# 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 TWENTY-FIRST 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**"<sup>1</sup>), respectfully moves the Court for the entry of an order awarding fees and the reimbursement of costs to the Receiver and his professionals. *See* Doc. 98 (approving retention of professionals). This motion covers all fees and costs incurred from April 1, 2024 through June 30, 2024. The Standardized Accounting Report (the "**Accounting Report**") for the time covered by this motion is attached as **Exhibit 1**.<sup>2</sup>

#### **Case Background and Status**

As of the date of filing this motion, the Court has appointed Burton W.

Wiand as Receiver over the assets of the following entities and individuals:

- a) Defendants Oasis International Group, Limited; Oasis Management, LLC; Satellite Holdings Company; Michael J. DaCorta; Joseph S. Anile, II; Francisco "Frank" L. Duran; John J. Haas; and Raymond P. Montie, III; and
- b) Relief defendants 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

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 On July 11, 2019, the Court entered the Consolidated Order (Doc. 177), which combined and superseded two prior orders (Docs. 7 and 44) and is the operative document governing the Receiver's activities.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

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

Lacantera Circle, LLC; 13318 Lost Key Place, LLC; and 40<br/>aks LLC. $^{3}$ 

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

On July 31, 2024, the Receiver filed his Twenty-first Interim Report (Doc. 828) (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

<sup>&</sup>lt;sup>3</sup> 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).<sup>4</sup> On March 24, 2020, the Receiver filed a motion to retain John Waechter and Englander Fischer ("Englander Fischer") (Doc. 258), which the Court granted on April 13, 2020 (Doc. 264). On March 31, 2021, the Receiver filed a motion to approve the retention of the Sallah Firm on a contingency fee basis for the purpose of

<sup>&</sup>lt;sup>4</sup> 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.

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.<sup>5</sup> 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;<sup>6</sup> (2) KapilaMukamal, LLP

<sup>&</sup>lt;sup>5</sup> 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.

<sup>&</sup>lt;sup>6</sup> 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 Perez also left

("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;<sup>7</sup> (7) Maples Group to provide legal services in the Cayman Islands; (8) Sergio Godinho with SEDA Experts, LLC to provide litigation consulting in connection with litigation against Fundadministration, Inc.; (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").<sup>8</sup>

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

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.

<sup>&</sup>lt;sup>7</sup> 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.

<sup>&</sup>lt;sup>8</sup> Maples Group, Sergio Godinho, the Piper Firm, RWJ, KM, and RPM did not submit any invoices for the time covered by this motion and therefore are not included in this motion.

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 April 1, 2024 through June 30, 2024, in the amount of \$38,828.09. The standard hourly rate the Receiver charges clients in private litigation is \$500. However, the Receiver agreed, for purposes of his appointment as the Receiver, that his hourly rate would be reduced to \$360, representing a twenty-eight percent discount off the standard hourly rate that he charges clients in comparable matters. This rate was set forth in the Receiver's submission to the CFTC. *See* Doc. 87, Ex. A.

The Receiver commenced services immediately upon his appointment. The Receiver has billed his time for these activities in accordance with the Billing Instructions, which request that this motion contain a narrative of each "business enterprise or litigation matter" for which outside professionals have been employed. The Billing Instructions identify each such business enterprise or litigation matter as a separate "project." Further, the Billing Instructions request that time billed for each project be allocated to one of several Activity Categories.<sup>9</sup> 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 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 April 1, 2024 through June 30, 2024, are as follows:

<sup>&</sup>lt;sup>9</sup> 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 Analysis and		
Recovery	27.10	\$9,756.00
<b>Business Operations</b>	5.00	\$1,800.00
Case Administration	8.10	\$2,916.00
Claims		
Administration	30.50	\$10,980.00
TOTAL	70.70	\$25,452.00

<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 59.4 hours assisting the Receiver with Receivership matters. The Receiver requests the Court award him fees for the professional services rendered by Ms. Tate from April 1, 2024 through June 30, 2024, in the amount of \$7,425.00. 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 \$1,667.09 as summarized below.  $^{10}\,$ 

Costs	Total
Web-Related	\$1,534.03
Delivery Services	\$47.47
Other	\$85.59
Total	\$1,667.09

<sup>&</sup>lt;sup>10</sup> The cost included in other is for the purchase of an external hard drive to provide documents to counsel.

#### **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.a.) 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 postjudgment discovery. A copy of the statement summarizing the Receiver's services rendered for this project from April 1, 2024 through June 30, 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	9.90	\$3,564.00
TOTAL	9.90	\$3,564.00

# <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 April 1, 2024 through June 30, 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>
<b>Receiver's Time and Fees for Services Rendered</b>

	Hours	Fee
Activity Category	Expended	Amount
Asset Analysis and		
Recovery	2.00	\$720.00
TOTAL	2.00	\$720.00

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

The Receiver requests that the Court award G&P a total of \$47,203.27, which includes \$44,102.50 in fees for professional services rendered and

\$3,100.77 in costs incurred from April 1, 2024 through June 30, 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 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 April 1, 2024 through June 30, 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:

	Hours	
Activity Category	Expended	Fee Amount
Asset Analysis and		
Recovery	58.80	\$13,969.00
Case Administration	19.90	\$4,503.00
Claims Administration	140.70	\$25,630.50
TOTAL	219.40	\$44,102.50

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

In addition to legal fees, G&P has advanced costs of \$3,100.77. 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 April 1, 2024 through June 30, 2024, in the amount of \$8,451.00. A copy of the statement summarizing the services rendered and costs incurred by Ms. Gura from April 1, 2024 through June 30, 2024, is attached as **Exhibit 10**.

#### **B.** Discrete Litigation Projects.

In conjunction with the Receivership, two discrete litigation projects have been formally commenced by the Receiver. *See* Sections I.B.1 and I.B.2 above. G&P did not charge fees for services rendered or incur any costs for either discrete litigation matter during the time covered by this Motion.

#### III. Jared J. Perez P.A.

The Receiver requests the Court award Jared Perez fees for professional services rendered and costs incurred from April 1, 2024 through June 30, 2024,

in the amount of \$7,232.00. As an accommodation to the Receiver and to conserve the resources of the Receivership Estate, Mr. Perez has agreed to follow the reduced rates provided in the 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 **Exhibit 11**.

#### IV. Englander Fischer.

The Receiver requests the Court award Englander Fischer fees for professional services rendered and costs incurred from April 1, 2024 through June 30, 2024 in the amount of \$7,533.00. On March 24, 2020, the Receiver sought the approval of the retention of John Waechter and Englander Fischer to assist the Receiver and his primary counsel, G&P, with the clawback litigation explained in Sections I.B.1 and I.B.2 above. Doc. 258. The Court granted the Receiver's motion on April 13, 2020. Doc. 264. As an accommodation to the Receiver, Mr. Waechter agreed to a reduced rate of \$335 per hour for his work on behalf of the Receivership. Copies of the statements summarizing the services rendered and costs incurred by Englander Fischer

from April 1, 2024 through June 30, 2024 are attached as **Exhibit 12.** 

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

Professional	Hours	Rate	Total
Beatriz McConnell (BM)	21.60	\$335.00	\$7,236.00
Iris Munguia-Revollo (IMR)	1.60	\$185.00	\$296.00
Total Fees			\$7,532.00
Disbursements			\$1.00
Total			\$7,533.00

#### V. <u>Evans Keane LLP.</u>

The Receiver requests the Court award Evans Keane LLP fees for professional services rendered and costs incurred from April 1, 2024 through June 30, 2024 in the amount of \$2,268.74. Evans Keane is assisting the Receiver as local counsel in Idaho in connection with a subpoena served on a non-party in Idaho. Copies of the statements summarizing the services rendered and costs incurred by Evans Keane from April 1, 2024 through June 30, 2024 are attached as **Exhibit 13**.

#### VI. <u>Phillips Lytle LLP.</u>

The Receiver requests the Court award Phillips Lytle LLP fees for professional services rendered and costs incurred from April 1, 2024 through June 30, 2024 in the amount of \$3,284.00. Phillips Lytle is assisting the Receiver as local counsel in New York in connection with enforcement and collection of a clawback judgment in New York. Copies of the statements summarizing the services rendered and costs incurred by Philips Lytle from April 1, 2024 through June 30, 2024 are attached as **Exhibit 14**.

# VII. PDR CPAs.

The Receiver requests the Court award PDR fees for professional services rendered from April 1, 2024 through June 30, 2024, in the amount of \$6,031.53. 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** 15.

#### VIII. <u>E-Hounds, Inc.</u>

The Receiver requests the Court award E-Hounds fees for professional services rendered and costs incurred from April 1, 2024 through June 30, 2024, in the amount of \$6,195.00. 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 16</u>**.

#### **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:<sup>11</sup>

Burton W. Wiand, Receiver \$38,828.09

<sup>&</sup>lt;sup>11</sup> A proposed order is attached as **Exhibit 17**.

\$47,203.27
\$8,451.00
\$7,232.00
\$7,533.00
2,268.74
3,284.00
6,031.53
\$6,195.00

#### 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 CFTC 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 taken a position on the Receiver's fee applications and the stay it earlier obtained expired on July 24, 2022.

Respectfully submitted,

## <u>/s/ Maya Lockwood</u>

Maya Lockwood, FBN 0175481 <u>mlockwood@guerrapartners.law</u> GUERRA & PARTNERS, P.A. The Towers at West Shore 1408 N. West Shore Blvd. Suite 1010 Tampa, FL 33607 Tel.: (813) 347-5100 Fax: (813) 347-5198

Jared J. Perez, FBN 0085192 jared.perez@jaredperezlaw.com JARED J. PEREZ P.A. 301 Druid Rd W Clearwater, FL 33756-3852 Tel.: (727) 641-6562

Attorneys for Burton W. Wiand, Receiver

# **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 27, 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:

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

Raymond P. Montie, III RayMontie7@yahoo.com

<u>/s/ Maya M. Lockwood</u>

Maya M. Lockwood

#### **<u>RECEIVER'S CERTIFICATION</u>**

The Receiver has reviewed this Twenty-first 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

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# **EXHIBIT 1**

	Standardize							
	Standardized Accounting Rep			-		ceiv	ership	
	Civil Court Dock							
	Reporting Per	iod	04/01/2024 t	to 0	6/30/2024			
			Details		Subtotal		Grand Total	Notes
Line 1	Beginning Balance (As of 04/01/2024)					\$	10,882,496.18	
	Increases in Fund Balance							
Line 2	Business Income							
Line 3	Cash and Securities							
Line 4	Interest/Dividend Income	\$	25,474.44					Interest Income
Line 5	Asset Liquidation	\$	1,291.50					Items Auctioned
Line 6	Third-Party Litigation Income	\$	19,796.89					Settlements
Line 7	Other Miscellaneous	\$	700.00					Reissue Fees
	Total Funds Available - Totals Line 1 - 7	Ť		\$	47,262.83	\$	10,929,759.01	
				1 *	.,	Ť		1
	Decreases in Fund Balance							
Line 9	Disbursements to Investors				8,981,536.33			
Line 10	Disbursements for Receivership Operations				0,701,550.55			
	Receiver	\$	40,525.76					
	Guerra King	\$	104,228.08					Professional Fees
	KapilaMukamal LLP	\$	77.18					Professional Fees
10.a.4 PDR Certified Public Accts		\$	7,821.25					Professional Fees
10.a.5 RPM Financial		Ű	7,021.25					Professional Fees
10.a.6 Englander Fisher								Professional Fees
	The RWJ Group	\$	627.50					Professional Fees
	E Hounds	\$	13,315.00					Professional Fees
	Maples Group	\$						Professional Fees
	Jared J Perez PA	\$	30,548.95					Professional Fees
	Other Professional Fees	\$	6,216.50					Professional Fees
Line 10	Total Disbursements to Receiver/Professionals	<u> </u>	,	\$	203,360.22			
10b	Third-Party Litigation Expenses							
	Asset Expenses				243.52			Bank Charges
	Tax Payments							
	Total Disbursements for Receivership Ops.			\$	203,603.74			
Line 11	Disbursements Related to Distribution Expenses	 5						
Line 12	Disbursement to Court/Other							
Line 13	Other							
	Total Funds Disbursed - Total Lines 9 - 13					\$	9,185,140.07	
Line 14	Ending Balance (as of 06/30/2024)					\$	1,744,618.94	

			ting Report Form		
	Standardized Account	• •	•	-	
	Civil Cou		9-cv-00886-VMC-	SPF	
		From Inception to	06/30/2024	I	
				Grand	
		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	\$ 760,165.79			Interest Income
Line 5	Asset Liquidation	\$ 7,900,650.41			Sale of Real Estate/Misc.
Line 6	Third-Party Litigation Income	\$ 5,344,032.83			Settlements, etc
Line 7	Other Miscellaneous	\$ 7,787,974.26			Remitted Funds & Misc.
	Total Funds Available - Totals Line 1 - 7		\$31,004,740.75	\$ 31,004,740.75	
	Decreases in Fund Balance				
Line 9	<b>Decreases in Fund Balance</b> Disbursements to Investors		\$18,842,493.32		
	Disbursements for Receivership Operations		\$10,042,495.52		
	Receiver	\$ 515,861.22			Professional Fees
	Cuerra King	\$ 2,158,639.32			Professional Fees
	KapilaMukamal LLP	\$ 320,452.44			Professional Fees
	PDR Certified Public Accts	\$ 320,432.44 \$ 102,746.85			Professional Fees
	RPM Financial	\$ 102,740.83 \$ 84,036.92			Professional Fees
		\$ 534,401.18			Professional Fees
	Englander Fisher The RWJ Group	\$ 100,636.30			Professional Fees
	E Hounds	\$ 163,817.97			Professional Fees
	Maples Group-	\$ 54,811.60			Professional Fees
	Jared J. Perez	\$ 135,442.06			Professional Fees
	Other Professional Fees	\$ 98,244.56			Professional Fees
	Total Disbursements to Receiver/Professionals	\$ 90,244.30	\$ 4,269,090.42		
	Third-Party Litigation Expenses				
	Asset Expenses		\$ 42,160.00 \$ 357,181.93		Condo Fees, Insurance
100	Asset Expenses		\$ 337,101.93		Repairs, Maint & Utilities
104	Tax Payments		\$ 109,117.36		County Sales & Propery Tax
100	Total Disbursements for Receivership Ops.		\$ 4,777,549.71		County Sales & Hopery Tax
Line 11	Disburgements Balated to Distribution Furgers				
Line 11	Disbursements Related to Distribution Expense				
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			\$ 29,260,121.81	
Line 14	Ending Balance (as of 06/30/2024)			\$ 1,744,618.94	

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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	734 Second Interim Distribution Checks Issued
	No. of Claimants/Investors Paid	732 First Interim Distribution Checks Issued;
16b	Since Inception of Estate	734 Second Interim Distribution Checks Issued

\_

Receiver:

Burton W. Wiand, Receiver Printed Name

Date: 7/30/2024

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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.

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# THE RECEIVER'S TWENTY-FIRST INTERIM REPORT

Information and Activity from April 1, 2024 through June 30, 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 Twenty-First 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.<sup>1</sup>

## **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:

- Obtained the Court's approval of a second interim distribution of approximately **\$9 million** to claimants with approved claims and mailed distribution checks to such claimants at their designated addresses on April 30, 2024 (*see infra* § VI);
- Obtained the Court's approval of settlements worth **\$247,500** with insiders Gil and Charis Wilson as well as Mario C. Nicolaou and MCN Management Advisors, Inc. (*see infra* § V.1.g.);

<sup>&</sup>lt;sup>1</sup> As directed by the Court, the Receiver will submit his next interim report and subsequent reports within thirty days after the end of each calendar quarter. Where possible, the Receiver has also included information about events occurring between June 30, 2024 (the end of the reporting period) and the date of this filing.

- Settled a clawback and bankruptcy action with Rocco Garbellano for **\$165,000** or proceeds from the sale of certain real estate, whichever is greater (*see infra* § V.1.g.);
- Continued pre-litigation settlement efforts with other insiders and potential defendants, including drafting demand letters and preparing complaints should litigation be necessary (*see infra* § V.3.);
- Engaged in discovery and other collection efforts with respect to various judgments, including the **\$146,092.90** default judgment against insider Doug Clark and his affiliated entity (*see infra* § V.2.c.);
- Litigated the enforceability of a subpoena to Intermountain Precious Metals in federal court in Idaho regarding a potential recovery scam targeting defrauded investors (*see infra* § II.A.);
- Continued to litigate the Receiver's lawsuit against ATC Brokers Ltd., David Manoukian, and Spotex, LLC (*see infra* § V.2.b.);
- Collected litigation income of **\$19,796.89** through settlements and/or the enforcement of default judgments (*see* Ex. A);
- Sold miscellaneous personal property for **\$1,291.50** (*see id.*); and
- Collected **\$25,474.44** in interest income on seized funds (*see id.*).

# **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 **\$7,900,650.41** in assets (net, excluding remitted funds), mostly subject to agreements with the Department of Justice and the United States Marshals Service;
- Collected **\$760,165.79** in interest and/or dividend income;

- Collected total litigation income of **\$5,344,032.83** 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. **Procedure and Chronology**

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

The complaint charged the defendants with violations of the Commodity Exchange Act and CFTC regulations and sought to enjoin their violations of these laws regarding a fraudulent foreign currency ("**forex**") trading scheme. The CFTC alleged 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 asserted that the defendants raised approximately \$75 million from these investors and misappropriated over \$28 million of the pool funds to make payments to other pool participants and over \$18 million for unauthorized personal and business expenses, including the transfer of at least \$7 million to the relief defendants.<sup>2</sup>

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

 $<sup>^2</sup>$  On June 12, 2019, the CFTC filed an amended complaint (Doc. 110), which contained additional allegations about certain defendants and relief defendants.

directly or indirectly owned, beneficially or otherwise, by the Receivership Defendants." See *id.* at p. 14,  $\P$  32 & p. 15,  $\P$  30.b. The SRO also imposed a temporary injunction against the defendants and relief defendants and froze their assets. *Id.* at 19.

Subsequently, all defendants and relief defendants either defaulted or consented to the entry of a preliminary injunction against them (with some differences unique to the circumstances of each party). *See* Docs. 35, 43, 44, 82, 85, 172, 174-77. On July 11, 2019, the Court entered a Consolidated Receivership Order, which is now the operative document governing the Receiver's activities. Doc. 177 (the "**Consolidated Order**").<sup>3</sup> 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

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

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

On August 8, 2019, defendant Anile pled guilty to three counts involving the scheme – (1) conspiracy to commit wire and mail fraud; (2) engaging in an illegal monetary transaction; and (3) filing a false income tax return. *See United States of America v. Joseph S. Anile, II,* Case No. 8:19-cr-334-T-35CPT (M.D. Fla.) (the "Anile Criminal Action" or "ACA"). A copy of Anile's plea agreement was attached as Exhibit A to the Receiver's Second Interim Report. Doc. 195. On November 18, 2020, Anile was sentenced to imprisonment of 120 months and supervised release of three years. ACA Doc. 56. He was also ordered to pay restitution of \$53,270,336.08. *Id*.

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

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

Similarly, on December 17, 2019, a federal grand jury returned a 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 is collecting the disgorgement amounts and distributing 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

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motion for summary judgment against the CFTC (Doc. 750).<sup>4</sup> 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 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. He filed an appellate brief and voluminous index on June 25, 2024. The CFTC's response is due on August 28, 2024, and DaCorta's reply is due on October 2, 2024. *See generally C.F.T.C. v. DaCorta*, Case No. 24-10132-AA (11th Cir.).

#### 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

<sup>&</sup>lt;sup>4</sup> Because DaCorta's assets are frozen, the Receiver served a subpoena on the attorney representing DaCorta in this enforcement action to determine the source of the funds used to pay his legal expenses. DaCorta appealed the Court's order granting summary judgment against him, and a New York attorney, Stephen Preziosi, was hired to represent DaCorta before the Eleventh Circuit Court of Appeals. For the same reason, the Receiver also served a subpoena on Mr. Preziosi. *See infra* § II.A.

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, Limited and then Oasis Global FX, S.A. -i.e., the Oasis Pools. These companies were registered in New Zealand and Belize, respectively, and were purportedly introducing brokers that would trade currencies or currency-related contracts. The 12% return was to be derived from trading profits and transaction income earned by the brokers. The preferred shares were sold to investors through a private placement memorandum that contained significant false representations and omitted numerous material facts, including that DaCorta, the "Chief Investment Officer," was prohibited from currency trading through a prior regulatory action in the United States. As the scheme grew, other companies - Oasis Management and Satellite Holdings - were used to gather investments and funnel them into the scheme. Preferred shareholders became purported "lenders" (although the entities continue to have shareholders to this day) who

were told they were lending money to certain defendants. Investors were regularly sent statements showing an account with a principal amount and accrued and accruing earnings. All of this was false, as confirmed by defendant Anile's guilty plea and DaCorta's conviction.

As the scheme matured, the perpetrators created a website that investors could access to view their purported accounts. Investors' account pages showed that they were credited with a 1% "interest" payment each month plus, on a daily basis, a portion of purported trading income earned by the scheme's forex trading entity.<sup>5</sup> The scheme was successful and proliferated because of the continued deception of the investors with respect to their purported accounts. They were led to believe that they held valuable loan accounts that continually earned money when, in fact, the scheme appears to have been insolvent since its inception. As an example, when the CFTC stopped the scheme in April 2019, the fraudulent website showed investors that they were owed an aggregate of over \$120 million. In truth, OIG only had

<sup>&</sup>lt;sup>5</sup> Specifically, many investors were told by those perpetrating the scheme that the investors would receive a portion of the "spread pay" that Oasis Global FX, S.A. earned from its purported role as a broker of forex transactions for OIG. The spread pay, however, was nothing more than a markup on all transactions and served to increase the losses in the OIG account. No spread pay (or any portion thereof) was ever distributed to an investor. Rather, it was a ruse used to deceive investors into believing that they were receiving enhanced returns when, in fact, fictitious amounts were being credited to their fraudulent accounts. In truth, Oasis Global FX, S.A. and its traders conducted continually and routinely unprofitable trades and lost almost all the investors' money. The fabrication of returns based on purported spread pay was an integral part of the system through which the perpetrators lured investors into the scheme.

liquid assets of less than \$10 million and was continually losing money. At the time the CFTC asked the Court to freeze the Receivership Entities' accounts, OIG was accruing debt obligations to its investors in excess of \$1 million per month. OIG was losing money and had no ability to satisfy its obligations to its investors, but insiders were regularly representing to investors that its operations were profitable. Over time, some investors withdrew a portion or even all of their investment amounts. No payment was ever made from successful operations or trading, and all distributions were made from the deposits of other investors.

The Receiver's analysis indicates that a total of approximately \$80 million was raised from investors.<sup>6</sup> An analysis from the beginning of 2017 indicates that approximately \$20 million was deposited for trading, which resulted in substantial losses. The remainder of the money raised from investors was used to make Ponzi payments to other investors, to pay expenses to perpetuate the scheme, and to enrich the defendants. Through the claims process discussed below in Section VI, investors and other creditors have submitted hundreds of claims totaling approximately \$70 million.

<sup>&</sup>lt;sup>6</sup> To the extent these numbers differ from those alleged by the CFTC, the Receiver understands that the CFTC only considered transactions within the pertinent statute of limitations while the Receiver is reviewing all available transactions.

# 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.<sup>7</sup> Doc. 654. Kurpiers

<sup>&</sup>lt;sup>7</sup> 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. The agreement described Winters and Kurpiers as co-counsel. DaCorta, however, was convicted of defrauding Oasis investors, including the aforementioned objectors, and sentenced to 23 years in prison. As such, Kurpiers simultaneously represents both the 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. A clear purpose of DaCorta's litigation efforts is to remove the Receiver for the purported benefit of his victims, who Winters and Kurpiers also claim to represent.

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. Determining the nature and scope of Winters' 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 do not draw or understand any distinction between an "attorney-at-law" and an "attorney-in-fact."

In that regard, Winters is 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.

- 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 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 (oasisreplevin.net), which is rife with false and misleading information as well as personal attacks against the Receiver, his professionals, the CFTC, and prosecutors. The Receiver believes this website is intended to deceive claimants while seeking contributions to fund frivolous legal efforts attacking the Receiver and the Receivership while defending DaCorta. As explained in more detail below, this website and group bear all the hallmarks of "recovery fraud."
- 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) to represent investors, 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." The "Power of Attorney" forms, however, make clear that the services he promised to provide claimants included legal representation, and the Receiver believes that his machinations regarding the nature of his representation reflect the dishonesty of his activities.

- 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 and is providing them with legal representation, but he also represents defendant DaCorta – the criminally convicted (and now also civilly liable) 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.<sup>8</sup> 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,

<sup>&</sup>lt;sup>8</sup> See <u>www.cftc.gov/LearnAndProtect/AdvisoriesAndArticles/RecoveryFrauds.html</u>.

efforts at service have been unsuccessful because Winters apparently has no discernable residence, and his published office address is a UPS store.

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 filed a document opposing the motion to compel, and the Receiver submitted a reply to that document on May 3, 2024. The Idaho court struck the company's filing on June 18, 2024, and ordered it to retain counsel or otherwise advise the court as to "how it will be represented in this matter" by July 19, 2024. To date, the company has not retained counsel, but its owner did file a document attempting to invoke the Fifth Amendment privilege against self-incrimination.

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 any distributions to any claimants until a final judgment has been entered in this action.<sup>9</sup> 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

<sup>&</sup>lt;sup>9</sup> Claimants had no legitimate reason to obstruct the first interim distribution. The Notices continued a pattern of behavior by Winters and others, which seeks to advance defendant DaCorta's interests at the expense of his victims.

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 did not appear or present 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, 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.<sup>10</sup>

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

<sup>&</sup>lt;sup>10</sup> 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."

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.
- 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. Earlier this year, 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 only 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 and generally also copied winterslaw@nym.hush.com and info@oasisreplevin.net. 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 Interim Regarding Receiver's Supplemental Report 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 Receivership website.

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. Most recently, DaCorta retained Stephen Preziosi, Esq. of New York. Mr. Preziosi was served with a

subpoena and produced a limited number of documents which indicate that he has been paid over \$155,000 to represent DaCorta in his appeal of the Court's order granting summary judgment against him. That appeal is intended, in part, to undermine the Receivership and the rights of the claimants. While Mr. Preziosi has not clarified the source of his funding, he was clearly recruited by Winters and the "Oasis Helpers," including an individual named Greg Mellick, who is a leader of that group. Records produced to date indicate that the funding came from a check (\$80,000) from one of the scheme's victims (a 78-year-old investor from New Hampshire) and a wire transfer from an undisclosed source. Mr. Preziosi has refused to produce communications with the "Oasis Helpers" or other documents relating to the funding of the appeal and his engagement. 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 April 1, 2024, through June 30, 2024, the Receiver collected \$47,262.83.<sup>11</sup>

# 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

<sup>&</sup>lt;sup>11</sup> As explained in footnote 1, to the extent possible, the Receiver has included in this Interim Report transactions and events occurring after June 30, 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, these funds were remitted (*i.e.*, returned) to the Receiver along with additional money that the DOJ

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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**").<sup>12</sup> 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**.<sup>13</sup>

## 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.,

 $<sup>^{\</sup>rm 12}$  The Receiver also opened a checking/operating account for making disbursements.

<sup>&</sup>lt;sup>13</sup> During earlier reporting periods, 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 have been 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 has since been 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.<sup>14</sup> In the Consolidated Order and its predecessors, the Court directed the Receiver to "[t]ake all steps necessary to secure the business and other premises under the control of the Receivership Defendants" (Doc. 7 at 15-16) and to "take immediate possession of all real property of the Receivership Defendants, wherever located, including but not limited to all ownership and leasehold interests and fixtures" (Doc. 44 ¶ 19; Doc. 177 ¶ 19).

<sup>&</sup>lt;sup>14</sup> 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 within the Receivership Estate and included in Exhibit A.

# 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. 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.<sup>15</sup> 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. For more information, please see the Receiver's prior interim reports.

## 3. Other Personal Property

When the Receiver and his representatives visited certain defendants' residences on April 18, 2019, they observed and photographed potentially valuable items, including art, antiques, collectibles, sports memorabilia, and jewelry. The defendants were instructed that all such personal property is

<sup>&</sup>lt;sup>15</sup> 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 was authorized to release those funds so they could be applied toward the satisfaction of the settlement between Montie and the Receiver.

subject to the asset freeze, and they were not to sell, transfer, or otherwise dispose of anything without the Receiver's authorization. These obligations have since been modified by the pertinent settlement agreements between certain defendants, the CFTC, and the Receiver. To date, the Receiver has identified and/or seized the property listed in **Exhibit C**.<sup>16</sup> 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.

<sup>&</sup>lt;sup>16</sup> Importantly, the values identified in Exhibit C were and are only estimates. Actual recoveries have been and will be subject to market conditions and other factors.

## **IV.** Retention of Professionals

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

On May 30, 2019, the Receiver moved the Court to approve his engagement of the following legal, accounting, and other professionals: (1) 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.

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.

Finally, Phillips Lytle LLP is assisting the Receiver as local counsel in New York in connection with the collection of a clawback judgment.

## 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. *See Wiand v. Montie*, Case No. 8:20-cv-863-TPM-SPF (M.D. Fla.) (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 a 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.

# g. Settled Claims Against Gil and Charis Wilson, Mario Nicolaou, MCN Management Advisors, Inc., and Rocco Garbellano

The Receiver reached pre-litigation settlement agreements with insiders Gil Wilson and Charis Wilson as well as Mario C. Nicolaou and MCN Management Advisors, Inc. Pursuant to the agreements, the Wilsons will pay the Receiver \$107,500 according to an installment schedule. Nicolaou and his entity, MCN Management Advisors, will pay the Receiver \$140,000. Again, 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. On July 31, 2024, the Court granted the Receiver's motion to approve the settlements. *See* Doc. 827.

The Receiver also settled claims against Rocco Garbellano, but that settlement required filing suit and material litigation. Specifically, the Receiver obtained a judgment of \$327,928.51 against Garbellano in the Clawback Action (as defined below). Garbellano then filed bankruptcy in the United States District Court for the Southern District of New York. To resolve those matters, Garbellano will cede his interest in certain real estate to the Receiver. That property will then be sold, and the Receiver will be entitled to retain \$165,000 or the net sale proceeds, whichever is greater. On July 29, 2024, the Receiver moved the Court for approval of the settlement. *See* Doc. 826. That motion is currently pending.

#### h. The DaCorta Criminal Action

As noted above, defendant DaCorta was indicted in a separate but related criminal 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). DaCorta was taken into custody and is in prison. He appealed his conviction, but on May 1, 2024, the Eleventh Circuit affirmed the trial court. *See United States of America v. DaCorta*, Case No. 22-13564 (11th Cir.). As such, this matter is concluded.

### 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 Receiver's General Clawback Litigation

The Court found that entry of the Consolidated Order was necessary and appropriate for the purposes of marshaling and preserving all assets, including in relevant part, assets that "were fraudulently transferred by the Defendants and/or Relief Defendants." Doc. 177 at 2. The Court also authorized the Receiver "to sue for and collect, recover, receive and take into possession all Receivership Property" (*id.* ¶ 8.B.) and "[t]o bring such legal actions based on law or equity in any state, federal, or foreign court as the Receiver deems necessary or appropriate in discharging his duties as Receiver" (*id.* ¶ 8.I.). Similarly, the Court authorized, empowered, and directed the Receiver to "prosecute" actions "of any kind as may in his discretion, and in consultation with the CFTC's counsel, be advisable or proper to recover and/or conserve Receivership Property." *Id.* ¶ 43.

Pursuant to that mandate, the Receiver obtained pre-suit clawback settlements collectively worth \$246,497.09. On April 14, 2020, the Receiver filed a 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.

### b. 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

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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.

### c. 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 <u>Receiver's website</u>. 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.

### **3.** Contemplated Litigation

As mentioned above, the Receiver is asserting claims against sales agents and others (like Clark, Portela, Marchiony, Dribusch, the Wilsons, Nicolaou, and MCN Management Advisors) 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-g. 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 through 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.<sup>17</sup> 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.

<sup>&</sup>lt;sup>17</sup> 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, were required to have been negotiated within 120 days - i.e., by August 4, 2023. After 120 days, unnegotiated checks became null

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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 sent 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 (<u>www.oasisreceivership.com</u>) 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 by phone at 727-460-4679 or by email <u>Burt@BurtonWWiandPA.com</u>.

Dated this 31st day of July 2024.

Respectfully submitted,

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

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 31, 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

Maya Lockwood, FBN 0175481 <u>mlockwood@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** A

	Standardize							
	Standardized Accounting Rep			-		eceiv	rership	
	Civil Court Dock	et N	No. 8:19-cv-0	088	6-VMC-SPF			
	Reporting Per	iod	04/01/2024 t	:o 06	5/30/2024			
			Details		Subtotal		Grand Total	Notes
Line 1	Beginning Balance (As of 04/01/2024)					\$	10,882,496.18	
	Increases in Fund Balance							
Line 2	Business Income							
Line 3	Cash and Securities							
Line 4	Interest/Dividend Income	\$	25,474.44					Interest Income
Line 5	Asset Liquidation	\$	1,291.50					Items Auctioned
Line 6	Third-Party Litigation Income	\$	19,796.89					Settlements
Line 7	Other Miscellaneous	\$	700.00					Reissue Fees
	Total Funds Available - Totals Line 1 - 7			\$	47,262.83	\$	10,929,759.01	
				1	,			
		I				1		1
	Decreases in Fund Balance							
Line 9	Disbursements to Investors				8,981,536.33			
Line 10	Disbursements for Receivership Operations							
10.a.	1 Receiver	\$	40,525.76					
10.a.:	2 Guerra King	\$	104,228.08					Professional Fees
10.a.	3 KapilaMukamal LLP	\$	77.18					Professional Fees
10.a.	4 PDR Certified Public Accts	\$	7,821.25					Professional Fees
	5 RPM Financial							Professional Fees
	6 Englander Fisher							Professional Fees
	7 The RWJ Group	\$	627.50					Professional Fees
	8 E Hounds	\$	13,315.00					Professional Fees
	9 Maples Group	\$	-					Professional Fees
	0 Jared J Perez PA	\$	30,548.95					Professional Fees
	1 Other Professional Fees	\$	6,216.50					Professional Fees
	0 Total Disbursements to Receiver/Professionals			\$	203,360.22			
	b Third-Party Litigation Expenses							
	c Asset Expenses				243.52			Bank Charges
10	d Tax Payments			0	202 (02 74			
	Total Disbursements for Receivership Ops.			\$	203,603.74			
Line 11	Disbursements Related to Distribution Expenses	1 5 						
Line 12	Disbursement to Court/Other							
Line 13	Other							
	Total Funds Disbursed - Total Lines 9 - 13					\$	9,185,140.07	
Line 14	Ending Balance (as of 06/30/2024)					\$	1,744,618.94	

r			ting Report Form		
	Standardized Accoun		-	-	
	Civil Cou		9-cv-00886-VMC-	SPF	
		From Inception to	o 06/30/2024	1	1
				Grand	
		Details	Subtotal	Total	Notes
Line 1	Beginning Balance			_	
Enic I	Deginning Dulance				
	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	\$ 760,165.79			Interest Income
Line 5	Asset Liquidation	\$ 7,900,650.41			Sale of Real Estate/Misc.
Line 6	Third-Party Litigation Income	\$ 5,344,032.83			Settlements, etc
Line 7	Other Miscellaneous	\$ 7,787,974.26			Remitted Funds & Misc.
		,			
	Total Funds Available - Totals Line 1 - 7		\$31,004,740.75	\$ 31,004,740.75	
T · 0	Decreases in Fund Balance		¢10.042.402.22		
Line 9	Disbursements to Investors		\$18,842,493.32		
	Disbursements for Receivership Operations 1 Receiver	¢ 515.9(1.22			Des Constant Des a
		\$ 515,861.22			Professional Fees
	2 Guerra King	\$ 2,158,639.32			Professional Fees
	3 KapilaMukamal LLP	\$ 320,452.44			Professional Fees
	4 PDR Certified Public Accts	\$ 102,746.85			Professional Fees
	5 RPM Financial	\$ 84,036.92 • 524 401 10			Professional Fees
	6 Englander Fisher	\$ 534,401.18			Professional Fees
	7 The RWJ Group	\$ 100,636.30 \$ 1(2,817.07			Professional Fees
	8 E Hounds	\$ 163,817.97 \$ 54,811.00			Professional Fees Professional Fees
	9 Maples Group- 0 Jared J. Perez	\$ 54,811.60 \$ 125,442.00			
		\$ 135,442.06 \$ 08,244.56			Professional Fees
	1 Other Professional Fees	\$ 98,244.56	¢ 1 2 (0 000 12		Professional Fees
	a Total Disbursements to Receiver/Professionals		\$ 4,269,090.42		
	o Third-Party Litigation Expenses		\$ 42,160.00		
	c Asset Expenses		\$ 357,181.93		Condo Fees, Insurance
10	1 T. D. martin		¢ 100 117 20		Repairs, Maint & Utilities
100	d Tax Payments		\$ 109,117.36 \$ 4,777,549.71		County Sales & Propery Tax
	Total Disbursements for Receivership Ops.		\$ 4,777,349.71		
Line 11	Disbursements Related to Distribution Expense	l S			
	1				
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			\$ 29,260,121.81	
	Total Fullus Disburseu - Total Ellies 9 - 13			\$ 29,200,121.81	
Line 14	Ending Polones (as of 06/20/2024)			¢ 1744 (19.04	
Line 14	Ending Balance (as of 06/30/2024)			\$ 1,744,618.94	

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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	734 Second Interim Distribution Checks Issued
	No. of Claimants/Investors Paid	732 First Interim Distribution Checks Issued;
16b	Since Inception of Estate	734 Second Interim Distribution Checks Issued

Receiver:

1 Sunchem 2 By: \_\_\_\_ Signature

Burton W. Wiand, Receiver

Printed Name

Date: 7/30/2024

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# EXHIBIT B

Page 2 of 4 PageID 18726
Filed 07/31/24
Document 828-2
Case 8:19-cv-00886-VMC-SPF

Account Name by Party or Affiliate	Account	Authorized Signer(s)	Bank	Account Type	Status	Still Frozen	Liquidated
13318 Lost Key Place, LLC	*2850	Michael Dacorta	Wells Fargo	Simple Business Checking	Liquidated	\$0.00	\$490.97
4064 Founders Club Drive, LLC	*3975	Joseph S. Anile II; MaryAnne E. Anile	Wells Fargo	Business Choice Checking	Liquidated	\$0.00	\$10,383.26
4064 Founders Club Drive, LLC	*1807	Joseph S. Anile II; MaryAnne E. Anile	Wells Fargo	Business Platinum Savings	Closed	\$0.00	\$0.00
444 Gulf of Mexico Drive, LLC	*3967	Michael Dacorta; Joseph S. Anile II	Wells Fargo	Simple Business Checking	Liquidated	\$0.00	\$15,600.10
40aks, LLC	*2572	Joseph S. Anile II; MaryAnne E. Anile	Wells Fargo	Business Choice Checking	Liquidated	\$0.00	\$30,910.45
6922 Lacantera Circle, LLC	*2805	Michael Dacorta	Wells Fargo	Simple Business Checking	Liquidated	\$0.00	\$37,929.49
Bowling Green Capital Management	*7485	Joseph S. Anile II; MaryAnne E. Anile	Capital One	Small Business Rewards Checking	Liquidated	\$0.00	\$6,173.59
Francisco Duran Francisco Duran	*9152 *0568	Francisco Duran Francisco Duran; Lauren K Duran	JPMorgan Chase JPMorgan Chase	Total Checking Checking	Liquidated Liquidated	\$0.00 \$0.00	\$309.24 \$1,097.04
Francisco Duran Francisco Duran Francisco Duran	*1192 *8083 *9788	Francisco Duran Francisco Duran Francisco Duran	JPMorgan Chase M&I/BMO Harris M&I/BMO Harris	Total Checking Checking Checking	Liquidated Closed Closed	\$0.00 \$0.00 \$0.00	\$4,174.69 \$0.00 \$0.00
Francisco Duran or Rebecca C. Duran	*2550	Francisco Duran; Rebecca C. Duran	SunTrust	Checking	Closed	\$0.00	\$0.00
John J. Haas John J. Haas	*0245 *5029	John J. Haas John J. Haas	TD Bank Jovia (f/k/a Nassau Educators Federal Credit Union)	Checking Go Green Checking	Liquidated Income Account, Settlement	\$0.00 \$0.00	\$31,065.79 \$0.00
John J. Haas John J. Haas; Lillian Haas	TBD *2105	John J. Haas John J. Haas	Equity Trust TD Bank	IRA Checking	Settlement Liquidated	\$0.00 \$0.00	\$0.00 \$4,362.80
John J. Haas; Lillian Haas	*9201	John J. Haas	TD Bank	Savings	Liquidated	\$0.00	\$1,001.23
John J. Haas, Inc. John J. Haas	*2488 *1211	John J. Haas John J. Haas	TD Bank Knights of Columbus Insurance	TD Business Convenience Plus Cash Surrender Value	Liquidated Settlement	\$0.00 \$0.00	\$517.83 \$0.00

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Account Name by Party or Affiliate	Account	Authorized Signer(s)	Bank	Account Type	Status	Still Frozen	Liquidated
John J. Haas	*0715	John J. Haas	Knights of Columbus Insurance	Cash Surrender Value	Settlement	\$0.00	\$0.00
Joseph S. Anile II	*7857	Joseph S. Anile II	Regions	Savings	Disputed	\$5,000.75	\$0.00
Joseph S. Anile II	*8241	Joseph S. Anile II	Regions	Lifegreen Checking	Liquidated	\$0.00	\$3,123.20
Lagoon Investments, Inc.	*1522	Michael Dacorta; loseph S. Anile II.	Regions	Business Checking	Liquidated	\$0.00	\$17,889.07
Mainstream Fund	*1174	Denise DePaola;	Citibank	Savings	Unfrozen by Agreement	\$0.00	\$0.00
Mainstream Fund	*5606	Denise DePaola;	Citibank	Checking	Unfrozen by	\$0.00	\$0.00
Services, Inc.		Michael Nolan		)	Agreement		
Mainstream Fund Services. Inc.	*0764	Denise DePaola; Michael Nolan	Citibank	Checking	Liquidated	\$0.00	\$0.00 \$6,012,397.78
Michael DaCorta	*1424	Michael Dacorta	Wells Fargo	Everyday Checking	Liquidated	\$0.00	\$751.54
Michael DaCorta	*0387	Michael Dacorta	АХА	Annuity Policy	Terminated 7/15/16	\$0.00	\$0.00
Michael DaCorta	TBD	Michael Dacorta	PNC	N/A	N/A	\$0.00	\$0.00
Michael DaCorta;	*0386	Michael Dacorta	People's United	N/A	N/A	\$0.00	\$0.00
Carolyn DaCorta							
Oasis Management, LLC	*9302	Michael Dacorta	Wells Fargo	Business Package Checking	Liquidated	\$0.00	\$2,149,654.18
Oasis Management, LLC	*3887	Michael Dacorta	Wells Fargo	Market Rate Savings	Liquidated		\$605.33
Oasis Capital Management S.A.	*6058	TBD	British Caribbean Bank International	N/A	Closed	\$0.00	\$0.00
Oasis Capital	*1200	TBD	Belize Bank	N/A	Closed	\$0.00	\$0.00
Management S.A.			International, Ltd.				
Oasis Global (Nevis) Ltd.	*9631	TBD	Bank of America	Busines Checking	Closed	\$0.00	\$0.00
Oasis Global FX Limited	*4622	Joseph S. Anile II	Choice Bank (Belize)	Liquidator Appointed	See Report	\$0.00	\$55,960.78
Oasis Global FX, S.A.	*0055	Joseph S. Anile II	Barclays Bank/ATC	Closed "Trading" Account	See Report	\$0.00	\$2,005,368.28
Oasis Global FX, S.A.	*5663	Joseph S. Anile II	Choice Bank (Belize)	N/A	Closed	\$0.00	\$0.00
Oasis Global FX, S.A.	*6059	Joseph S. Anile II	Heritage Bank	Deposit for Broker Activity	See Report	\$0.00	\$497,148.87
Ravmond D Montie	*1510	Raymond D Montie	AXA/Founitable	401k Plan	Sattlament	¢ΟΟΟ	¢υ υυ
Raymond P. Montie	*8414	Raymond P. Montie	Federal Savings Bank; First SeaCoast Bank	Checking	Income Account,	\$0.00	\$0.00
					Settlement		
Raymond P. Montie	*1574	Raymond P. Montie	Fidelity Investments	IRA Account	Settlement	\$0.00	\$0.00

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Raymond P. Montie*4500RaymoRaymond P. Montie*2805RaymoRaymond P. Montie*3802RaymoRaymond P. Montie*3148RaymoRaymond P. Montie;*3934RaymoDanielle TerraNova*6068RaymoRPM 7 LLC*1952RaymoRPM 7 LLC*1952RaymoRPM 7 LLC*1952Raymo	Raymond P. Montie Raymond P. Montie Raymond P. Montie Raymond P. Montie Raymond P. Montie Raymond P. Montie	Fidelity Investments TD Bank TD Bank TD Bank TD Bank TD Bank	Investment Account Premier Checking Savings TD Beyond Checking; Old Income Account; Closed by TD Bank	Underwater Liquidated	-\$24.82	¢0 00
*2805 *3802 *2148 *3934 *6068 *1952 *1952	mond P. Montie mond P. Montie mond P. Montie mond P. Montie mond P. Montie	TD Bank TD Bank TD Bank TD Bank TD Bank	Premier Checking Savings TD Beyond Checking; Old Income Account; Closed by TD Bank	Liguidated		20.05
*3802 *2148 *3934 *6068 *1952 *6076	mond P. Montie mond P. Montie mond P. Montie mond P. Montie	TD Bank TD Bank TD Bank TD Bank	Savings TD Beyond Checking; Old Income Account; Closed by TD Bank		\$0.00	\$138,508.73
*2148 *3934 *6068 *1952 *6076	mond P. Montie mond P. Montie mond P. Montie	TD Bank TD Bank TD Bank	TD Beyond Checking; Old Income Account; Closed by TD Bank	Settlement	\$0.00	\$0.00
*3934 *6068 *1952 *6076	mond P. Montie mond P. Montie mond P. Montie	TD Bank TD Bank		Closed	\$0.00	\$0.00
*6068 *1952 *6076	mond P. Montie mond P. Montie	TD Bank	Relationship Checking	Closed	\$0.00	\$0.00
*1952 *6076	mond P Montie		Business Convenience Plus	Liquidated	\$0.00	\$2.395.63
*6076		ID Bank	Business Convenience Plus	Liquidated	\$0.00	\$7,834.46
	Raymond P. Montie	TD Bank	N/A	Closed	\$0.00	\$0.00
RPM 7 LLC *6430 Raymo	Raymond P. Montie	TD Bank	N/A	Closed	\$0.00	\$0.00
RPM 7 LLC *6638 Raymo	Raymond P. Montie	TD Bank	N/A	Closed	\$0.00	\$0.00
Diamond BOA LLC *0306 Raymo	Raymond P. Montie	TD Bank	Business Convenience Plus	Liquidated	\$0.00	\$8,130.54
Goose Pond Consulting *9658 Raymo Daniell	Raymond P. Montie; Danielle TerraNova	NBT Bank	Free Business Checking	Settlement	\$0.00	\$0.00
Roar of the Lion Fitness, LLC *1396 Michae Andrev	Michael Dacorta; Andrew Dacorta	Wells Fargo	Business Choice Checking	Liquidated	\$0.00	\$17,704.97
Satellite Holdings Company *808 John Haas	n Haas	Wells Fargo	Market Rate Savings	Liquidated	\$0.00	\$500.42
Satellite Holdings Company *5347 John Haas	n Haas	Wells Fargo	General Operating Checking	Liquidated	\$0.00	\$127,921.13

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# EXHIBIT C

		Estimated Value		Actual Value
Property	Units	or Purchase Price	Lien Status or Disposition	or Sale Price
Defendant Anile/A064 Founders Club Drive				
2015 Marcades Banz SIK 350	-	\$28 050 DD	\$0.00 Eorfeited: Sold: Returned: Resold	\$23 000 00
2016 Mercedes Benz GLE 400		\$37,000.00	\$0.00 Forfeited; Sold	\$31,027.50
100 Ounce Silver Bars	100	\$150,900.00	\$0.00 Forfeited; Sold; Listed Price is for all Metals	\$657,382.25
One Ounce Gold Coins	200	\$255,320.00	\$0.00 Forfeited; Sold; Listed Price is for all Metals	\$657,382.25
U.S. Currency	N/A	\$62,750.00	\$0.00 Forfeited; In USMS/FBI Custody; Remission TBD	\$62,750.00
Quietsource 48KW Generator	1	\$28,017.00	\$0.00 Sold by Receiver	\$12,500.00
Pool Table	Ч	TBD	\$0.00 Receiver Seeking Return from Anile	TBD
Piano	1	\$1,000.00	\$0.00 Sold by Receiver	\$1,000.00
Jewelry	Misc.	\$60,749.00	\$0.00 Receiver Seeking Return from Anile	TBD
Bedroom Set	1	\$1,000.00	\$0.00 Sold by Receiver	\$1,000.00
Grandfather Clock	1	TBD	\$0.00 Receiver Seeking Return from Anile	TBD
Large Bird Cage/Misc. Items	Misc.	\$372.75/Misc.	\$0.00 Sold by Receiver	\$372.75/Misc.
Misc. Household Items and Furniture	59	\$6,000.00	\$0.00 Auctioned (Gross Sale Price)	\$17,875.00
Defendant DaCorta/13318 Lost Key Place/6922 Lacantera	zz Lacante	Circle		
2017 Maserati Ghibli S Q4	1	\$60,800.00	\$43,528.88 Forfeited; Abandoned After Further Investigation	n \$0.00
2018 Land Rover Range Rover Velar	1	\$57,825.00	\$0.00 Forfeited; Sold	\$48,462.00
2015 Land Rover Range Rover Evoque	1	\$25,100.00	\$26,129.29 Abandoned Due to Lack of Value Given Lien	\$0.00
100 Ounce Silver Bars	64	\$96,576.00	\$0.00 Forfeited; Sold; Listed Price is for all Metals	\$657,382.25
\$1.00 Silver One Ounce Coins	1,500	\$22,635.00	\$0.00 Forfeited; Sold; Listed Price is for all Metals	\$657,382.25
Credit Suisse One Ounce Gold Ingots	ŝ	\$3,829.80	\$0.00 Forfeited; Sold; Listed Price is for all Metals	\$657,382.25
APMEX.com One Ounce Silver Coins	ъ	\$75.45	\$0.00 Forfeited; Sold; Listed Price is for all Metals	\$657,382.25
Lady Liberty \$50 Gold One Ounce Coins	7	\$8,629.80	\$0.00 Forfeited; Sold; Listed Price is for all Metals	\$657,382.25
Lady Liberty \$50 Gold One Ounce Coins	40	\$48,000.00	\$0.00 Forfeited; Sold; Listed Price is for all Metals	\$657,382.25
Lady Liberty \$1.00 Silver One Ounce Coins	120	\$2,400.00	\$0.00 Forfeited; Sold; Listed Price is for all Metals	\$657,382.25
"Bitcoin" One Ounce Gold-Plated Coin	1	\$1.00	\$0.00 Forfeited; Sold; Listed Price is for all Metals	\$657,382.25
U.S. Currency	N/A	\$160,000.00	\$0.00 Forfeited; In USMS/FBI Custody; Remission TBD	\$160,000.00
Handgun	1	\$517.00	\$0.00 Receiver Seeking Return from DaCorta	TBD
Coffee Table	1	\$200.00	\$0.00 Sold by Receiver	\$200.00
Televisions	2	\$200.00	\$0.00 Sold by Receiver	\$200.00
Safe	Η	\$200.00	\$0.00 Sold by Receiver	\$200.00
Outdoor Speakers	2	\$150.00	\$0.00 Sold by Receiver	\$150.00

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Pool Table Chairs Sauna Quietsource 48KW Generator Misc. Household Items and Furniture	2 1 50	\$300.00 \$4,200.00 \$24,969.81 \$2,000.00	\$0.00 Sold by Receiver \$0.00 Sold by Receiver \$0.00 Not Delivered; Unrecoverable \$0.00 Auctioned (Gross Sale Price)	\$300.00 \$4,200.00 \$0.00 \$1,465.00
Defendant Duran/7312 Desert Ridge Glen 2018 Porsche 911 C4 Targa 2018 Mercedes Benz Convertible SL 450R 2019 Land Rover Range Rover Sport Swiss Watch Golf Cart Televisions Misc. Household Items and Furniture	2 2 1 1 1 1 1 2	\$113,375.00 \$65,825.00 \$0.00 \$10,900.00 \$5,500.00 \$1,000.00 \$1,000.00	<ul> <li>\$90,898.75 Forfeited; Sold</li> <li>\$83,611.29 Abandoned Due to Lack of Value Given Lien</li> <li>\$0.00 Leased; Not Seized Due to Lack of Value</li> <li>\$0.00 Receiver Seeking Return from Duran</li> <li>\$0.00 Sold by Receiver</li> <li>\$0.00 Sold by Receiver</li> <li>\$0.00 Auctioned (Gross Sale Price)</li> </ul>	\$104,902.50 \$0.00 \$0.00 \$4,750.00 \$2,160.00 \$2,160.00
Defendant Montie 1996 Mercedes Benz 500SL 2016 Toyota 4Runner 2009 South Bay Pontoon Boat Furniture Located in PA House Furniture Located in NY House Furniture Located in NY House Standard Oil Company, Inc. Stock Ounces of Silver Firearms	1 1 Misc. Misc. Misc. 60,606 990 19	\$2,167.00 \$22,885.00 \$11,590.00 TBD \$0.00 \$0.00 TBD \$17,087.00 \$8,290.00	<ul> <li>\$0.00 Sold; Escrowed</li> <li>\$12,180.85 Disclosed in 8/30/19 Financial Affidavit</li> <li>\$0.00 Disclosed in 8/30/19 Financial Affidavit</li> </ul>	\$10,500.00 Settlement Settlement Settlement \$50.00 Settlement Settlement Settlement
Defendant Haas 2012 Mercedes Benz GLK 350 (black) 2012 Mercedes Benz GLK 350 (silver) 1966 Ford LTD (gold) 1966 Ford LTD (green) 1959 GMC 100 Truck 2014 Ford Escape 2013 Horton Trailer Household Furniture Auto Parts	Misc. 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	\$2,800.00 \$10,000.00 \$2,500.00 \$5,000.00 \$12,000.00 \$12,000.00 \$12,000.00 \$12,000.00 \$12,000.00 \$100.00	<ul> <li>\$0.00 Disclosed in 6/24/19 Financial Affidavit; Updated</li> <li>\$0.00 Disclosed in 6/24/19 Financial Affidavit; Updated</li> <li>\$0.00 Disclosed in 6/24/19 Financial Affidavit; Disposed</li> <li>\$0.00 Disclosed in 6/24/19 Financial Affidavit; Repairs</li> <li>\$0.00 Disclosed in 6/24/19 Financial Affidavit; L. Haas</li> <li>\$0.00 Disclosed in 6/24/19 Financial Affidavit; Updated</li> <li>\$0.00 Disclosed in 6/24/19 Financial Affidavit; Varies</li> <li>\$0.00 Disclosed in 6/24/19 Financial Affidavit; Varies</li> </ul>	Settlement Settlement Settlement Settlement Settlement Settlement Settlement Settlement

Relief Defendant 40aks, LLC (Anile)				
2015 Ferrari California T	ĊI	\$174,300.00	\$0.00 Forfeited; Sold	\$100,470.00
<b>Relief Defendant Roar of the Lion Fitness, LLC</b>				
Nutritional Supplement Capsules	11,247	\$0.00	\$0.00 Disposed - No Commercial Value	\$0.00
Promotional Yoga Mats and Hats	357	\$0.00	\$0.00 Donated to Charity	\$0.00
Nutritional Protein Powder	1805	\$0.00	\$0.00 Disposed - No Commercial Value	\$0.00
Nutritional "Pre-Workout" Powder	876	\$0.00	\$0.00 Disposed - No Commercial Value	\$0.00
Nutritional Creatine Powder	861	\$0.00	\$0.00 Disposed - No Commercial Value	\$0.00

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# **EXHIBIT 3**

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## 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	August 14, 2	024
Attention: Burton W. Wiand, as Receiver	Client:	025305
Burton W. Wiand PA	Matter:	001921
114 Turner Street	Invoice #:	21582
Clearwater, FL 33756		
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RE: CFTC Oasis Receivership(Receiver) Travel is half rate outside of 20 miles.

For Professional Services Rendered Through June 30, 2024

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
4/2/2024	BWW	Review correspondence from A. Cruz to Idaho counsel regarding status of filing action against IPM (.1).	0.1	\$36.00
4/3/2024	BWW	Review correspondence from A. Cruz to Idaho attorney regarding status of filing (.1); review motion to compel filed in Idaho against IPM and respond to same (.2); review incoming wire for settlement payment from J. Haas (.1); review correspondence from E. Tate regarding same (.1); review response from C. Ellis regarding method for future payments (.1).	0.6	\$216.00
4/4/2024	BWW	Review settlement agreement signed by G. and C. Wilson (.1).	0.1	\$36.00
4/5/2024	BWW	Review correspondence from A. Cruz to M. Nicolaou regarding status of settlement agreement (.1).	0.1	\$36.00
4/10/2024	BWW	Review and sign settlement agreements for G. and C. Wilson and M. Nicolaou (.3).	0.3	\$108.00
4/11/2024	BWW	Review correspondence from A. Avery regarding status of M. Utter subpoena (.1); call with M. Lockwood regarding same (.1); review correspondence from M. Lockwood confirming service of service of subpoena on M. Utter (.1).	0.3	\$108.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset /	Analysis and Recovery		
4/12/2024	BWW	Review correspondence and response to subpoena filed by IPM (.2); correspond with C. Ellis, A. Cruz, M. Lockwood, and local counsel regarding same (.1); prepare correspondence to C. Ellis and M. Lockwood regarding status of subpoena to New York lawyer (.1); correspond with P. McMillan regarding status on locating additional subpoena target (.1).	0.5	\$180.00
4/15/2024	BWW	Review correspondence from C. Ellis to local counsel regarding IPM's response to subpoena (.1); review correspondence from C. Ellis regarding moving to strike same (.1); review correspondence and pleadings from local counsel regarding same (.1); review draft subpoena to New York lawyer and attachment (.1).	0.4	\$144.00
4/16/2024	BWW	Call with J. Sallah regarding M. DaCorta's criminal proceedings transcripts (.2); call with E. Tate regarding same (.1); review and download D. Cheslow and B. Lyle documents (2.0); correspond with J. Sallah and E. Tate regarding same (.3).	2.6	\$936.00
4/19/2024	BWW	Review information regarding ATC Brokers Limited (.2); forward same to J. Sallah, J. Katz, and P. Rengstl for review (.1); review briefs from 11th Circuit Court of Appeals regarding M. DaCorta matter (.3).	0.6	\$216.00
4/23/2024	BWW	Correspond with C. Ellis regardng status of subpoena to Intermountain Precious Metals and response due from M. Utter (.2); review response from M. Lockwood regarding same (.1); review correspondence from M. Lockwood to attorney for M. Utter regarding late response to subpoena (.1); review response from M. Lockwood regarding receipt of documents from attorney for M. Utter (.1); participate in Zoom call with R. Bedke, FBI agent, J. Perez, and M. Lockwood (1.0).	1.5	\$540.00
4/24/2024	BWW	Review information produced by M. Utter (1.0); review correspondence from M. Lockwood regarding status of documents to be provided to FBI/DOJ (.1).	1.1	\$396.00
4/25/2024	BWW	Review correspondence from M. Lockwood and U.S. Attorney's office regarding documents provided (.1); review and designate documents for J. Sallah (3.0); calls with E. Tate regarding same (.3).	3.4	\$1,224.00
4/26/2024	BWW	Review correspondence from Idaho counsel and order granting extension of time to file reply brief in support of motion to compel compliance with non-party subpoena duces tecum and for sanctions against IPM (.1); correspond with J. Perez regarding same (.1); continue reviewing and gathering documents for J. Sallah (2.0); correspond with E. Tate regarding same (.1).	2.3	\$828.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
4/28/2024	BWW	Call with E. Tate regarding documents to send to J. Sallah (.2).	0.2	\$72.00
4/29/2024	BWW	Review correspondence from E. Tate regarding status of documents for J. Sallah (.1).	0.1	\$36.00
5/1/2024	BWW	Review email and information regarding extension in M. DaCorta's appeal (.2); correspond with J. Perez regarding same (.1); review 11th Circuit's affirmance of M. DaCorta's criminal conviction (.2); exchange emails with S. Batsch and J. Perez regarding same (.2).	0.7	\$252.00
5/2/2024	BWW	Review opinion from 11th Circuit Court of Appeals denying M. DaCorta's appeal (.2); correspond with J. Perez regarding same (.1); work with J. Perez on reply to IPM's objection to subpoena (.5); review C. Ellis' revision to same (.1); review and approve final version of same (.1).	1.0	\$360.00
5/3/2024	BWW	Correspond with C. Ellis regarding C. Huckabee's deposition (.1); review correspondence and documents provided by J. Perez to Idaho counsel for filing reply in support of motion to compel against IPM (.1); review filed documents received from Idaho counsel (.1); review email regarding D. Clark's deposition (.2); review summary of C. Huckabee's deposition (.2); correspond with C. Ellis regarding same (.1).	0.8	\$288.00
5/4/2024	BWW	Perform license search for C. Huckabee and provide findings to C. Ellis, J. Perez, and M. Lockwood (.3); correspond with E. Tate regarding approving process for transmitting documents to J. Sallah (.1).	0.4	\$144.00
5/5/2024	BWW	Correspond with E. Tate regarding status of documents for J. Sallah (.1); review and approve correspondence to J. Sallah regarding same (.1).	0.2	\$72.00
5/6/2024	BWW	Review mandate issued by court of appeals in ATC matter (.1); correspond with J. Perez, J. Katz, P. Rengstl, and J. Sallah regarding same (.2); review mandate for 11th Circuit regarding reversal of ATC decision (.3); communicate with counsel regarding court filings (.2).	0.8	\$288.00
5/13/2024	BWW	Review motion for extension to file motion and emails regarding same (.2).	0.2	\$72.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
5/14/2024	BWW	Correspond with C. Ellis regarding status of subpoena issued to New York attorney (.1); review response from C. Ellis with draft subpoena to same (.1); review and edit same (.5); correspond with C. Ellis regarding same (.1); exchange emails with C. Ellis regarding status of M. DaCorta's appeal and judgment (.1); review correspondence from C. Ellis to R. Kurpiers regarding motion for extension (.1); correspond with C. Ellis regarding same (.1); correspond with R. Bedke regarding same (.1); review filed copy of same (.1).	1.3	\$468.00
5/16/2024	BWW	Attend to subpoena to New York lawyer (.2); exchange emails with C. Ellis and M. Lockwood regarding same (.1).	0.3	\$108.00
5/17/2024	BWW	Review final subpoena to New York attorney (.1).	0.1	\$36.00
5/21/2024	BWW	Review sur-reply by special appearance in support of motion to compel Intermountain Precious Metal's compliance with subpoena and for sanctions (.1); review R. Kurpiers' response to C. Ellis indicating he no longer represents M. DaCorta (.1); communicate with C. Ellis regarding same (.1).	0.3	\$108.00
5/22/2024	BWW	Review correspondence from M. Lockwood regarding communication with New York attorney regarding requesting acceptance of service by email (.1).	0.1	\$36.00
5/30/2024	BWW	Exchange correspondence with M. Lockwood regarding perfecting service of subpoena for New York attorney (.2); review draft second amended complaint in ATC Brokers matter provided by J. Katz (.3).	0.5	\$180.00
6/1/2024	BWW	Review and revise draft amended ATC complaint from J. Sallah (1.0).	1.0	\$360.00
6/3/2024	BWW	Review draft amended complaint in ATC matter (.4); telephone conference with J. Sallah regarding same (.6); review and edit subpoenas to UPS store and J. McKee (.3); review docket notice regarding M. DaCorta's appeal (.1); review insider subpoenas (.5).	1.9	\$684.00
6/4/2024	BWW	Review amended notice of issuance of subpoena to produce documents to New York attorney (.1).	0.1	\$36.00
6/10/2024	BWW	Review correspondence from M. Lockwood (.1).	0.1	\$36.00
6/11/2024	BWW	Review notice of issuance of subpoenas to produce documents to J. McKee and UPS (.2).	0.2	\$72.00
6/12/2024	BWW	Attend to subpoena to New York attorney (.2).	0.2	\$72.00
6/18/2024	BWW	Correspond with M. Lockwood regarding status of subpoena for New York attorney (.2).	0.2	\$72.00
6/20/2024	BWW	Review correspondence from J. Perez and Idaho court's order to show cause against IPM (.1).	0.1	\$36.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
6/25/2024	BWW	Review status memorandum and documents provided by M. Lockwood (.7); review correspondence from E. Tate regarding same (.1).	0.8	\$288.00
6/26/2024	BWW	Continue review of documents included with status memo from M. Lockwood (.7); telephone call with M. Lockwood regarding same (.3).	1.0	\$360.00
6/27/2024	BWW	Review filed motion to approve settlements with G. and C. Wilson and M. Nicolaou (.1); review correspondence from M. Lockwood and J. Perez regarding status call (.1); review brief filed by M. DaCorta in criminal action (.3).	0.5	\$180.00
6/30/2024	BWW	Schedule planning meeting with J. Perez and M. Lockwood (.1).	0.1	\$36.00
		Total: Asset Analysis and Recovery	27.10	\$9,756.00
BUSIN	Busin	ess Operations		
4/1/2024	BWW	Review bank account statement (.2); review notice from GoDaddy regarding renewal information for Roar of the Lion (.1); review response from R. Rohr regarding same (.1).	0.4	\$144.00
4/3/2024	BWW	Review correspondence from E. Tate regarding updating payment method for GoDaddy renewals (.1); review correspondence from R. Rohr regarding same (.1); review correspondence from W. Price and E. Tate regarding status of tax returns (.1).	0.3	\$108.00
4/4/2024	BWW	Communicate with E. Tate regarding status of tax returns (.1).	0.1	\$36.00
4/8/2024	BWW	Review and approve request to transfer funds provided to ServisFirst Bank by E. Tate (.1); review confirmation from ServisFirst Bank regarding same (.1); review correspondence from E. Tate regarding GoDaddy charges (.1).	0.3	\$108.00
4/11/2024	BWW	Review with R. Rohr renewal of Green Geeks hosting (.1); prepare email to E. Tate regarding same (.1).	0.2	\$72.00
4/16/2024	BWW	Review correspondence from E. Tate and R. Rohr regarding status of credit for GoDaddy cancellations (.1).	0.1	\$36.00
4/18/2024	BWW	Review follow-up correspondence from E. Tate to R. Rohr regarding status of refund from GoDaddy (.1).	0.1	\$36.00
4/19/2024	BWW	Review correspondence from E. Tate regarding automatic renewal for AWS (.1) review response from R. Rohr regarding same (.1).	0.2	\$72.00

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Date	TKPR	Description of Services	Hours	Amount
BUSIN	Busin	ess Operations		
4/24/2024	BWW	Review correspondence from E. Tate and R. Rohr regarding status of refund from GoDaddy (.1); review confirmation of same (.1).	0.2	\$72.00
4/30/2024	BWW	Correspond with E. Tate and R. Rohr regarding update to Amazon RDS and Amazon Aurora SSL/TLS certificates (.1).	0.1	\$36.00
5/1/2024	BWW	Review bank statements (.2); review email from A. Sharp regarding payment to E-Hounds (.2).	0.4	\$144.00
5/3/2024	BWW	Attention to emails relating to external hardware (.5).	0.5	\$180.00
5/4/2024	BWW	Further attention to hardware issues (.2).	0.2	\$72.00
5/5/2024	BWW	Review and approve invoices (.1); telephone conference with M. Lockwood regarding same (.1).	0.2	\$72.00
5/8/2024	BWW	Review and approve invoices (1.0); communicate with M. Lockwood regarding same (.1).	1.1	\$396.00
5/17/2024	BWW	Review correspondence from P. McMillan regarding payment of invoice (.1).	0.1	\$36.00
6/3/2024	BWW	Review bank statements (.2).	0.2	\$72.00
6/17/2024	BWW	Review correspondence between E. Tate and ServisFirst Bank regarding providing access to stop payment requests through eServis (.2); review and sign authorization provided by ServisFirst Bank to add online stop payment service to E. Tate profile (.1).	0.3	\$108.00
		Total: Business Operations	5.00	\$1,800.00
CASE	Case	Administration		
4/17/2024	BWW	Meet with M. Lockwood regarding interim report (.5).	0.5	\$180.00
4/18/2024	BWW	Review draft supplemental report provided by M. Lockwood (1.0); review response to same by K. Paulson (.1); review further revised draft supplemental report and exhibits and respond with additional information (.6); review documents and provide information to M. Lockwood (1.0); review responses from J. Perez and M. Lockwood regarding same (.1).	2.8	\$1,008.00
4/19/2024	BWW	Review further revised draft supplemental report and edits by J. Perez (.5); review edits to same by C. Ellis (.2); review and approve exhibits to supplemental report (.2); review and approve final supplemental report (.3); dictate, review, and approve letter to U.S. Attorneys office regarding filing (.2); review and approve website posting regarding supplemental interim report (.1); review confirmation of posting same (.1); review response from R. Bedke regarding supplemental report (.1).	1.7	\$612.00

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Date	TKPR	Description of Services	Hours	Amount	
CASE	Case Administration				
4/21/2024	BWW	Review response from R. Handberg regarding supplemental report (.1); correspond with R. Bedke regarding scheduling call regarding same (.1).	0.2	\$72.00	
4/22/2024	BWW	Review endorsed order regarding Receiver's supplemental interim report (.1).	0.1	\$36.00	
4/29/2024	BWW	Review correspondence from J. Perez regarding status of interim report (.1).	0.1	\$36.00	
5/1/2024	BWW	Review draft interim report (1.4); correspond with J. Perez regarding same (.1); review correspondence from M. Lockwood regarding same (.1); review, approve, and sign final draft of interim report (.6); attend to website updates (.5).	2.7	\$972.00	
		Total: Case Administration	8.10	\$2,916.00	
CLAIM	Claims	s Administration and Objections			
4/5/2024	BWW	Review and revise draft letter to claimants for second distribution (.2); call with M. Lockwood regarding same (.1).	0.3	\$108.00	
4/9/2024	BWW	Review order granting motion to approve second interim distribution (.1); communicate with M. Lockwood regarding same (.1).	0.2	\$72.00	
4/10/2024	BWW	Review address confirmation form provided by claimant (.1); correspond with M. Lockwood and J. Perez regarding same (.1).	0.2	\$72.00	
4/11/2024	BWW	Review additional address confirmation forms provided by claimants (.2); review summary of same from M. Lockwood (.1); call with M. Lockwood regarding mailing of second distribution checks (.2); prepare for and participate in Zoom meeting regarding submissions from claimants (1.0).	1.5	\$540.00	
4/12/2024	BWW	Review numerous address confirmation forms from claimants (.2); telephone conference with claimant G.C. (.3); telephone conference with K. Paulson regarding same (.1); dictate memo regarding same (.4); review correspondence from M. Lockwood regarding website update for order granting second interim distribution (.1).	1.1	\$396.00	
4/14/2024	BWW	Review documents and correspondence from M. Lockwood regarding claimants' revocation of power of attorney given to B. Winters (.2); call with claimants regarding same (.4).	0.6	\$216.00	

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SERVICES	5			
Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
4/15/2024	BWW	Review additional address confirmation forms provided by claimants (.2); review message from M. Lockwood regarding claimant's concerns (.1); call with claimant regarding same (.2); review email from M. Lockwood regarding claimant who no longer wants to be associated with B. Winters (.1); respond to same (.1); call with claimant regarding same (.2).	0.9	\$324.00
4/16/2024	BWW	Review additional correspondence and information from Oasis Helpers Group (.3); review correspondence from M. Lockwood regarding same (.1); review additional address confirmation documents provided by claimants (.2); communicate with E. Tate regarding status of checks for second distribution and transfer of funds (.2); review correspondence from M. Lockwood and M. Gura and approve amount of funds to be transferred for payment of second distribution (.1).	0.9	\$324.00
4/17/2024	BWW	Review correspondence with M. Lockwood regarding proposed letter to claimants (.1); prepare for and attend Zoom meeting with M. Lockwood, J. Perez, A. Stephens, M. Gura and C. Ellis regarding same (.5); review and approve letter to ServisFirst Bank authorizing transfer of funds for second distribution (.1); review confirmation from ServisFirst Bank regarding same (.1); review additional correspondence from Oasis Helpers Group to claimants regarding requests for funds (.1).	0.9	\$324.00
4/18/2024	BWW	Review additional address confirmation forms provided by claimants (.6); review correspondence and documents regarding Oasis Helpers Group (.2); review correspondence from M. Lockwood regarding status of notification to claimants regarding second distribution (.1).	0.9	\$324.00
4/19/2024	BWW	Review additional address confirmation forms provided by claimants (.3); review correspondence from claimant requesting distribution check not be sent to Winters (.1); review response from K. Paulson regarding same (.1); call with claimant regarding same (.1).	0.6	\$216.00
4/20/2024	BWW	Review additional address confirmation forms provided by claimants (.2); review and approve email to claimants regarding supplemental report (.1); call with M. Lockwood regarding same (.1); review correspondence from K. Paulson regarding denied claims for claimants represented by Winters (.1).	0.5	\$180.00
4/21/2024	BWW	Review additional address confirmation forms provided by claimants (.2); review correspondence from M. Gura regarding claim on denied list (.1); review correspondence from K. Paulson regarding emails from Oasis Helpers Group to claimants (.1).	0.4	\$144.00

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SERVICES	;			
Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claim	s Administration and Objections		
4/22/2024	BWW	Review additional address confirmation forms provided by claimants (.3); review additional correspondence from Oasis Helpers Group to claimants (.1).	0.4	\$144.00
4/23/2024	BWW	Review numerous emails from claimants (.2); review correspondence with A. Stephens regarding responding to newly received final address confirmation forms from claimants (.1); review additional final address confirmation forms provided by claimants (.3); correspond with A. Stephens and M. Lockwood regarding process going forward (.1).	0.7	\$252.00
4/24/2024	BWW	Review various emails from claimants (.3); prepare email to M. Lockwood regarding responses (.2); review responses to claimants (.1).	0.6	\$216.00
4/25/2024	BWW	Review additional address confirmation forms provided by claimants (.2); correspond with M. Lockwood regarding procedure to follow for larger distribution checks (.1); review correspondence from B. Nguyen regarding undeliverable emails to claimants (.1).	0.4	\$144.00
4/26/2024	BWW	Review additional address confirmation forms provided by claimants (.1); communicate with M. Lockwood regarding second distribution (.1):.	0.1	\$36.00
4/27/2024	BWW	Review additional address confirmation forms provided by claimants (.1).	0.1	\$36.00
4/28/2024	BWW	Review additional address confirmation forms provided by claimants (.1).	0.1	\$36.00
4/29/2024	BWW	Review additional address confirmation forms provided by claimants (.1); correspond with claimant regarding same (.1).review correspondence from claimant regarding status of Midland unsecured note (.1).	0.3	\$108.00
4/30/2024	BWW	Review correspondence from E. Tate and claims team regarding process for sending second distributions by wire transfer (.1); review additional address confirmation forms provided by claimants (.2); review correspondence from K. Paulson requesting approval for stop payment on missing first distribution check (.1).	0.4	\$144.00
5/1/2024	BWW	Review correspondence from E. Tate regarding preferred method for processing wire transfers to claimants outside the country (.1); review matters relating to second distribution (.4).	0.5	\$180.00
5/3/2024	BWW	Review address confirmation forms provided by claimants (.1).	0.1	\$36.00
5/4/2024	BWW	Attend to email from C. Nettleton regarding check for distribution (.3).	0.3	\$108.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	s Administration and Objections		
5/5/2024	BWW	Review correspondence from claimant regarding distribution check sent to B. Winters per claimant's instructions (.1); correspond with K. Paulson regarding same (.1); review and approve request from K. Paulson for stop payment on missing first distribution check (.1); exchange correspondence with claimant regarding worthless asset and status of second distribution (.1); correspond with E. Tate regarding same and timing of wire transfers (.1); attend to wire transfer to M.R. (.2); attend to issue regarding stop payment on check for C.C. (.1).	0.8	\$288.00
5/6/2024	BWW	Review and respond to correspondence from claims team regarding responding to claimant regarding distribution check sent to B. Winters per claimant's instructions (.1); further correspondence to M. Lockwood regarding same (.1); review address confirmation forms provided by claimants (.1); review and approve request for stop payment for missing distribution check (.1).	0.4	\$144.00
5/7/2024	BWW	Communicate with ServisFirst Bank regarding distribution checks returned for improper endorsement (.2); correspond with M. Lockwood regarding same (.1); review additional correspondence from claims team regarding same (.2); review confirmation information from ServisFirst Bank for three returned checks (.1); review information for 11 distribution checks returned by the post office (.1); review confirmation of stop payment from ServisFirst Bank (.1); review request to ServisFirst Bank for wire transfers (.1); review correspondence from ServisFirst Bank regarding same (.1); call with ServisFirst Bank to confirm same (.1).	1.1	\$396.00
5/8/2024	BWW	Review correspondence from ServisFirst Bank regarding additional distribution checks returned for improper endorsement (.2); review correspondence from K. Paulson and M. Lockwood regarding same (.1); call with M. Lockwood regarding same (.1).	0.4	\$144.00
5/9/2024	BWW	Review correspondence from E. Tate and ServisFirst Bank regarding transaction reports (.1); review message from claimant regarding recovery of funds (.1); review correspondence from E. Tate, M. Lockwood, and K. Paulson regarding status of cleared distribution checks and representation by B. Winters regarding non-receipt of distribution checks (.1); review confirmation of delivery of same by FedEx on May 2 (.1); review address confirmation forms provided by claimants (.1); review claimant's request for custodial endorsement change (.1); review email from claimant whose check was returned by ServisFirst Bank for lack of endorsement (.1); review correspondence from K. Paulson to ServisFirst Bank regarding same (.1); review response to same from ServisFirst Bank (.1).	0.9	\$324.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
5/10/2024	BWW	Review address confirmation form provided by claimant (.1); review correspondence and voided checks from claimant with custodian change (.1); correspond with claims team regarding approved process and fee to charge for reissuing same (.1); review correspondence from ServisFirst Bank regarding returned check being properly re-deposited (.1); correspond with claims team regarding same (.1); correspond with claimant regarding submission of unnecessary address confirmation form (.1).	0.6	\$216.00
5/13/2024	BWW	Review email from K. and J.M. (.1); review and distribute correspondence from claimant (.1); review check issue relating to M.C. (.2); communicate with K. Paulson regarding check clearance issues (.1); telephone conference with K. Vanater at ServisFirst Bank regarding same (.1); telephone conference with R. Smith at ServisFirst Bank regarding same (.5); work on issues relating to check for corporate claimant (.2); exchange emails with E. Tate and K. Paulson regarding same (.1).	1.4	\$504.00
5/14/2024	BWW	Attend to various matters relating to distribution checks (.5).	0.5	\$180.00
5/15/2024	BWW	Review correspondence from K. Paulson to ServisFirst Bank regarding contact with claimants with rejected checks (.1); correspond with J. Perez and claims team regarding resolution of same (.1); review correspondence from K. Paulson regarding communication from claimant who endorsed and re-deposited rejected check (.1); review correspondence from M. Lockwood regarding possible endorsement issues with B. Winter's clients and requesting approval of email blast (.1); participate in Zoom meeting with M. Lockwood, K. Paulson., E. Tate, and M. Gura regarding second distribution checks (1.0); work with K. Vanater at ServisFirst Bank regarding same (.1); review correspondence from K. Paulson requesting stop payment on missing distribution check (.1); review correspondence from K. Paulson to claimant living in Australia requesting confirmation of wire transfer information (.1); review correspondence from K. Paulson to E. Tate confirming contact information for claimant living in Spain (.1); communicate with DOJ regarding B.G. (.1); communicate with M. Gura regarding same (.2); correspond with M. Lockwood regarding same (.2); correspond with M. Lockwood regarding same (.1).	2.4	\$864.00

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SERVICES	5				
Date	TKPR	Description of Services	Но	urs	Amount
CLAIM	Claims	Administration and Objections			
5/16/2024	BWW	Work on international wire transfer to S. and J.P. (.4); exchange emails with S.P. regarding same (.2); review and authorize wire transfer (.2); telephone conference with ServisFirst Bank regarding same (.2); exchange emails with E. Tate regarding approval of same (.1); review address confirmation form from claimant (.1); review correspondence from ServisFirst Bank regarding successful re-deposit of rejected check (.1); review correspondence from K. Paulson regarding missing distribution check found by claimant (.1); review correspondence from K. Paulson regarding additional rejected check pending re-deposit (.1).		1.5	\$540.00
5/17/2024	BWW	Attend to preparation and review of draft email to Oasis claimants (.5); correspond with M. Lockwood regarding same (.1); request status of distribution checks from claims team (.1); review report from K. Paulson regarding same (.1); further attention to distribution checks (.2); review and process returned distribution checks (.3).	i	1.3	\$468.00
5/18/2024	BWW	Review correspondence from claimant confirming address (.1).		0.1	\$36.00
5/20/2024	BWW	Review correspondence from claims team regarding claimant's inquiry as to status of distribution check and request for B. Winter's contact information (.1); respond to same (.1); review correspondence from M. Lockwood and K. Paulson regarding draft email to send to B. Winters regarding check endorsements (.1); review correspondence from claimant requesting status of distribution check sent to B. Winters (.1); meet with E. Tate regarding returned checks (.1); review email from K. Vanater at ServisFirst Bank regarding rejected check (.1).		0.6	\$216.00
5/21/2024	BWW	Review correspondence from claimant regarding amount of distribution (.1); correspond with K. Paulson regarding same (.1); review distribution check status report from K. Paulson (.1); attend to inquiry from claimant Z.C. (.2).	f	0.5	\$180.00
5/22/2024	BWW	Review request from K. Paulson to E. Tate requesting stop payment on undelivered distribution checks (.1); review correspondence from E. Tate requesting status of check returned by post office (.1); call with E. Tate regarding confirmation of wiring instructions with claimant living in New Zealand (.1).		0.3	\$108.00
5/23/2024	BWW	Review and approve wire transfer to claimant living in New Zealand (.1); review notice of successful transmission of same (.1).		0.2	\$72.00
5/24/2024	BWW	Review detailed email from K. Paulson regarding status of distributions (.1); exchange emails with K. Paulson regarding same (.1).		0.2	\$72.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
5/25/2024	BWW	Review and respond to correspondence from K. Paulson regarding lost distribution check (.1).	0.1	\$36.00
5/29/2024	BWW	Review, save, and circulate distribution checks returned by post office (.2); call with E. Tate regarding status of stop payment on lost distribution check (.1); review correspondence from E. Tate to ServisFirst Bank regarding same (.1).	0.4	\$144.00
5/30/2024	BWW	Review status report of second distribution provided by K. Paulson (.1); respond to same requesting additional information (.1).	0.2	\$72.00
5/31/2024	BWW	Review distribution checks returned by post office and forward copies of same to claims team (.2).	0.2	\$72.00
6/1/2024	BWW	Review and process several returned distribution checks (.3).	0.3	\$108.00
6/4/2024	BWW	Review request from K. Paulson to approve stop payment on lost distribution checks (.1).	0.1	\$36.00
6/5/2024	BWW	Review returned check from claimant with letter requesting reissued check due to custodian change (.1); review response to same from K. Paulson (.1); respond to same authorizing reissuance of distribution check (.1).	0.3	\$108.00
6/6/2024	BWW	Review corresponence from K. Paulson regarding surviving co-claimant's request to reissue check in his name only (.1); review response to same from M. Lockwood (.1); review address confirmation form provided by claimant (.1); review correspondence from M. Lockwood and K. Paulson regarding distribution check inadvertently returned and request to forward to Equity Trust for deposit (.1); review confirmation of forwarding same (.1).	0.5	\$180.00
6/7/2024	BWW	Review status of second distribution provided by K. Paulson (.1).	0.1	\$36.00
6/11/2024	BWW	Process mail from claimants and forward to claims team (.2).	0.2	\$72.00
6/12/2024	BWW	Call with M. Lockwood regarding status of distribution (.4).	0.4	\$144.00
6/14/2024	BWW	Correspond with K. Paulson regardng status of second distribution (.2).	0.2	\$72.00
6/17/2024	BWW	Review report from K. Paulson regarding summary of second distribution (.1); correspond with K. Paulson regarding uncashed distribution checks sent to B. Winters' claimants (.1); review list from K. Paulson and request additional information (.1); correspond with M. Lockwood regarding deceased claimant's joint account with surviving child (.1).	0.4	\$144.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	s Administration and Objections		
6/18/2024	BWW	Review confirmation of stop payments issued on claim distribution checks (.1).	0.1	\$36.00
6/24/2024	BWW	Review and respond to claimant's inquiry regarding M. DaCorta's appeal (.2).	0.2	\$72.00
6/25/2024	BWW	Review email from claimant represented by B. Winters requesting the status of his distributions (.1); send request to claims team requesting letter be sent to claimant explaining why claim was denied (.1); exchange emails with K. Paulson regarding claimants whose checks have not cleared and preparation of email to same (.4).	0.6	\$216.00
		Total: Claims Administration and Obje	30.50	\$10,980.00
		Total Professional Services	70.7	\$25,452.00
DISBURSI	EMENTS			
Date		Description of Disbursements		Amount
E107 [	Del. Servic	es/Messengers		
5/9/2024		FedEx - Ship External Hard Drive with Documents to J. Salla	h	\$47.47
E123 \	Neb-Relate	ed Expenses		
4/1/2024		Web-related expenses - GoDaddy - Web Hosting Plus Rene month) - oasisgloballimited.com -	wal (1	\$36.99
4/3/2024		Web-related expenses - Amazon Web Services - Web Servi	ces	\$284.85
4/11/2024		Web-related expenses - GoDaddy - Renewal and Protection oasisig.com	-	\$110.32
4/11/2024		Web-related expenses - GoDaddy - roarofthelion.com renew	al	\$22.17
4/13/2024		Web-related expenses - GoDaddy - Renewal and Protection oasismgt.com	-	\$110.32
4/15/2024		Web-related expenses - GreenGeeks - main hosting site.		\$203.40
4/24/2024		Web-related expenses - GoDaddy - 1 year Domain, Privacy, Protection renewals - oasisig.info and oasisig.net	and	\$86.32
5/1/2024		Web-related expenses - GoDaddy - Web Hosting Plus Rene month)	wal (1	\$36.99
5/2/2024		Web-related expenses - Amazon Web Services - Web Servi	ces	\$283.15
6/1/2024		Web-related expenses - GoDaddy - Web-site Hosting plus Renewal (1 Month)		\$36.99

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DISBUR	SEMENTS		
Date	Description of Disbursements		Amount
E123	Web-Related Expenses		
6/3/2024	Web-related expenses - Amazon Web Services - Web Services		\$287.37
6/11/202	24 Web-related expenses - GoDaddy - Domain Renewal, Privacy, an Protection (1 year renewal) - oasisinternationalgroupltd.com	d	\$35.16
E124	Other		
5/4/2024	Other - Best Buy - external hard drive for documents to James Sallah.		\$85.59
	Total Disbursements		\$1,667.09
	Total Services	\$25,452.00	
	Total Disbursements	\$1,667.09	
	Total Current Charges		\$27,119.09
	Previous Balance		\$184,186.59
	PAY THIS AMOUNT		\$211,305.68

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### TASK RECAP

### Services

Project No.	Hours	Amount
ASSET - ASSET	27.10	\$9,756.00
BUSIN - BUSIN	5.00	\$1,800.00
CASE - CASE	8.10	\$2,916.00
CLAIM - CLAIM	30.50	\$10,980.00
	70.70	\$25,452.00

### Disbursements

Project No.	Amount
Del. Services/Messengers	\$47.47
Web-Related Expenses	\$1,534.03
Other	\$85.59
	\$0.00
	\$1,667.09

70.70 \$25,452.00

### **BREAKDOWN BY PERSON**

Person		Project No.	lours	Amount
BWW	Burton W. Wiand	ASSET - ASSET	27.10	\$9,756.00
BWW	Burton W. Wiand	BUSIN - BUSIN	5.00	\$1,800.00
BWW	Burton W. Wiand	CASE - CASE	8.10	\$2,916.00
BWW	Burton W. Wiand	CLAIM - CLAIM	30.50	\$10,980.00

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### **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

#### Rendered 04/1/2024 Through 06/30/2024

Date	Timekeeper	r Description of Services		Amount
	ASSET -	Asset Analysis and Recovery		
4/16/24	EPT	Call with Receiver regarding M. DaCorta trial transcripts (.1); create zip file and email to J. Sallah (.1); call with Receiver regarding D.C. and B.L. documents (.1); review correspondence to J. Sallah regarding same (.1); perform search for relevant documents (.2); prepare email to Receiver regarding status of same (.1); monitor downloaded files, create SharePoint link for D.C. files, and provide to J. Sallah (.2); review response from J. Sallah regarding same (.1); correspond with Receiver regarding status of B.L. files (.1); call with J. Sallah's paralegal regarding documents (.1); exchange emails with Receiver regarding status of SharePoint files (.1).	1.3	\$162.50
4/17/24	EPT	Monitor downloaded files, create SharePoint link for requested files, and provide to J. Sallah (.5).		\$62.50
4/25/24	EPT	Call with Receiver regarding documents to send to J. Sallah (.1); monitor file for documents to download (.4); follow-up calls with Receiver regarding same (.3); transfer files as directed and monitor status (.3).		\$137.50
4/28/24	EPT	Check on status of documents to J. Sallah (.1); communicate with Receiver regarding same (.2).		\$37.50
4/29/24	EPT	Work on documents to be provided to J. Sallah (1.7).		\$212.50
4/30/24	EPT	Check on status of files pending upload (.2); work with IT representative on pending documents (1.0); begin transfer of documents to external hard drive (.1).		\$162.50
5/4/24	EPT	Correspond with Receiver regarding documents to provide to J. Sallah (.1); gather, prepare, format, monitor and copy files to external hard drive (2.0); prepare correspondence to J. Sallah regarding same and provide to Receiver for approval (.2); review approval from Receiver and prepare package for delivery to J. Sallah (.3).		\$325.00
5/6/24	EPT	Review email from Receiver with request for mandate issued in ATC case (.1); access Pacer site, download document, and provide copy to Receiver (.1).		\$25.00
		Total: Asset Analysis and Recovery		\$1,125.00
	BUSIN -	Business Operations		
4/1/24	EPT	Business Operations Download, review, and send March bank account statements to PDR, Receiver, and M. Lockwood (.2); review GoDaddy renewal alert for Roar of the Lion (.1); correspond with R. Rohr regarding access to account to process payment (.1).		\$50.00

4/3/24	EPT	Review and verify incoming wire from J. Haas (.1); prepare correspondence to ServisFirst Bank requesting transfer of same to money market account (.1); prepare email to Receiver requesting approval of correspondence (.1); prepare email to A. Cruz and C. Ellis providing money market wiring instructions to be used for future settlement payments (.1); review request from PDR for identification of deposits to money market account in March (.1); research file for information and respond (.2).		\$87.50
4/5/24	EPT	Review notice from Amazon Web Services and provide to R. Rohr for further action (.1); review email from GoDaddy regarding issue with renewal of Roar of the Lion (.1); provide information to Receiver and R. Rohr for further action (.1); call with R. Rohr regarding status of domain renewals and payment information for Roar of the Lion renewal (.3).		\$75.00
4/8/24	EPT	Call with Receiver regarding transfer of funds (.1); finalize and send request to ServisFirst Bank for transfer of J. Haas settlement funds (.1); review confirmation from ServisFirst Bank and provide to PDR and S. Bhullar (.1).		\$37.50
4/11/24	EPT	Review correspondence from Receiver regarding signed settlement agreements (.1): access G. Wilson settlement agreement signed by Receiver (.1); update record and provide document to A. Cruz, C. Ellis, and A. Avery (.1); access M. Nicolaou settlement agreement signed by Receiver (.1); update record and provide document to A. Cruz, C. Ellis, and A. Avery (.1); update record and provide document to A. Cruz, C. Ellis, and A. Avery (.1); update record and provide document to A. Cruz, C. Ellis, and A. Avery (.1); update record and provide document to A. Cruz, C. Ellis, and A. Avery (.1); update record and provide document to A. Cruz, C. Ellis, and A. Avery (.1); update record and provide document to A. Cruz, C. Ellis, and A. Avery (.1).		\$62.50
4/19/24	EPT	Review AWS Route 53 renewal notice from GoDaddy (.1); provide copy of same to Receiver and R. Rohr for further action (.1); review AWS account reminder and provide to R. Rohr for further action (.1).		\$37.50
4/24/24	EPT	Prepare email to R. Rohr regarding status of refund from GoDaddy (.1); review notice of refund and update record regarding same (.1).		\$25.00
5/1/24	EPT	Review and provide bank account statements to Receiver, PDR, and M. Lockwood (.2); review message from B. McConnell regarding response to motion to show cause in D. Lipinczyk clawback case and request additional information (.1); review and process requested document approved by the Receiver for filing, update, and return same to B. McConnell for filing (.2); review standardized account report form signed by the Receiver (.1); update record and provide same to J. Perez for further action (.1).		\$87.50
5/7/24	EPT	Review correspondence from PDR requesting information for deposit in money market account (.1); research file and respond with requested information (.1).		\$25.00
6/3/24	EPT	Download, save and provide May bank account statements to Receiver, M. Lockwood, and PDR (.2).	0.2	\$25.00
6/17/24	EPT	Correspond with ServisFirst Bank regarding request for eService stop payment access for Oasis accounts (.1); correspond with Receiver regarding same (.1).		\$25.00
6/18/24	EPT	Review correspondence from ServisFirst Bank regarding change in online account to add stop payments (.1).		\$12.50
		Total: Business Operations	4.4	\$550.00

	CLAIM -	Claims Administration and Objections			
4/15/24	EPT	Call with M. Gura regarding timeline for distribution checks (.1); correspond with PDR regarding same (.1); review and update record with final address confirmation forms from claimants (.3).	0.5	\$62.50	

4/16/24	EPT	<ul> <li>Call with M. Gura to coordinate delivery of checks from PDR (.1); correspond with Receiver regarding same (.1); review correspondence from M. Gura regarding status of uncashed check from first distribution (.1); search emails, file, and bank records and respond (.3); prepare email to Receiver and claims team regarding amount of funds to transfer for second distribution (.1); call with Receiver regarding same (.1); correspond with PDR regarding delivery and inclusion of blank checks for reissues (.1); call with courier regarding error on delivery address (.1); accept delivery of distribution checks (.1); prepare email to PDR requesting details for marked check (.1); review response from PDR regarding same (.1); begin stamping Receiver's signature on second distribution checks (1.1); review and update record with final address confirmation forms from claimants (.3).</li> </ul>		\$337.50
4/17/24	EPT	Review information from M. Gura and M. Lockwood regarding total amount of funds for second distribution checks (.1); prepare and provide request to ServisFirst Bank regarding same (.1); review confirmation of transfer and provide to PDR, Receiver, and claims team (.1); continue stamping Receiver's signature on second distribution checks (2.2); repackage completed checks (.1); prepare email to M. Lockwood and M. Gura regarding status of checks (.1).		\$337.50
4/18/24	EPT	Call with M. Gura and A. Stephens to coordinate pick-up of distribution checks (.1); prepare package for courier pick-up (.1); review and update record with final address confirmation forms from claimants (.4).		\$75.00
4/19/24	EPT	Review and update record with final address confirmation forms from claimants (.4).	0.4	\$50.00
4/22/24	EPT	Review and update record with final address confirmation forms from claimants (.7); run cleared checks report and provide to M. Lockwood (.1).		\$100.00
4/23/24	EPT	Review and update record with final address confirmation forms from claimants (.1); review reissued checks from PDR and forward to claims team for review (.1); correspond with claims team regarding same (.1); review correspondence from PDR regarding delivery of reissued checks (.1); call with M. Gura regarding same (.1); provide PDR with requested information for check delivery (.1); call with PDR regarding timing for delivery (.1).		\$87.50
4/24/24	EPT	Review and update record with final address confirmation forms from claimants (.3); meet courier to accept reissued checks from PDR (.1); process checks with signature, scan, save to file, and provide copy to claims team (.3).		\$87.50
4/25/24	EPT	Review correspondence from claims team requesting reissued distribution check (.1); review reissued check from PDR (.1); process same with signature, update record, and provide copy to claims team and PDR (.2); correspond with claims team regarding uniformity in mailings and create and print labels for same (.2).	0.6	\$75.00
4/26/24	EPT	Review request from M. Gura to prepare second distribution check for mailing (.1); prepare same (.1); review and update record with final address confirmation forms from claimants (.1).	0.3	\$37.50
4/29/24	EPT	Review and save final address confirmation forms received from claimants (.1); prepare second distribution check for mailing (.1); update record regarding same (.1); prepare email to claims team regarding same (.1).		\$50.00
4/30/24	EPT	Review correspondence from M. Lockwood regarding wiring information for claimants outside the United States (.1); correspond with Receiver regarding same (.1); search		\$75.00

5/1/24	EPT	Review request from K. Paulson regarding status of first distribution check (.1); research file and provide requested information (.2); review and save final address confirmation forms provided by claimants (.1); correspond with Receiver regarding process for wiring second distribution checks (.1); research file and send wiring instructions used in first distribution and forward to K. Paulson for further action (.3); review request from K. Paulson regarding additional information for claimant's wire to two separate Charles Schwab accounts (.1); research file and respond with requested information (.1).		\$125.00
5/5/24	EPT	Correspond with Receiver regarding timing of wire transfer for second distribution (.1); review response from Receiver regarding same (.1); review correspondence from Receiver to claimant regarding IRA account (.1); call with claimant to confirm request for distribution by wire (.1); review correspondence from claimant regarding IRA account and provide same to Receiver for further action (.1).		\$62.50
5/6/24	EPT	Access banking site and initiate wire transfers (.6); correspond with Receiver and claims team regarding same (.1); review request from K. Paulson for bank report (.1); run cleared checks report and provide to K. Paulson (.1); call with claimant regarding status of distribution check being sent to B. Winters (.1); correspond with Receiver and claims team regarding same (.1); review request to stop payment on missing first distribution check (.1); request additional information regarding same (.1); review additional information, confirm status with bank, and process stop payment letter (.2); review and save final address confirmation form provided by claimants (.1); correspond with claims team regarding information for claimants who call regarding checks sent to B. Winters (.1); correspond with claims team regarding status of second distribution wire transfers (.1); correspond with claims team regarding status of payment fees charged by ServisFirst Bank (.1).		\$237.50
5/7/24	EPT	Review request from Receiver regarding procedure for reprocessing wire transfers (.1); review correspondence from claimant (.1); prepare correspondence to ServisFirst Bank regarding same (.4); review correspondence from ServisFirst Bank regarding same (.1); call with claimant regarding reissuing distribution checks (.1); provide information to Receiver and claims team for further action (.1); review correspondence from ServisFirst Bank regarding stop payment request (.1); review correspondence from ServisFirst Bank regarding distribution checks lacking endorsement (.1); provide same to Receiver and claims team for further action (.1); correspond with Receiver regarding how to proceed (.1); review email from K. Paulson to ServisFirst Bank requesting information on improperly endorsed checks (.1); communicate with ServisFirst Bank regarding same (.1); review emails and copies of returned checks from ServisFirst Bank (.1); update record regarding same (.1); scan and save second distribution envelopes returned by the post office (.2); provide copies to Receiver and claims team (.1); review wire transfer confirmation (.1); update record and provide to claims team (.1); review request from K. Paulson to re-mail returned distribution checks to new addresses (.1); prepare checks for re-mailing (.5); update record and provide copies to claims team (.2).	3.0	\$375.00
5/8/24	EPT	Correspond with PDR regarding check to be voided after wire transfer (.1); review request from K. Paulson to re-mail returned distribution checks to newly provided addresses (.1); process same for re-mailing (.6); review correspondence from ServisFirst Bank regarding checks returned for lack of endorsement and update record regarding same (.1).	0.9	\$112.50
5/9/24	EPT	Run cleared check reports for K. Paulson (.6); exchange emails with ServisFirst Bank regarding change of settings for reports (.1); generate new report in revised format (.1); provide same to K. Paulson (.1); correspond with K. Paulson regarding same (.1); call with claimant regarding status of distribution check sent to B. Winters (.1); correspond with Receiver and claims team regarding same (.1); review and save final address confirmation forms provided by claimants (.1); review and save custodian change request provided by claimant (.1).	1.4	\$175.00
5/10/24	EPT	Run cleared checks report and provide to K. Paulson (.1); review request from K. Paulson to research status of specific check (.1); access bank records and respond with requested information (.1).	0.3	\$37.50

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5/13/24	EPT Run cleared checks report and provide to K. Paulson (.1); review final address confirmation forms provided by claimants and update record (.2); review check returned by USPS (.1); review request from K. Paulson to re-mail to new address (.1); review correspondence from K. Paulson and ServisFirst Bank regarding status of re- deposited check (.1); access bank file and respond with available information (.1).		0.7	\$87.50
5/14/2024	EPT	Run cleared checks report and provide to K. Paulson (.1); review correspondence from ServisFirst Bank regarding status of returned distribution check (.1).		\$25.00
5/15/24	EPT	Run cleared checks report and provide to K. Paulson (.1); review email from M. Gura to PDR regarding request for reissued checks (.1); correspond with PDR regarding preferred check number order for same (.1); review copy of voided check provided by M. Gura (.1); update record regarding same (.1); review and verify reissued distribution checks provided by PDR (.2); review correspondence from M. Gura and K. Paulson regarding review of same (.1); review email approving checks (.2); process checks for mailing (1.3); update record regarding same (.1); provide copies to claims team and PDR (.1); review request from K. Paulson to run report on returned checks (.1); access banking site, download, and save copies of returned checks (.2); run credits report (.1); update record regarding same (.1); provide requested information to claims team (.1); call with K. Paulson and M. Lockwood regarding information provided (.1); follow-up call with K. Paulson regarding same (.1); attend Zoom claims team meeting with Receiver (1.0); review request from K. Paulson to make adjustment to reissued checks (.1); provide same to PDR for further		\$562.50
5/16/24	<ul> <li>Run cleared checks report and provide to K. Paulson (.1); set up WhatsApp for claimant living in Spain (.1); call to claimant regarding wiring instructions for second distribution (.1); prepare email to Receiver and claims team regarding same (.1); review response from claimant (.1); provide response and wiring instructions to Receiver to confirm with claimant (.1); review response from Receiver regarding same (.1); call with claimant living in Sweden to confirm wiring instructions (.2); correspond with Receiver and claims team regarding same (.1); review request from Receiver for additional information and respond (.1); call with Receiver regarding same (.1); access ServisFirst Bank site and set up international wire transfer for Receiver's approval (.5); correspond with PDR regarding correction to check alignment (.1); process distribution checks and priority mail envelopes (.6); update record and provide confirmation of same to Receiver and claims team (.1); correspond with Receiver regarding status of international wire transfer (.1); review notice of wire delivery (.1); update record and provide same to Receiver, claims team, and PDR (.1); provide information to M. Lockwood and M. Gura regarding same (.1); call with M. Lockwood regarding issue with missing endorsements (.1).</li> </ul>		3.1	\$387.50
5/17/24	EPT	Run cleared checks report and provide to K. Paulson (.1); correspond with claims team regarding status of cover letter for distribution check being held (.1); review checks returned by post office (.1); update record regarding same (.1).	0.4	\$50.00
5/20/24	EPT	Run cleared checks report and provide to K. Paulson (.1); review request from PDR for more information regarding wire transfer to claimants living in Spain (.1); search file and respond with requested information (.1); review request from K. Paulson for information on specific cleared check (.1); access bank records and respond with requested information (.1); process returned distribution checks for re-mailing to new addresses (.8); update record and provide copies to Receiver and claims team (.2); review picture of voided check provided by K. Paulson (.1); update record regarding same (.1); review email from K. Paulson regarding stop payment request (.1); prepare request to ServisFirst Bank (.1); confirm status of check on bank site (.1); correspond with K. Paulson regarding same (.2); meet with Receiver to pick up checks returned by claimants and the post office (.2); update record regarding same	2.4	\$300.00

5/21/24	EPT	Run cleared checks report and provide to K. Paulson (.1); review request from M. Gura regarding status of reissued checks received from PDR (.1); respond requesting approval to process same (.1); review approval to process and prepare check for mailing (.3); review correspondence from M. Gura regarding change in mailing address (.1); respond to same with copy of note from claimant (.1); update record regarding same (.1); provide copy to claims team and PDR (.1); send email to claims team regarding unmailed reissued distribution check (.1); review cover letter for unmailed reissued check provided by K. Paulson (.1); prepare check and correspondence for mailing (.2); update record and provide copies to claims team and PDR (.2); review email from M. Gura to PDR requesting additional reissued checks (.1); access bank site and search for cleared check and respond to stop payment request (.1); process and prepare reissued distribution checks for mailing (.4); update record and provide copies to claims team and PDR (.1); process checks for mailing (.4); call with K. Paulson regarding check to be voided and stop payment (.1); void check, update record, and provide copy to claims team (.1).	2.9	\$362.50
5/22/24	EPT	Run cleared checks report and provide to K. Paulson (.1); review correspondence from claimant living in New Zealand (.1); provide same to Receiver for further instructions (.1); review request from K. Paulson for stop payments on lost distribution checks (.1); correspond with Receiver regarding status of check returned by the post office (.1); call with claimant living in New Zealand to confirm wiring instructions (.1); correspond with Receiver regarding same (.1); access bank site and initiate wire transfer for review and approval by Receiver (.5).		\$150.00
5/23/24	EPT	Run cleared checks report and provide to K. Paulson (.1); review correspondence from ServisFirst Bank regarding expired international wire transfer to claimant in New Zealand (.1); re-initiate same (5); correspond with Receiver regarding same (.1); review notice of successful wire transfer and provide to claims team and PDR (.1).	0.9	\$112.50
5/24/24	EPT	Run cleared checks report and provide to K. Paulson (.1); review email from K. Paulson regarding undelivered reissued check (.1); locate Priority Mail receipt and track online (.1); provide results of search to K. Paulson (.1); correspond with Receiver regarding status of distribution checks returned by the post office (.1).	0.5	\$62.50
5/28/24	EPT	Run cleared checks report and provide to K. Paulson (.1).	0.1	\$12.50
5/29/24	EPT	Run cleared checks report and provide to K. Paulson (.1); correspond with K. Paulson regarding contact information for claimants with missing distribution check (.1); call with Receiver regarding same (.1); calls with claimant requesting additional information for wire transfer (.1); prepare and provide request for stop payment on missing distribution check to ServisFirst Bank (.2); review correspondence from K. Paulson requesting status of stop payment (.1); respond to request and provide additional information (.1); review confirmation of stop payment from ServisFirst Bank (.1); review request from K. Paulson to mail reissued distribution check (.1); prepare and process same for mailing (.2); update record and provide copy to claims team (.1); process reissued distribution checks for mailing (.4).		\$212.50
5/30/24	EPT	Run cleared checks report and provide to K. Paulson (.1); access banking site and initiate wire transfer to claimant with missing check for approval by Receiver (.5); review confirmation of successful wire transfer (.1); update record and provide copy to Receiver, claims team, and PDR (.1).	0.8	\$100.00
5/31/24	EPT	Run cleared checks report and provide to K. Paulson (.1); correspond with PDR regarding source of funds for wire transfer to claimant (.1); correspond with claims team regarding status of approval to stop payment on two lost distribution checks (.1).		\$37.50
6/3/24	EPT	Run cleared checks report and provide to K. Paulson (.1); review request from K. Paulson to mail distribution check returned by the post office to claimant at new address (.1); process check for re-mailing (.5); update record and provide copy to K. Paulson (.1).	0.8	\$100.00

6/4/24	EPT	Run cleared checks report and provide to K. Paulson (.1); review correspondence from PDR regarding returned claim distribution checks (.1); research file and provide requested information (.1).		\$37.50
6/5/24	EPT	Run cleared checks report and provide to K. Paulson (.1); review request from K. Paulson to reprocess distribution check returned by post office (.1); reprocess same, update record and provide copy to K. Paulson and M. Gura (.1); review letter and check received from claimant (.1); update record and provide copies to Receiver and claims team for further instruction (.1).		\$62.50
6/6/24	EPT	Run cleared checks report and provide to K. Paulson (.1).	0.1	\$12.50
6/7/24	EPT	Run cleared checks report and provide to K. Paulson (.1); review request from K. Paulson to re-mail distribution check returned by post office to new address (.1); process same for mailing, update record, and provide copy to K. Paulson (.1); correspond with Receiver and claims team regarding status of misdirected distribution check (.1).	0.4	\$50.00
6/10/24	EPT	Run cleared checks report and provide to K. Paulson (.1);	0.1	\$12.50
6/11/24	EPT	Run cleared checks report and provide to K. Paulson (.1);	0.1	\$12.50
6/12/24	EPT	Run cleared checks report and provide to K. Paulson (.1); correspond with ServisFirst Bank and claims team regarding stop payment charges (.1).	0.2	\$25.00
6/13/24	EPT	Run cleared checks report and provide to K. Paulson (.1).		\$12.50
6/14/24	EPT	Run cleared checks report and provide to K. Paulson (.1).		\$12.50
6/17/24	EPT	Run cleared checks report and provide to K. Paulson (.1); review reissued distribution checks from PDR (.1); prepare email to PDR regarding same (.1); review and verify reissued checks (.1); update record regarding same and email copies to claims team for final approval (.1); review approval from K. Paulson (.1); prepare reissued checks for mailing (.2); update record regarding same and provide copies to claims team (.2).	1.0	\$125.00
6/18/24	EPT	Run cleared checks report and provide to K. Paulson (.1); process stop payments online for lost distribution checks (.3); update record and provide information to Receiver, claims team, and PDR (.2); provide PDR with copies of reissued checks (.1); process checks for mailing (.4).	1.1	\$137.50
6/19/24	EPT	Run cleared checks report and provide to K. Paulson (.1).	0.1	\$12.50
6/21/24	EPT	Run cleared checks report and provide to K. Paulson (.1); review request from claims team for stop payment on missing distribution check (.1); perform online search to confirm check has not cleared (.1); process stop payment (.1); update record and provide confirmation of same to claims team (.1).		\$62.50
6/24/24	EPT	Run cleared checks report and provide to K. Paulson (.1); review request from K. Paulson to stop payment on lost distribution check (.1); process stop payment online (.1); update record and provide confirmation of same to claims team and PDR (.2).		\$62.50
6/25/24	EPT	Run cleared checks report and provide to K. Paulson (.1).		\$12.50
6/26/24	EPT	Run cleared checks report and provide to K. Paulson (.1).	0.1	\$12.50

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6/27/24	EPT Run cleared checks report and provide to K. Paulson (.1).		0.1	\$12.50
6/28/24	EPT Run cleared checks report and provide to K. Paulson (.1).		0.1	\$12.50
		Total: Claims Administration and Objections	46.0	\$5,750.00
	Total Professional Services			\$7,425.00
		PAY THIS AMOUNT		\$7,425.00

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### TASK RECAP

# PersonRateEPTEdwina P. Tate\$125.00CategoryHoursASSET<br/>BUSIN<br/>CLAIM9.0<br/>4.4<br/>46.0\$1.200TOTAL59.4

**TOTAL AMOUNT** \$7,425.00

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### 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	August 14, 2	024
Attention: Burton W. Wiand, as Receiver	Client:	025305
Burton W. Wiand PA	Matter:	002096
114 Turner Street	Invoice #:	21589
Clearwater, FL 33756		
	Page:	1

RE: Oasis - Recovery from Investors (Receiver)

For Professional Services Rendered Through June 30, 2024

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
4/30/2024	BWW	Review correspondence and proposed response from B. McConnell regarding motion to dismiss registered judgment entered against D. Lipinczyk in a New York district court (.2); approve proposed response and correspond with B. McConnell and E. Tate regarding same (.1).	0.3	\$108.00
5/1/2024	BWW	Attention to court filing and approval of submission in D. Lipincyk matter (.5); review D. Lipinczyk emails (.1).	0.6	\$216.00
5/13/2024	BWW	Work on D. Lipinczyk WDNY case (.8); telephone conferences with B. McConnell and F. Curran regarding same (.4); review seller's closing statement and correspondence from B. McConnell regarding sale of property by R. Garbellano and acceptance of sale amount to satisfy judgment (.3).	1.5	\$540.00
5/14/2024	BWW	Review correspondence from B. McConnell and response to court's order to show cause in D. Lipincyzk matter (.1); review correspondence from B. McConnell regarding potential local counsel in Buffalo, New York (.1); correspond with E. Tate regarding same (.1); participate in conference call with B. McConnell and New York counsel (.7).	1.0	\$360.00
5/17/2024	BWW	Work with B. McConnell regarding D. Lipinczyk matter in WDNY (.3).	0.3	\$108.00

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			Page:	2
SERVICES	3			
Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
5/19/2024	BWW	Communicate with B. McConnell regarding filing in WDNY regarding D. Lipinczyk (.1).	0.1	\$36.00
5/20/2024	BWW	Communicate with B. McConnell regarding correspondence from local counsel in D. Lipinczyk case regarding recommendations for next steps (.1); respond and approve same (.1); review motion for electronic filing by D. Lipinczyk (.1); correspond with B. McConnell regarding same (.1).	0.4	\$144.00
5/21/2024	BWW	Review proposed response to D. Lipinczyk filing (.2); telephone conferences with B. McConnell regarding same (.3).	0.5	\$180.00
5/22/2024	BWW	Exchange emails with B. McConnell regarding R. Garballano settlement proposal (.2); review correspondence from B. McConnell and filed motion for leave to file sur-reply, memorandum in support, and exhibits filed in D. Lipincyzk matter (.5); correspond with B. McConnell regarding same (.1).	0.8	\$288.00
5/23/2024	BWW	Review correspondence from B. McConnell (.1); review and respond to offer of settlement from R. Garbellano (.1).	0.2	\$72.00
5/28/2024	BWW	Correspond with B. McConnell and review settlement offer from R. Garbellano (.1); call with B. McConnell regarding same (.3).	0.4	\$144.00
6/3/2024	BWW	Review correspondence from B. McConnell regarding pro hac vice approval in D. Lipinsky case (.1).	0.1	\$36.00
6/10/2024	BWW	Review WDNY filing by D. Lipinczyk (.4); telephone conference with B. McConnell regarding same (.1); exchange emails with B. McConnell and J. Perez regarding same (.2).	0.7	\$252.00
6/11/2024	BWW	Correspond with B. McConnell regarding possible	1.0	\$360.00

6/11/2024	BWW	Correspond with B. McConnell regarding possible settlement with R. Garbellano (.2); meet with E. Tate regarding sending exhibits to D. Lipinczyk's recent court filing to B. McConnell and J. Perez (.1); review and revise settlement agreement with R. Garbellano (.4); exchange emails with B. McConnell regarding same (.1); telephone conference with B. McConnell regarding D. Lipinczyk case (.2).	1.0	\$360.00
6/19/2024	BWW	Review and sign declaration for objection denial (.4); negotiate settlement with Garbellano (.2).	0.6	\$216.00
6/20/2024	BWW	Attend to Garbellano settlement (.1); telephone conference with B. McConnell regarding same (.1).	0.2	\$72.00

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SERVICES	5			
Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
6/24/2024	BWW	Review proposed settlement agreement from attorney for R. Garbellano (.1); correspond with B. McDonnell regarding same (.1); review additional information regarding same provided by B. McConnell (.1); work on information regarding collection actions against D. Lizpinzcyk (.1); telephone conference with B. McConnell regarding same (.5).	0.9	\$324.00
6/27/2024	BWW	Attend to D. Lipzinczyk filing and instructions for filing with WDNY (.3).	0.3	\$108.00
		Total: Asset Analysis and Recovery	9.90	\$3,564.00
		Total Professional Service	<u> </u>	\$3,564.00
		Total Services	\$3,564.00	
		Total Current Charges		\$3,564.00
		Previous Balance		\$8,244.00
		PAY THIS AMOUNT		\$11,808.00

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### TASK RECAP

Services			Disbursements		
Project No.	Hours	Amount	Project No.	Amount	
ASSET - ASSET	9.90	\$3,564.00		\$0.00	
	9.90	\$3,564.00		\$0.00	

### **BREAKDOWN BY PERSON**

Person		Project No.	Hours	Amount
BWW	Burton W. Wiand	ASSET - ASSET	9.90	\$3,564.00
			9.90	\$3,564.00

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### 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
Attention: Burton W. Wiand, as Receiver
Burton W. Wiand PA
114 Turner Street
Clearwater, FL 33756

August 14, 2024				
Client:	025305			
Matter:	002097			
Invoice #:	21590			

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RE: Oasis - Raymond Montie, III. (Receiver)

For Professional Services Rendered Through June 30, 2024

Date ASSET	TKPR Asset	Description of Services Analysis and Recovery	Hours	Amount
6/25/2024	BWW	Exchange emails with R. Montie (.2); review Ambit Energy information (1.4); telephone conference with J. Perez (.4).	2.0	\$720.00
		Total: Asset Analysis and Recovery	2.00	\$720.00
		Total Professional Services	2.0	\$720.00
		Total Services	\$720.00	
		Total Current Charges		\$720.00
		Previous Balance		\$10,008.00
		PAY THIS AMOUNT		\$10,728.00

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### TASK RECAP

Services			Disbursements	
Project No.	Hours	Amount	Project No.	Amount
ASSET - ASSET	2.00	\$720.00		\$0.00
	2.00	\$720.00		\$0.00

### **BREAKDOWN BY PERSON**

Person		Project No.	Hours	Amount
BWW	Burton W. Wiand	ASSET - ASSET	2.00	\$720.00
			2.00	\$720.00

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Receivership					
Expense Type Amount					
Photocopies	\$	94.20			
Outside Printing	\$	153.06			
Online Research	\$	290.53			
Delivery Services/Messengers	\$	139.20			
Postage	\$	524.28			
Subpoena Fees	\$	999.35			
Web-Related Expenses	\$	150.00			
Other	\$	750.15			
TOTAL	\$	3,100.77			

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

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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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### 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
Attention: Burton W. Wiand, as Receiver
Burton W. Wiand PA
114 Turner Street
Clearwater, FL 33756

 August 14, 2024

 Client:
 025305

 Matter:
 001922

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 21584

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

For Professional Services Rendered Through June 30, 2024

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
4/1/2024	AC	Instruct A. Avery regarding amendment of subpoena to insider (.1).	0.1	\$32.00
4/2/2024	AC	Prepare emails to J. Manwaring regarding filing of action to compel compliance with out of state subpoena (.2); telephone call with J. Manwaring regarding same (.1).	0.3	\$96.00
4/2/2024	CE	Review email exchange with J. Haas regarding settlement payment (.1); draft email to A. Cruz regarding same (.1).	0.2	\$48.00
4/3/2024	CE	Exchange emails with E. Tate regarding payments from insider (.1); exchange emails with J. Haas regarding same (.3); phone call with A. Stephens regarding same (.1).	0.5	\$120.00
4/3/2024	AS	Telephone call with J. Haas regarding wire (.3); telephone call with C. Ellis regarding same (.1); exchange emails with J. Haas (.1) exchange emails with Bolter and Carr regarding status of subpoenas (.2).	0.7	\$94.50
4/4/2024	AC	Prepare email to R. Green regarding settlement agreement with insider (.1); prepare email to E. Tate regarding same (.1).	0.2	\$64.00
4/4/2024	EF	Draft motion to approve substitute service of subpoena to insider's attorney (3.6).	3.6	\$864.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
4/5/2024	AC	Review and revise Receiver's motion for substituted service on insider's attorney (.8); prepare email to insider regarding settlement (.1).	0.9	\$288.00
4/5/2024	EF	Continue to draft motion to approve substitute service and perform research regarding Federal Rule of Civil Procedure 45 for same (1.6).	1.6	\$384.00
4/8/2024	EF	Draft complaint against insider (2.4).	2.4	\$576.00
4/11/2024	AC	Prepare email to J. Manwaring regarding deadline for response to motion to compel subpoena in Idaho (.1).	0.1	\$32.00
4/11/2024	CE	Direct A. Stephens regarding settlement payment by insider (.2).	0.2	\$48.00
4/11/2024	AS	Review settlement spreadsheet with regard to J. Haas and communicate with C. Ellis regarding same. (.2).	0.2	\$27.00
4/11/2024	MML	Review outstanding litigation matters (.2); communicate with A. Avery regarding same (.2); call with Receiver regarding service of subpoena (.1); call with attorney C. Pitts regarding same (.1); prepare correspondence to same confirming service of subpoena and extension of time to respond (.1); instruct A. Avery to cancel process server and review confirmation of same (.1).	0.8	\$192.00
4/15/2024	CE	Review and analyze response by D. Young on behalf of Intermountain Precious Metals to Receiver's motion to compel compliance with third party subpoena (.4); exchange emails with M. Lockwood and Receiver regarding same (.5); exchange emails with J. Manwaring regarding same (.2); exchange emails with Receiver regarding subpoena to S. Preziosi (.2); review and analyze file to assess status of same (.4); exchange emails with M. Lockwood regarding potential complaints against insider and research on personal jurisdiction (.3); phone conference with M. Lockwood regarding status of pending legal tasks for Receivership (.5).	2.5	\$600.00
4/15/2024	MML	Review correspondence regarding subpoena response (.2); call with C. Ellis regarding same and other pending matters (.5); review correspondence regarding other outstanding subpoenas (.1); review correspondence regarding draft complaints (.1).	0.9	\$216.00
4/23/2024	CE	Exchange emails with Receiver regarding subpoena to third party (.2); exchange emails with M. Lockwood, A. Stephens, and A. Avery regarding same (.2).	0.4	\$96.00
4/23/2024	AS	Pull documents for production (.7); communicate with M. Lockwood regarding same (.1).	0.8	\$108.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
4/23/2024	MML	Attend call with Receiver, R. Bedke, and W. Hauser (1.0); review correspondence from C. Ellis regarding subpoena responses (.1); communicate with Receiver regarding same (.2); communicate with C. Pitts regarding response to subpoena (.1).	1.4	\$336.00
4/24/2024	MML	Review documents produced in response to subpoena (1.0); review and prepare materials for production (3.1); communicate with A. Stephens regarding same (.1); communicate with Receiver regarding same (.1).	4.3	\$1,032.00
4/25/2024	MML	Prepare correspondence to R. Bedke and W. Hauser regarding documents (.1); communicate with S. Howland regarding same (.1); transfer documents to assigned folder (.1).	0.3	\$72.00
4/30/2024	CE	Phone call with A. Avery regarding preparations for upcoming depositions of C. Huckabee and D. Clark.	0.1	\$24.00
4/30/2024	AA	Exchange emails with insiders C.H. and D.C. regarding upcoming depositions (.2).	0.2	\$30.00
5/1/2024	CE	Exchange emails with A. Stephens regarding background check for insider (.1); review documents in preparation for deposition of C. Huckabee (2.1); draft outline for C. Huckabee deposition testimony (1.5).	3.7	\$888.00
5/1/2024	AS	Review and pull updated Accurint reports for C. Huckabee and D. Clark in preparation for depositions (.5).	0.5	\$67.50
5/1/2024	MML	Review motion for extension filed by M. DaCorta in appellate matter (.1).	0.1	\$24.00
5/2/2024	CE	Conduct deposition of C. Huckabee (1.3); exchange emails with M. Lockwood regarding same (.1); review and revise notes from deposition (.3); draft email to Receiver summarizing information gathered from deposition (.6); review and revise reply and exhibits in support of motion to compel IPM subpoena (.8); review documents in preparation for deposition of D. Clark and Clark Asset Management (2.2); draft outline for deposition testimony (1.8).	7.1	\$1,704.00
5/2/2024	MML	Communicate with C. Ellis regarding deposition (.2); review correspondence from C. Ellis and Receiver regarding same (.1).	0.3	\$72.00
5/3/2024	CE	Continue preparing for deposition of D. Clark and Clark Asset Management (1.9); conduct deposition of D. Clark and Clark Asset Management (1.5); draft summary of deposition for Receiver (.6).	4.0	\$960.00
5/3/2024	AA	Perform research in preparation for deposition of insider D.C. (.6).	0.6	\$90.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
5/3/2024	MML	Review summary of D. Clark's deposition (.1).	0.1	\$24.00
5/14/2024	CE	Research M. DaCorta's status in litigation and exchange emails with Receiver regarding judgment against M. DaCorta (.4).	0.4	\$96.00
5/14/2024	MML	Review correspondence regarding subpoena status (.1); communicate with C. Ellis regarding same (.1).	0.2	\$48.00
5/16/2024	MML	Review and revise subpoena to non-party (.3); communicate with Receiver regarding same (.1); communicate with A. Avery regarding same and service (.2); review notice of subpoena (.1).	0.7	\$168.00
5/17/2024	CE	Review and revise notice, subpoena, and Attachment A to non-party subpoena (.5).	0.5	\$120.00
5/17/2024	MML	Continue work on non-party subpoena (.2); review notice of issuance of same (.1).	0.3	\$72.00
5/20/2024	MML	Review correspondence regarding service (.1).	0.1	\$24.00
5/21/2024	MML	Review correspondence regarding IPM subpoena (.1).	0.1	\$24.00
5/22/2024	MML	Review correspondence regarding virtual office (.1); communicate with A. Avery regarding service and other addresses (.2); prepare correspondence to non-party subpoena recipient regarding accepting service by email (.1); communicate with Receiver regarding same (.1).	0.5	\$120.00
5/23/2024	MML	Review correspondence from non-party regarding subpoena (.1); communicate with A. Avery regarding same (.1); prepare response to non-party regarding service (.1).	0.3	\$72.00
5/24/2024	MML	Communicate with A. Avery regarding service of subpoena (.1).	0.1	\$24.00
5/30/2024	CE	Communicate with M. Lockwood regarding non-party subpoenas (.2).	0.2	\$48.00
5/30/2024	MML	Communicate with Receiver regarding service of subpoena to non-party (.1); communicate with A. Avery regarding status of same (.1); review two additional subpoenas to non-parties (.2); communicate with A. Cruz and A. Avery regarding same (.2); revise request for one non-party subpoena (.4); revise requests for other non-party subpoena (.4).	1.4	\$336.00
5/31/2024	MML	Prepare correspondence to Receiver regarding additional non-party subpoenas (.1).	0.1	\$24.00
6/4/2024	CE	Review and revise subpoena to non-party (.2); exchange emails with Alana Avery regarding same (.1).	0.3	\$72.00

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
6/6/2024	MML	Review Receiver's edit to non-party subpoena (.1); revise same (.1); prepare correspondence to A. Avery regarding service of same (.1); research target of subpoena (.3); review correspondence regarding change of compliance date and additional attempts at service (.1); review revised subpoena and notice (.1).	0.8	\$192.00
6/7/2024	MML	Communicate with A. Avery regarding subpoena to non-party in Illinois (.2); conduct research regarding same (.2).	0.4	\$96.00
6/10/2024	MML	Review correspondence from process server regarding service of subpoenas (.1); review correspondence from A. Avery and C. Ellis regarding notices and subpoenas (.1).	0.2	\$48.00
6/11/2024	CE	Review and revise notices, subpoenas, and exhibits to subpoenas to two non-parties (.6).	0.6	\$144.00
6/11/2024	MML	Review notice of service and forward same to Receiver (.1).	0.1	\$24.00
6/18/2024	MML	Communicate with Receiver regarding subpoena status (.1); communicate with A. Avery regarding same (.1).	0.2	\$48.00
6/19/2024	MML	Communicate with A. Avery regarding status of subpoenas (.1); review correspondence from process server regarding same (.1).	0.2	\$48.00
6/20/2024	MML	Call with A. Avery regarding status of outstanding matters (.3); review confirmation of service of subpoenas (.1); review order to show cause (.1); review correspondence from J. Perez regarding same (.1).	0.6	\$144.00
6/21/2024	MML	Revise and update status memorandum for Receiver (.7); conduct research for same (.7); draft motion to approve settlements (.5); conduct research for same (.5); prepare correspondence to E. Feld regarding insider complaint (.1); prepare correspondence to J. Perez regarding R. Montie (.1); prepare correspondence to A. Cruz regarding settlements (.1).	2.7	\$648.00
6/24/2024	MML	Continue work on status memorandum (1.0); review and revise motion for substituted service (1.0); work on exhibits for same (.5); communicate with A. Avery regarding same and service information (.2); work on judgment lien for insider (.5); communicate with M. Gura regarding same (.1); communicate with E. Feld regarding insider complaint (.1).	3.4	\$816.00
6/25/2024	AC	Direct A. Avery regarding recording of final judgment against insider (.3); prepare email to M. Lockwood regarding motion to approve settlements with insiders (.1).	0.4	\$128.00

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SERVICES	6			
Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset	Analysis and Recovery		
6/25/2024	MML	Continue work on judgment lien for insider (.3); review research and pleadings regarding same (.3); review correspondence from Corporations Division regarding lien (.1); prepare motion to approve settlements (2.3); communicate with J. Perez regarding same (.1); continue work on status memorandum and exhibits for same (.5); communicate with M. Gura regarding Dropbox link (.1); prepare correspondence to Receiver and J. Perez regarding status memorandum (.1).	3.8	\$912.00
6/26/2024	MML	Call with Receiver regarding outstanding tasks and motion to approve settlements (.3); review correspondence regarding service of subpoena (.1); communicate with J. Perez regarding motion to approve settlements and 3.01(g) (.2).	0.6	\$144.00
6/27/2024	MML	Review revisions to motion to approve settlements from J. Perez (.1); communicate with CFTC and J. Perez regarding motion to approve settlements (.1); communicate with A. Avery regarding filing and service (.1).	0.3	\$72.00
6/28/2024	MML	Review correspondence from Receiver regarding M. DaCorta (.1); review appellate brief and article regarding same (.1).	0.2	\$48.00
		Total: Asset Analysis and Recovery	58.80	\$13,969.00
CASE	Case	Administration		
4/12/2024	AS	Review order granting second distribution and communicate with M. Lockwood and B. Nguyen regarding website post (.2).	0.2	\$27.00
4/12/2024	BN	Update Receivership website (.3).	0.3	\$40.50
4/12/2024	MML	Prepare website update for order (.2); communicate with A. Stephens regarding same (.1).	0.3	\$72.00
4/17/2024	MML	Attend meeting with Receiver regarding interim report (.5); draft same (1.0); communicate with M. Gura regarding same (.5).	2.0	\$480.00
4/18/2024	CE	Exchange emails with M. Lockwood regarding Receiver's report (.2); review and analyze Receiver's report (.4).	0.6	\$144.00
4/18/2024	KAP	Review drafts of Receiver's supplemental report to court and communicate with M. Lockwood regarding same (.1).	0.1	\$13.50
4/18/2024	MML	Prepare supplemental interim report (4.0); review documents for same (1.0); research status of criminal appeal for same (.2); prepare exhibits (1.0).	6.2	\$1,488.00
4/19/2024	CE	Review and revise Receiver's supplemental report (1.2); draft email to M. Lockwood and Receiver regarding same (.1).	1.3	\$312.00

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SERVICES				
Date	TKPR	Description of Services	Hours	Amount
CASE	Case A	Administration		
4/19/2024	BN	Update Receivership website (.3).	0.3	\$40.50
4/19/2024	MML	Revise and finalize supplemental interim report and exhibits (3.5); communicate with Receiver regarding approval of same and correspondence to R. Bedke (.3); prepare post for website (.1); prepare draft email blast to claimants regarding report (.1); communicate with B. Nguyen and A. Stephens regarding web posting and email blast (.3); review correspondence from R. During (.1); review correspondence from PDR regarding accounting reports and send same to J. Perez (.1).	4.5	\$1,080.00
4/20/2024	MML	Call with Receiver regarding email to investors (.1); work on same (.8).	0.9	\$216.00
4/22/2024	MML	Review order on supplemental interim report (.1).	0.1	\$24.00
4/23/2024	BN	Update Receivership website (.1).	0.1	\$13.50
4/26/2024	MML	Communicate with B. Nguyen regarding website update (.1).	0.1	\$24.00
5/1/2024	MML	Review and provide comments on draft interim report (1.0).	1.0	\$240.00
5/2/2024	BN	Update Receivership website (1.0).	1.0	\$135.00
5/2/2024	MML	Work on website updates (.2).	0.2	\$48.00
5/17/2024	BN	Update Receivership website with seven filings (.4).	0.4	\$54.00
6/6/2024	MML	Communicate with M. Gura regarding website updates (.1).	0.1	\$24.00
6/18/2024	BN	Update Receivership website (.1).	0.1	\$13.50
6/27/2024	BN	Update Receivership website (.1).	0.1	\$13.50
		Total: Case Administration	19.90	\$4,503.00
CLAIM Claims Administration and Objections				
4/1/2024	КАР	Review revocations of powers of attorney for three claimants, update their nine claims on spreadsheet per same, and prepare email to M. Lockwood and M. Gura regarding same (.2).	0.2	\$27.00
4/1/2024	MML	Review revocations of power of attorney submitted by three claimants (.1); review correspondence from K. Paulson regarding same (.1); prepare correspondence to review team regarding timing of distribution (.1).	0.3	\$72.00
4/2/2024	MML	Communicate with claims team and additional staff regarding preparation for mailout and status of motion (.3).	0.3	\$72.00
4/3/2024	AS	Telephone calls with three investors regarding case updates and second distribution (.3); review spreadsheet and verify address information (.2).	0.5	\$67.50

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	s Administration and Objections		
4/5/2024	KAP	Exchange emails with M. Gura regarding correct address for L.D. (.1).	0.1	\$13.50
4/5/2024	MML	Prepare correspondence to Receiver regarding approval of letter to claimants (.1); call with Receiver regarding same (.1); revise letter for Receiver's comments (.1); prepare correspondence to team with revised letter (.1); communicate with M. Gura regarding merge of letter in preparation for mail-out (.2); review re-formatted letter for same (.1).	0.7	\$168.00
4/8/2024	AS	Exchange emails with two investors (.1); telephone calls with three investors regarding second distribution (.4).	0.5	\$67.50
4/9/2024	CE	Review order granting second interim distribution (.2).	0.1	\$24.00
4/9/2024	AS	Review order regarding second distribution (.1); communicate with M. Gura regarding same (.3).	0.4	\$54.00
4/9/2024	MML	Review order granting motion for second distribution (.1); communicate with Receiver regarding same (.1); communicate with M. Gura regarding initiating distribution (.3); review correspondence to PDR regarding finalizing checks (.1); communicate with B. Nguyen regarding second distribution (.1); review and revise letters to claimants for second distribution checks being sent to claimants (1.0); prepare summary of changes and send same to M. Gura (.2); review and revise letters to B. Winters and claimants for checks being sent to Winters with a copy to claimants (.8); prepare summary of changes and send same to M. Gura (.2).	2.9	\$696.00
4/10/2024	AS	Communicate with two investors via email and five investors via phone regarding second distribution (1.0).	1.0	\$135.00
4/10/2024	MML	Communicate with PDR and M. Gura regarding second distribution checks (.3); revise master spreadsheet for distribution (.5); direct M. Gura and K. Paulson regarding revisions needed for second distribution (.2).	1.0	\$240.00
4/11/2024	AS	Review address confirmation forms sent by claimants (.3); telephone call with M. Gura (.2); telephone calls with two claimants regarding second distribution (.2); exchange emails with M. Gura (.3); prepare and affix labels for second distribution (1.5).	2.5	\$337.50
4/11/2024	КАР	Review email from M. Lockwood regarding questions about claimants' information on spreadsheet and respond to same (.2); incorporate changes to claimants' information on spreadsheet (.1); review ten newly submitted address confirmation forms, compare against claims spreadsheet, and save and upload to Teams (.5); exchange emails with M. Gura and M. Lockwood regarding same (.1).	0.9	\$121.50

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SERVICES	6			
Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claim	s Administration and Objections		
4/11/2024	MML	Call with Receiver regarding second distribution mailing and recent correspondence received (.2); review "final" address confirmation forms from claimants represented by B. Winters (.2); research each claimant and prepare summary for Receiver (.5); communicate with K. Paulson regarding N.S. (.1); attend Zoom conference with Receiver, J. Perez, and M. Gura regarding same and course of action (.5); review additional forms sent by claimants after conference (.3); communicate with K. Paulson regarding review and tracking of same (.1); communicate with M. Gura and PDR regarding second distribution checks (.2); continue to review and revise master spreadsheet for distribution (.4); respond to questions from M. Gura regarding same (.4).	2.9	\$696.00
4/12/2024	KAP	Review three address confirmation forms sent by claimants, compare against claims spreadsheet, and save and upload to Teams (.2); telephone call with Receiver regarding influx of address confirmation forms (.1).	0.3	\$40.50
4/12/2024	MML	Review numerous and duplicative forms submitted by claimants represented by B. Winters (.3); communicate with claims team regarding same (.2); conduct research regarding same (.1); prepare correspondence to Receiver and J. Perez regarding change to distribution procedure for same (.1).	0.7	\$168.00
4/13/2024	MML	Prepare correspondence to Receiver regarding information for claimants who revoked power of attorney for nine claims (.1).	0.1	\$24.00
4/15/2024	AS	Multiple telephone calls with investor and legal team regarding B. Winters emails (.6); review emails from investor regarding same (.3); review additional address confirmation forms (.2); exchange emails with claimant (.2); exchange emails with Receiver (.6).	1.9	\$256.50
4/15/2024	КАР	Review outstanding distribution issues and exchange numerous emails with M. Lockwood and M. Gura regarding same (.5); review numerous address confirmation forms sent by claimants, compare against claims spreadsheet, and save and upload to Teams (1.1); add column to claims spreadsheet for new address confirmation forms and populate same (.2); communicate with M. Gura and M. Lockwood regarding same (.1); exchange emails with M. Gura regarding handling reissued first distribution check for C.C. (.1).	2.0	\$270.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
4/15/2024	MML	Work on second distribution checks, letters, and preparation for mail-out (1.0); prepare correspondence to B. Nguyen and A. Stephens regarding same (.1); call with B. Nguyen regarding distribution logistics (.3); review correspondence from claimant (.2); communicate with Receiver regarding same (.2); review additional unnecessary forms submitted by claimants represented by B. Winters (.2); communicate with M. Gura regarding check to reissue for C.C. (.1).	2.1	\$504.00
4/16/2024	AS	Exchange emails with claimants (.2); telephone calls with M. Gura (.2); telephone calls with two investors regarding second distribution (.2); review additional address confirmation forms (.2).	0.8	\$108.00
4/16/2024	KAP	Review two address confirmation forms sent by claimants, compare against claims spreadsheet, and save and upload to Teams (.2).	0.2	\$27.00
4/16/2024	MML	Communicate with M. Gura regarding processing of second distribution checks (.2); review amount to transfer for distribution (.2); communicate with E. Tate regarding same (.1); review correspondence with address confirmation forms (.2); review numerous correspondence with unnecessary address confirmation forms submitted by claimants associated with B. Winters (.3); review several emails from the Helpers Group and related correspondence (.4).	1.4	\$336.00
4/17/2024	AS	Exchange emails with investors (.4); review email from D.O. and forward to K. Paulson (.1); telephone calls with three investors regarding second distribution (.3).	0.8	\$108.00
4/17/2024	KAP	Review address confirmation forms sent by claimants, compare against claims spreadsheet, and save and upload to Teams (.3); review draft letter to claimants from Receiver (.1); exchange emails with D. and S.O. regarding closing IRAs and reissuing checks (.1); communicate with M. Gura and M. Lockwood regarding same and update three claims on spreadsheet (.1).	0.6	\$81.00
4/17/2024	MML	Review draft correspondence from Receiver to claimants (.1); review additional emails from the Helpers Group and related correspondence (.5); review inquiry from S.O. (.1); communicate with K. Paulson and M. Gura regarding same and other changes for second distribution (.3); review confirmation of funds transfer for distribution (.1); work on second distribution logistics (.2); communicate with E. Tate regarding completion of check signing (.1); review additional correspondence with address confirmation forms (.2).	1.6	\$384.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
4/18/2024	AS	Telephone calls with two investors regarding distribution (.2); exchange emails with Receiver and investor (.3); call with courier service regarding checks (.1); telephone call with M. Gura (.5); copy checks and prepare watermark copies for mailing (1.5).	2.6	\$351.00
4/18/2024	KAP	Exchange emails with claimant regarding proper address for sending communications (.1); review dozens of address confirmation forms sent by claimants, determine which are duplicates, compare against claims spreadsheet, and save and upload to Teams (1.8); communicate with M. Gura and M. Lockwood regarding same (.2); communicate with D.C. regarding proper address for M.B. (.1).	2.2	\$297.00
4/18/2024	MML	Review numerous address confirmation forms to determine mailing impact on second distribution, including address and custodian changes being submitted by claimants through these forms (.5); communicate with M. Gura and K. Paulson regarding same (.2); prepare correspondence to Receiver to confirm that distribution mailing date and method should not be adjusted due to the forms being unnecessarily submitted (.1); prepare correspondence to Tampa Legal regarding specifications for printing enclosure letters for second distribution checks (.2).	1.0	\$240.00
4/19/2024	AS	Communicate with M. Lockwood and B. Nguyen regarding email blast (.4); exchange emails with two investors (.2); telephone calls with two investors (.2).	0.8	\$108.00
4/19/2024	KAP	Review numerous address confirmation forms sent by claimants, determine which are duplicates, compare against claims spreadsheet, and save and upload to Teams (.5); review email regarding call from D.B. regarding not having check sent to B. Winters and call and leave voicemail for same (.1); prepare emails to M. Lockwood and M. Gura regarding same (.1).	0.7	\$94.50
4/19/2024	MML	Review numerous correspondence and forms submitted by claimants (.2); communicate with claims team regarding same and any changes (.2); review communications with D.B. (.1).	0.5	\$120.00
4/20/2024	КАР	Review numerous address confirmation forms, determine which are duplicates, compare against claims spreadsheet, and save and upload to Teams (.5); exchange emails with M. Lockwood regarding Oasis Outlook email group (.1).	0.6	\$81.00

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SERVICES	6						
Date	TKPR	Description of Se	rvices		Но	urs	Amount
CLAIM	Claim	s Administration and	d Objections				
4/20/2024	MML	hundreds of addres revise two distribut needed as a result (2.2); create electro	ion to updated masters confirmation form ion spreadsheets to of the submission of onic mailing groups distribution (.4); cor same (.1).	is received (3.5); include all changes f confirmation forms of claimants for		6.2	\$1,488.00
4/21/2024	KAP	Update IRA custod	lians for claims of E.	and C.R. on		2.6	\$351.00

4/21/2024	КАР	Update IRA custodians for claims of E. and C.R. on spreadsheet and communicate with M. Lockwood and M. Gura regarding same (.1); review numerous address confirmation forms, determine which are duplicates, compare against claims spreadsheet, and save and upload to Teams (1.0); communicate with legal team regarding emails from Helpers Group (.1); telephone call with M. Lockwood regarding outstanding issues related to second distribution (.4); review M. Gura's summary of changes needed for checks and add additional changes to same (.2); review spreadsheet to verify all items in cc column are accurate and communicate with M. Lockwood and M. Gura regarding same (.8).	2.6	\$351.00
4/21/2024	MML	Review additional address confirmation forms and related communications (.4); review and revise distribution letters for changes needed as a result of address confirmation forms and other communications from claimants (1.0); review custodian change for E. and C.R. (.1); review correspondence from K. Paulson regarding Helpers Group (.1); telephone call with K. Paulson regarding outstanding issues related to second distribution (.4); perform quality control review of distribution checks (1.5); prepare distribution for mailing to claimants (3.7).	7.2	\$1,728.00
4/22/2024	AS	Review investor email and communicate with legal team regarding same (.1); exchange emails with three investors regarding distribution (.3).	0.4	\$54.00
4/22/2024	КАР	Exchange emails with M. Lockwood and M. Gura regarding outstanding distribution issues (.1); review address confirmation forms, compare against claims spreadsheet, and save and upload to Teams (.2); update claims spreadsheet by removing unnecessary entries in cc column and communicate with M. Gura and M. Lockwood	0.8	\$108.00

and communicate with M. Gura and M. Lockwood regarding same (.2); review claims spreadsheet and communicate with M. Gura and M. Lockwood regarding additional claims for which the cc may need to be removed (.3).

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SERVICES	5			
Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
4/22/2024	MML	Continue review of distribution letters for claimants who provided address confirmation forms and for claimants who sent communications to indicate they are no longer affiliated with B. Winters and direct further revisions of same (1.5); review additional address confirmation forms and reconcile same (.4); communicate with M. Gura and K. Paulson regarding outstanding distribution issues (.4); review and verify copies which need to be provided to attorneys or others are correctly captured and make changes as needed (1.5); communicate with K. Paulson regarding same (.2); review revised letters to be sent to claimants and replace in distribution as needed (1.8); review and pull distributions being sent by wire (.4); prepare list of 19 missing checks for PDR (.2); review and flag distribution letters for same (.3); communicate with M. Gura regarding same (.2); communicate with PDR regarding additional distribution checks (.2); prepare correspondence to PDR and M. Gura regarding changes needed for checks for claims 508 and 163 (.2); correspond with K. Paulson regarding claims 29 and 30 (.2); research delivery method for distribution check being sent to Japan (.1); review other distributions being sent internationally (.2); prepare correspondence to M. Gura regarding same (.1); create updated Winters and non-Winters spreadsheets for final review and mailing confirmation of second distribution (.6).	8.5	\$2,040.00
4/23/2024	AS	Prepare second distribution and review checks and spreadsheet for accuracy (4.3); exchange emails with investor (.1); telephone calls with M. Gura (.3).	4.7	\$634.50
4/23/2024	КАР	Review address confirmation forms, compare against claims spreadsheet, and save and upload to Teams (.5); review 26 distribution checks from PDR for accuracy and communicate with M. Gura, M. Lockwood, and E. Tate regarding same (.6); review Court's response to Receiver's supplemental report (.1); prepare list of claimants and their contact information (.3); prepare list of Florida claimants affiliated with B. Winters (.4).	1.9	\$256.50

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SERVICES	6			
Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claim	s Administration and Objections		
4/23/2024	MML	Meet with team regarding distribution review and mailing (1.0); communicate with M. Gura regarding same (.2); review correspondence from claimants associated with B. Winters (.2); review correspondence from Receiver regarding direction on same (.1); communicate with B. Nguyen regarding same (.1); communicate with K. Paulson and M. Gura regarding date issue on reprinted checks (.2); review correspondence to PDR regarding same (.1); respond to questions from review team regarding issues found during final review (.9); review mailing of distributions to Winters and direct method of mailing (.3); communicate with B. Winters (.3).	3.4	\$816.00
4/24/2024	AS	Telephone call with courier service regarding delivery of checks (.1); prepare email to team regarding same (.1).	0.2	\$27.00
4/24/2024	KAP	Review numerous address confirmation forms, identify duplicates, compare against claims spreadsheet, and save and upload to Teams (.4).	0.4	\$54.00
4/24/2024	MML	Communicate with M. Gura and E. Tate regarding reissued checks (.2); prepare correspondence to A. Stephens regarding same (.1).	0.3	\$72.00
4/25/2024	AS	Continue compiling second distribution checks for mailing (2.7).	2.7	\$364.50
4/25/2024	MML	Review additional and corrected checks for distribution (.4); attention to mailing of same (.5); communicate with Receiver regarding high dollar checks (.1); work on additional issues related to distribution (.5); review undeliverable emails (.1).	1.6	\$384.00
4/26/2024	AS	Exchange emails with team regarding distribution (.2); telephone calls with two investors regarding same (.3).	0.5	\$67.50
4/26/2024	KAP	Review address confirmation forms, identify duplicates,	0.3	\$40.50

compare against spreadsheet, and save and upload to Teams (.3). Communicate with Receiver regarding distribution (.1); communicate with E. Tate and M. Gura regarding same 4/26/2024 MML 0.3 (.1); review correspondence from K.M. (.1). Exchange emails with investor regarding revocation of power of attorney with B. Winters (.1); continue compiling second distribution checks for mailing (.9); communicate \$202.50 4/29/2024 AS 1.5 with D. Roush regarding investor address issues (.2); review master spreadsheet regarding same (.3).

\$72.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
4/29/2024	КАР	Review address confirmation forms, identify duplicates, compare against claims spreadsheet, and save and upload to Teams (.2); exchange emails with M. Lockwood regarding claimants with denied claim who submitted address confirmation forms (.2).	0.4	\$54.00
4/29/2024	MML	Reconcile confirmation forms to spreadsheet for mailing of distribution (.8); research denied and unfiled claims where individuals submitted confirmation forms (.3); communicate with B. Nguyen regarding actual mailing of distribution (.1); respond to inquiry from D. Roush regarding priority mailing (.1); review communications with claimant regarding same (.1).	1.4	\$336.00
4/30/2024	AS	Exchange emails with investor and K. Paulson (.2).	0.2	\$27.00
4/30/2024	KAP	Communicate with M. Lockwood regarding logistics of wiring distribution funds to certain claimants (.3); telephone call to E. Tate regarding same (.1); verify amounts of distributions for claimants receiving wire transfers (.1); telephone call to K.D. regarding need for court order allowing mother to negotiate deceased father's distribution check (.2); telephone call to attorney for G.D.'s estate regarding same (.1); review history of C.C.'s reissued distribution check and prepare email to E. Tate regarding same (.1); prepare email to M. Lockwood and M. Gura regarding same (.1); telephone call with E. Tate regarding wire transfers of distribution funds to out of country claimants (.1); prepare email to M. Gura and M. Lockwood regarding same (.1); communicate with M. Lockwood regarding cover letters to be sent to claimants receiving wire transfers (.1); prepare email to Receiver regarding approving stop payment for C.C.'s check (.1); review two address confirmation forms, compare against spreadsheet, and save and upload to Teams (.1).	1.5	\$202.50
4/30/2024	MML	Review and address outstanding distribution issues, finalize, and complete second distribution (2.3); communicate with K. Paulson regarding wiring distributions to certain claimants (.3); communicate with K. Paulson regarding cover letters for claimants receiving wires (.2); review correspondence regarding C.C.'s first distribution (.1); review correspondence from K. Paulson regarding wires (.1).	3.0	\$720.00

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SERVICES	5			
Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claim	s Administration and Objections		
5/1/2024	КАР	Review email from E. Tate regarding instructions used to wire first distributions to three claimants (.1); prepare emails to three claimants regarding confirming same (.1); communicate with E. Tate regarding additional instructions for claimant M.R. (.1); prepare second email to M.R. regarding second account number (.1); update claims spreadsheet with new addresses from M. and M.K. and communicate with M. Lockwood regarding same (.1); telephone call with C.S. regarding Receiver's supplemental report (.2); prepare emails to two claimants regarding new addresses (.1).	0.8	\$108.00
5/2/2024	KAP	Review email from M.R. regarding confirmation of wire transfer information for second distribution and prepare email to E. Tate regarding same (.1).	0.1	\$13.50
5/2/2024	MML	Review correspondence regarding M.R. (.1); review correspondence from M. Gura regarding cleared check tracking (.1).	0.2	\$48.00
5/3/2024	КАР	Exchange emails with M.K. regarding new address and prepare follow-up email to M. Lockwood and M. Gura regarding same (.1); add notes column to claims spreadsheet and communicate with M. Gura and M. Lockwood regarding same (.1); exchange emails with K.M. regarding address change and update spreadsheet per same (.1).	0.3	\$40.50
5/3/2024	MML	Correspond with K. Paulson regarding noting changes for second distribution (.1).	0.1	\$24.00
5/5/2024	KAP	Exchange emails with Receiver regarding two claimants' distribution checks (.1); prepare detailed email to C.N. regarding sending second distribution check to B. Winters (.2).	0.3	\$40.50

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SERVICE	6						
Date	TKPR	Description of Ser	vices		Но	urs	Amount
CLAIM	Claim	s Administration and	l Objections				
5/6/2024	КАР	Winters (.2); create Tate's reference (.1 update claims sprea emails with four cla Winters (.2); telephy depositing check m M. Lockwood and E first distribution che same (.1); send sec regarding confirmin distributions (.1); re compare against cla to Teams (.2); exch	laimants whose che condensed spread ); review cleared ch adsheet regarding s imants whose check one call with claima ade out to IRA (.2); E. Tate regarding pla ck and update clain cond emails to S. ar g wire instructions f view three address aims spreadsheet, a ange emails with R ion check was maile	ecks were sent to B. sheet of same for E. necks report and same (.1); exchange ks were sent to B. nt regarding communicate with acing stop on C.C.'s ns spreadsheet per nd J.P. and R.C. for their second confirmation forms, and save and upload .Z. regarding date ed (.1); review email	1	1.4	\$189.00

from D. Roush regarding call from R.S. and telephone call to same regarding distribution check sent to B. Winters

Winters' claimants' inquiries regarding distribution checks (.2); review confirmation of wires (.1); communicate with K. Paulson regarding check to issue and administrative fee (.1); prepare correspondence to Receiver regarding same

Communicate with Receiver and team regarding B.

(.1).

(.1).

5/6/2024

MML

0.5 \$120.00

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SERVICE	6			
Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
5/7/2024	ΚΑΡ	Exchange emails with R.Z. regarding new address and update claims spreadsheet per same (.1); exchange emails with D.B. regarding new address and update claims spreadsheet for same (.1); review email from L.E. regarding new custodian for IRA and update claims spreadsheet per same (.1); exchange emails with E.S. regarding his distribution check sent to B. Winters (.1); exchange emails with J.D. regarding same (.1); telephone call with M.C. regarding deposited check with no endorsement (.1); telephone call with S.C. regarding same (.1); telephone call to I.H. regarding same (.1); communicate with M. Lockwood and E. Tate regarding resolving three checks with no endorsements (.3); telephone call with L.E. regarding reissuing checks to new custodian (.2); review follow-up email from L.E., update claims spreadsheet per same, and prepare email to claims team regarding check reissues (.1); review thirteen checks returned by post office, update claims spreadsheet per same, and communicate with claims team regarding handling same (.5); exchange emails with C.G. regarding B. Winters' receipt of her check (.1); exchange emails with M. Lockwood regarding B.R.'s checks and update claims spreadsheet per same (.1); exchange emails with claims team regarding C.T.'s returned check (.1); prepare reissue request spreadsheet, add three requests to same, and upload to Teams (.2); review wire transfer confirmations for M.R. and update claims spreadsheet per same (.1); prepare email to T.R. regarding check returned by post office (.1).	2.6	\$351.00
5/7/2024	MML	Review communications from claimants regarding their respective second distributions (.2); review correspondence from team regarding returned mail and reprocessing of same (.1).	0.3	\$72.00
5/8/2024	KAP	Review email from T.R. regarding new address and update claims spreadsheet for same (.1); telephone calls with three claimants regarding unendorsed checks (.2); perform research regarding new address for C.T. (.1); telephone call with C.T. regarding updated contact information and update claims spreadsheet per same (.2); prepare email to E. Tate regarding re-mailing C.T.'s check to new address (.1); review email from non-investor and communicate with M. Lockwood regarding same (.1); review email message from bank regarding lack of endorsement on three additional checks and communicate with Receiver and team regarding same (.1); telephone calls to three claimants regarding same (.2); exchange emails with M.S. regarding check sent to B. Winters (.1); telephone call with I.H. regarding resolving unendorsed check (.1).	1.3	\$175.50

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SERVICE	8			
Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claim	s Administration and Objections		
5/8/2024	MML	Call with Receiver regarding checks returned by ServisFirst Bank (.1); prepare correspondence to K. Paulson regarding directives for same (.1); review correspondence from E. Tate and S. O'Brien regarding check to void (.1); respond and provide list of all checks to void (.2); review correspondence from K. Paulson regarding returned check (.1); review communications from Winters' claimants inquiring about checks (.1); communicate with K. Paulson regarding same (.1); review correspondence regarding C.T. (.1); communicate with K. Paulson regarding additional checks returned by bank for improper endorsement (.2); review same (.1); review correspondence regarding re-mailed checks (.1).	1.3	\$312.00
5/9/2024	КАР	Exchange emails with N.C. regarding check sent to B. Winters (.1); review cleared checks report for period from May 7, 2024 through May 9, 2024 and update claims spreadsheet for hundreds of cleared checks (1.1); prepare summary of cleared checks for claims team (.2); review email and estate document from K.D., review previous estate documents provided by same, and respond (.2); review two address confirmation forms, compare against claims spreadsheet, and save and upload to Teams (.1); exchange emails with claims team regarding B. Winters' receipt of checks and claimants' requests for same (.1); telephone call with D.C. regarding check returned by bank (.1); telephone call with D.T. regarding reissuing check with new account number (.1); telephone call with D.T. regarding new address and update his two claims on spreadsheet per same (.2).	2.3	\$310.50
5/9/2024	MML	Review additional final address confirmation forms submitted by claimants with claim name change request (.1); communicate with K. Paulson regarding same (.1); review call from claimant regarding B. Winters not receiving checks (.1); review mail receipt for same and send to team (.1); review update of cleared second interim distribution checks (.1); attention to checks being returned by the bank for improper endorsements and communicate with team regarding same (.6); communicate with K. Paulson regarding returned courtesy copy for B.R. (.2); review wire confirmations for M.R. (.1).	1.4	\$336.00

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SERVICES Date	TKPR	Description of Services		Ног	Page:	20 Amount
CLAIM 5/10/2024		s Administration and Objections Review address confirmation form, compare ag spreadsheet, and save and upload to Teams (. telephone call with D.B. regarding revoking B. V power of attorney and send email to same (.1); cleared checks report and update claims sprea same (.3); communicate with E. Tate regarding check number (.1); review reissued checks sen (.1); telephone call with E.S. regarding check sen (.1); telephone call with D.B. regarding to his old address (.1); review voided checks fro communications between M. Lockwood and Re regarding same (.1); update reissue request sp per same and prepare email to L.E. (.1).	1); Winters' review adsheet per g missing ht by E.T. ent to B. checks sent om L.E. and eceiver	t	1.1	\$148.50

\$48.00

\$270.00

\$144.00

5/10/2024	MML	Communicate with Receiver regarding reissue charge (.1); review correspondence from Receiver and bank regarding check returns (.1).	0.2
5/13/2024	КАР	Review three address confirmation forms, update addresses for four claims on spreadsheet per same, and save and upload to Teams (.2); communicate with K.M. regarding lack of address confirmation forms for additional claims (.1); exchange emails with M. Lockwood regarding claimant communications (.1); telephone call with M.C. regarding unendorsed check rejected by bank (.1); prepare email to Receiver and claims team regarding same and update claims spreadsheet (.1); review correspondence from E.S. and update address on claims spreadsheet for same (.1); exchange emails with Receiver regarding reissuing M.C.'s check and add to check reissue list (.1); telephone call with D.C. regarding status of rejected check (.1); telephone call with J.R. regarding parents' check sent to B. Winters and revocation of power of attorney (.3); telephone call with N.M. regarding check sent to old address and update claims spreadsheet with new address (.2); prepare email to M.K. regarding whether address change is permanent (.1); telephone calls with D.T. regarding rejected check (.2); exchange emails with ServisFirst Bank regarding status of same (.1); communicate with Receiver regarding returned check (.1); review email from M.K. regarding new address and update claims spreadsheet per same (.1).	2.0
5/13/2024	MML	Review correspondence from K. Paulson regarding "final" address confirmation forms (.1); review correspondence regarding distribution to estate (.1); review correspondence from Receiver and K. Paulson regarding bank-rejected check (.1); review distribution update from K. Paulson (.1); review correspondence from Receiver regarding undeliverable check (.1); review reactivation address forms from J. and K.M. (.1).	0.6

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SEI	RVICES					

Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
5/14/2024	КАР	Review voice mail from D.C. and telephone call to same regarding reissuing check (.1); update reissue request spreadsheet for same (.1); prepare email to D.C. with details for FedEx label (.1); telephone call with D.T. regarding reissuing rejected check (.1); prepare email to Receiver and claims team regarding reissuing rejected checks (.1); review voice mail from L.S. and leave voicemail for same (.1); review address confirmation form from J.M. and update three claims on spreadsheet for same (.1); communicate with K. and J.M. regarding children's claims (.1); communicate with K.H. regarding reissuing rejected check (.1); telephone call with M. Gura regarding reissuing checks for those claimants whose checks were rejected by bank (.2); telephone call with M. Lockwood regarding same and method for mailing same (.4); prepare email to M. Gura regarding same (.1).	1.6	\$216.00
5/14/2024	MML	Review correspondence from K. Paulson regarding bank-rejected checks (.1); call with K. Paulson regarding same (.4).	0.5	\$120.00

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SERVICES	;				
Date	TKPR	Description of Services	Ηοι	ırs	Amount
CLAIM	Claims	Administration and Objections			
5/15/2024	КАР	Exchange emails with two claimants regarding reissuing checks that were rejected by bank (.1); telephone call with claimant regarding same (.1); correspond with M. Lockwood regarding manner of mailing reissued checks, stop payments, and email blast (.2); prepare email to claims team regarding communications with claimants whose checks were rejected (.1); prepare draft email regarding proper endorsement of distribution checks for blast to claimants (.1); review cleared checks report and update claims spreadsheet regarding same (.2); prepare summary of status of cleared checks and send same to M. Gura and M. Lockwood (.2); review seven reissued checks (.1); communicate with E. Tate regarding approval of same method of mailing, and addresses for same (.2); telephone call with E. Tate and M. Lockwood regarding resolving checks rejected by bank (.1); telephone call with R.S. regarding check sent to B. Winters (.1); exchange emails with K. Vanater of ServisFirst Bank regarding rejected checks (.1); call and leave phone messages for two claimants regarding rejected checks (.1); call and leave phone messages for two claimants regarding rejected checks (.1); participate in Zoom meeting with Receiver, M. Lockwood, M. Gura, E. Tate, and J. Perez regarding distribution issues (1.0); telephone call with M.S. regarding non-receipt of distribution check (.1); update claims spreadsheet with new address for same and communicate with Receiver regarding whether to place a stop payment on check (.1); review finalized reissued checks and communicate with E. Tate regarding methods for mailing (.2); prepare email to E. Tate with contact information for claimants living in Spain (.1); prepare envised draft email for blast to claimants and send to Receiver and M. Lockwood (.1); prepare email to E. Tate with contact information for claimants living in Spain (.1); prepare envised draft email for blast to claimants and send to Receiver and M. Lockwood (.1); prepare email to E. Tate with contact information for claimants living in Spain (.		3.7	\$499.50
5/15/2024	MML	Review emails regarding bank-refused checks (.2); call with E. Tate and K. Paulson regarding same (.1); review correspondence from ServisFirst Bank regarding same (.1); revise draft email blast to claimants regarding proper endorsement of checks (.2); attend Zoom conference with Receiver and claims team (1.0); exchange correspondence regarding stop payment for M.S. (.1); review correspondence from M. Gura with reissue requests (.1); review distribution status update from K. Paulson (.1); communicate with Receiver regarding B.G. (.1); review correspondence from K. Paulson regarding wires (.1); review correspondence from E. Tate regarding check reissues (.1).		2.2	\$528.00

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SERVICES	5						
Date	TKPR	Description of Se	rvices		Но	urs	Amount
CLAIM	Claims	s Administration and	d Objections				
5/16/2024	КАР	prepare emails to t reissued checks ( non-receipt of distr U.V. and D.C. rega claims spreadshee C.G. regarding nev email from M.S. re check and prepare (.1); telephone call check (.1); review of		ling mailing of with K.M. regarding xchange emails with ges and update hange emails with irm (.1); review cond distribution m regarding same ailing of reissued egarding completed		0.9	\$121.50
5/16/2024	MML	Review correspond	lence from claims te	am regarding		0.5	\$120.00

5/16/2024 MML Review correspondence from claims team regarding 0.5 \$12 pending wire transfers (.1); work on email blast (.2); review correspondence from K. Vanater regarding S.D. (.1); review confirmation of wire (.1).

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SERVICES	6					
Date	TKPR	Description of Se	rvices		Hours	Amount
CLAIM	Claim	s Administration and	d Objections			
5/17/2024	ΚΑΡ	reminder to proper telephone call with telephone call with (.1); review voicem Winters and call ar communicate with review two cleared spreadsheet per sa second distribution claims team (.1); te distribution check ( update claims spre re-mailing to new a returned by T.B. ar team regarding new voided check and I claims team regard exchange emails w address (.1); updat for same (.1); telephon outstanding distribu Winters regarding of reissued check sho J.S. regarding instr new custodian and Receivership recor regarding reissuing spreadsheet per sa team regarding out (.1); prepare email	ail from R.S. regard ad leave voicemail for E. Tate regarding cl check reports, and ame (.2); prepare su checks and send to elephone call with L. .1); review returned adsheet, and instruct ddress (.1); review ad prepare email to F ed for estate docume etter from S.P. and ling reissuing check with D.A. regarding c e claims spreadshe hone call with M. Lo nd sending reissued hone call with M. Gura ution issues (.1); pre confirming address buld be sent (.1); exc uctions for having c changing custodian ds (.2); prepare email check for D.A. and ame (.1); exchange of the confirming address for changing custodian ds (.2); prepare email check for D.A. and ame (.1); exchange of the confirming address for changing custodian	on checks (.2); ding same (.1); nd distribution check ing check sent to B. or same (.1); eared check reports, update claims mmary of status of o Receiver and S. regarding second check for D.T., ct E. Tate regarding voided check Receiver and claims entation (.1); review prepare email to for same (.1); heck sent to old et with new address ockwood regarding d first distribution regarding pare email to B. where S.P.'s change emails with heck reissued to name in ail to claims team update claims emails with claims as for three claimants ording reissuing		\$297.00

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SERVICES	;			
Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claim	s Administration and Objections		
5/17/2024	MML	Prepare correspondence to Receiver regarding email blast (.1); review revisions and further revise same (.1); communicate with K. Paulson regarding same (.1); review email blast as sent to claimants (.1); communicate with K. Paulson regarding bounced emails (.1); call with D. Roush regarding email and response to claimant inquiries (.1); communicate with K. Paulson regarding C.C.'s first distribution check (.1); review status update of checks clearing and response from Receiver regarding same (.1); review correspondence regarding returned checks (.1); communicate with K. Paulson regarding same (.1); review correspondence regarding same (.1); ressue requests (.1); review correspondence regarding reissue for J.S. (.1); communicate with K. Paulson regarding mother and son claim (.1); review correspondence from M. Gura and K. Paulson regarding distribution questions (.1).	1.4	\$336.00
5/20/2024	КАР	Exchange emails with T.M. regarding distribution check sent to prior address and update claims spreadsheet with new address for same (.1); exchange emails with T.Z. regarding check sent to B. Winters (.1); telephone call with Receiver regarding same (.1); communicate with T.Z. regarding same (.1); exchange emails with J.S. regarding address change and communicate with M. Lockwood regarding same (.1); review cleared checks report and update claims spreadsheet per same (.1); exchange emails with E. Tate regarding check not on spreadsheet and update spreadsheet per same (.1); review dozens of bounced emails from email blast, update claims spreadsheet for invalid emails, and determine which claimants did not receive email blast and have not yet negotiated checks (.7); communicate with M. Lockwood regarding same (.1); update claims spreadsheet for two checks re-mailed to new addresses (.1); exchange emails with K.C. regarding check sent to old address and update claims spreadsheet with new address (.1); telephone call with D.T. regarding timing of reissued check (.1); prepare email to D.T. regarding same (.1).	1.9	\$256.50
5/20/2024	MML	Communicate with K. Paulson regarding J.S. (.1); prepare draft email to B. Winters regarding proper endorsement of distribution checks (.2); review correspondence regarding B. Winters' claimants' confusion (.1); review information regarding bounced back emails (.1).	0.5	\$120.00

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SERVICES	5			
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CLAIM	Claims	Administration and Objections		
5/21/2024	КАР	Exchange emails with T.B. regarding estimated recovery from Receivership (.1); prepare cover letter to accompany C.C.'s reissued check and send same to E. Tate (.1); communicate with claims team regarding multiple reissued distribution checks (.2); prepare email to S.P. regarding correct address to send reissued check (.1); review cleared check report and update claims spreadsheet per same (.3); prepare summary of status of second distribution checks and wires and send same to Receiver and claims team (.5); exchange emails with Z.C. regarding first distribution check (1); review email from D.A. regarding finding lost check and telephone call with E. Tate regarding same (.1); prepare mail to claims team regarding same (.1); telephone call with T.B. regarding reissuing check in only his name after death of co-account holder (.1); telephone call with D.T. regarding status of mailed reissued check (.1); perform research regarding right of survivorship under Pennsylvania law (.3); perform search of E-Hounds for documentation of account change due to death of co-investor (.2).	2.3	\$310.50
5/21/2024	MML	Review correspondence regarding check reissues and holds (.2); review correspondence to C.C. (.1); review correspondence regarding addresses for claimants (.1); review correspondence regarding D.A. (.1); review status update of second distribution (.1); communicate with M. Gura regarding check sent to Japan (.1); review summary of reissue fees charged to claimants (.1); communicate with K. Paulson regarding N.C. (.1).	0.9	\$216.00
5/22/2024	KAP	Review email from R.C. regarding wire transfer information and forward to E. Tate (.1); exchange emails with K.C. regarding receipt of check (.1); telephone call with D.B. regarding reissuing lost checks (.1); prepare email to claims team regarding same (.1); review cleared check report and update claims spreadsheet per same (.3).	0.7	\$94.50
5/22/2024	MML	Communicate with K. Paulson regarding D.B. (.1).	0.1	\$24.00
5/23/2024	KAP	Review outgoing wire confirmation for R.C.'s second distribution and update claims spreadsheet per same (.1); review cleared check report and update claims spreadsheet per same (.2); telephone call with S.C. regarding new address and death of co-claimant (.4); update claims spreadsheet per same (.1); prepare email to S.C. regarding documentation needed to change name on parents' claim after father's death (.1); review email from D. Roush regarding call from D.B. and verify information for same in claims spreadsheet (.1).	1.0	\$135.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
5/23/2024	MML	Communicate with K. Paulson regarding unreturned checks and stop payments (.1); review notice of wire and related correspondence (.1).	0.2	\$48.00
5/24/2024	КАР	Review cleared check report and update claims spreadsheet per same (.2); prepare summary of status of second distribution checks and send same to Receiver and claims team (.2); exchange emails with Receiver regarding same (.1); telephone call with D.T. regarding missing priority mail package (.1); exchange emails with E. Tate regarding same (.1); prepare email to Receiver regarding same (.1).	0.8	\$108.00
5/24/2024	MML	Review correspondence from K. Paulson regarding D.T. (.1).	0.1	\$24.00
5/27/2024	MML	Review summary of status of second distribution (.1); review correspondence between K. Paulson and Receiver regarding same (.1).	0.2	\$48.00
5/28/2024	KAP	Telephone calls with D.T. regarding wiring instructions for sending distribution payment (.2); review cleared check report and update claims spreadsheet per same (.1); review remaining outstanding checks to identify those requiring follow-up (.1); communicate with E. Tate regarding J.S.'s voided check (.1); telephone call with A.A. regarding false profits, B. Winters' failure to make objection to same, and future distributions (.9).	1.4	\$189.00
5/28/2024	MML	Review correspondence from K. Paulson regarding additional wire (.1).	0.1	\$24.00
5/29/2024	KAP	Exchange emails with E. Tate regarding wiring distribution funds to D.T. (.1); exchange emails with S.P. regarding preferred address for mailing reissued check (.1); prepare email to E. Tate regarding same (.1); exchange emails with C.F. regarding depositing check made out to IRA (.1); telephone call with D.T. regarding status of wire transfer (.1); review reissued check for J.S. and update claims spreadsheet per same (.1); review cleared check report and update claims spreadsheet per same (.1); review checks returned in mail and update claims spreadsheet for same (.1); prepare email to claims team regarding same (.1); prepare email to C.P. regarding returned letter and new address (.1).	1.0	\$135.00
5/29/2024	MML	Review communications from K. Paulson and E. Tate regarding additional wire (.1); review stop payment for same (.1); review returned mail (.1).	0.3	\$72.00

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
5/30/2024	КАР	Review email from E. Tate regarding reissued checks being mailed and update claims spreadsheet per same (.1); review cleared check report and update claims spreadsheet per same (.1); prepare detailed summary of status of second distribution checks and send to Receiver and claims team (.3); exchange emails with Receiver regarding same (.1).	0.6	\$81.00
5/30/2024	MML	Review second distribution status update (.1).	0.1	\$24.00
5/31/2024	MML	Communicate with M. Gura regarding R.C.'s voided check (.1); review correspondence regarding tracking of deductions (.1).	0.2	\$48.00
6/2/2024	KAP	Review tab added to spreadsheet regarding check deductions and communicate with M. Gura regarding same (.1); review two distribution checks returned by post office and update claims spreadsheet per same (.1); review cleared check report and update claims spreadsheet per same (.1).	0.3	\$40.50
6/3/2024	КАР	Review inquiry from K.T. regarding denial of wife's claim and prepare detailed response to same (.2); telephone call with N.C. regarding re-mailing check to new address (.1); update claims spreadsheet with new address for same and instruct E. Tate regarding re-mailing check (.1); review cleared check report and update claims spreadsheet per same (.1).	0.5	\$67.50
6/4/2024	КАР	Telephone call with K.R. regarding new address for re-mailing his returned check (.1); update claims spreadsheet per same and instruct E. Tate to re-mail check (.1); telephone call to D.D. regarding returned check and update claims spreadsheet per same (.1); prepare email to Receiver regarding placing stop payments on two checks for D.B. (.1); telephone call with D.B. regarding status of reissued check (.1); review cleared check report and update claims spreadsheet per same (.1).	0.6	\$81.00
6/5/2024	КАР	Review email from E. Tate regarding re-mailing check for K.R. and update claims spreadsheet per same (.1); telephone call with T.B. regarding documentation needed to change name on claim (.1); prepare email to M. Lockwood regarding same (.1); review check and letter inadvertently sent to Receiver by A.G. and call and leave voice mail for same (.1); prepare email to claims team regarding same (.1); review message from Omni regarding communication from L.K. regarding error on distribution check and call and leave voice mail for same (.1); update claims spreadsheet per same and prepare email to claims team regarding reissuing check (.1).	0.7	\$94.50

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	s Administration and Objections		
6/6/2024	KAP	Telephone call to A.G. regarding check inadvertently sent to Receiver (.1); research proper address to send same and instruct E. Tate to mail same (.1); review cleared check reports for two days and update claims spreadsheet per same (.2); telephone call to D.D. regarding check returned by post office (.1).	0.5	\$67.50
6/6/2024	MML	Communicate with K. Paulson regarding A.G. (.1); review wire confirmation (.1); review correspondence from K. Paulson regarding T.B. (.1); prepare correspondence to Receiver regarding same (.1).	0.4	\$96.00
6/7/2024	КАР	Review cleared check report and update claims spreadsheet per same (.1); prepare summary of uncleared second distribution checks for Receiver and claims team (.1); telephone call with D.D. regarding new address and update claims spreadsheet per same (.1); prepare email to E. Tate regarding re-mailing D.D.'s check to new address (.1); exchange emails with E. Tate regarding forwarding A.G.'s check to custodian (.1); review IRA documentation, letter, and voided check sent by B.M. and update claims spreadsheet per same (.1); prepare email to M. Gura regarding reissuing B.M.'s check to new custodian (.1).	0.7	\$94.50
6/7/2024	MML	Review status update on second distribution (.1); prepare correspondence to K. Paulson and Receiver regarding same (.1); review correspondence regarding A.G. (.1).	0.3	\$72.00
6/10/2024	КАР	Review cleared check report and update claims spreadsheet per same (.1); telephone call with M. Lockwood regarding outstanding claim issues (.2); telephone call to D.T. regarding missing check (.1); update claims spreadsheet regarding same and prepare email to claims team regarding reissuing check (.1).	0.5	\$67.50
6/10/2024	MML	Review correspondence from K. Paulson regarding check reissue and stop payment request (.1); communicate with K. Paulson regarding status and outstanding issues (.2).	0.3	\$72.00
6/11/2024	KAP	Review cleared check report and update claims spreadsheet per same (.1).	0.1	\$13.50
6/11/2024	MML	Review correspondence from E. Tate regarding stop payments (.1); communicate with J. Perez regarding status (.2); exchange correspondence regarding C.E. (.1).	0.4	\$96.00
6/12/2024	KAP	Telephone call with daughter of N.H. regarding check sent to old address (.1); prepare email to M. Gura and E. Tate regarding ordering stop payment and reissuing check for same and update claims spreadsheet (.1); review cleared check report and update claims spreadsheet per same (.1).	0.3	\$40.50

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
6/12/2024	MML	Review reissue requests (.1); call with Receiver regarding status (.4); communicate with K. Paulson regarding N.H. (.1).	0.6	\$144.00
6/13/2024	KAP	Review cleared check report and update claims spreadsheet per same (.1).	0.1	\$13.50
6/14/2024	KAP	Review cleared check report and update claims spreadsheet per same (.1); prepare summary of uncleared distribution checks for Receiver and claims team (.2).	0.3	\$40.50
6/14/2024	MML	Review current status summary of distribution from K. Paulson (.1).	0.1	\$24.00
6/17/2024	КАР	Review cleared check report and update claims spreadsheet per same (.1); compile information regarding 40 claimants represented by B. Winters whose checks have not cleared and send same to Receiver (.1); telephone call with Receiver regarding sending email to claimants whose checks have not cleared (.1); review three reissued checks, update claims spreadsheet per same, and communicate with E. Tate regarding same (.1); prepare, address, and send email to 36 claimants and B. Winters regarding reminder to negotiate distribution checks (.2); prepare, address, and send email to 29 claimants regarding same (.2); review email from F.A. regarding non-receipt of check and new address and update claims spreadsheet per same (.1).	0.9	\$121.50
6/17/2024	MML	Communicate with Receiver regarding T.B. (.1); review correspondence from E. Tate and ServisFirst Bank regarding stop payment fees for distribution checks (.1); review spreadsheet of outstanding checks sent to B. Winters (.1); conduct research regarding T.B. (.1); communicate with K. Paulson regarding same (.1); review correspondence to claimants with outstanding distribution checks (.1).	0.6	\$144.00
6/18/2024	КАР	Exchange emails with M.H. regarding non-receipt of check (.1); telephone call with F.A. regarding check sent to old address and Receiver's website (.3); prepare email to claims team regarding same and update claims spreadsheet (.1); update claims spreadsheet for four stop payments and two reissued checks (.1); review cleared check report and update claims spreadsheet per same (.1); exchange emails with M. Lockwood regarding reissuing check to co-claimant after death of other co-claimant (.1).	0.8	\$108.00
6/18/2024	MML	Review correspondence regarding stop payments and check reissues (.1); communicate with K. Paulson regarding T.B. and V.B. (.1).	0.2	\$48.00
6/19/2024	KAP	Review voicemail from D.B. regarding status of reissued checks and call and leave voicemail for same (.1).	0.1	\$13.50

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
6/20/2024	KAP	Telephone call to D.B. regarding status of reissued checks (.1); telephone call with daughter of deceased investor regarding depositing check and mother's inheritance of investor's IRA and update claims spreadsheet per same (.2).	0.3	\$40.50
6/21/2024	KAP	Review cleared check report and update claims spreadsheet per same (.1); review stop payment processed for F.A.'s check and update claims spreadsheet for same (.1).	0.2	\$27.00
6/21/2024	MML	Review stop payment for F.A. (.1).	0.1	\$24.00
6/24/2024	КАР	Telephone call with L.B. regarding non-receipt of check (.1); prepare email to claims team regarding placing stop payment and reissuing check for same and update claims spreadsheet (.1); review cleared check report and update claims spreadsheet per same (.1); review stop payment verification for L.B.'s check and update claims spreadsheet per same (.1).	0.4	\$54.00
6/25/2024	КАР	Review voice mail from R.M. regarding non-receipt of distributions and forward same to Receiver and claims team (.1); review cleared check report and update claims spreadsheet per same (.1); prepare summary of second distribution checks and send to Receiver and claims team (.1); exchange emails with Receiver regarding email blasts (.1); communicate with M. Lockwood regarding distribution status report (.1); telephone call to A.G. regarding distribution check (.1); telephone call to W.R. regarding distribution check for deceased husband (.1).	0.7	\$94.50
6/25/2024	MML	Review status summary of second distribution (.1); communicate with K. Paulson regarding outstanding distribution checks (.1); communicate with K. Paulson regarding T.B. (.1); review correspondence from R.M. (.1).	0.4	\$96.00
6/26/2024	KAP	Review cleared check report and update claims spreadsheet per same (.1); update contact and attorney information for B.W.'s claim (.1); prepare letters to D.P. and D.H. regarding need for estate documentation before releasing second distribution check (.1).	0.3	\$40.50
6/26/2024	MML	Communicate with M. Gura regarding check reissue (.1).	0.1	\$24.00
6/27/2024	КАР	Update address in claims spreadsheet for I.H. per email from same (.1); telephone call with P.F. regarding status of reissued check (.1); prepare email to R.M. regarding denial of claim (.1); review cleared check report and update claims spreadsheet per same (.1); communicate with M. Gura regarding status of distribution, reissued checks, and information on claims spreadsheet (.6).	1.0	\$135.00

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SERVICES	5			
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CLAIM	Claims	Administration and Objections		
6/27/2024	MML	Review correspondence regarding L.B. (.1); review correspondence regarding new custodian request from claimants (.1); exchange correspondence with K. Paulson regarding C.C. (.1).	0.3	\$72.00
6/28/2024	КАР	Review cleared check report and update claims spreadsheet per same (.1); prepare email to T.B. regarding obtaining estate documentation for deceased co-claimant (.1).	0.2	\$27.00
		Total: Claims Administration and Obje	140.70	\$25,630.50
WFEE	Work o	on Fees Motions		
4/1/2024	MML	NO CHARGE: Review correspondence from PDR regarding March invoice (.1).	0.1	\$0.00
4/8/2024	MML	NO CHARGE: Review February prebills (.8); review correspondence from E-Hounds regarding March invoice (.1).	0.9	\$0.00
4/12/2024	KAP	NO CHARGE: Review and revise Receiver's January and February time entries (.9).	0.9	\$0.00
4/12/2024	MML	NO CHARGE: Communicate with M. Gura regarding first-quarter invoice (.1); review correspondence regarding prebills (.1); communicate with R. Jernigan regarding invoice (.1).	0.3	\$0.00
4/15/2024	MML	NO CHARGE: Review correspondence from KapilaMukamal regarding invoice (.1); communicate with K. Paulson regarding Receiver's time entries (.1); review invoice from Evans Keene (.1); communicate with A. Avery regarding same (.1).	0.4	\$0.00
4/16/2024	KAP	NO CHARGE: Review and revise Receiver's January and February prebills and send same to M. Lockwood (.5); review and revise March team prebills (.8).	1.3	\$0.00
4/17/2024	KAP	NO CHARGE: Continue to review and revise March team prebills (1.6).	1.6	\$0.00
4/17/2024	MML	NO CHARGE: Review correspondence regarding March prebills (.1); review correspondence from J. Perez regarding invoice (.1).	0.2	\$0.00
4/22/2024	KAP	NO CHARGE: Review and revise edited team prebills for March (.4); send same to M. Lockwood (.1); review and revise E. Tate's first-quarter invoice (1.0).	1.5	\$0.00
4/25/2024	MML	NO CHARGE: Review correspondence from E. Tate regarding costs (.1).	0.1	\$0.00
4/29/2024	KAP	NO CHARGE: Review and revise Receiver's March time entries (1.2).	1.2	\$0.00

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WFEE	Work	on Fees Motions		
4/30/2024	KAP	NO CHARGE: Review and edit Receiver's first-quarter prebills (.5); communicate with M. Lockwood regarding same (.1).	0.6	\$0.00
5/1/2024	KAP	NO CHARGE: Communicate with M. Lockwood regarding missing expenses on prebills (.1).	0.1	\$0.00
5/2/2024	KAP	NO CHARGE: Review Receiver's list of expenses against prebills and correspond with M. Lockwood and B. Nguyen regarding same (.1).	0.1	\$0.00
5/2/2024	MML	NO CHARGE: Review correspondence from E-Hounds regarding April invoice (.1).	0.1	\$0.00
5/6/2024	MML	NO CHARGE: Review invoices for J. Perez and JND (.2); communicate with JND regarding final invoice (.1); review and edit E. Tate's invoice (.3); review and edit all team and Receiver prebills for first quarter (2.5); review correspondence regarding PDR's April invoice (.1); communicate with A. Farber regarding invoices for first quarter and April (.1).	3.3	\$0.00
5/7/2024	MML	NO CHARGE: Prepare motion for fees (2.2); review third-party invoices and update spreadsheet and motion for same (1.0); prepare correspondence to Receiver regarding approval of motion and invoices (.1).	3.3	\$0.00
5/8/2024	MML	NO CHARGE: Communicate with Receiver regarding approval of fees motion (.1); prepare correspondence to E. Tate regarding fee amount confirmation (.1); review correspondence from E. Tate regarding information for same (.1).	0.3	\$0.00
5/9/2024	CE	NO CHARGE: Review, analyze, and revise Receiver's motion for fees and review invoices for privilege and work product (2.3); exchange emails with M. Lockwood regarding same (.3).	2.6	\$0.00
5/9/2024	MML	NO CHARGE: Prepare proposed order (.1); prepare categorization of costs (.1); review final invoices and compare to motion (.2); communicate with B. Nguyen regarding changes to invoices (.2); review revised invoices (.1); update motion for fees for same (.5); prepare correspondence to C. Ellis regarding motion and exhibits (.1); communicate with E. Tate and T. Kelly regarding late expense (.2).	1.5	\$0.00
5/10/2024	CE	NO CHARGE: Exchange meet and confer emails with A. Auxter regarding Receiver's twentieth interim motion for fees and invoices supporting same (.3); exchange emails with M. Lockwood regarding same (.1).	0.4	\$0.00
5/10/2024	MML	NO CHARGE: Communicate with C. Ellis regarding motion for fees (.1); review revisions to same (.1); communicate with C. Ellis and B. Nguyen regarding Evans Keane (.1).	0.3	\$0.00

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Date	TKPR	Description of Services	Hours	Amount
WFEE	Work	on Fees Motions		
5/13/2024	CE	NO CHARGE: Exchange emails with A. Auxter regarding Receiver's 20th interim motion for fees (.1).	0.1	\$0.00
5/13/2024	MML	NO CHARGE: Review correspondence from A. Auxter and C. Ellis regarding fees motion extension (.1).	0.1	\$0.00
5/14/2024	CE	NO CHARGE: Review and revise motion for extension of time to file Receiver's 20th interim motion for fees and costs (.3); draft meet and confer email to R. Kurpiers and send follow-up email regarding same (.3).	0.6	\$0.00
5/15/2024	MML	NO CHARGE: Review motion for extension of time to file fees motion and related correspondence (.1).	0.1	\$0.00
5/16/2024	MML	NO CHARGE: Review order granting extension (.1).	0.1	\$0.00
5/17/2024	CE	NO CHARGE: Exchange emails with A. Auxter regarding Receiver's motion for fees (.1).	0.1	\$0.00
5/20/2024	CE	NO CHARGE: Review and revise exhibits to Receiver's 20th interim motion for fees (.7); draft email to R. Kurpiers to meet and confer regarding same (.2).	0.9	\$0.00
5/21/2024	CE	NO CHARGE: Review email from R. Kurpiers regarding meet and confer on Receiver's 20th interim motion for fees (.1); exchange emails with J. Perez regarding efforts to meet and confer with M. DaCorta regarding Receiver's 20th interim motion for fees (.2).	0.3	\$0.00
5/21/2024	MML	NO CHARGE: Review correspondence from R. Kurpiers regarding representation for 3.01(g) (.1); review correspondence from J. Perez and C. Ellis regarding same (.1).	0.2	\$0.00
5/22/2024	MML	NO CHARGE: Review notice of filing motion for fees (.1).	0.1	\$0.00
5/23/2024	MML	NO CHARGE: Review invoice from Tampa Legal (.1); prepare correspondence to B. Nguyen regarding payment of same (.1).	0.2	\$0.00
6/6/2024	MML	NO CHARGE: Review correspondence from E-Hounds regarding May invoice (.1); review correspondence from PDR regarding May invoice (.1).	0.2	\$0.00
6/7/2024	MML	NO CHARGE: Communicate with B. Nguyen regarding payment of invoices (.1).	0.1	\$0.00
6/12/2024	KAP	NO CHARGE: Review and revise April team prebills (2.0).	2.0	\$0.00
6/18/2024	MML	NO CHARGE: Review order granting fees motion (.1).	0.1	\$0.00
6/24/2024	KAP	NO CHARGE: Review and revise edited April prebills and send same to M. Lockwood (.5).	0.5	\$0.00
6/28/2024	KAP	NO CHARGE: Review and revise May team prebills (.3).	0.3	\$0.00

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SERVIC	ES			
Date		Description of Services	Hours	Amount
WFEE	Work on	Fees Motions		
6/28/202		NO CHARGE: Review correspondence from A. Avery and 3. Nguyen regarding invoices (.1).	0.1	\$0.00
		Total: Work on Fees Motions	27.20	\$0.00
		Total Professional Services	246.6	\$44,102.50
DISBUR	SEMENTS			
Date		Description of Disbursements		Amount
E101	Photocopies			
4/25/202	24	Photocopies @ .15 each (628 @ \$0.15)		\$94.20
E102	Outside Print	ing		
5/12/202	24	Tampa Legal Copies, Inc Copy Service- Digital printing B&V letters for mailout	V	\$153.06
E106	On Line Rese	arch		
4/5/2024	Ļ	Westlaw		\$114.53
5/1/2024	Ļ	PACER printing costs for month of April 2024 (189 @ \$0.10)	)	\$18.90
6/7/2024	ļ	Accurint - background research		\$157.10
E107	Del. Services	Messengers		
4/20/202	24	Xpress Deliveries- Courier Service- Xpress Deliveries from Receiver's office to Guerra & Partners' office		\$47.46
4/30/202	24	FedEx to Brent Allen Winters		\$44.28
5/4/2024	ŀ	Xpress Deliveries- Courier Service- Xpress delivery from Edv Tate to Guerra & Partners	vina	\$47.46
E108	Postage			
4/29/202	24	Postage		\$524.28
E113	Subpoena Fe	es		
4/3/2024	Ļ	Bolter & Carr Investigations- Service of Process- Service fee subpoena to be served on Douglas B. Clark	for	\$55.00
4/3/2024	Ļ	Bolter & Carr Investigations- Service of Process- Service fee subpoena to be served on Clark Asset Management LLC	for	\$59.35

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DISBUR	SEMENTS			
Date		Description of Disbursements		Amount
E113	Subpoena Fees	3		
4/8/2024	l .	Bolter & Carr Investigations- Service of Process- Service fee for subpoena - NY to be served on Michelle Utter		\$155.00
4/10/202	24	Bolter & Carr Investigations- Service of Process- Service fee for subpoena - IL to be served on Brent Allen Winters		\$180.00
4/16/202	24	Bolter & Carr Investigations- Service of Process- Service Fee for Subpoena out of State-Michelle Utter		\$85.00
6/21/202	24	Bolter & Carr Investigations- Service of Process- Service Fee-IL To be served on UPS Store #4451		\$145.00
6/21/202	24	Bolter & Carr Investigations- Service of Process- Service Fee-IL To be served on Jason McKee		\$150.00
6/26/202	24	Bolter & Carr Investigations- Service of Process- Service fee - NY to be served on Stephen Preziosi		\$170.00
E123	Web-Related E	xpenses		
4/1/2024	l I	Rad Technology Consulting LLC- Web-related expenses- Monthly hosting services		\$50.00
6/1/2024	ļ	Rad Technology Consulting LLC- Web-related expenses- Website hosting for June 2024		\$50.00
6/10/202	24	RAD Technology - Web-related expenses - monthly hosting		\$50.00
E124	Other			
4/1/2024	ł	Evans Keane LLP- Services related to IPM subpoena		\$65.15
5/6/2024	ļ	Veritext- Court Reporter Charges- Wiand v. Arduini-Deposition Hearing		\$325.00
5/8/2024	ļ	Veritext- Court Reporter Charges- Deposition of Douglas Clark		\$325.00
	24	Miscellaneous- Sunbiz.org - Judgment Lien Certificate for D. Clark		\$35.00
6/25/202		and Clark Asset Management		
6/25/202		and Clark Asset Management Total Disbursements		\$3,100.77
6/25/202			\$44,102.50 \$3,100.77	\$47,203.27
6/25/202		Total Disbursements Total Services Total Disbursements Total Current Charges		

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#### TASK RECAP

Services

Project No.	Hours	Amount
ASSET - ASSET	58.80	\$13,969.00
CASE - CASE	19.90	\$4,503.00
CLAIM - CLAIM	140.70	\$25,630.50
WFEE - WFEE	27.20	\$0.00
	0.00	\$0.00
	0.00	\$0.00
	0.00	\$0.00
	0.00	\$0.00
	246.60	\$44,102.50

#### Disbursements

Project No.	Amount
Photocopies	\$94.20
Outside Printing	\$153.06
On Line Research	\$290.53
Del. Services/Messengers	\$139.20
Postage	\$524.28
Subpoena Fees	\$999.35
Web-Related Expenses	\$150.00
Other	\$750.15
	\$3,100.77

#### **BREAKDOWN BY PERSON**

Person		Project No.	Hours	Amount
AC	Ailen Cruz	ASSET - ASSET	2.00	\$640.00
CE	Chemere Ellis	ASSET - ASSET	20.70	\$4,968.00
CE	Chemere Ellis	CASE - CASE	1.90	\$456.00
CE	Chemere Ellis	CLAIM - CLAIM	0.10	\$24.00
CE	Chemere Ellis	WFEE - WFEE	5.00	\$0.00
EF	Eric Feld	ASSET - ASSET	7.60	\$1,824.00
AA	Alana Avery	ASSET - ASSET	0.80	\$120.00
BN	Binny Nguyen	CASE - CASE	2.30	\$310.50
AS	Amanda Stephens	ASSET - ASSET	2.20	\$297.00
AS	Amanda Stephens	CASE - CASE	0.20	\$27.00
AS	Amanda Stephens	CLAIM - CLAIM	22.00	\$2,970.00
KAP	Kimberly A. Paulson	CASE - CASE	0.10	\$13.50
KAP	Kimberly A. Paulson	CLAIM - CLAIM	55.50	\$7,492.50
KAP	Kimberly A. Paulson	WFEE - WFEE	10.10	\$0.00

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### **BREAKDOWN BY PERSON**

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Person		Project No.	Hours	Amount
MML	Maya M. Lockwood	ASSET - ASSET	25.50	\$6,120.00
MML	Maya M. Lockwood	CASE - CASE	15.40	\$3,696.00
MML	Maya M. Lockwood	CLAIM - CLAIM	63.10	\$15,144.00
MML	Maya M. Lockwood	WFEE - WFEE	12.10	\$0.00
			246.60	\$44,102.50

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# **EXHIBIT 10**



J N D

Date: 07/12/2024

# 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**

Date	Attorney	Description	Quantity	Rate	Total
04/04/2024	MG	Review and organize investor communications (.7); update list of investor contact changes in preparation for mailout (.4).	1.10	\$135.00	\$148.50
04/05/2024	MG	Draft the mail merge for second distribution letters to claimants (.7); review and revise draft letters (2.1).	2.80	\$135.00	\$378.00
04/09/2024	MG	Communicate with PDR regarding second distribution checks (.1); review order from the Court (.1).	0.20	\$135.00	\$27.00
04/10/2024	MG	Communicate with PDR regarding second distribution checks (.3); work on second distribution (.5); revise master spreadsheet with edits from M. Lockwood (.6).	1.40	\$135.00	\$189.00
04/11/2024	MG	Communicate with PDR regarding the second distribution checks (.1); update revisions needed to the master spreadsheet and letters (2.2); attend Zoom meeting with the Receiver regarding newly submitted address confirmation forms (.5); revise new address labels (.4).	3.20	\$135.00	\$432.00
04/12/2024	MG	Communicate with PDR regarding second distribution checks (.1); review and revise letter changes for distribution (.5).	0.60	\$135.00	\$81.00
04/15/2024	MG	Review and update revisions needed for the second distribution (.8); communicate with an investor regarding B. Winters (.2); draft additional notes for second distribution (.4); communicate with PDR regarding a check reissue (.1).	1.50	\$135.00	\$202.50
04/16/2024	MG	Review correspondence from B. Winters and the Helpers Group to claimants (.3); coordinate second	1.10	\$135.00	\$148.50

Wiand-00005-Oasis Receivership - 07/12/2024

		distribution checks with PDR, E. Tate, and Guerra & Partners (.4); revise distribution notes (.4).			
04/17/2024	MG	Attend Zoom meeting with the Receiver to discuss supplemental interim report (.5); communicate with M. Lockwood regarding same (.5); prepare for second distribution (1.9).	2.90	\$135.00	\$391.50
04/18/2024	MG	Compile and prepare exhibits to the filing of the supplemental interim report (2.0); review filing (.4).	2.40	\$135.00	\$324.00
04/21/2024	MG	Communicate with an investor regarding the status of the second distribution (.1); review status of denied claimants (.2); review and update notes of changes to the second distribution (2.5)	2.80	\$135.00	\$378.00
04/22/2024	MG	Revise second distribution letters (4.5); draft email to PDR for additional checks (.8); update notes and e-files related to second distribution changes (1.5).	6.80	\$135.00	\$918.00
04/23/2024	MG	Review revised letters and checks (.8); review and update distribution notes (.5).	1.30	\$135.00	\$175.50
04/24/2024	MG	Review distribution reconciliation (.4); review and compile distribution revisions (1.2); review and assist with distribution and claims issues (1.2).	2.80	\$135.00	\$378.00
04/25/2024	MG	Work on second distribution (1.8); communicate with E. Tate regarding reissued check (.1); communicate with PDR regarding a reissued check (.2).	2.10	\$135.00	\$283.50
04/26/2024	MG	Review case documents for denied claimant (.2); communicate with two investors regarding the claims process (.3).	0.50	\$135.00	\$67.50
04/29/2024	MG	Review distribution notes and prepare for the second distribution (1.4).	1.40	\$135.00	\$189.00
04/30/2024	MG	Final review and preparation of the second distribution (3.0); update the master spreadsheet with second distribution check numbers (1.8).	4.80	\$135.00	\$648.00
05/02/2024	MG	Review and organize claimant communications (.9); reconcile notes from second distribution (.4).	1.30	\$135.00	\$175.50
05/07/2024	MG	Review communication related to the second distribution (.2).	0.20	\$135.00	\$27.00
05/10/2024	MG	Review claimant communications related to the second distribution (.3).	0.30	\$135.00	\$40.50
05/13/2024	MG	Review status of second distribution checks (.5).	0.50	\$135.00	\$67.50
05/15/2024	MG	Review case documents for records related to B.G. (.2); communicate with PDR regarding re-issued checks (.2); review and organize claimant communications (.3); attend Zoom call with the Receivership team regarding second distribution check negotiation issues (1.0).	1.70	\$135.00	\$229.50

Wiand-00005-Oasis Receivership - 07/12/2024

		Qu	antity Subto	otal	62.6
06/27/2024	MG	Update distribution spreadsheet (.4).	0.40	\$135.00	\$54.00
06/26/2024	MG	Review status memo (.2); review and organize claimant communications (.5); request check reissues (.5).	1.20	\$135.00	\$162.00
06/25/2024	MG	Review status of distributions and outstanding checks (.5).	0.50	\$135.00	\$67.50
06/24/2024	MG	Review status of C.D. judgment (1.3).	1.30	\$135.00	\$175.50
06/19/2024	MG	Review and organize claimant emails (.5).	0.50	\$135.00	\$67.50
06/07/2024	MG	Conduct research for contact information for non-party subpoena service (.9).	0.90	\$135.00	\$121.50
06/03/2024	MG	Communicate with K. Paulson regarding status of check reissues (.5); review and organize claimant communications (1.5).	2.00	\$135.00	\$270.00
06/03/2024	MG	Review documents for additional information related N.C. (.2).	0.20	\$135.00	\$27.00
05/31/2024	MG	Update the master spreadsheet with wire transfer information (.2); review and organize claimant communications (1.5); update list of outstanding second distribution tasks (1.2).	2.90	\$135.00	\$391.50
05/29/2024	MG	Review and organize second distribution emails (2.8).	2.80	\$135.00	\$378.00
05/23/2024	MG	Review and organize claimant communications (.5).	0.50	\$135.00	\$67.50
05/22/2024	MG	Review and organize claimant communications (.5); review reissued checks (.5).	1.00	\$135.00	\$135.00
05/21/2024	MG	Review and organize claimant communications (1.4); review check reissues (.2).	1.60	\$135.00	\$216.00
05/17/2024	MG	Communicate with PDR to request a check reissue (.1); review and organize claimant communications (.8); update electronic copies of second distribution checks (.9); update notes with second distribution revisions (1.1).	2.90	\$135.00	\$391.50
05/16/2024	MG	Update the master spreadsheet with new claimant contact information (.2).	0.20	\$135.00	\$27.00

Quantity Subtotal

62.6

Time Keeper	Quantity	Rate	Total
Mary Gura	62.6	\$135.00	\$8,451.00
		Quantity Total	62.6
		Subtotal	\$8,451.00
		Total	\$8,451.00

Wiand-00005-Oasis Receivership - 07/12/2024

# **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
8537	07/12/2024	\$8,451.00	\$0.00	\$8,451.00
			Outstanding Balance	\$8,451.50
			e atotanang Dalanoo	<i>+•,••</i>

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

Payment is due upon receipt.

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



3242 Henderson Boulevard, Suite 210 Tampa, FL 33609

Date: 07/12/2024



### 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.

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## **EXHIBIT 11**



INVOICE

Invoice # 29 Date: 07/27/2024 Due On: 08/26/2024

## 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	04/10/2024	CLAIMS: Perform initial review of numerous "Final Address Confirmation Forms" received from claimants and direct correspondence to additional team members (.2).	0.20	\$320.00	\$64.00
Service	04/11/2024	CLAIMS: Continue initial review of numerous "Final Address Confirmation Forms" received from claimants and direct correspondence to additional team members (.2).	0.20	\$320.00	\$64.00
Service	04/12/2024	CLAIMS: Continue initial review of numerous "Final Address Confirmation Forms" received from claimants and direct correspondence to additional team members (.2).	0.20	\$320.00	\$64.00
Service	04/13/2024	CLAIMS: Continue initial review of numerous "Final Address Confirmation Forms" received from claimants and direct correspondence to additional team members (.2).	0.20	\$320.00	\$64.00
Service	04/14/2024	CLAIMS: Continue initial review of numerous "Final Address Confirmation Forms" received from claimants and direct correspondence to additional team members (.2).	0.20	\$320.00	\$64.00
Service	04/15/2024	CLAIMS: Continue initial review of numerous "Final Address Confirmation Forms" received from claimants and direct correspondence to additional team members (.2).	0.20	\$320.00	\$64.00
Service	04/16/2024	CLAIMS: Continue initial review of numerous "Final Address Confirmation Forms" received from claimants and direct correspondence to additional team members	0.20	\$320.00	\$64.00

Invoice # 29 - 07/27/2024

		(.2).			
Service	04/17/2024	CLAIMS: Continue initial review of numerous "Final Address Confirmation Forms" received from claimants and discuss implications and response with Receiver and team (.7).	0.70	\$320.00	\$224.00
Service	04/18/2024	CLAIMS: Continue initial review of numerous "Final Address Confirmation Forms" received from claimants and discuss implications and response with Receiver and team (.5); review and provide comments on special interim status report to Court (.5).	1.00	\$320.00	\$320.00
Service	04/19/2024	CLAIMS: Review and provide detailed comments and edits on updated drafts of special interim status report to Court, including communications with M. Lockwood (1.6).	1.60	\$320.00	\$512.00
Service	04/20/2024	CLAIMS: Continue initial review of numerous "Final Address Confirmation Forms" received from claimants and direct correspondence to additional team members (.2).	0.20	\$320.00	\$64.00
Service	04/21/2024	CLAIMS: Continue initial review of numerous "Final Address Confirmation Forms" received from claimants and direct correspondence to additional team members (.2).	0.20	\$320.00	\$64.00
Service	04/22/2024	CLAIMS: Continue initial review of numerous "Final Address Confirmation Forms" received from claimants and direct correspondence to additional team members (.2).	0.20	\$320.00	\$64.00
Service	04/23/2024	AAR: Participate in call with law enforcement regarding efforts to disrupt the Receivership and to raise money from victim investors, including attention to follow-up issues (1.0).	1.00	\$320.00	\$320.00
Service	04/23/2024	CLAIMS: Continue initial review of numerous "Final Address Confirmation Forms" received from claimants and direct correspondence to additional team members (.2).	0.20	\$320.00	\$64.00
Service	04/24/2024	CLAIMS: Continue initial review of numerous "Final Address Confirmation Forms" received from claimants and direct correspondence to additional team members (.2).	0.20	\$320.00	\$64.00
Service	04/24/2024	AAR: Communicate with Idaho counsel regarding reply to objection to subpoena by Intermountain Precious Metals (.2).	0.20	\$320.00	\$64.00
Service	04/25/2024	AAR: Communicate with Receiver and Idaho counsel regarding reply to objection to subpoena by Intermountain Precious Metals (.4).	0.40	\$320.00	\$128.00
Service	04/25/2024	CLAIMS: Continue initial review of numerous "Final Address Confirmation Forms" received from claimants	0.10	\$320.00	\$32.00

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		and direct correspondence to additional team members (.1).			
Service	04/26/2024	AAR: Communicate with Idaho counsel regarding extension motion and reply to objection to subpoena by Intermountain Precious Metals (.2).	0.20	\$320.00	\$64.00
Service	04/26/2024	CLAIMS: Continue initial review of numerous "Final Address Confirmation Forms" received from claimants and direct correspondence to additional team members (.1).	0.10	\$320.00	\$32.00
Service	04/27/2024	CLAIMS: Continue initial review of numerous "Final Address Confirmation Forms" received from claimants and direct correspondence to additional team members (.1).	0.10	\$320.00	\$32.00
Service	04/28/2024	CLAIMS: Continue initial review of numerous "Final Address Confirmation Forms" received from claimants and direct correspondence to additional team members (.1).	0.10	\$320.00	\$32.00
Service	04/29/2024	CLAIMS: Continue initial review of numerous "Final Address Confirmation Forms" received from claimants and direct correspondence to additional team members (.1).	0.10	\$320.00	\$32.00
Service	04/29/2024	CASE MGMT: Begin draft of twentieth interim report (1.0).	1.00	\$320.00	\$320.00
Service	04/30/2024	CLAIMS: Continue initial review of numerous "Final Address Confirmation Forms" received from claimants and direct correspondence to additional team members (.1).	0.10	\$320.00	\$32.00
Service	04/30/2024	CASE MGMT: Draft twentieth interim report (2.5).	2.50	\$320.00	\$800.00
Service	05/01/2024	CASE MGMT: Revise, finalize, and file twentieth interim report, including exhibits (2.5).	2.50	\$320.00	\$800.00
Service	05/02/2024	AAR: Draft reply to objection to subpoena by Intermountain Precious Metals (4.1).	4.10	\$320.00	\$1,312.00
Service	05/03/2024	AAR: Review summary of D. Clark deposition (.2).	0.20	\$320.00	\$64.00
Service	05/05/2024	CLAIMS: Continue initial review of numerous "Final Address Confirmation Forms" received from claimants and direct correspondence to additional team members (.1).	0.10	\$320.00	\$32.00
Service	05/06/2024	CLAIMS: Continue initial review of numerous "Final Address Confirmation Forms" received from claimants and direct correspondence to additional team members (.1).	0.10	\$320.00	\$32.00
Service	05/09/2024	CLAIMS: Continue initial review of numerous "Final Address Confirmation Forms" received from claimants and direct correspondence to additional team members	0.10	\$320.00	\$32.00

Invoice # 29 - 07/27/2024

<u> </u>	0.5/1.0/0.001	negotiation issue and related matters, including review of correspondence (1.0).		<u> </u>	<b>*</b> ***
Service	05/16/2024	AAR: Communicate with B. McConnell regarding documents needed for filing (.2).	0.20	\$320.00	\$64.00
Service	06/10/2024	AAR: Review filing in Western District of New York regarding judgment collection efforts and telephone calls with Receiver and B. McConnell (.4).	0.40	\$320.00	\$128.00
Service	06/25/2024	AAR: Communicate with B. McConnell regarding settlement of judgment against R. Garbellano (.2); communicate with M. Lockwood regarding R. Montie and M. Nicolaou settlements (.3).	0.50	\$320.00	\$160.00
Service	06/25/2024	AAR: Review case status memo and outstanding projects drafted by M. Lockwood (.2).	0.20	\$320.00	\$64.00
Service	06/26/2024	AAR: Review and revise motion to approve settlements worth \$247,500 and send to CFTC per Local Rule 3.01(g) (.9).	0.90	\$320.00	\$288.00
Service	06/27/2024	AAR: Revise, finalize, and file motion to approve settlements worth \$247,500 and communicate with CFTC per Local Rule 3.01(g) (.5).	0.50	\$320.00	\$160.00
			-	「otal	\$7.232.00

Total \$7,232.00

### **Detailed Statement of Account**

#### **Current Invoice**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
29	08/26/2024	\$7,232.00	\$0.00	\$7,232.00
			Outstanding Balance	\$7,232.00

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Invoice # 29 - 07/27/2024

Total Amount Outstanding \$7,232.00

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

Please pay within 30 days.

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## **EXHIBIT 12**

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ENGLANDER FISCHER

July 17, 2024

John Waechter as Counsel E-Mailed to: jperez@wiandlaw.com

Please remit with payment

#### **INVOICE FOR LEGAL SERVICES RENDERED THROUGH 06/28/2024**

Client Name:Wiand Guerra King and Burton W. WiandClient Matter No.2450Matter Name:Burton W. Wiand v. Chris Arduini, et al.Invoice Date:July 17, 2024Invoice No.88002

TOTAL AMOUNT DUE THIS BILL

\$7,533.00

Thank you for your business. Payment is due within 15 days of the invoice date. If you have any questions, please do not hesitate to contact us.

**Payment Options:** 

**Remittance by credit card or ACH:** 

Pay Now

Remittance by check: Englander Fischer 721 First Avenue North St. Petersburg, FL 33701 Remittance by wire\*:Bank:Republic Bank & Trust CompanyAddress:601 West Market Street, Louisville, KY<br/>40202-2700Routing #083001314For credit to:Englander FischerAccount #59780738Please refererer the matter number

\*A \$30 wire fee will be added to your next invoice

Mailing address: 721 First Avenue North St. Petersburg, FL 33701

Phone: 727-898-7210 Fax: 727-898-7218 eflegal.com

Invoice No. 88002 John Waechter as Counsel Burton W. Wiand v. Chris Arduini, et al.



Invoice Date: July 17, 2024

#### <u>FEES</u>

Date	Staff	Description	Hours	Amount
04/25/2024	BM	Call with Tracy Sachs re: Garbellano judgment and note file (0.20); call with client (0.10).	0.30	\$100.50
04/30/2024	BM	Review order re: response to motion to dismiss (0.10); correspondence with client (0.10); draft response to Court's order to show cause and directives re: same (0.70).	0.90	\$301.50
05/01/2024	IMR	Finalized Receiver's Response to Court's Order to Show Cause.	0.20	\$37.00
05/13/2024	BM	Correspondence with counsel for Garbellano and client (0.20); correspondence with client re: Lipinczyk and Garbellano (0.20); correspondence with counsel (0.20)	0.60	\$201.00
05/14/2024	BM	Call with local counsel in NY and client (0.70); correspondence with client and counsel re: order to include in Lipinzcyk filing (0.10).	0.80	\$268.00
05/17/2024	BM	Call with local counsel.	0.20	\$67.00
05/17/2024	BM	Review Lipinczyk filing and call with client; correspondence with local counsel re: response.	0.40	\$134.00
05/17/2024	BM	Call with local counsel.	0.10	\$33.50
05/19/2024	BM	Correspondence with client.	0.10	\$33.50
05/19/2024	BM	Draft sur reply re: Lipinczyk.	2.80	\$938.00
05/20/2024	BM	Correspondence with client (0.10); draft Sur Reply and motion for leave to file sur reply (1.30); correspondence with local counsel and complete pro hac admission forms (0.30).	1.70	\$569.50
05/21/2024	BM	Draft motion for leave to file sur reply and sur reply (2.40); correspondence with client (0.20); correspondence with local counsel re: pro hac admission (0.10);	2.70	\$904.50
05/21/2024	IMR	Assist attorney BM with document preparation re: Pro Hac Vice with the US Western District Court.	0.50	\$92.50
05/21/2024	IMR	Phone call with attorney Jacob Sonner regarding Admission Petition Form and Electronic Case Filing Registration.	0.20	\$37.00

Invoice No. 88002 John Waechter as Counsel Burton W. Wiand v. Chris Arduini, et al.

## ENGLANDER FISCHER

Invoice Date: July 17, 2024

05/21/2024	IMR	Reviewed Notice of Filing Plaintiff's response to the Motion to Dismiss.	0.10	\$18.50
05/22/2024	BM	Correspondence with local counsel (0.20); draft, revise and edit notice of motion for leave, memorandum of law, and proposed sur-reply (1.50).	1.70	\$569.50
05/23/2024	BM	Review correspondence re: Garbellano settlement and correspondence with client.	0.20	\$67.00
05/28/2024	BM	Review proposal for settlement and correspondence with client re: same(0.30); correspondence with counsel for Garbellano and note file re: same (0.20).	0.50	\$167.50
06/03/2024	BM	Review order granting pro hac motion and correspondence with client.	0.10	\$33.50
06/04/2024	BM	Correspondence with clerk for WDNY and directives re: same.	0.10	\$33.50
06/10/2024	BM	Call with client (0.10); correspondence with counsel and client (0.20); review Lipinczyk Reply served on client (0.40).	0.70	\$234.50
06/11/2024	BM	Correspondence re: settlement with Garbellano's counsel (0.10); review proposed agreement (0.30); correspondence with client (0.20).	0.60	\$201.00
06/11/2024	BM	Revise and edit settlement agreement and correspondence with client.	0.70	\$234.50
06/17/2024	BM	Review client's redlines to agreement and revise (0.10); correspondence with opposing counsel and client (0.20).	0.30	\$100.50
06/19/2024	BM	Multiple correspondence with Garbellano's counsel and note file re: same $(0.50)$ ; research home value $(0.10)$ ; correspondence with client $(0.20)$	0.80	\$268.00
06/20/2024	BM	Call with Tracy Saxe re: settlement.	0.30	\$100.50
06/21/2024	BM	Correspondence with Garbellano's counsel re: settlement and review revised agreement (0.10); correspondence with client (0.20)	0.30	\$100.50
06/24/2024	BM	Correspondence with client (0.30); call with attorney Perez re: motion to approve settlement agreement with Garbellano (0.10); review Lipinczyk's motion to file reply (0.10); review file to determine previous collection efforts (0.40);	1.20	\$402.00

Invoice No. 88002 John Waechter as Counsel Burton W. Wiand v. Chris Arduini, et al.



Invoice Date: July 17, 2024

		correspondence with local counsel re: judgment lien on personal and real property (0.10); research		
		re: Lipincyzk assets (0.20).		<b>*</b> - <b>^</b>
06/24/2024	IMR	Reviewed docket for up to date filings and	0.30	\$55.50
06/24/2024	IMR	Defendant's reply. Review of Defendant's Motion to File Defendant's Reply to Plaintiff's Response to Defendant's Motion to Dismiss.	0.10	\$18.50
06/25/2024	BM	Correspondence with attorney Perez re: motion to approve settlement (0.20); correspondence with Garbellano's counsel (0.20); call with client (0.50); correspondence with attorney Sonner re: executing on Lipinczyk judgment (0.20); review client correspondence (0.10)	1.20	\$402.00
06/27/2024	BM	Research re: potential Lipinczyk employers for continuing writ of garnishment (0.20); draft motion for continuing writ of garnishment, proposed order, and proposed writ (0.50); directives re: ex parte motion (0.10).	0.80	\$268.00
06/27/2024	BM	Review Lipinczyk docketed filing and correspondence with local counsel; correspondence with client.	0.30	\$100.50
06/27/2024	BM	Draft response to Lipinczyk motion for leave to file reply.	0.30	\$100.50
06/28/2024	BM	Correspondence with client (0.10); correspondence with local counsel in NY re: Lipinczyk (0.20); legal research re: lack of jurisdiction to invalidate foreign judgment (0.60)	0.90	\$301.50
06/28/2024	IMR	Review and finalized Ex Parte Motion for Continuing Writ of Garnishment along with (3) Exhibits in preparation for filing.	0.20	\$37.00
<b>Total Fees</b>			23.20	\$7,532.00
<u>EXPENSES</u>				
Date	Qty.	Description	Each	Amount
06/27/2024	1	Simple Search of Entity - Ambit Energy Holdings LLC, Document # 1376581550002	\$1.00	\$1.00

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Invoice No. 88002
John Waechter as Counsel
Burton W. Wiand v. Chris Arduini, et al.



Invoice Date: July 17, 2024

Total Expenses	\$1.00
<b>Total Fees and Expenses</b> Previous Balance	<b>\$7,533.00</b> \$758.03
Less: Payments Applied	\$758.03 (\$758.03) <b>\$7,533.00</b>
TOTAL DUE	ψ1,555.00

#### \$7,533.00 TOTAL LEGAL SERVICES

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## **EXHIBIT 13**



1161 West River Street Suite 100 P.O. Box 959 Boise, Idaho 83701-0959 Phone: 208-384-1800 Fax: 208-345-3514 firm@evanskeane.com www.evanskeane.com



With Independent Firms in Principal Cities Worldwide

#### Wiand, Receiver Burton W.

Ailen Cruz, Guerra & Partners The Towers of Westshor 1401 N. Westshore Blvd, Suite 1019 Tampa, FL 33607

### Invoice 12540

Date	Apr 30, 2024
Terms	Net 30
Service Thru	Apr 30, 2024

#### In Reference To: Intermountain Precious Metals LLC (Hours)

#### Matter ID: 4341-2

Date	Ву	Services	Hours	Rates	Amount
04/02/2024	JWM	Telephone call with Ms. Cruz re: issues with Subpoena and procedure to proceed; review and research Rle 45; edit and finalize Motion to Compel response to Subpoena and instruct on filing the same.	1.30	\$ 325.00/hr	\$ 422.50
04/02/2024	DAJ	Draft and Finalize Motion to Compel; Draft Summons; Draft Civil Case Information Sheet; Stamp and Prepare Exhibits; Finalize Documents for Filing; Send Documents to The United States District Court for the District of Idaho.	0.70	\$ 125.00/hr	\$ 87.50
04/03/2024	DAJ	Correspond with the clerk of the Court to discuss Case Details and Submission Formalities; Discuss refund of initial case fees; Finalize details with the court; Deliver Check to Court to Finalize Re- submission.	0.70	\$ 125.00/hr	\$ 87.50
04/03/2024	JWM	Review conformed copy of Motion to Compel and instruct DAJ on service and mailing.	0.20	\$ 325.00/hr	\$ 65.00
04/03/2024	DAJ	Receipt of Conformed Motion to Compel and Summons; Copy Documents to Client; Send Copies to Defendant.	0.20	\$ 125.00/hr	\$ 25.00
04/10/2024	JWM	Email exchange with co-counsel re: status of service on defendant.	0.20	\$ 325.00/hr	\$ 65.00
04/11/2024	JWM	Email to co-counsel re: status of service on Defendant.	0.20	\$ 325.00/hr	\$ 65.00

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04/15/2024	JWM	Review emails from Ellis and Wiand re: status and possible Motion to Strike; Review docket and filings in Fed. Court; review Respondents pro se response; email to co-counsel providing conformed copies of pleadings filed and making recommendations.	0.70	\$ 325.00/hr	\$ 227.50
04/24/2024	JWM	Email exchange with co-counsel Perez re: timing for Reply Brief and edit case caption format for Perez.	0.40	\$ 325.00/hr	\$ 130.00
04/25/2024	JWM	Email exchange with Perez re: rule on Reply Brief; draft and file Motion for Extension of Time and proposed Order.	0.70	\$ 325.00/hr	\$ 227.50
04/25/2024	DAJ	Finalize Motion for Extension of Time to File Reply Brief; Submit the same to the Court.	0.30	\$ 125.00/hr	\$ 37.50
04/25/2024	DAJ	Submit Order for Extension of Time to File Reply Brief to J. Brailsford by email.	0.10	\$ 125.00/hr	\$ 12.50
04/26/2024	JWM	Email exchange x2 with Perez re: provide Motion and Order for Extension of Time.	0.30	\$ 325.00/hr	\$ 97.50

#### In Reference To: Intermountain Precious Metals LLC (Expenses)

#### Matter ID: 4341-2

Date	Ву	Expenses	Amount
04/03/2024	MLM	Burton W. Wiand and Intermountain Precious Metals, LLC (4341-2). Refiling the Case with the US District Court for the District of Idaho.	\$ 52.00
04/30/2024	MLM	April, 2024 - Copies ( 72 copies @ \$0.15 )	\$ 10.80

Total Hours	6.00 hrs
Total Hours	\$ 1,550.00
Total Expenses	\$ 62.80
Total Invoice Amount	\$ 1,612.80
Previous Balance	\$ 64.89
Balance (Amount Due)	\$ 1,677.69

#### PAST DUE BALANCE - PLEASE REMIT PAYMENT IMMEDIATELY

#### **Aged Balances**

Current	30 Days	60 Days	90 Days
\$ 390.94	\$ 265.00	\$ 1,612.80	\$ 0.00

#### User Hours Summary

Billing Period: 04/01/2024 - 04/30/2024

#### Matter: Intermountain Precious Metals LLC

User	Hours Billed	Rate/Hour	Amount Billed
Jed W Manwaring	4.00	\$ 325.00	\$ 1,300.00
Duskin A Johnson	2.00	\$ 125.00	\$ 250.00



1161 West River Street Suite 100 P.O. Box 959 Boise, Idaho 83701-0959 Phone: 208-384-1800 Fax: 208-345-3514 firm@evanskeane.com www.evanskeane.com



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#### Wiand, Receiver Burton W.

Ailen Cruz, Guerra & Partners The Towers of Westshor 1401 N. Westshore Blvd, Suite 1019 Tampa, FL 33607

### Invoice 12682

Date	Jun 04, 2024	
Terms	Net 30	
Service Thru	May 31, 2024	

#### In Reference To: Intermountain Precious Metals LLC (Hours)

#### Matter ID: 4341-2

Date	Ву	Services	Hours	Rates	Amount
05/02/2024	JWM	Review and approve proposed Reply brief and email to co-counsel team with instructions.	0.40	\$ 325.00/hr	\$ 130.00
05/03/2024	DAJ	Finalize Reply to Response to Motion to Compel Compliance and for Sanctions; Submit Final Document to the Court; Email team copies of the same.	0.30	\$ 125.00/hr	\$ 37.50
05/16/2024	JWM	Receipt and review Defendant's Sur-Reply brief and forward to Perez.	0.30	\$ 325.00/hr	\$ 97.50

Total Hours	1.00 hrs
Total Hours	\$ 265.00
Total Invoice Amount	\$ 265.00
<b>Previous Balance</b>	\$ 1,677.69
9/2024 Payment - Check Payment for invoice 12326	(\$65.15)
 Balance (Amount Due)	\$ 1,877.54

#### PAST DUE BALANCE - PLEASE REMIT PAYMENT IMMEDIATELY

#### **Aged Balances**

Current	30 Days	60 Days	90 Days
\$ 390.94	\$ 265.00	\$ 1,612.80	\$ 0.00

#### User Hours Summary

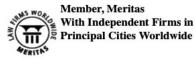
Billing Period: 05/01/2024 - 05/31/2024

#### Matter: Intermountain Precious Metals LLC

User	Hours Billed	Rate/Hour	Amount Billed
Jed W Manwaring	0.70	\$ 325.00	\$ 227.50
Duskin A Johnson	0.30	\$ 125.00	\$ 37.50



1161 West River Street Suite 100 P.O. Box 959 Boise, Idaho 83701-0959 Phone: 208-384-1800 Fax: 208-345-3514 firm@evanskeane.com www.evanskeane.com



#### Wiand, Receiver Burton W.

Invoice 12784

Date	Jun 30, 2024
Terms	Net 30
Service Thru	Jun 30, 2024

Ailen Cruz, Guerra & Partners The Towers of Westshor 1401 N. Westshore Blvd, Suite 1019 Tampa, FL 33607

#### In Reference To: Intermountain Precious Metals LLC (Hours)

#### Matter ID: 4341-2

Date	Ву	Services	Hours	Rates	Amount
06/07/2024	JWM	Email exchange with process server to cease service efforts and provide Return of Non-Service.	0.20	\$ 325.00/hr	\$ 65.00
06/20/2024	JWM	Receive and review Court's Order to Defendant to obtain counsel and forward by email to co-counsel.	0.40	\$ 325.00/hr	\$ 130.00

#### In Reference To: Intermountain Precious Metals LLC (Expenses)

#### Matter ID: 4341-2

Date	Ву	Expenses	Amount
06/27/2024	MLM	Christianson Process Serving: Attempted Service upon Intermountain Precious Metals, Inc.	\$ 195.00
06/30/2024	MLM	06/2024 - Copies x 2	\$ 0.30
06/30/2024	MLM	06/2024 - Postage Expense	\$ 0.64

Total Hours	0.60 hrs
Total Hours	\$ 195.00
Total Expenses	\$ 195.94
Total Invoice Amount	\$ 390.94
Previous Balance	\$ 1,877.54
Balance (Amount Due)	\$ 2,268.48

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Aged Balances					
Current	30 Days	60 Days	90 Days		
\$ 390.94	\$ 265.00	\$ 1,612.80	\$ 0.00		

#### User Hours Summary

Billing Period: 06/01/2024 - 06/30/2024

#### Matter: Intermountain Precious Metals LLC

User	Hours Billed	Rate/Hour	Amount Billed
Jed W Manwaring	0.60	\$ 325.00	\$ 195.00

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# **EXHIBIT 14**

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Attorneys at Law One Canalside 125 Main Street Buffalo, NY 14203-2887 Telecopier # (716) 852-6100 (716) 847-8400 FED I.D. #16-0505790

Burton W. Wiand, as receiver for Oasis Intl., et al. Beatriz McConnell Englander Fischer 721 First Avenue North St. Petersburg, FL 33701

Invoice Number1118209Invoice Date06/21/24Client Number45310Matter Number00000J B Schwartz00000

#### Re: WD NY CASE 1:21-MC-00014-LJV

#### FOR PROFESSIONAL SERVICES RENDERED THROUGH MAY 31, 2024:

<u>Date</u> 05/14/24	<u>Tkpr</u> JSS2	Analyze docket and discussed judgment enforcement action with B. McConnell.	Hours 1.4
05/15/24	JSS2	Drafted correspondence to co-counsel concerning engagement letter and status of pending motion to dismiss.	0.7
05/20/24	JSS2	Reviewed and revised pro hac vice application.	0.4
05/20/24	JSS2	Analyze judgment debtors' request for e-filing credentials and drafted correspondence to co-counsel concerning same.	0.2
05/21/24	JSS2	Revised motion for leave to file sur reply and proposes sur reply and drafted email correspondence to co-counsel concerning same.	2.1
05/21/24	JSS2	Finalize pro hac vice application for filing and service.	0.2
05/22/24	JSS2	Revised motion for sur-reply and finalized same for filing.	0.8

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45310 Burton W. Wiand, as receiver for Oasis Intl., et al.	Invoice Number 1118209
00000 WD NY Case 1:21-mc-00014-LJV June 21, 2024	Page 2 of 2

## CURRENT FEES \$2,378.00

#### FOR COSTS ADVANCED AND EXPENSES INCURRED:

Filing Fee	<u>VALUE</u> 200.00
CURRENT EXPENSES	200.00
TOTAL AMOUNT OF THIS INVOICE	\$2,578.00

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Page 1 of 2



Attorneys at Law One Canalside 125 Main Street Buffalo, NY 14203-2887 Telecopier # (716) 852-6100 (716) 847-8400 FED I.D. #16-0505790

Burton W. Wiand, as receiver for Oasis Intl., et al. Beatriz McConnell Englander Fischer 721 First Avenue North St. Petersburg, FL 33701 Invoice Number1119468Invoice Date07/11/24Client Number45310Matter Number00000J B Schwartz00000

#### Re: WD NY CASE 1:21-MC-00014-LJV

#### FOR PROFESSIONAL SERVICES RENDERED THROUGH JUNE 30, 2024:

<u>Date</u> 06/03/24	<u>Tkpr</u> JSS2	Email correspondence to co-counsel re: pro hac vice order	Hours 0.0
06/24/24	JSS2	Reviewed rules for obtaining and recording exemplified judgment and drafted email correspondence to co-counsel re: same.	0.4
06/25/24	JSS2	Drafted correspondence re: obtaining certified judgment transcript and recording same in Monroe County.	0.6
06/27/24	JSS2	Received and analyzed motion to file sur-sur-reply from Lipinczyk and drafted recommendation to co-counsel re: same.	0.4
06/27/24	LBW	Work re: obtain the certified transcript of judgment	0.3
06/28/24	LBW	Correspondence with clerk re: transcript of judgment	0.2
			\$694.00

CURRENT FEES

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45310 Burton W. Wiand, as receiver for Oasis	Invoice Number 1119468
Intl., et al.	
00000 WD NY Case 1:21-mc-00014-LJV	Page 2 of 2
July 11, 2024	

#### FOR COSTS ADVANCED AND EXPENSES INCURRED:

Transcript of Judgment	<u>VALUE</u> 12.00
CURRENT EXPENSES	12.00
TOTAL AMOUNT OF THIS INVOICE	\$706.00

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# **EXHIBIT 15**

4023 Tampa	Oldsmar, FL	Phone (727)	in about the second
	K L L L L	CPAs + ADVISORS	

4023 Tampa Road, Suite 2000 Oldsmar, FL 34677 Phone (727) 784-5491 <u>WWW. pdf-cpa.com</u>

# OASIS MANAGEMENT April 1, 2024 - April 30, 2024

Reconciled #4299 bank statement, recorded bank activity, recorded         0.90         5125.00         5           SAO         Recorded bank activity         0.55         5125.00         5         1           SAO         Recorded bank activity         recorded bank activity         0.55         5125.00         5         1           SAO         Recorded bank activity         recorded bank activity	Date	Activity Category	Timekeeper	Description	Hours	Rate	Amount	Int
Accounting & Auditing         SAO         Reposits         0.50         \$ 125.00         \$ 5           Accounting & Auditing         SAO         Recorded bank activity         0.50         \$ 125.00 <td></td> <td></td> <td></td> <td>Reconciled #4299 bank statement, recorded bank activity, recorded</td> <td></td> <td></td> <td></td> <td></td>				Reconciled #4299 bank statement, recorded bank activity, recorded				
Accounting & Auditing         SAO         Recorded bank activity.         0.56         5 125.00         5           Accounting & Auditing         SAO         Recorded bank activity.         0.25         5 125.00         5           Accounting & Auditing         SAO         Recorded bank activity.         0.26         5 125.00         5           Accounting & Auditing         SAO         Recorded bank activity.         0.75         5 125.00         5           Accounting & Auditing         SAO         Recorded bank activity.         0.75         5 125.00         5           Accounting & Auditing         SAO         Recorded bank activity.         0.75         5 125.00         5           Accounting & Auditing         SAO         Recorded bank activity.         0.75         5 125.00         5           Accounting & Auditing         SAO         Recorded bank activity.         0.75         5 155.00         5         1           Accounting & Auditing         SAO         Recorded bank activity.         0.50         5 155.00         5         1           Accounting & Auditing         SAO         Recorded bank activity.         0.50         5 155.00         5         1           Accounting & Auditing         SAO         Recorded bank activity.	4/3/2024	Accounting & Auditing	SAO	deposits	0.90	\$ 125.00		112.50
Accounting & AuditingSAORecorded bank activity $0.26$ $3,125.00$ $3$ Accounting & Auditing & Auditing & Auditing & Auditing & Auditing & SAORecorded bank activity $0.26$ $3,125.00$ $3$ Accounting & Auditing & Auditi	4/5/2024	Accounting & Auditing	SAO	Recorded bank activity	0.50	\$ 125.00		62.50
Accounting & AuditingSAORecorded bank activity baccounting & AuditingSAORecorded bank activity baccounting & AuditingSAORecorded bank activity baccounting & AuditingC.30\$ 125.00\$Accounting & AuditingSAORecorded bank activity baccounting & AuditingSAORecorded bank activity baccounting & AuditingCAHReassigned checks and reviewed dates0.55\$ 125.00\$ 1Accounting & AuditingGAHRecorded bank activity baccounting & AuditingGAHRecorded bank activity baccounting & Auditing0.55\$ 125.00\$ 1Accounting & AuditingGAHRecorded bank activity baccounting & AuditingGAHRecorded bank activity baccounting & Auditing0.55\$ 125.00\$ 1Accounting & AuditingSAORecorded bank activity baccounting & AuditingSAORecorded bank activity baccounting & Auditing0.50\$ 125.00\$ 1Accounting & AuditingSAORecorded bank activity baccounting & AuditingSAORecorded bank activity baccounting & Auditing0.50\$ 125.00\$ 1Accounting & AuditingSAORecorded bank activity baccounting & AuditingSAORecorded bank activity baccounting & Auditing0.50\$ 125.00\$ 155.00\$ 155.00\$ 1Accounting & AuditingSAORecorded bank activity baccounting & AuditingSAORecorded bank activity baccount records, prepared0.50\$ 125.00\$ 155.00\$ 1Accounting & AuditingSAORecorded bank activity baccounting &	4/6/2024	Accounting & Auditing		Recorded bank activity	0.25	\$ 125.00		31.25
Accounting & AuditingSAORecorded bank activity, updated account records0.75\$ 125.00\$Accounting & AuditingSAOResorded bank activity0.50\$ 125.00\$\$Accounting & AuditingSAOResorded bank activity0.55\$ 125.00\$\$\$Accounting & AuditingSAORecorded bank activity, reconciled bank activity0.55\$ 155.00\$\$Accounting & AuditingGAHResorded bank activity, reconciled bank activity, reconciled bank activity, reconciled bank activity0.50\$ 125.00\$\$Accounting & AuditingSAORecorded bank activity, reconciled bank activity8\$<	4/9/2024	Accounting & Auditing		Recorded bank activity	0.30	\$ 125.00		37.50
Accounting & AuditingSAORecorded bank activity0.568 125.008Accounting & AuditingGAHReassigned checks and reviewed dates1.258 155.0051Accounting & AuditingGAHRecorded bank activity. reconciled bank activity. Reconc	4/10/2024	Accounting & Auditing	SAO	Recorded bank activity, updated account records	0.75	\$ 125.00		93.75
Accounting & AuditingGAHReassigned checks and reviewed dates1.25\$ 155.00\$ 1Accounting & AuditingSAORecorded bank activity0.25\$ 155.00\$ 1\$ 1Accounting & AuditingSAORecorded bank activity0.25\$ 155.00\$ 1\$ 1Accounting & AuditingSAORecorded bank activity0.50\$ 155.00\$ 1\$ 1Accounting & AuditingSAURecorded bank activity0.50\$ 155.00\$ 1\$ 1Accounting & AuditingCAHIssued claim distribution checks0.75\$ 155.00\$ 1\$ 1Accounting & AuditingCAHIssued claim distribution checks0.75\$ 155.00\$ 1\$ 1Accounting & AuditingSAORecorded bank activity0.30\$ 125.00\$ 1\$ 1\$ 1Accounting & AuditingSAORecorded bank activity0.31\$ 125.00\$ 1\$ 1\$ 1\$ 1\$ 1\$ 1\$ 155.00\$ 155.00\$ 1\$ 1\$ 1\$ 1\$ 1\$ 1\$ 1\$ 1\$ 1\$ 155.00\$ 1 <t< td=""><td>4/11/2024</td><td>Accounting &amp; Auditing</td><td>SAO</td><td>Recorded bank activity</td><td>0.50</td><td>\$ 125.00</td><td></td><td>62.50</td></t<>	4/11/2024	Accounting & Auditing	SAO	Recorded bank activity	0.50	\$ 125.00		62.50
Accounting & AuditingSAORecorded bank activity $0.25$ s125.00sAccounting & AuditingGAHProcessed claim distribution checks and scanned into system $0.26$ s155.00sAccounting & AuditingSAORecorded bank activity. reconcled bank account $0.75$ s155.00srAccounting & AuditingSAORecorded bank activity. reconcled bank account $0.75$ s155.00srAccounting & AuditingSAORecorded bank activity. records $0.75$ s125.00srAccounting & AuditingSAORecorded bank activity $0.75$ s125.00srAccounting & AuditingSAORecorded bank activity $0.30$ s125.00	4/11/2024	Accounting & Auditing	GAH	Reassigned checks and reviewed dates	1.25	\$ 155.00	Ì	193.75
Accounting & AuditingGAHProcessed claim distribution checks and scanned into system0.50\$ 155.00\$ 5Accounting & AuditingSAORecorded bank activity. reconciled bank account0.90\$ 125.00\$ 7Accounting & AuditingGAHRescorded bank activity. reconciled bank account0.75\$ 155.00\$ 7Accounting & AuditingGAHRescorded bank activity0.75\$ 155.00\$ 7\$ 155.00\$ 7Accounting & AuditingSAORecorded bank activity0.30\$ 125.00\$ 7\$ 125.00\$ 7Accounting & AuditingSAORecorded bank activity0.30\$ 125.00\$ 7\$ 125.00\$ 7Accounting & AuditingSAORecorded bank activity0.30\$ 125.00\$ 7\$ 125.00\$ 7Accounting & AuditingSAORecorded bank activity recordes0.30\$ 125.00\$ 7\$ 155.00\$ 7Accounting & AuditingSAOReviewed quarterly reports0.30\$ 125.00\$ 7\$ 125.00\$ 7Accounting & AuditingSAOReviewed quarterly report0.30\$ 125.00\$ 7\$ 155.00\$ 7Accounting & AuditingSAOReviewed duarterly reports0.30\$ 125.00\$	4/12/2024	Accounting & Auditing		Recorded bank activity	0.25	\$ 125.00		31.25
Accounting & AuditingSAORecorded bank activity, reconciled bank account0.90\$ 125,00\$ 1Accounting & AuditingGAHIssued claim distribution checks0.75\$ 155,00\$ 1\$ 1Accounting & AuditingEAORecorded bank activity0.75\$ 155,00\$ 1\$ 1Accounting & AuditingSAORecorded bank activity0.30\$ 125,00\$ 1\$ 1Accounting & AuditingSAOReviewed transactions0.30\$ 125,00\$ 1\$ 1Accounting & AuditingSAORecorded bank activity0.30\$ 125,00\$ 1\$ 1Accounting & AuditingSAORecorded bank activity0.30\$ 125,00\$ 1\$ 1Accounting & AuditingAuditingSAORecorded bank activity0.30\$ 12	4/15/2024	Accounting & Auditing		Processed claim distribution checks and scanned into system	0.50	\$ 155.00		77.50
Accounting & AuditingGAHIssued claim distribution checks0.75\$ 155.00\$ 1Accounting & AuditingEAORecorciled #2728 bank statement, updated account records, prepared3.90\$ 125.00\$ 1Accounting & AuditingSAORecorciled #2728 bank statement, updated account records, prepared3.90\$ 125.00\$ 1Accounting & AuditingSAORecorded bank activity0.30\$ 125.00\$ 1\$ 1Accounting & AuditingSAORecorded bank activity0.30\$ 125.00\$ 1\$ 1Accounting & AuditingCalutingSAOReviewed transactions0.30\$ 125.00\$ 1Accounting & AuditingNEPReviewed quarterly report0.30\$ 125.00\$ 1\$ 1Accounting & AuditingSAOSent quarterly report0.30\$ 125.00\$ 1\$ 1Accounting & AuditingSAOReviewed transactions0.30\$ 125.00\$ 1\$ 1Accounting & AuditingSAOReviewed transactions0.30\$ 125.00\$ 125.00\$ 1Accounting & AuditingSAOReviewed transactions0.30\$ 125.00\$ 125.00\$ 125.00\$ 1Accounting & AuditingSAORecorded bank activity, processed additional changes to distribution0.30\$ 125.00\$ 125.00\$ 125.00\$ 125.00\$ 125.00\$ 125.00\$ 125.00\$ 125.00\$ 125.00\$ 125.00\$ 125.00\$ 125.00\$ 125.00\$ 125.00\$ 125.00\$ 125.00\$ 125.00\$ 125.00\$ 12	4/15/2024	Accounting & Auditing		Recorded bank activity, reconciled bank account	06.0	\$ 125.00		112.50
Accounting & AuditingReconciled #2728 bank statement, updated account records, prepared3.90\$ 125.00\$ 4Accounting & AuditingSAORecorded bank activity0.30\$ 125.00\$ 1\$ 1Accounting & AuditingSAORecorded bank activity0.30\$ 125.00\$ 1	4/16/2024	Accounting & Auditing		ssued claim distribution checks	0.75	\$ 155.00		116.25
Accounting & AuditingSAOquarterly court reports, reviewed investor checks3:90\$ 125.00\$ 4Accounting & AuditingSAORecorded bank activity0.30\$ 125.00\$ 125.00\$ 4Accounting & AuditingSAORecorded bank activity0.30\$ 125.00\$ 1				Reconciled #2728 bank statement, updated account records, prepared				
Accounting & Auditing         SAO         Recorded bank activity         0.30         \$ 125.00         \$           Accounting & Auditing         SAO         Recorded bank activity         0.30         \$ 125.00         \$         100         \$ 155.00         \$         1         \$         \$         \$         1         \$         \$         1         \$	4/16/2024	Accounting & Auditing		quarterly court reports, reviewed investor checks	3.90	\$ 125.00		487.50
Accounting & Auditing         SAO         Recorded bank activity         0.30         \$ 125.00         \$           Accounting & Auditing         GAH         Reviewed transactions         1.00         \$ 155.00         \$ 15.00         \$ 155.00         \$ 100         \$ 155.00         \$ 100         \$ 155.00         \$ 100         \$ 155.00         \$ 100         \$ 155.00         \$ 100         \$ 155.00         \$ 100         \$ 155.00         \$ 100         \$ 155.00         \$ 100         \$ 155.00         \$ 100         \$ 125.00         \$ 100 <td< td=""><td>4/17/2024</td><td>Accounting &amp; Auditing</td><td>SAO</td><td>Recorded bank activity</td><td>0.30</td><td>\$ 125.00</td><td></td><td>37.50</td></td<>	4/17/2024	Accounting & Auditing	SAO	Recorded bank activity	0.30	\$ 125.00		37.50
Accounting & Auditing         GAH         Reviewed transactions         1.00         \$ 155.00         \$ 7           Accounting & Auditing         WEP         Reviewed quarterly report         0.50         \$ 320.00         \$ 1           Accounting & Auditing         WEP         Reviewed quarterly reports to attorney         0.50         \$ 320.00         \$ 1           Accounting & Auditing         SAO         Sent quarterly reports to attorney         0.30         \$ 125.00         \$ 1           Accounting & Auditing         SAO         Recorded bank activity         0.30         \$ 125.00         \$ 1           Accounting & Auditing         SAO         Recorded bank activity, processed additional checks         0.30         \$ 155.00         \$ 1           Accounting & Auditing         SAO         Recorded bank activity, processed additional changes to distribution         0.50         \$ 155.00         \$ 1           Accounting & Auditing         SAO         Updated investor checks         0.50         \$ 125.00         \$ 1           Accounting & Auditing         SAO         Becorded bank activity, processed additional checks         0.50         \$ 125.00         \$ 15           Accounting & Auditing         SAO         Updated investor checks         0.50         \$ 125.00         \$ 15           Accou	4/18/2024	Accounting & Auditing		Recorded bank activity	0.30	\$ 125.00		37.50
Accounting & Auditing         WEP         Reviewed quarterly report         0.50         \$ 320.00         \$ 1           Accounting & Auditing         SAO         Sent quarterly reports to attorney         0.50         \$ 225.00         \$ 1           Accounting & Auditing         SAO         Sent quarterly reports to attorney         0.30         \$ 125.00         \$ 1           Accounting & Auditing         SAO         Recorded bank activity         0.30         \$ 125.00         \$ 1           Accounting & Auditing         SAO         Recorded bank activity, processed additional checks         0.50         \$ 155.00         \$ 1           Accounting & Auditing         SAO         Recorded bank activity, processed additional changes to distribution         0.50         \$ 155.00         \$ 1           Accounting & Auditing         SAO         Updated investor checks         0.50         \$ 125.00         \$ 1           Accounting & Auditing         SAO         Updated investor checks         0.30         \$ 125.00         \$ 1           Accounting & Auditing         SAO         Updated investor checks         0.30         \$ 126.00         \$ 1           Accounting & Auditing         SAO         Updated investor checks         0.30         \$ 125.00         \$ 1           Accounting & Auditing <t< td=""><td>4/18/2024</td><td>Accounting &amp; Auditing</td><td>GAH</td><td>Reviewed transactions</td><td>1.00</td><td>\$ 155.00</td><td></td><td>55.00</td></t<>	4/18/2024	Accounting & Auditing	GAH	Reviewed transactions	1.00	\$ 155.00		55.00
Accounting & Auditing         SAO         Sent quarterfy reports to attorney         0.30         \$ 125.00         \$           Accounting & Auditing         SAO         Recorded bank activity         0.30         \$ 125.00         \$ <td>4/19/2024</td> <td>Accounting &amp; Auditing</td> <td>WEP</td> <td>Reviewed quarterly report</td> <td>0.50</td> <td>\$ 320.00</td> <td></td> <td>160<u>.</u>00</td>	4/19/2024	Accounting & Auditing	WEP	Reviewed quarterly report	0.50	\$ 320.00		160 <u>.</u> 00
Accounting & AuditingSAORecorded bank activity0.30\$ 125.00\$Accounting & AuditingGAHIssued additional checks0.50\$ 155.00\$Accounting & AuditingCAHIssued additional checks0.50\$ 155.00\$Accounting & AuditingSAORecorded bank activity, processed additional changes to distribution1.50\$ 125.00\$Accounting & AuditingSAOUpdated investor checks0.30\$ 125.00\$\$Accounting & AuditingSAOUpdated investor checks0.30\$ 125.00\$Accounting & AuditingAAMIssued check0.50\$ 125.00\$Total Accounting & AuditingAuditingAuditingAuditing\$\$ 223	4/19/2024	Accounting & Auditing		Sent quarterly reports to attorney	0.30	\$ 125.00		37.50
Accounting & AuditingGAHIssued additional checks0.50\$ 155.00\$Accounting & AuditingEacorded bank activity, processed additional changes to distribution1.50\$ 125.00\$1Accounting & AuditingSAOchecks, prepared and updated distribution checks1.50\$ 125.00\$1Accounting & AuditingSAOUpdated investor checks0.30\$ 125.00\$\$Accounting & AuditingAAMIssued check0.50\$ 125.00\$\$Total Accounting & AuditingAAMIssued check0.50\$ 125.00\$\$Total Accounting & AuditingAuditingAuditingI.5.3\$\$\$2.2	4/22/2024	Accounting & Auditing		Recorded bank activity	0.30	\$ 125.00		37.50
Accounting & Auditing       Recorded bank activity, processed additional changes to distribution       1.50       \$ 125.00       \$ 1         Accounting & Auditing       SAO       checks, prepared and updated distribution checks       0.30       \$ 125.00       \$ 1         Accounting & Auditing       SAO       Updated investor checks       0.30       \$ 125.00       \$ 1         Accounting & Auditing       AAM       Issued check       0.50       \$ 125.00       \$ 2         Total Accounting & Auditing       Auditing       Auditing       Auditing       8 125.00       \$ 22	4/23/2024	Accounting & Auditing	GAH	ssued additional checks	0.50	\$ 155.00		77.50
Accounting & Auditing     SAO     checks, prepared and updated distribution checks     1.50     \$ 125.00     \$ 1       Accounting & Auditing     SAO     Updated investor checks     0.30     \$ 125.00     \$ 1       Accounting & Auditing     AAM     Issued check     0.30     \$ 125.00     \$ 1       Total Accounting & Auditing     AAM     Issued check     0.50     \$ 125.00     \$ 22				Recorded bank activity, processed additional changes to distribution				
Accounting & Auditing         SAO         Updated investor checks         0.30         \$ 125.00         \$           Accounting & Auditing         AAM         Issued check         0.50         \$ 125.00         \$           Total Accounting & Auditing         Additing         A         16.25         \$         \$         2,2	4/23/2024	Accounting & Auditing	SAO	checks, prepared and updated distribution checks	1.50	\$ 125.00	-	87.50
Accounting & Auditing         AAM         Issued check         0.50         \$ 125.00         \$           Total Accounting & Auditing         Auditing         Auditing         Auditing         16.25         \$	4/25/2024	Accounting & Auditing	SAO	Jpdated investor checks	0.30	\$ 125.00		37.50
16.25 \$	4/25/2024	Accounting & Auditing	AAM	ssued check	0.50	\$ 125.00		62.50
		Total Accounting & Auditing			16.25		\$ 2,248.75	8.75

Total Burton Wiand as Receiver, Oasis Management

<u>16.25</u>

\$ 2,248.75

4023 Tamp	Oldsmar, F	Phone (727	www.ndr
		s + ADVISORS	
		CPAs	

'ampa Road, Suite 2000 ar, FL 34677 (727) 785-4447 Fax (727) 784-5491 <u>pdf--cpa.com</u>

OASIS MANAGEMENT May 1, 2024 - May 31, 2024

Date	Activity Category	Timekeeper	Description	Hours	Rate	Amount
5/2/2024	Accounting & Auditing	SAO	Reconciled #4299 and #3838 bank statements, recorded bank activity	06.0	\$ 125.00	\$ 112.50
5/3/2024	Accounting & Auditing	SAO	Recorded bank activity	0.30	\$ 125.00	\$ 37.50
5/7/2024	Accounting & Auditing	SAO	Recorded bank activity	0.30	\$ 125.00	\$ 37.50
5/8/2024	Accounting & Auditing	SAO	Recorded bank activity, updated Quickbooks with distribution information	1 <u>.</u> 00	\$ 125.00	\$ 125 <u>.</u> 00
5/15/2024	Accounting & Auditing	AAM	Issued checks	1.50	\$ 125.00	\$ 187.50
5/15/2024	Accounting & Auditing	GAH	Reviewed checks	0.25	\$ 155.00	\$ 38.75
5/20/2024	Accounting & Auditing	SAO	Recorded bank activity, recorded void and reissued vendor checks	1.30	\$ 125.00	\$ 162.50
5/20/2024	Accounting & Auditing	AAM	Issued check	1.00	\$ 125.00	\$ 125.00
			Updated Quickbooks with check reissues and voids, recorded bank			
			activity, recorded additional investor check voids and reissues, updated			
5/21/2024	Accounting & Auditing	SAO	account records	2.20	\$ 125.00	\$ 275.00
5/21/2024	Accounting & Auditing	AAM	Issued checks	0.75	\$ 125.00	\$ 93.75
			Reviewed Quickbooks file for voids and reissues of investor checks,			
5/22/2024	Accounting & Auditing	SAO	recorded bank activity	1.25	\$ 125.00	\$ 156.25
5/23/2024	Accounting & Auditing	SAO	Recorded bank activity	0.50	\$ 125.00	\$ 62.50
5/29/2024	Accounting & Auditing	SAO	Recorded bank activity	0.30	\$ 125.00	\$ 37.50
5/30/2024	Accounting & Auditing	SAO	Recorded bank activity	1.00	\$ 125.00	\$ 125.00
5/31/2024	Accounting & Auditing	SAO	Recorded bank activity, reviewed and updated vendor distributions	2.00	\$ 125.00	\$ 250.00
	Total Accounting & Auditing			14.55		\$ 1,826.25
4/25/2024	Consulting	PDR	Courier for checks to Edwina Tate			\$ 75.28
	Total Consulting					\$ 75.28

Total Burton Wiand as Receiver, Oasis Management

<u>14.55</u> <u>\$ 1,901.53</u>

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

677 5-4447 Fax (727) 784-5491 .com

OASIS MANAGEMENT June 1, 2024 - June 30, 2024

Date	Activity Category	Timekeeper	Description	Hours	Rate	Amount
6/3/2024	Accounting & Auditing	SAO	Recorded bank activity	0.50	\$ 125.00	\$ 62.50
6/4/2024	Accounting & Auditing	SAO	Reconciled bank statement and investor distributions	5.50	\$ 125.00	\$ 687.50
6/5/2024	Accounting & Auditing	SAO	Reconciled MM bank statement and investor distributions in Quickbooks	2.05	\$ 125.00	\$ 256.25
6/10/2024	Accounting & Auditing	SAO	Recorded bank activity	0:30	\$ 125.00	\$ 37.50
6/12/2024	Accounting & Auditing	SAO	Reissued checks	0.40	\$ 125.00	\$ 50.00
6/13/2024	Accounting & Auditing	SAO	Updated account records	0.25	\$ 125.00	\$ 31.25
6/13/2024	Accounting & Auditing	AAM	Printed checks	1.00	\$ 125.00	\$ 125.00
6/14/2024	Accounting & Auditing	SAO	Recorded bank activity	0:30	\$ 125.00	\$ 37.50
6/17/2024	Accounting & Auditing	SAO	Recorded bank activity and updated account records	09.0	\$ 125.00	\$ 75.00
			Reviewed bank activity and updated general ledger, recorded stop			
6/18/2024	Accounting & Auditing	SAO	payments and reissued for distribution checks, recorded bank activity	1.30	\$ 125.00	\$ 162.50
6/21/2024	Accounting & Auditing	SAO	Recorded bank activity	0.50	\$ 125.00	\$ 62.50
6/24/2024	Accounting & Auditing	SAO	Recorded bank activity	0.50	\$ 125.00	\$ 62.50
6/25/2024	Accounting & Auditing	SAO	Recorded bank activity	0.30	\$ 125.00	\$ 37.50
6/26/2024	Accounting & Auditing	SAO	Recorded bank activity, voided and reissued investor checks	0.80	\$ 125.00	\$ 100.00
6/26/2024	Accounting & Auditing	AAM	Printed checks	0.25	\$ 125.00	\$ 31.25
6/27/2024	Accounting & Auditing	SAO	Updated account records	0.50	\$ 125.00	\$ 62.50
	Total Accounting & Auditing			15.05		\$ 1,881.25

Total Burton Wiand as Receiver, Oasis Management

\$ 1,881.25

<u>15.05</u>

Case 8:19-cv-00886-VMC-SPF Document 837 Filed 08/27/24 Page 212 of 218 PageID 19178

# **EXHIBIT 16**

Case 8:19-cv-00886-VMC-SPF Document 837 Filed 08/27/24 Page 213 of 218 PageID 19179 All funds payable to: E-Hounds, Inc.

Invoice for Services

2

04/01/2024

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

\$125.00

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COLORE ON

\$250.00

	en Date /01/2024	Close Date 04/30/2024	Invoice # 52578	Balance Due \$2065.00	Case Re	ference (E9295) CFTC v. Oasis, et al.	Terms	ue on Rece	eipt
		Invoice to: Burton W Wiand PA 114 Turner Street Clearwater, FI 33756				Case Contact: Burton W Wiand PA Burt Wiand 727-460-4679			
Q	Date	Expedited	All quantitie	s are based Hourly	unless oth	nerwise noted	Tech	Price	Ext
2	04/01/202	24 E-Hounds Revie	ew Platform (Courtes	y Rate Monthly)				\$595.00	\$1190.00
4	04/01/202			ers (per user) Courtesy Ra				\$125.00	\$500.00
1	04/01/202	24 E-Hounds Revie	ew Platform Add'l Use	ers (per user) Courtesy Ra	ate Eflegal u	ser		\$125.00	\$125.00

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

	SUBTOTAL	\$2005.00
	TOTAL	\$2065.00
Balance D	ue	\$2065.00
E-Hounds also	accepts:	
0		
	E-Hounds also Venmo: @eh Zelle: supp	TOTAL Balance Due E-Hounds also accepts: Venmo: @ehounds Zelle: support@ehounds.cc

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

Case 8:19-cv-00886-VMC-SPF Document 837 Filed 08/27/24 Page 214 of 218 PageID 19180 All funds payable to: E-Hounds, Inc.



2

05/01/2024

## Invoice for Services

32815 US 19 North Suite 100

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

\$125.00

\$250.00

	en Date 01/2024	Close Da		Invoice # 53414	Balance Due		eference (E9295) CFTC v. Oasis, et al.	Terms	Due on Rece	eipt
		Invoice to: Burton W Wia 114 Turner Stre Clearwater, Fl	eet				Case Contact: Burton W Wiand PA Burt Wiand 727-460-4679			
Q	Date	Expedited		All quantit	ies are based Hour	ly unless c	otherwise noted	Tech	Price	Ext
2	05/01/202	4 E-Hou	inds Review	Platform (Courte	esy Rate Monthly)				\$595.00	\$1190.00
4	05/01/202	4 E-Hou	inds Review	/ Platform Add'l U	sers (per user) Courtes	Rate Sallah	law users		\$125.00	\$500.00
1	05/01/202	4 E-Hou	inds Review	/ Platform Add'l U	sers (per user) Courtes	Rate Eflega	luser		\$125.00	\$125.00

E-Hounds Review Platform Add'I 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	\$2065.00
Payments Applied		
	TOTAL	\$2065.00
	Balance Due	\$2065.00
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	DEGRESS MIDICICAL VIDA
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		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 REFUND This invoice is made under the fee agreement signed on behalf of the above listed client. As stared in the Fee Agreement for E-Hounds services, Final billing must be satisfied before the final release of equipment or findings/reporting. All billing is DUE ON RECEIPT, unless the dotherwise above. All unpaid balances over 30 days will be subject to a 1.5% fee per month. Any unpaid balances over 60 days we 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.	a e 5. vs ss ili	B PayPal

Case 8:19-cv-00886-VMC-SPF Document 837 Filed 08/27/24 Page 215 of 218 PageID 19181 All funds payable to: E-Hounds, Inc.



2

06/01/2024

## Invoice for Services

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

\$125.00

\$250.00

	en Date /01/2024		se Date 30/2024	Invoice # 54943	Balance Due \$2065.00	Case Re	ference (E9295) CFTC v. Oasis, et al.	Terms	ue on Rece	eipt
		114 Turne	V Wiand PA				Case Contact: Burton W Wiand PA Burt Wiand 727-460-4679			
Q	Date	Expedited		All quantiti	es are based Hourly	unless oth	nerwise noted	Tech	Price	Ext
2	06/01/202	24	E-Hounds Revie	w Platform (Courte	sy Rate Monthly)				\$595.00	\$1190.00
4	06/01/202	24	E-Hounds Revie	w Platform Add'l Us	sers (per user) Courtesy R	ate Sallahlav	v users		\$125.00	\$500.00
1	06/01/202	24	E-Hounds Revie	w Platform Add'l Us	sers (per user) Courtesy R	ate Eflegal u	ser		\$125.00	\$125.00

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

If you would prefer to apply the balance of your reta additional services may result in our request for add	ainer to this statement, please pay the difference. Rea itional retainer.	questing	SUBTOTAL	\$2065.00
Payments Applied			тоты	\$2065.00
			TOTAL	\$2005.00
		Balan	ce Due	\$2065.00
Please note: Our fees are subject to change a	nnually. Last change: 2/1/2022	E-Hounds	also accepts:	
<b>Statement of Limited Liability and</b> E-Hounds, Inc. shall not be liable under any circumstances for any	special, consequential, or exemplary damages arising from the use or	Zelle <sup>.</sup>	: @ehounds support@ehounds.	ECRRESS THE RELEVANCE OF THE RELEVANCE O
storage of recovered data for more than 30 days unless otherwise must be reported to E-Hounds within 5 business days of receipt. Pr client's request or upon case closure. Additional storage fees may This invoice is made under the fee agreement signed on behalf of services, Final billing must be satisfied before the final release of e stated otherwise above. All unpaid balances over 30 days will be su be subject to equipment liquidation, collection process and reasc	ent and/or owner(s). E-Hounds shall not be liable for the continued specified in writing by the client. Any problems with recovered data operty and/or equipment held for legal matters is held for 1 Year at the apply to extended storage/maintenance. ABSOLUTELY NO REFUNDS. the above listed client. As stated in the Fee Agreement for E-Hound's quipment or findings/reporting. All billing is DUE ON RECEIPT, unless bject to a 1.5% fee per month. Any unpaid balances over 60 days will nable attorney's fees incurred in collection. Services by E-Hounds is r the services, and payment for such services is the sole liability and or assignable.			
			venmo	PayPal

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# **EXHIBIT 17**

### UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA TAMPA DIVISION

## COMMODITY FUTURES TRADING COMMISSION,

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

### Plaintiff,

v.

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

Defendants;

and

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

Relief Defendants.

\_\_\_\_\_/

### **ORDER**

This cause comes before the Court for consideration of the Receiver's Twenty-First 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 Twenty-First 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	\$38,828.09
Guerra & Partners, P.A.	\$47,203.27
Johnson Newlon & DeCort	\$8,451.00
Jared J. Perez P.A.	\$7,232.00
Englander Fischer	7,533.00
Evans Keane	2,268.74
Phillips Lyte LLP	\$3,284.00
PDR CPAs	6,031.53
E-Hounds, Inc.	\$6,195.00

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

2024.