service	\$337.50

Case 8:19-cv-	00886-VMC-SPF Document 817-9 Filed 05/22/24 Page	27 of 29 Pa May 08, 2 Client:	ageID 18580 024 025305
		Matter: Invoice #:	001922 21480
		Page:	26
DISBURSEMENTS			
Date	Description of Disbursements		Amount
E123 Web-Relat	ed Expenses		
3/1/2024	Rad Technology Consulting LLC- Web-related expenses- Monthly hosting		\$50.00
3/1/2024	Rad Technology Consulting LLC- Web-related expenses- Service Work Order		\$112.50
3/29/2024	Rad Technology Consulting LLC- Web-related expenses- Service order		\$75.00
E124 Other			
3/1/2024	Miscellaneous - W.B. Mason - envelopes for distribution mail out		\$64.48
3/1/2024	George Guerra- Miscellaneous- WB Mason - envelopes for mailou	t	\$64.48
	Total Disbursements		\$3,486.97
	Total Services	\$45,104.50	
	Total Disbursements	\$3,486.97	.
	Total Current Charges		\$48,591.47
	Previous Balance		\$49,492.61
	Less Payments PAY THIS AMOUNT		(\$49,492.61) \$48,591.47
			φ40,331.4 <i>1</i>

Case 8:19-cv-00886-VMC-SPF	Document 817-9	Filed 05/22/24	Page 28 of 29 Page May 08, 2024	
			Client:	025305
			Matter:	001922
			Invoice #:	21480
			Page:	27

TASK RECAP

Services

Project No.	Hours	Amount
ASSET - ASSET	133.20	\$33,548.00
CASE - CASE	5.70	\$1,189.50
CLAIM - CLAIM	57.80	\$10,367.00
WFEE - WFEE	37.20	\$0.00
	0.00	\$0.00
	0.00	\$0.00
	233.90	\$45,104.50

Disbursements

Project No.	Amount
Photocopies	\$121.05
On Line Research	\$1,980.71
Court Fees	\$40.00
Subpoena Fees	\$541.25
Web-Related Expenses	\$675.00
Other	\$128.96
	\$3,486.97

BREAKDOWN BY PERSON

Person		Project No.	Hours	Amount
AC	Ailen Cruz	ASSET - ASSET	37.60	\$12,032.00
AC	Ailen Cruz	CLAIM - CLAIM	0.10	\$32.00
AC	Ailen Cruz	WFEE - WFEE	0.20	\$0.00
CE	Chemere Ellis	ASSET - ASSET	34.00	\$8,160.00
CE	Chemere Ellis	CASE - CASE	2.40	\$576.00
CE	Chemere Ellis	CLAIM - CLAIM	2.20	\$528.00
CE	Chemere Ellis	WFEE - WFEE	12.60	\$0.00
EF	Eric Feld	ASSET - ASSET	48.00	\$11,520.00
AA	Alana Avery	ASSET - ASSET	0.90	\$121.50
AS	Amanda Stephens	ASSET - ASSET	12.70	\$1,714.50
AS	Amanda Stephens	CASE - CASE	1.70	\$229.50
AS	Amanda Stephens	CLAIM - CLAIM	24.10	\$3,253.50
KAP	Kimberly A. Paulson	CLAIM - CLAIM	9.10	\$1,201.50
KAP	Kimberly A. Paulson	WFEE - WFEE	13.00	\$0.00
MML	Maya M. Lockwood	CASE - CASE	1.60	\$384.00
MML	Maya M. Lockwood	CLAIM - CLAIM	22.30	\$5,352.00

Case 8:19-cv-00886-VMC-SPF	Document 817-9	Filed 05/22/24	Page 29 of 29 Page May 08, 202	
			Client:	025305
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			Invoice #:	21480
			Page:	28

BREAKDOWN BY PERSON

Person		Project No. Hours	Amount
MML	Maya M. Lockwood	WFEE - WFEE 11.40	\$0.00
		233.90	\$45,104.50

Case 8:19-cv-00886-VMC-SPF Document 817-10 Filed 05/22/24 Page 1 of 5 PageID 18583

EXHIBIT 10





Invoice # 8174 Date: 04/12/2024

Johnson, 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

Туре	Date	Description	Attorney	Quantity	Rate	Total
Service	01/02/2024	Update the master spreadsheet with claimant communication (.1).	MG	0.10	\$135.00	\$13.50
Service	01/30/2024	Review investor documents for claimant's contact information (.2).	MG	0.20	\$135.00	\$27.00
Service	02/12/2024	Review information regarding claimant represented by B. Winters (.2); review previous distributions sent via wire (.3).	MG	0.50	\$135.00	\$67.50
Service	02/13/2024	Review outstanding claims process issues in preparation for the next distribution (.6).	MG	0.60	\$135.00	\$81.00
Service	02/15/2024	Review master spreadsheet notes in preparation for a distribution (2.0).	MG	2.00	\$135.00	\$270.00
Service	02/16/2024	Review and organize investor communications (.2).	MG	0.20	\$135.00	\$27.00
Service	02/23/2024	Review case documents related to M. S. (.4); prepare exhibit to the motion for a second distribution (.8).	MG	1.20	\$135.00	\$162.00
Service	02/26/2024	Review draft second distribution cover letter (.1); review notes in preparation for filing the second distribution motion (1.2); revise the second distribution motion exhibit (.5).	MG	1.80	\$135.00	\$243.00
Service	02/27/2024	Revise the second distribution motion exhibit (.4).	MG	0.40	\$135.00	\$54.00
Service	02/28/2024	Review case documents for a declaration regarding a deceased investor (.3); prepare	MG	0.90	\$135.00	\$121.50

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Invoice # 8174 - 04/12/2024

		second distribution list for PDR (.5); communicate with R. During regarding website posting (.1).				
Service	02/29/2024	Work on the second distribution (1.6).	MG	1.60	\$135.00	\$216.00
Service	03/04/2024	Communicate with PDR regarding the second distribution checks (.1);	MG	0.10	\$135.00	\$13.50
Service	03/12/2024	Review supplies for the second distribution (.3).	MG	0.30	\$135.00	\$40.50
Service	03/13/2024	Review the master spreadsheet notes for the second distribution (.4).	MG	0.40	\$135.00	\$54.00
Service	03/14/2024	Draft and revise spreadsheets and labels for the second distribution (4.3).	MG	4.30	\$135.00	\$580.50
Service	03/18/2024	Communicate with PDR regarding the second distribution checks (.1); draft a test mail merge in preparation for the second distribution (1.4).	MG	1.50	\$135.00	\$202.50
Service	03/19/2024	Communicate with an investor regarding the status of a second distribution (.2); review the address labels for the second distribution (.3); review the draft second distribution checks from PDR (3.8).	MG	4.30	\$135.00	\$580.50
Service	03/20/2024	Continue to review the draft second distribution checks from PDR (5.5).	MG	5.50	\$135.00	\$742.50
Service	03/21/2024	Continue to review draft second distribution checks (.7); work on second distribution preparation (.5).	MG	1.20	\$135.00	\$162.00
Service	03/25/2024	Revise the updated second distribution spreadsheet with revisions for PDR (.6).	MG	0.60	\$135.00	\$81.00
Service	03/26/2024	Review and organize investor communications (.2); draft website post regarding second distribution order (.3); communicate with an investor about his IRA custodian (.1).	MG	0.60	\$135.00	\$81.00

Time Keeper	Quantity	Rate	Total
Mary Gura	28.3	\$135.00	\$3,820.50
		Subtotal	\$3 ,8 20.50
		Total	\$3, 8 20.50

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7799	01/05/2024	\$175.50	\$175.00	\$0.50
Current Invoice				
Invoice Number	Due On	Amount Due	Payments Received	Balance Due
Invoice Number 8174	Due On 04/12/2024	Amount Due \$3,820.50	Payments Received \$0.00	Balance Due \$3,820.50
			-	

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

Payment is due upon receipt.

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Invoice # 8174 - 04/12/2024

Johnson, Newlon & DeCort, P.A.



3242 Henderson Boulevard, Suite 210 Tampa, FL 33609

Invoice # 8174 Date: 04/12/2024



Pay your invoice online

To pay your invoice, open the camera on your mobile device and place the QR code in the camera's view.

Or, **click here** if you're viewing on a computer or smartphone.

Case 8:19-cv-00886-VMC-SPF Document 817-11 Filed 05/22/24 Page 1 of 5 PageID 18588

EXHIBIT 11

Case 8:19-cv-00886-VMC-SPF Document 817-11 Filed 05/22/24 Page 2 of 5 PageID 18589

Guerra & Partners, P.A. 1408 N. Westshore Blvd., Suite 1010

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

Federal Tax ID # 27-0937962

Burton W. Wiand	May 08, 2024	1
Attention: Burton W. Wiand, as Receiver	Client:	025305
Burton W. Wiand PA	Matter:	002095
114 Turner Street	Invoice #:	21477
Clearwater, FL 33756		
	Page:	1

RE: Oasis Legal Team - Raymond Montie, III.

For Professional Services Rendered Through March 31, 2024

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
1/10/2024	CE	Draft letter to R. Montie regarding release of funds held in escrow pursuant to settlement agreement (.3); review and analyze escrow agreement to identify release conditions (.3); draft joint release certificate for R. Montie pursuant to escrow agreement (.6).	1.2	\$288.00
1/11/2024	CE	Draft email to R. Montie regarding settlement payment (.1).	0.1	\$24.00
1/16/2024	CE	Review and analyze email from R. Montie regarding settlement (.1); participate in conference call with R. Montie regarding affidavits and frozen accounts (.2); research file regarding affidavit (.6); prepare email to R. Montie regarding same (.1).	1.0	\$240.00
1/17/2024	CE	Review email from R. Montie regarding joint release certificate (.1); exchange emails with Receiver regarding R. Montie affidavit (.3); draft email to R. Montie regarding same (.2).	0.6	\$144.00
1/26/2024	CE	Exchange emails with R. Montie regarding December 2023 financial report (.2).	0.2	\$48.00
2/2/2024	CE	Review email from R. Montie regarding settlement payment and authorization to open accounts (.1).	0.1	\$24.00

Case 8:19-cv-00886-VMC-SPF	Document 817-11	Filed 05/22/24	Page 3 of 5 Pagell May 08, 2024	
			Client: Matter: Invoice #:	025305 002095 21477
			Page:	2

SERVICES

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
2/7/2024	CE	Exchange emails with Receiver regarding authorization for insider to open bank accounts (.2); research whether and which assets of R. Montie were frozen by reviewing spreadsheets, orders, and correspondence between insider and third parties (2.3); draft email to J. Perez, M. Lockwood, E. Feld, and A. Stephens regarding asset freeze and release of funds to Receiver (.2); exchange emails with J. Perez regarding whether insider's seized bank accounts were applied to settlement (.2); draft email to insider seeking additional information regarding asset freeze (.2); draft email to insider to authorize insider's opening of bank accounts (.1).	3.1	\$744.00
2/7/2024	AS	Telephone call with C. Ellis regarding research regarding R. Montie's frozen Ambit assets (.1); preform research regarding same (.1); prepare email to C. Ellis regarding same (.2).	0.4	\$54.00
2/13/2024	CE	Exchange emails with R. Montie regarding asset freeze (.4); review and analyze R. Montie's correspondence with third party regarding asset freeze (.2); review and revise letter to third party regarding release of frozen assets to the Receiver (.5).	1.1	\$264.00
2/14/2024	AS	Review attorney communications regarding R. Montie and Ambit Energy frozen funds (.2).	0.2	\$27.00
2/14/2024	MML	Review correspondence regarding R. Montie's held commission (.1).	0.1	\$24.00
3/1/2024	CE	Draft email to R. Montie regarding frozen funds (.1); review and analyze payments from R. Montie and direct A. Stephens regarding payment chart (.2).	0.3	\$72.00
3/7/2024	AC	Telephone calls to Receiver regarding funds held at Ambit Energy (.2); prepare letter to Ambit Energy requesting release of same (.2); prepare emails to R. Montie regarding same (.2); telephone call with R. Montie regarding same (.1).	0.7	\$224.00
3/13/2024	AC	Participate in telephone calls with R. Montie regarding frozen bank accounts (.3); prepare email to R. Montie regarding same (.1); draft and revise letters to banks regarding release of frozen funds (.2); confer with A. Stephens regarding same (.2).	0.8	\$256.00
3/13/2024	AS	Prepare letter to First Seacoast Bank regarding release of frozen funds for R. Montie (.3); prepare email to First Seacoast Bank regarding same (.1); prepare letter and email to NBT Bank regarding same (.5).	0.9	\$121.50
3/14/2024	AS	Exchange emails with First Seacoast Bank and update settlement spreadsheet for R. Montie (.5).	0.5	\$67.50
3/15/2024	AS	Update settlement spreadsheet for R. Montie payment (.2).	0.2	\$27.00

Case 8:19-cv-00886-VMC-SPF	Document 817-11	Filed 05/22/24	Page 4 of 5 Pagel May 08, 2024 Client: Matter: Invoice #:	
			Page:	3

SERVICES

Date ASSET	TKPR Asset	Description of Services Analysis and Recovery	Hours	Amount
3/18/2024	CE	Exchange emails with Receiver regarding settlement payments from R. Montie (.2).	0.2	\$48.00
3/21/2024	AS	Prepare follow up email to NBT Bank regarding frozen funds for R. Montie (.1).	0.1	\$13.50
		Total: Asset Analysis and Recovery	11.80	\$2,710.50
		Total Professional Service	11.8	\$2,710.50
		Total Services Total Current Charges	\$2,710.50	\$2,710.50
		Previous Balance		\$3,433.50
		Less Payments		(\$3,433.50)
		PAY THIS AMOUNT		\$2,710.50

eID 18592
025305
002095
21477
4

TASK RECAP

Services			Disbursements	
Project No.	Hours	Amount	Project No.	Amount
ASSET - ASSET	11.80	\$2,710.50		\$0.00
	11.80	\$2,710.50		\$0.00

BREAKDOWN BY PERSON

Person		Project No.	Hours	Amount
AC	Ailen Cruz	ASSET - ASSET	1.50	\$480.00
CE	Chemere Ellis	ASSET - ASSET	7.90	\$1,896.00
AS	Amanda Stephens	ASSET - ASSET	2.30	\$310.50
MML	Maya M. Lockwood	ASSET - ASSET	0.10	\$24.00
			11.80	\$2,710.50

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INVOICE

Invoice # 24 Date: 04/17/2024 Due On: 05/17/2024

Law Office of Jared J. Perez

301 Druid Rd W Clearwater, Florida 33756

Mr Burton W. Wiand 114 Turner Street Clearwater, FL 33756

00003-Wiand

Oasis Receivership

Туре	Date	Notes	Quantity	Rate	Total
Service	01/26/2024	CASE MGMT: Gather information and draft nineteenth interim report (2.5).	2.50	\$320.00	\$800.00
Service	01/30/2024	CASE MGMT: Revise, finalize, and file nineteenth interim report, including exhibits (2.9).	2.90	\$320.00	\$928.00
Service	02/15/2024	AAR: Begin draft of outline for ATC oral argument (1.6).	1.60	\$320.00	\$512.00
Service	02/16/2024	AAR: Continue draft of outline for ATC oral argument, including review and summarization of all arguments raised in four appellate briefs (3.5).	3.50	\$320.00	\$1,120.00
Service	02/20/2024	AAR: Continue draft of outline for ATC oral argument, including review and summarization of all arguments raised in four appellate briefs (3.5).	3.50	\$320.00	\$1,120.00
Service	02/22/2024	AAR: Continue draft of outline for ATC oral argument, including review and summarization of all arguments raised in four appellate briefs (4.2).	4.20	\$320.00	\$1,344.00
Service	02/23/2024	AAR: Continue draft of outline for ATC oral argument, including review and analysis of cases cited in four appellate briefs (3.2).	3.20	\$320.00	\$1,024.00
Service	02/25/2024	AAR: Continue draft of outline for ATC oral argument, including review and analysis of cases cited in four appellate briefs (3.8).	3.80	\$320.00	\$1,216.00
Service	02/26/2024	AAR: Continue draft of outline for ATC oral argument, including review and analysis of cases cited in four appellate briefs (4.0).	4.00	\$320.00	\$1,280.00
Service	02/27/2024	CLAIMS: Review and revise motion for second interim	0.70	\$320.00	\$224.00

Invoice # 24 - 04/17/2024

		distribution (.7).			
Service	02/27/2024	AAR: Continue draft of outline for ATC oral argument, including review and analysis of cases cited in four appellate briefs (3.3).	3.30	\$320.00	\$1,056.00
Service	02/28/2024	CLAIMS: Review, revise, and file motion for second interim distribution, including Local Rule 3.01(g) communications (.6).	0.60	\$320.00	\$192.00
Service	02/28/2024	AAR: Continue draft of outline for ATC oral argument, including review and analysis of cases cited in four appellate briefs (1.5).	1.50	\$320.00	\$480.00
Service	02/29/2024	AAR: Continue draft of outline for ATC oral argument, including legal and factual research as needed to develop and finalize arguments (7.0).	7.00	\$320.00	\$2,240.00
Service	03/01/2024	AAR: Continue draft of outline for ATC oral argument, including legal and factual research as needed to develop and finalize arguments (5.4).	5.40	\$320.00	\$1,728.00
Service	03/02/2024	AAR: Complete draft of outline for ATC oral argument, including legal and factual research as needed to develop and finalize arguments (5.1).	5.10	\$320.00	\$1,632.00
Expense	03/03/2024	Travel: Travel 285 miles to Miami to present oral argument in ATC appeal.	1.00	\$190.95	\$190.95
Service	03/03/2024	Travel from Tampa to Miami for oral argument in ATC appeal (4.8/half rate).	4.80	\$160.00	\$768.00
Service	03/03/2024	AAR: Conduct final preparations for oral argument in ATC appeal, including review and annotation of outline, review of most important cases, and development of arguments (3.5).	3.50	\$320.00	\$1,120.00
Expense	03/04/2024	Reimbursable expenses: Hotel charges for night prior to 8:30 AM oral argument, including parking and taxes.	1.00	\$611.35	\$611.35
Service	03/04/2024	AAR: Conduct final preparations for oral argument in ATC appeal, including review and annotation of outline, review of most important cases, and development of arguments (5.2); Zoom call with Receiver and team to review arguments (.8).	6.00	\$320.00	\$1,920.00
Service	03/05/2024	AAR: Arrive at Miami courthouse, conduct final review of outline, observe panel, and present oral argument (3.5).	3.50	\$320.00	\$1,120.00
Expense	03/05/2024	Travel: Uber to courthouse to present oral argument in ATC appeal.	1.00	\$19.70	\$19.70
Expense	03/06/2024	Travel: Travel 285 miles from Miami after presenting oral argument in ATC appeal.	1.00	\$190.95	\$190.95
Service	03/06/2024	Travel from Miami to Tampa following oral argument in ATC appeal (5.2/half rate).	5.20	\$160.00	\$832.00

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Invoice # 24 - 04/17/2024

Service	03/06/2024	AAR: Attend Zoom meeting with Receiver and team regarding open projects and next steps (1.0).	1.00	\$320.00	\$320.00
Service	03/19/2024	AAR: Review Eleventh Circuit opinion reversing and remanding ATC case and consider implications (.5); telephone conference with J. Sallah (.3).	0.80	\$320.00	\$256.00
Service	03/20/2024	AAR: Attend Zoom meeting with Receiver and team to discuss next steps in ATC litigation (1.0).	1.00	\$320.00	\$320.00
			٦	Fotal	\$24,564.95

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
24	05/17/2024	\$24,564.95	\$0.00	\$24,564.95
			Outstanding Balance	\$24,564.95
			Total Amount Outstanding	\$24,564.95

Please make all amounts payable to: Law Office of Jared J. Perez

Case 8:19-cv-00886-VMC-SPF Document 817-13 Filed 05/22/24 Page 1 of 3 PageID 18597

Case 8:19-cv-00886-VMC-SPF Document 817-13 Filed 05/22/24 Page 2 of 3 PageID 18598



CPAs, Forensic and Insolvency Advisors

EIN #46-5394135

CFTC V. OASIS INTERNATIONAL GROUP, LIMITED, ET AL Client ID: 90141 Invoice #10948 - 03/31/24

TIME SUMMARY BY STAFF

<u>Staff</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
RLW - RACHEL WEISS - CONSULTANT CPA, CFE	0.20	454.00	90.80
TOTAL	0.20	_	\$90.80
	BLENDED RATE	\$454.00	
	DISCOUNT (15%)		(13.62)
		_	
TOTAL AMOUNT OF THIS INVOICE			\$77.18
	ADJUSTED BLENDED RATE	= \$385.90	





CPAs, Forens	CPAs, Forensic and Insolvency Advisors							
1000 S. F	1000 S. Federal Highway, Suite 200							
Fort	Lauderdale, FL 3	3316						
Phone - 954-761-1011 F	Phone - 954-761-1011 F - 954-761-1033 www.kapilamukamal.com							
EIN #46-5394135								

C/O BURTOI VIA EMAIL C BWIAND@W	n W. Wiai DNLY: /IANDLAV	RNATIONAL GROUP, LIMITED, ET AL ND, RECEIVER V.COM; JRIZZO@WIANDLAW.COM ces Rendered Through March 31, 2024	Invoice: 03/31/20 Client IE	
DATE	<u>STAFF</u>	DESCRIPTION	<u>HRS</u>	AMOUNT
LITIGATION	SUPPOR	Т		
03/07/2024	RLW	EXTRACT BANK STATEMENT SUPPORT FOR INSIDER TRANSACTIONS	0.20	90.80
				90.80
				90.80
		Discount (15%)		(13.62)
		Total amount of this ir	ivoice	\$77.18

OPTIONAL WIRE/ACH INSTRUCTIONS							
Bank Name:	The Northern Trust Company 1100 East Las Olas Blvd. Fort Lauderdale, FL 33301-2387 Phone: 954-768-4000 Fax: 954-768-4017						
Bank ABA Routing:	071000152						
Swift Code: CNORUS44							
Account Name:	KAPILAMUKAMAL, LLP						
Account Number: 3802463544							
	G THE WIRE, WE SUGGEST YOU CONFIRM THESE INSTRUCTIONS AL (954) 761-1011.						

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

Case 8:19-cv-00886-VMC-SPF Document 817-14 Filed 05/22/24 Page 1 of 4 PageID 18600

I, Suite 2000	CPAs + ADVISCR®bne (727) 785-4447 Fax (727) 784-5491
7	<u>www.pdr-cpa.com</u>
23 Tampa Road, Suite 2000	Mone (727) 785-447
dsmar, FL 34677	www.pdr-cpa.com
PDR	CPAs + ADVISC

OASIS MANAGEMENT January 1, 2024 - January 31, 2024

SAO SAO SAO GAH SAO SAO SAO SAO GAH WEP SAO SAO SAO SAO SAO SAO SAO SAO SAO SAO	Date	Activity Category	Timekeeper	Description	Hours	Rate	Amount
Accounting & Auditing SAO Accounting & Auditing SAO				Reconciled #4299 bank statement, recorded bank activty, updated			
Accounting & Auditing SAO	1/2/2024	Accounting & Auditing	SAO	Quickbooks records for 2023	1.30	1.30 \$ 125.00 \$ 162.50	\$ 162.50
Accounting & Auditing GAH Accounting & Auditing SAO A Accounting & Auditing A Accounting & Auditing A Accounting & Auditing A Accounting & Auditing	1/6/2024	Accounting & Auditing	SAO	Updated account records, prepared 1099s	1.60	\$ 125.00 \$	\$ 200.00
Accounting & AuditingSAOAccounting & AuditingSAOAccounting & AuditingDRHAccounting & AuditingSAOAccounting & AuditingSAO	1/6/2024	Accounting & Auditing	GAH	Prepared John Haas amortization schedule	0.50	\$ 155.00	\$ 77.50
Accounting & AuditingSAOAccounting & AuditingSAO				Recorded bank activity, prepared quarterly reports, reconciled bank			
Accounting & AuditingSAOAccounting & AuditingAccounting & AuditingSAOAccounting & AuditingSAOSAOAccounting & AuditingSAOAccounting & AuditingAccounting & AuditingSAOMEPAccounting & AuditingSAOAccounting & AuditingAccounting & AuditingSAOAccounting & Auditing				statement, recorded bank activty, updated account records, prepared 4th			
Accounting & AuditingDRHAccounting & AuditingSAOAccounting & AuditingSAOAccounting & AuditingGAHAccounting & AuditingWEPAccounting & AuditingSAOAccounting & AuditingSAOAccounting & AuditingSAO	1/8/2024	Accounting & Auditing	SAO	quarter reports	2.80	\$ 125.00 \$ 350.00	\$ 350.00
Accounting & Auditing SAO Accounting & Auditing SAO Accounting & Auditing GAH Accounting & Auditing WEP Accounting & Auditing SAO Accounting & Auditing SAO Accounting & Auditing SAO Accounting & Auditing SAO	1/8/2024	Accounting & Auditing	DRH	Reviewed 1099s, entered changes and approved	0.75	\$ 155.00	\$ 116.25
Accounting & Auditing SAO Accounting & Auditing GAH Accounting & Auditing WEP Accounting & Auditing SAO Accounting & Auditing SAO Accounting & Auditing SAO	1/12/2024	Accounting & Auditing	SAO	Reviewed bank activity	0.30	\$ 125.00	\$ 37.50
Accounting & Auditing GAH Accounting & Auditing WEP Accounting & Auditing SAO Accounting & Auditing SAO Total Accounting & Auditing SAO	1/19/2024	Accounting & Auditing	SAO	Recorded bank activity	0.30	\$ 125.00	\$ 37.50
Accounting & Auditing WEP Accounting & Auditing SAO Accounting & Auditing SAO Total Accounting & Auditing	1/19/2024	Accounting & Auditing	GAH	Reviewed quarterly report	1.25	\$ 155.00	\$ 193.75
Accounting & Auditing SAO 1 Accounting & Auditing SAO 1 Total Accounting & Auditing	1/19/2024	Accounting & Auditing	WEP	Reviewed 4th quarter fund report	1.00	\$ 320.00 \$	\$ 320.00
Accounting & Auditing SAO Total Accounting & Auditing	1/22/2024	Accounting & Auditing	SAO	Updated quarterly report	0.30	\$ 125.00	\$ 37.50
Total Accounting & Auditing	1/26/2024	Accounting & Auditing	SAO	Recorded bank activity	0.30	\$ 125.00	\$ 37.50
		Total Accounting & Auditing			10.40		\$ 1,570.00

Total Burton Wiand as Receiver, Oasis Management

<u>10.40</u> \$ 1,570.00



OASIS MANAGEMENT

February 1, 2024 - February 29, 2024

2/1/2024 Accounting & Auditing SAO Reconciled #4299 and #3838 bank statements, recorded bank activity 1.20 \$ 125.00 \$ 150.00 2/1/2024 Accounting & Auditing SAO Scanned tax documents to backup folder 0.30 \$ 125.00 \$ 37.50 \$ 37.50 2/16/2024 Accounting & Auditing SAO Scanned tax documents to backup folder 0.30 \$ 125.00 \$ 37.50 \$ 37.50 2/16/2024 Accounting & Auditing SAO Vecorded bank activity 0.30 \$ 125.00 \$ 37.50 \$ 37.50 2/16/2024 Accounting & Auditing SAO Updated accounting records 0.30 \$ 125.00 \$ 37.50 2/20/2024 Accounting & Auditing SAO Updated accounting records 0.30 \$ 125.00 \$ 37.50 2/21/2024 Accounting & Auditing SAO Updated accounting records 0.30 \$ 125.00 \$ 37.50 2/21/2024 Accounting & Auditing SAO Updated accounting records 0.30 \$ 125.00 \$ 37.50 2/26/2024 Accounting & Auditing SAO Updated accounting	Date	Activity Category	Timekeeper	Description	Hours	Rate	Amount
Accounting & Auditing SAO Reconciled #4299 and #3838 bank statements, recorded bank activity Accounting & Auditing SAO Updated accounting records Accounting & Auditing SAO Placed check order, updated accounting records Accounting & Auditing SAO Placed check order, updated accounting records, recorded bank activity Accounting & Auditing SAO Placed check order, updated accounting records Accounting & Auditing SAO Placed check order, updated accounting records, recorded bank activity Accounting & Auditing SAO Placed check order, updated accounting records, recorded bank activity Accounting & Auditing SAO Placed check order, updated accounting records, recorded bank activity Accounting & Auditing SAO Placed check order, updated accounting records, recorded bank activity			(
Accounting & Auditing SAO Scanned tax documents to backup folder Accounting & Auditing SAO Recorded bank activity Accounting & Auditing SAO Updated accounting records Accounting & Auditing SAO Placed check order, updated accounting records, recorded bank activity Accounting & Auditing SAO Sent out missing 1099 not received yet, prepared checks for distribution Total Accounting & Auditing Total Accounting & Auditing SAO	2/1/2024	Accounting & Auditing	SAO	Reconciled #4299 and #3838 bank statements, recorded bank activity	1.20	\$ 125.00	\$ 150.00
Accounting & Auditing SAO Recorded bank activity Accounting & Auditing SAO Updated accounting records Accounting & Auditing SAO Placed check order, updated accounting records, recorded bank activity Accounting & Auditing SAO Sent out missing 1099 not received yet, prepared checks for distribution Total Accounting & Auditing Total Accounting & Auditing Sent out missing 1099 not received yet, prepared checks for distribution	2/6/2024	Accounting & Auditing	SAO	Scanned tax documents to backup folder		\$ 125.00	\$ 37.50
Accounting & Auditing SAO Updated accounting records Accounting & Auditing SAO Placed check order, updated accounting records, recorded bank activity Accounting & Auditing SAO Sent out missing 1099 not received yet, prepared checks for distribution Total Accounting & Auditing Sent out missing 1099 not received yet, prepared checks for distribution	2/16/2024	Accounting & Auditing	SAO	Recorded bank activity	0.30	\$ 125.00	\$ 37.50
Accounting & Auditing SAO Updated accounting records Accounting & Auditing SAO Updated accounting records Accounting & Auditing SAO Updated accounting records Accounting & Auditing SAO Placed check order, updated accounting records, recorded bank activity Accounting & Auditing SAO Placed check order, updated accounting records, recorded bank activity Accounting & Auditing SAO Sent out missing 1099 not received yet, prepared checks for distribution Total Accounting & Auditing Modeling Sent out missing 1099 not received yet, prepared checks for distribution	2/20/2024	Accounting & Auditing	SAO	Jpdated accounting records		\$ 125.00	\$ 37.50
Accounting & Auditing SAO Updated accounting records Accounting & Auditing SAO Placed check order, updated accounting records, recorded bank activity Accounting & Auditing SAO Sent out missing 1099 not received yet, prepared checks for distribution Total Accounting & Auditing Modeling	2/21/2024	Accounting & Auditing	SAO	Jpdated accounting records	0.30	\$ 125.00	\$ 37.50
Accounting & Auditing SAO Placed check order, updated accounting records, recorded bank activity Accounting & Auditing SAO Sent out missing 1099 not received yet, prepared checks for distribution Total Accounting & Auditing Auditing	2/24/2024	Accounting & Auditing	SAO	Jpdated accounting records		\$ 125.00	\$ 37.50
Accounting & Auditing SAO Placed check order, updated accounting records, recorded bank activity Accounting & Auditing SAO Sent out missing 1099 not received yet, prepared checks for distribution Total Accounting & Auditing Auditing							
Accounting & Auditing Total Accounting & Auditing Total Accounting & Auditing	2/26/2024	Accounting & Auditing	SAO	Placed check order, updated accounting records, recorded bank activity	1.10	\$ 125.00	\$ 137.50
Accounting & Auditing SAO Sent out missing 1099 not received yet, prepared checks for distribution Total Accounting & Auditing							
	2/29/2024	Accounting & Auditing	SAO	Sent out missing 1099 not received yet, prepared checks for distribution	3.30	\$ 125.00	\$ 412.50
		Total Accounting & Auditing			7.10		\$ 887.50

Total Burton Wiand as Receiver, Oasis Management

7.10 \$ 887.50

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

OASIS MANAGEMENT March 1, 2024 - March 31, 2024

Date	Activity Category	Timekeeper	Description	Hours	Rate	Amount
3/2/2024	Accounting & Auditing	SAO	Prepared distribution checks	2.50	\$ 125.00	\$ 312.50
3/3/2024	Accounting & Auditing	SAO	Prepared distribution checks	4.25	\$ 125.00	\$ 531.25
3/4/2024	Accounting & Auditing	SAO	Processed distribution checks	2.50	\$ 125.00	\$ 312.50
3/6/2024	Accounting & Auditing	GAH	Processed claims checks	1.00	\$ 155.00	\$ 155.00
3/13/2024	Accounting & Auditing	SAO	Recorded bank activity	0:30	\$ 125.00	\$ 37.50
3/13/2024	Accounting & Auditing	LBM	Reviewed distribution checks	1.75	\$ 125.00	\$ 218.75
3/14/2024	Accounting & Auditing	SAO	Recorded bank activity	0.50	\$ 125.00	\$ 62.50
3/17/2024	Accounting & Auditing	SAO	Reconciled #4299 and #3838 bank statements	09.0	\$ 125.00	\$ 75.00
3/18/2024	Accounting & Auditing	SAO	Prepared distribution checks, recorded bank activity	0.75	\$ 125.00	\$ 93.75
3/18/2024	Accounting & Auditing	LBM	Reviewed distribution checks	2.50	\$ 125.00	\$ 312.50
3/19/2024	Accounting & Auditing	SAO	Recorded bank activity	0:30	\$ 125.00	\$ 37.50
3/21/2024	Accounting & Auditing	SAO	Updated account records	0:30	\$ 125.00	\$ 37.50
3/25/2024	Accounting & Auditing	SAO	Recorded bank activity	0.50	\$ 125.00	\$ 62.50
3/25/2024	Accounting & Auditing	GAH	Processed distribution checks	0.25	\$ 155.00	\$ 38.75
3/26/2024	Accounting & Auditing	SAO	Recorded bank activity, recorded deposits	09.0	\$ 125.00	\$ 75.00
	Total Accounting & Auditing			18.60		\$ 2,362.50
3/5/2024	Тах	WEP	Gathered data for tax return preparation	1.25	\$ 320.00	\$ 400.00
3/5/2024	Тах	LH	Prepared initial draft of tax return	1.00	\$ 150.00	\$ 150.00
3/6/2024	Тах	WEP	Reviewed Federal & Florida state tax return	1.50	\$ 320.00	\$ 480.00
	Total Tax			3.75		\$ 1,030.00

Total Burton Wiand as Receiver, Oasis Management

\$ 3,392.50

22.35

Case 8:19-cv-00886-VMC-SPF Document 817-15 Filed 05/22/24 Page 1 of 4 PageID 18604

Case 8:19-cv-00886-VMC-SPF Document 817-15 Filed 05/22/24 Page 2 of 4 PageID 18605 All funds payable to: E-Hounds, Inc.



3

01/01/2024

Invoice for Services

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

\$125.00

\$375.00

	en Date 01/2024	Close	e Date /2024	Invoice # 50840	Balance Due		e Ref	ference (E9295) CFTC v. Oasis, et al.	Terms	ue on Rece	ipt
		Invoice to Burton W 114 Turner Clearwater	Wiand PA					Case Contact: Burton W Wiand PA Burt Wiand 727-460-4679			
Q	Date	Expedited		All quantitie	es are based Hou	rly unle	ss oth	nerwise noted	Tech	Price	Ext
2	01/01/202	24 E	E-Hounds Review	w Platform (Courtes	sy Rate Monthly)					\$595.00	\$1190.00
4	01/01/202				sers (per user) Courte					\$125.00	\$500.00
1	01/01/202	24 E	E-Hounds Review	w Platform Add'l Us	sers (per user) Courte	y Rate Ef	legal us	ser		\$125.00	\$125.00

E-Hounds Review Platform Add'l Users (per user) Courtesy Rate GK users (astephens; burt@burtonwwiandpa.com;

If you would prefer to apply the balance of your retainer to this statement, please pay the difference. Re additional services may result in our request for additional retainer.	equesting SUBTOTAL	\$2190.00
Payments Applied		
	TOTAL	\$2190.00
	Balance Due	\$2190.00
Please note: Our fees are subject to change annually. Last change: 2/1/2022	E-Hounds also accepts:	AMERICAN DORRESS MasterCard NICOLAR MasterCard
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 continue	d Zene: Supporte enounds.	com
storage of recovered data for more than 30 days unless otherwise specified in writing by the client. Any problems with recovered dat 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 th 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 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 w be subject to equipment liquidation, collection process and reasonable attorney's fees incurred in collection. Services by E-Hounds rendered on behalf of the agency, agent, or party contracting for the services, and payment for such services is the sole liability an responsibility of that agency, agent, or party, and is not transferrable or assignable.	e la la contrat, l	
	venmo	PayPal

Case 8:19-cv-00886-VMC-SPF Document 817-15 Filed 05/22/24 Page 3 of 4 PageID 18606 All funds payable to: E-Hounds, Inc.

Invoice for Services

3

32815 US 19 North Suite 100

Palm Harbor, Florida 34684 support@ehounds.com (727) 726-8985

Г

¢ 2100 00

	oen Date /01/2024	Close Date 02/29/2024	Invoice # 50906	Balance Due	Case Reference (E9295) CFTC v. Oasis, et al.	Terms	oue on Rece	eipt
		Invoice to: Burton W Wiand PA 114 Turner Street Clearwater, Fl 33756			Case Contact: Burton W Wiand PA Burt Wiand 727-460-4679			
Q	Date	Expedited	All quantitie	es are based Hourly (unless otherwise noted	Tech	Price	Ext
2	02/01/202	24 E-Hounds Revie	ew Platform (Courtes	sy Rate Monthly)			\$595.00	\$1190.00
4	02/01/202	24 E-Hounds Revie	ew Platform Add'l Us	ers (per user) Courtesy Ra	te Sallahlaw users		\$125.00	\$500.00
1	02/01/202	24 E-Hounds Revie	ew Platform Add'l Us	ers (per user) Courtesv Ra	te Eflegal user		\$125.00	\$125.00

E-Hounds Review Platform Add'I Users (per user) Courtesy Rate Eflegal user 02/01/2024 \$125.00 φ120.00 E-Hounds Review Platform Add'l Users (per user) Courtesy Rate GK users (astephens; burt@burtonwwiandpa.com; 02/01/2024 \$125.00 \$375.00

additional services may result in our request for additional retainer.	SUBTOTAL	\$2190.00
Payments Applied		
	TOTAL	\$2190.00
	Balance Due	\$2190.00
Please note: Our fees are subject to change annually. Last change: 2/1/2022	E-Hounds also accepts:	
Statement of Limited Liability and Financial Responsibility	Venmo: @ehounds	
E-Hounds, Inc. shall not be liable under any circumstances for any special, consequential, or exemplary damages arising from the use o 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		s.com
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-Hounds stated otherwise specified in writing's reporting. All billing is DUE ON REFCIPT, 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 inquidation, collection process and reasonable attorney's fees incurred in collection. Services is the sole liability and responsibility of that agency, agent, or party, and is not transferrable or assignable.	a e s s s s s	PayPal

If you would prefer to apply the balance of your retainer to this statement, please pay the difference. Requesting

Case 8/10% oice for Servicer Document 817-15 Filed 05/22/24 Page 4 of 4 Page 1 18607 32815 US 19 North Suite 100

Palm Harbor, Florida 34684 support@ehounds.com (727) 726-8985

\$125.00

\$300.00

HMC

\$250.00

\$300.00

	en Date 01/2024	Close Date 03/31/2024	Invoice #	Balance Due \$2365.00	Case Reference (E9295) CFTC v. Oasis, et al.	Terms	oue on Rece	ipt
		Invoice to: Burton W Wiand PA 114 Turner Street Clearwater, Fl 33756			Case Contact: Burton W Wiand PA Burt Wiand 727-460-4679			
Q	Date	Expedited	All quantit	ies are based Hourly	unless otherwise noted	Tech	Price	Ext
2	03/01/202	24 E-Hounds Revie	w Platform (Courte	esy Rate Monthly)			\$595.00	\$1190.00
4	03/01/202	24 E-Hounds Revie	w Platform Add'l U	sers (per user) Courtesy R	ate Sallahlaw users		\$125.00	\$500.00
1	03/01/202	24 E-Hounds Revie	w Platform Add'l U	sers (per user) Courtesy R	ate Eflegal user		\$125.00	\$125.00

E-Hounds Review Platform Add'I Users (per user) Courtesy Rate GK users (astephens; burt@burtonwwiandpa.com

Intake/Collection/Preservation E9295-9 (Lenovo Ideacentre)

2

1

03/01/2024

03/08/2024

If you would prefer to apply the balance of your retainer to this statement, please pay the difference. Re additional services may result in our request for additional retainer.	questing SUBTOTAL	\$2365.00
Payments Applied		
	TOTAL	\$2365.00
	Balance Due	\$2365.00
Please note: Our fees are subject to change annually. Last change: 2/1/2022	E-Hounds also accepts:	
Statement of Limited Liability and Financial Responsibility	Venmo: @ehounds	
E-Hounds, Inc. shall not be liable under any circumstances for any special, consequential, or exemplary damages arising from the use o		s.com
misuse of data or equipment after it has been returned to the client and/or owner(s). E-Hounds shall not be liable for the continued storage of recovered data for more than 30 days unless otherwise specified in writing by the client. Any problems with recovered data must be reported to E-Hounds within 5 business days of receipt. Property and/or equipment held for legal matters is held for 1 Year at the client's request or upon case closure. Additional storage fees may apply to extended storage/maintenance. ABSOLUTELY NO REFUNDS This invoice is made under the fee agreement signed on behalf of the above listed client. As stated in the Fee Agreement for E-Hound's services, Final billing must be satisfied before the final release of equipment or 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 rendered on behalf of the agency, agent, or party contracting for the services, and payment for such services is the sole liability and responsibility of that agency, agent, or party, and is not transferrable or assignable.		Revealed the second sec

Case 8:19-cv-00886-VMC-SPF Document 817-16 Filed 05/22/24 Page 1 of 3 PageID 18608

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

Invoice 20315

\$ 52.50

114 Turner Street			
Clearwater, FL 33756	Date	Mar 31, 2024	
	Terms		
	Service Thru	Mar 31, 2024	

In Reference To: Oasis (Time)

Law Office of Burton W. Wiand

Date	Services	Hours
01/08/2024	Several communications with Mrs. Bhullar regarding the remaining assets for the upcoming auction.	
	Total Hours	0.70 hrs
	Total Time	\$ 52.50

INVOICE

Total Invoice Amount

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

INVOICE

Law Office of Burton W. Wiand 114 Turner Street Clearwater, FL 33756

Invoice 20315

Date	Mar 31, 2024
Terms	
Service Thru	Mar 31, 2024

User Hours Summary

Billing Period: 01/01/2024 - 03/31/2024

User Hour Totals

User	Hours Billed	Rate/Hour	Amount Billed
Roger Jernigan	0.70	\$ 75.00	\$ 52.50

Case 8:19-cv-00886-VMC-SPF Document 817-17 Filed 05/22/24 Page 1 of 3 PageID 18611

UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA TAMPA DIVISION

COMMODITY FUTURES TRADING COMMISSION,

Case No. 8:19-CV-886-T-33SPF

Plaintiff,

v.

OASIS INTERNATIONAL GROUP, LIMITED; OASIS MANAGEMENT, LLC; SATELLITE HOLDINGS COMPANY; MICHAEL J DACORTA; JOSEPH S. ANILE, II.; RAYMOND P MONTIE III; FRANCISCO "FRANK" L. DURAN; and JOHN J. HAAS,

Defendants;

and

FUNDADMINISTRATION, INC.; BOWLING GREEN CAPITAL MANAGEMENT LLC; LAGOON INVESTMENTS, INC.; ROAR OF THE LION FITNESS, LLC; 444 GULF OF MEXICO DRIVE, LLC; 4064 FOUNDERS CLUB DRIVE, LLC; 6922 LACANTERA CIRCLE, LLC; 13318 LOST KEY PLACE, LLC; and 4 OAKS LLC,

Relief Defendants.

_____/

ORDER

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

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

Burton W. Wiand, Receiver	20,272.33
Guerra & Partners, P.A.	\$51,301.97
Johnson Newlon & DeCort	\$3,820.50
Jared J. Perez P.A.	\$24,564.95
KapilaMukamal, LLP	77.18
PDR CPAs	\$5,850.00
E-Hounds, Inc.	\$6,745.00
RWJ Group, LLC	\$52.50

DONE AND ORDERED at Tampa, Florida, this _____ day of _____,

2024.

VIRGINIA M. HERNANDEZ-COVINGTON UNITED STATES DISTRICT COURT JUDGE