# 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.	

RECEIVER'S TWENTY-FOURTH INTERIM MOTION FOR ORDER AWARDING FEES, COSTS, AND REIMBURSEMENT OF COSTS TO RECEIVER AND HIS PROFESSIONALS

Burton W. Wiand, the Court-appointed receiver over the assets of the above-captioned defendants and relief defendants (the "Receiver" and the "Receivership" or "Receivership Estate") pursuant to the Court's order dated July 11, 2019 (the "Consolidated Order" 1), respectfully moves the Court for the entry of an order awarding fees and the reimbursement of costs to the Receiver and his professionals. See Doc. 98 (approving retention of professionals). This motion covers all fees and costs incurred from January 1, 2025 through March 31, 2025. The Standardized Accounting Report (the

# Case Background and Status

Exhibit 1.2

"Accounting Report") for the time covered by this motion is attached as

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 On July 11, 2019, the Court entered the Consolidated Order (Doc. 177), which combined and superseded two prior orders (Docs. 7 and 44) and is the operative document governing the Receiver's activities.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 4Oaks LLC.<sup>3</sup>

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

On January 30, 2025, the Receiver filed his Twenty-third Interim Report (Doc. 855) (the "Interim Report"). The Interim Report contains comprehensive and detailed information regarding the case background and status; the recovery of assets; financial information about Receivership Entities; the Receiver's proposed course of action regarding assets in the Receivership Estate; the claims process; and related (and/or contemplated) litigation involving Receivership Entities. The Receiver incorporates the Interim Report into this motion and has attached a true and correct copy of the Interim Report as Exhibit 2 for the Court's convenience. The Interim Report addresses all activity that resulted in the fees and costs sought in this motion.

#### Professional Services Rendered and Costs Incurred

The Consolidated Order authorizes the Receiver to "solicit persons and entities ('Retained Personnel') to assist him in carrying out the duties and

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

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<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.

for the purpose of further investigating and pursuing claims against ATC Brokers Ltd. and related individuals and entities (generally, "ATC") (Doc. 385), which the Court granted on April 23, 2021.<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>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

("KM") to provide forensic accounting services; (3) PDR CPAs ("PDR") to provide general accounting and tax services; (4) RWJ Group, LLC ("RWJ") to provide asset management and investigative services; (5) E-Hounds, Inc. ("E-**Hounds**") to provide computer forensic services; (6) the Godfrey Firm to provide legal services in Belize; (7) Maples Group to provide legal services in the Cayman Islands; (8) Sergio Godinho with SEDA Experts, LLC to provide consulting connection with litigation litigation in against Fundadministration, Inc.; (9) Englander Fischer to assist the Receiver and his counsel with clawback litigation; and (10) Thomas J. Bakas with RPM Financial Markets Group LLC ("RPM") to provide litigation consulting in connection with litigation against ATC (all of the foregoing and the Piper Firm are collectively, the "**Professionals**").8

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

Perez also left Guerra King and continues to represent the Receiver through his new legal practice. (Doc. 655 at 24.) Other professionals at G&P who have also been providing legal services to the Receiver for this matter have remained at G&P. Given Ms. Gura's and Mr. Perez's knowledge regarding this matter, the Receiver determined that it is in the best interests of the Receivership that they continue to provide legal services to the Receiver along with the professionals at G&P. The Receiver does not anticipate that there will be

duplication of services provided by Ms. Gura, Mr. Perez, and G&P.

<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> 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.

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

### I. The Receiver.

The Receiver requests that the Court award him a total of \$13,303.06, which includes \$11,155.50 in fees for professional services rendered and \$2,147.56 in costs incurred from January 1, 2025 through March 31, 2025. 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.

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# A. The Receivership.

For the time covered by this motion, the work of the Receiver focused on investigating fraud and related activities, locating and taking control of Receivership assets, investigating and pursuing additional assets for the Receivership, and administering the claims process. These activities of the Receiver are set forth in detail in the Interim Report. Ex. 2. A copy of the statement summarizing the Receiver's services rendered for the Receivership is attached as **Exhibit 3**. The Receiver's time and fees for services rendered for each Activity Category from January 1, 2025 through March 31, 2025, are as follows:

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The Activity Categories set forth by the Commission in the Billing Instructions are as follows: (1) Asset Analysis and Recovery, which is defined as identification and review of potential assets including causes of action and non-litigation recoveries; (2) Asset Disposition, which is defined as sales, leases, abandonment and related transaction work (where extended series of sales or other disposition of assets is contemplated, the Billing Instructions provide that a separate category should be established for each major transaction); (3) Business Operations, which is defined as issues related to operation of an ongoing business; (4) Case Administration, which is defined as coordination and compliance activities, including preparation of reports to the court, investor inquiries, etc.; and (5) Claims Administration and Objections, which is defined as expenses in formulating, gaining approval of and administering any claims procedure. The Billing Instructions provide that time spent preparing motions for fees may not be charged to the Receivership Estate. In accordance with these instructions, the Receiver created an additional Activity Category for work on fees motions and his professionals at G&P have accounted for time spent on such work but have not charged any amount for that work.

Receivership
Receiver's Time and Fees for Services Rendered

	Hours	
Activity Category	Expended	Fee Amount
Asset Disposition	0.90	\$324.00
Asset Analysis and		
Recovery	16.00	\$5,760.00
Business Operations	7.20	\$2,592.00
Case Administration	1.30	\$468.00
Claims		
Administration	2.30	\$828.00
TOTAL	27.70	\$9,972.00

The Receiver also utilized paralegal services by his paraprofessional, Edwina Tate. During the time covered by this Application, Ms. Tate spent 6.30 hours assisting the Receiver with Receivership matters. The Receiver requests the Court award him fees for the professional services rendered by Ms. Tate from January 1, 2025 through March 31, 2025, in the amount of \$787.50. A copy of the statement summarizing Ms. Tate's services rendered for the Receivership is attached as **Exhibit 4**.

In addition to legal fees, the Receiver advanced costs of \$2,147.56 as summarized below.

Costs	Total
Web-Related	\$2,147.56
Total	\$2,147.56

# 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. A copy of the statement summarizing the Receiver's services rendered for this project from January 1, 2025 through March 31, 2025 is attached as Exhibit 5. The Receiver's time and fees for services rendered for each Activity Category are as follows:

Recovery from Investors
Receiver's Time and Fees for Services Rendered

	Hours	Fee
Activity Category	Expended	Amount
Asset Analysis and		
Recovery	1.00	\$360.00
TOTAL	1.00	\$360.00

# 2. Litigation Against Raymond P. Montie.

This is a project involving the Receiver's clawback litigation against Raymond P. Montie for fraudulent transfers and abetting or personally committing breaches of fiduciary duty. (See also Ex. 2 § V.1.e.) The Receiver has settled this litigation for \$549,410.88 after evaluation of the Receiver's claims and prospects of collection. A copy of the statement summarizing the Receiver's services rendered for this project from January 1, 2025 through March 31, 2025 is attached as **Exhibit 6**. The Receiver's time and fees for services rendered for each Activity Category are as follows:

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

	Hours	Fee
Activity Category	Expended	Amount
Asset Analysis and		
Recovery	0.10	\$36.00
TOTAL	0.10	\$36.00

#### II. Guerra & Partners, P.A.

The Receiver requests the Court award G&P fees for the professional services rendered from January 1, 2025 through March 31, 2025, in the amount of \$5,811.00. 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 7**. 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.

For the time covered by this motion, G&P's work focused primarily on pursuing additional assets for the Receivership, preserving Receivership assets, and administering the claims process. Ex. 2. A copy of the statement summarizing the services rendered and costs incurred by G&P from January 1, 2025 through March 31, 2025, is attached as **Exhibit 8.** G&P's time and fees for services rendered on this matter for each Activity Category are as follows:

Receivership
G&P's Time and Fees for Services Rendered

	Hours	
Activity Category	Expended	Fee Amount
Asset Disposition	2.00	\$480.00
Asset Analysis and		
Recovery	6.00	\$1,440.00
Business Operations	7.90	\$1,896.00
Case Administration	3.70	\$783.00
Claims Administration	6.70	\$1,188.00
TOTAL	26.30	\$5,787.00

The Receiver also requests the Court award Johnson Newlon and DeCort fees for professional services rendered by paralegal Mary Gura for her continuation of work on behalf of the Receivership from January 1, 2025 through March 31, 2025, in the amount of \$1,944.00. A copy of the statement summarizing the services rendered by Ms. Gura from January 1, 2025 through March 31, 2025, is attached as **Exhibit 9**.

# B. Discrete Litigation Projects.

In conjunction with the Receivership, 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. On April 14, 2020, the Receiver filed a clawback complaint against numerous investors. The liability portion of these actions is complete. G&P did not incur any professional fees or costs for this matter during the time covered by this motion.

# 2. Litigation Against Raymond P. Montie.

This is a project involving the Receiver's clawback litigation against Raymond P. Montie for fraudulent transfers and abetting or personally committing breaches of fiduciary duty. (See also Ex. 2 § V.1.e.) The Receiver

settled this litigation for \$549,410.88 after evaluation of the Receiver's claims and prospects of collection. A copy of the statement summarizing G&P's services rendered for this project from January 1, 2025 through March 31, 2025 is attached as **Exhibit 10**. G&P's time and fees for services rendered for each Activity Category are as follows:

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

	Hours	Fee
Activity Category	Expended	Amount
Asset Analysis and		
Recovery	0.10	\$24.00
TOTAL	0.10	\$24.00

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

The Receiver requests the Court award Jared Perez fees for professional services rendered and costs incurred from January 1, 2025 through March 31, 2025, in the amount of \$4,768.00. 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. 7. Jared J. Perez P.A. began providing services on July 8, 2022. However, as noted in the Interim Report, Mr. Perez was the lead counsel and senior attorney on this matter from its inception. The activities of Mr. Perez for the time covered by this Motion are set forth in the Interim Report. See Ex. 2. He has billed time for these activities in accordance with the Billing

Instructions. A copy of the statement summarizing the services rendered and costs incurred for the pertinent period is attached as **Exhibit 11**.

#### IV. Englander Fischer.

The Receiver requests the Court award Englander Fischer fees for professional services rendered and costs incurred from January 1, 2025 through March 31, 2025 in the amount of \$10,727.00. 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 January 1, 2025 through March 31, 2025 are attached as Exhibit 12.10

<sup>&</sup>lt;sup>10</sup> Englander Fischer's prior invoices did not include a summary of their professionals' hours. As such, the Receiver created a summary for those invoices and included it here in prior fees motions. Englander Fischer has updated its billing system, and its current invoices include a summary. Therefore, the Receiver has not included a summary in this motion and will not going forward unless the Court prefers for the Receiver to do so. Also, professionals at Englander Fischer accounted for time spent on preparing a response to the Court regarding the prior fees motion, but did not charge any fees for that work.

#### V. Elam & Burke.

The Receiver requests the Court award Elam & Burke (formerly Evans Keane LLP) fees for professional services rendered and costs incurred from January 1, 2025 through March 31, 2025 in the amount of \$736.70. Elam & Burke 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 Elam & Burke from January 1, 2025 through March 31, 2025 are attached as **Exhibit 13**.

# VI. Phillips Lytle LLP.

The Receiver requests the Court award Phillips Lytle LLP fees for professional services rendered and costs incurred from January 1, 2025 through March 31, 2025 in the amount of \$11,622.00.<sup>11</sup> Phillips Lytle is assisting the Receiver as local counsel in New York in connection with a subpoena served on a non-party in New York. A copy of the statement summarizing the services rendered and costs incurred by Phillips Lytle from January 1, 2025 through March 31, 2025 is attached as **Exhibit 14.** 

#### VII. PDR CPAs.

The Receiver requests the Court award PDR fees for professional services rendered and costs incurred from January 1, 2025 through March 31,

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<sup>&</sup>lt;sup>11</sup> The fees sought include an invoice for the second half of December 2024 in the amount of \$2,883.50, which Phillips Lytle inadvertently did not submit to the Receiver in time to be included in the last motion for fees

2025, in the amount of \$3,707.62. 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 January 1, 2025 through March 31, 2025, in the amount of \$5,145.00. E-Hounds is a computer forensics firm that assists the Receiver in securing, analyzing, and maintaining electronic data. E-Hounds started providing services for the Receivership on April 22, 2019. Copies of the statements summarizing the services rendered and costs incurred for the pertinent period are attached as composite **Exhibit 16**.

## IX. Maples Group.

The Receiver requests the Court award the Maples Group fees for professional services rendered and costs incurred from January 1, 2025 through March 31, 2025 in the amount of \$3,337.50. The Caymans Islands office of the Maples Group provides local counsel and foreign regulatory compliance services. A copy of the statement summarizing the services

rendered and costs incurred for the pertinent period is attached as **Exhibit**17.

#### **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) ("The 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 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  $\P$  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 the payment of these claims through the claims process. 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>12</sup>

Burton W. Wiand, Receiver	\$13,303.06
Guerra & Partners, P.A.	\$5,811.00
Johnson Newlon & DeCort	\$1,944.00
Jared J. Perez P.A.	\$4,768.00
Englander Fischer	\$10,727.00
Elam & Burke	\$736.70
Phillips Lyte LLP	\$11,622.00
PDR CPAs	\$3,707.62
E-Hounds, Inc.	\$5,145.00
Maples Group	\$3,337.50

#### 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 not consulted with defendants DaCorta, Anile, Duran, Haas, and Montie because they have either lost on the merits (pending appeal in DaCorta's case), defaulted, or settled the CFTC's claims against them through the entry of consent orders and judgments and thus are no longer active participants in this litigation. The Receiver has also not consulted with the United States, as an intervening party, because the government has not previously taken a

<sup>&</sup>lt;sup>12</sup> A proposed order is attached as **Exhibit 18**.

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

Respectfully submitted,

#### /s/ Maya Lockwood

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Attorneys for Burton W. Wiand, Receiver

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 29, 2025, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system.

#### /s/ Maya M. Lockwood

Maya M. Lockwood

#### RECEIVER'S CERTIFICATION

The Receiver has reviewed this Twenty-fourth Interim Motion for Order Awarding Fees, Costs, and Reimbursement of Costs to Receiver and His Professionals (the "Motion").

To the best of the Receiver's knowledge, information, and belief formed after reasonable inquiry, the Motion and all fees and expenses herein are true and accurate and comply with the Billing Instructions provided to the Receiver by the Commodity Futures Trading Commission.

All fees contained in the Motion are based on the rates listed in the fee schedule, attached as Exhibit 7. Such fees are reasonable, necessary, and commensurate with (if not below the hourly rate that is commensurate with) the skill and experience required for the activity performed.

The Receiver has not included in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay (except to the extent that any such amortization is included within the permitted allowable amounts set forth in the Billing Instructions for photocopies and facsimile transmission).

To the extent the Receiver seeks reimbursement for any service which the Receiver justifiably purchased or contracted for from a third party (such as copying, imaging, bulk mail, messenger service, overnight courier, computerized research, or title and lien searches), the Receiver has requested reimbursement only for the amount billed to the Receiver by the third-party vendor and/or paid by the Receiver to such vendor. The Receiver is not making a profit on such reimbursable services.

The Receiver believes that the fees and expenses included in this Motion were incurred in the best interests of the Receivership Estate. With the exception of the Billing Instructions and the Court-approved engagements described above, the Receiver has not entered into any agreement, written or oral, express or implied, with any person or entity concerning the amount of compensation paid or to be paid from the Receivership Estate, or any sharing thereof.

/s/ Burton W. Wiand

Burton W. Wiand, as Receiver

**Standardized Accounting Report Form** 

	Standardize							
	Standardized Accounting Report for Oasis Management LLC Receivership							
	Civil Court Dock							
	Reporting Peri	od (	01/01/2025 to	o 03.	/31/2025		Grand	1
			Details		Subtotal		Grand Total	Notes
			Details		Subtotal		Total	Notes
Line 1	Beginning Balance (As of 01/01/2025)					\$	1,893,790.81	
	Increases in Fund Balance							
Line 2	Business Income							
Line 3	Cash and Securities	Ф	0.507.05					T T
Line 4	Interest/Dividend Income	\$	8,597.85					Interest Income
Line 5 Line 6	Asset Liquidation Third Party Litigation Income	\$ \$	- 26 925 22					Settlements
Line 6 Line 7	Third-Party Litigation Income Other Miscellaneous	Э	26,835.23					Settlements
Line /	Total Funds Available - Totals Line 1 - 7			\$	35,433.08	2	1,929,223.89	
	Total Fullus Available - Totals Ellie 1 - 7			Φ	33,433.06	Φ	1,929,223.69	
	Decreases in Fund Balance							
Line 9	Disbursements to Investors							
Line 10	Disbursements for Receivership Operations							
	Receiver	\$	5,974.40					
	Guerra King	\$	20,059.38					Professional Fees
10.a.3	KapilaMukamal LLP							Professional Fees
	PDR Certified Public Accts	\$	7,186.88					Professional Fees
	RPM Financial							Professional Fees
	Englander Fisher	\$	20,187.26					Professional Fees
	The RWJ Group E Hounds	¢	11.550.00					Professional Fees Professional Fees
	Maples Group	\$ \$	11,550.00 3,800.00					Professional Fees Professional Fees
	Jared J Perez PA	\$	14,144.00					Professional Fees
	Other Professional Fees	\$	12,912.09					Professional Fees
	Total Disbursements to Receiver/Professionals	_	,	\$	95,814.01			
10b	Third-Party Litigation Expenses							
10c	Asset Expenses							
10d	Tax Payments							
	<b>Total Disbursements for Receivership Ops.</b>			\$	95,814.01			
Line 11	Disbursements Related to Distribution Expenses	] }						
Line 12	Disbursement to Court/Other							
Line 12	Disoursement to Court Other							
Line 13	Other							
	<b>Total Funds Disbursed - Total Lines 9 - 13</b>					\$	95,814.01	
Line 14	Ending Balance (as of 03/31/2025)					\$	1,833,409.88	

**Standardized Accounting Report Form** 

			ting Report Form		
	Standardized Accounting Report for Oasis Management LLC Receivership				
	Civil Court Docket No. 8:19-cv-00886-VMC-SPF				
		From Inception to	03/31/2025		
				Grand	
		Details	Subtotal	Total	Notes
Line 1	Beginning Balance				
Line	Deginning Datanee			_	
	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	\$ 792,742.39			Interest Income
Line 5	Asset Liquidation	\$ 7,900,700.41			Sale of Real Estate/Misc.
Line 6	Third-Party Litigation Income	\$ 5,634,772.90			Settlements, etc
Line 7	Other Miscellaneous	\$ 7,788,374.26			Remitted Funds & Misc.
Zine /	outer Misochaneous	ψ 7,700,571.20			Termited Funds & Wilse.
	<b>Total Funds Available - Totals Line 1 - 7</b>		\$31,328,507.42	\$ 31,328,507.42	
	<b>Decreases in Fund Balance</b>				
Line 9	Disbursements to Investors		\$18,824,628.07		
Line 10	Disbursements for Receivership Operations				
10.a.1	Receiver	\$ 589,145.44			Professional Fees
10.a.2	Guerra King	\$ 2,225,901.97			Professional Fees
10.a.3	KapilaMukamal LLP	\$ 320,452.44			Professional Fees
10.a.4	PDR Certified Public Accts	\$ 115,965.26			Professional Fees
10.a.5	RPM Financial	\$ 84,036.92			Professional Fees
10.a.6	Englander Fisher	\$ 562,121.44			Professional Fees
10.a.7	The RWJ Group	\$ 100,688.80			Professional Fees
10.a.8	E Hounds	\$ 181,562.97			Professional Fees
10.a.9	Maples Group-	\$ 59,112.85			Professional Fees
10.a.10	Jared J. Perez	\$ 156,818.06			Professional Fees
10.a.11	Other Professional Fees	\$ 124,454.13			Professional Fees
Line 10 a	Total Disbursements to Receiver/Professionals		\$ 4,520,260.28		
10b	Third-Party Litigation Expenses		\$ 42,160.00		
	Asset Expenses		\$ 358,853.05		Condo Fees, Insurance
					Repairs, Maint & Utilities
10d	Tax Payments		\$ 109,117.36		County Sales & Propery Tax
	<b>Total Disbursements for Receivership Ops.</b>		\$ 5,030,390.69		
Line 11	Disbursements Related to Distribution Expense	S			
T : 10	Disharas water Count/Oil		¢ 5 (27 (25 12		Daminian to HOMO
Line 12	Disbursement to Court/Other		\$ 5,637,625.12		Remission to USMS
Line 13	Other		\$ 2,453.66		Cayman Registration Fee
Line 13	onici		Ψ 2,733.00		Cayman regionation rec
	<b>Total Funds Disbursed - Total Lines 9 - 13</b>			\$ 29,495,097.54	
I in a 14	F. J. Dalamas (az af 02/21/2025)			0 1 022 400 00	
Line 14	Ending Balance (as of 03/31/2025)			\$ 1,833,409.88	

# 

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	733 Second Interim Distribution Checks Issued
	No. of Claimants/Investors Paid	732 First Interim Distribution Checks Issued;
16b	Since Inception of Estate	733 Second Interim Distribution Checks Issued

Receiver:	
By: Towkellens	Burton W. Wiand, Receiver
Signature	Printed Name

Date: 4/30/2025

# UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA TAMPA DIVISION

COMMODITY FUTURES TRADING COMMISSION,

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

Plaintiff,

v.

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

Defendants;

and

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

Relief Defendants.	

#### THE RECEIVER'S TWENTY-FOURTH INTERIM REPORT

Information and Activity from January 1, 2025 through March 31, 2025.

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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-Fourth 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, <a href="www.oasisreceivership.com">www.oasisreceivership.com</a>, which he updates periodically. The Receiver will continue to update the website regarding the Receiver's most significant actions, important Court filings, and other items that might be of interest to the public. This Interim Report, as well as all other reports, will be posted on the website.1

# Overview of Significant Activities During this Reporting Period

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

Prepared a motion for attorneys' fees and costs in connection with the United States District Court for the District of Idaho's order granting the Receiver's motion to compel enforcement of a subpoena and for sanctions against Intermountain Precious Metals ("IPM"). The Receiver will also seek a second contempt order imposing substantial sanctions on IPM and its principle(s) until the company produces the required documents and information (see infra § II.A.);

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

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reports within thirty days after the end of each calendar quarter. Where possible, the Receiver has also included information about events occurring between March 31, 2025 (the end of the reporting period) and the date of this filing.

Filed a motion for indirect civil contempt against Stephen Preziosi, defendant Michael DaCorta's civil appellate attorney, in the United States District Court for the Southern District of New York for failure to comply with a subpoena the Receiver served upon him in connection with a recovery scam (see infra § II.A.);

Continued to litigate the Receiver's lawsuit against ATC Brokers Ltd., David Manoukian, and Spotex, LLC, including obtaining an order from the court granting the Receiver's motion for compliance with the Eleventh Circuit's opinion and mandate and motion for leave to file a second amended complaint in most part (see infra § V.2.b.);

Engaged in discovery and other efforts to collect or sell various judgments, including preparing a motion to approve the sale of certain default judgments to a debt buyer for a total amount of \$22,000 (see infra § V.2.a.);

Collected litigation income of \$26,835.23 through settlements and/or the enforcement of default judgments (see Ex. A); and

Collected \$8,597.85 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 \$7,900,700.41 in assets (net, excluding remitted funds), mostly subject to agreements with the Department of Justice and the United States Marshals Service;

Collected \$792,742.39 in interest and/or dividend income;

Collected total litigation income of \$5,634,772.90 through clawback and other third-party settlements; and

Collected other miscellaneous income of \$7,788,374.26, 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 40aks LLC ("40aks") (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 directly or indirectly owned, beneficially or otherwise, by the Receivership Defendants." See id. at p. 14, ¶ 32 & p. 15, ¶ 30.b. The SRO also imposed a temporary injunction against the defendants and relief defendants and froze their assets. Id. at 19.

<sup>&</sup>lt;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.

Subsequently, all defendants and relief defendants either defaulted or consented to the entry of a preliminary injunction against them (with some differences unique to the circumstances of each party). See Docs. 35, 43, 44, 82, 85, 172, 174-77. On July 11, 2019, the Court entered a Consolidated Receivership Order, which is now the operative document governing the Receiver's activities. Doc. 177 (the "Consolidated Order"). Pursuant to the Consolidated Order and its predecessors (see Docs. 7, 44), the Receiver has the duty and authority to (1) administer and manage the business affairs, funds, assets, and any other property of the Receivership Entities; (2) marshal and safeguard the assets of the Receivership Entities; and (3) investigate and institute legal proceedings for the benefit of the Receivership Entities and their investors and other creditors as the Receiver deems necessary.

On 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.

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<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*.

Doc. 195. On November 18, 2020, Anile was sentenced to imprisonment of 120 months and supervised release of three years. ACA Doc. 56. He was also ordered to pay restitution of \$53,270,336.08. *Id.* On January 24, 2023, the judge presiding over the Anile Criminal Action 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.

Similarly, on December 17, 2019, a federal grand jury returned a two-count indictment against defendant DaCorta, alleging conspiracy to commit wire and mail fraud as well as engaging in an illegal monetary transaction. See United States of America v. Michael J. DaCorta, Case No. 8:19-cr-605-T-02CPT (M.D. Fla.) (the "DaCorta Criminal Action" or "DCA"). A copy of the original indictment was attached as Exhibit A to the Receiver's Third Interim Report, and a copy of a superseding indictment, which added an additional count related to tax evasion, was attached as Exhibit D to the Receiver's Eighth Interim Report. See Docs. 229, 393.

On May 4, 2022, after two weeks of testimony and argument before the Honorable William F. Jung and less than four hours of deliberation, a jury found DaCorta guilty on all 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 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 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

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<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.

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 submitted its response on August 28, 2024, and DaCorta filed his reply on October 8, 2024. The appellate court has not issued an opinion as of the date of this Interim Report. *See generally C.F.T.C. v. DaCorta*, Case No. 24-10132-AA (11th Cir.).

# II. Overview of the Receiver's Findings

The Consolidated Order authorizes, empowers, and directs the Receiver to "investigate the manner in which the financial and business affairs of the Receivership Defendants were conducted...." Doc. 177 ¶ 44. Pursuant to that mandate, the Receiver obtained and reviewed records from Receivership Entities and third parties. The Receiver has formed certain conclusions based on his review of 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. The scheme was successful and proliferated because of the continued deception of the investors with respect to their purported accounts. They were led to believe that they held valuable loan accounts that continually earned money when, in fact, the scheme appears to have been insolvent since its inception. As an example, when the CFTC stopped the scheme in April 2019, the fraudulent website showed investors that they were owed an aggregate of over \$120 million. In truth, OIG only had liquid assets of less than \$10 million and was 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

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<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.

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.

# 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

<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.

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 now-deceased private attorney, entered a notice of appearance in this action on DaCorta's behalf.<sup>7</sup> Doc. 654. Kurpiers thereafter filed a motion for summary judgment, opposed the CFTC's motion for summary judgment, took 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.

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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.

<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 represented both the convicted mastermind of the Oasis scheme and certain of his adjudicated victims. A clear purpose of DaCorta's litigation efforts is to remove the Receiver for the purported benefit of his victims, who Winters and Kurpiers have claimed to represent.

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, Brent Winters is an "Attorney" for his "Client/Defendant[,] Michael J. DaCorta." (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."

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 who 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 "Counsel 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." Many of these services can only be provided by an attorney.

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, yet Winters and the Helpers directed the victims not to communicate with the Receiver or those assisting him.

Since then, Winters has claimed 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 \$100,000 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 attempt 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 total amount of money that Winters has secured from investors for his purported services is unknown at this time, but it is clearly hundreds of thousands of dollars. The Receiver has prepared a subpoena, which he has attempted to serve. Winters has not responded to communications asking if he will accept service of the subpoena. As such, the Receiver attempted to serve Winters at least four times at four separate addresses across three states. To date, efforts at service have been unsuccessful because Winters apparently has no discernable residence, and his published office address is a UPS store.

Additionally, the Receiver subpoenaed and received documents from the bank that transferred \$100,000 to Kurpiers and uncovered that those funds were derived from deposits made by certain Oasis investors who have claimed

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

to be represented by Winters. The bank account is controlled by Winters, his wife, and certain Oasis investors. The Receiver also learned that more than \$190,000 in funds from the bank account were transferred to Intermountain Precious Metals ("IPM").

The Receiver served a subpoena on IPM, but it refused to comply with the subpoena. The Receiver retained 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. On July 18, 2024, an owner of the company filed a notice that IPM is seeking counsel and a separate notice attempting to invoke the Fifth Amendment privilege against selfincrimination. On August 5, 2024, the court entered an order granting the Receiver's motion to compel and finding that IPM would be subject to sanctions, including the Receiver's reasonable attorneys' fees and costs, if the company failed to comply with the subpoena within 30 days of the court's order.

In willful contempt of the order, however, IPM never produced any of the required documents. Instead, on September 4, 2024, IPM filed a motion for

reconsideration in the district court, and on September 6, 2024, it filed a notice of appeal to the United States Court of Appeals for the Ninth Circuit. On December 9, 2024, the Receiver filed a motion to dismiss the appeal, and on December 17, 2024, the Ninth Circuit granted the motion and remanded the matter to the Idaho district court. On January 10, 2025, the district court denied IPM's motion for reconsideration. The Receiver is preparing a motion to the district court for an award of attorneys' fees and costs in connection with his original motion to compel and for a second contempt order imposing substantial sanctions on IPM and its principal(s) until the company produces the documents required by the Receiver's subpoena. While the Receiver's professionals were working on this motion, IPM submitted a petition for writ of certiorari on March 17, 2025. The Receiver filed his response in opposition to the petition for writ of certiorari on April 21, 2025. As a writ does not stay the lower court proceedings, the Receiver intends to move forward with his motion for fees, costs, and additional sanctions and will file it soon. All of these filings are baseless, vexatious, and patently designed to impede the Receiver and conceal the Helpers', IPM's, Young's, and Winters' perfidy.

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. On April 18, 2022, the Court sua sponte struck the documents from the docket as a "scheme" to undermine the Receivership. See Doc. 638 at 7 ("[T]he deluge of identical filings seems to the Court merely to be a scheme — clearly led and directed by one person or a group of people — to disrupt the orderly administration of this Receivership case."). The Court was correct. It now appears that Winters and the "Oasis Helpers" created a PDF template that automatically generated the frivolous Notices.

As another example, Kurpiers filed a second motion to dismiss the CFTC's complaint in this action on August 19, 2022, seeking, among other things, to dissolve the Receivership. Doc. 663. The Court held a hearing on December 22, 2022, which the Receiver's counsel attended along with the CFTC's attorneys from Kansas City, but during the hearing, Kurpiers

<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.

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 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.

<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."

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 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 were confused about why they did not receive any distribution check, but given the untimeliness, the Receiver could only ask them to direct their questions to Winters or seek relief from the Court.

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.

Winters also 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" Also Disrupted The Second Interim Distribution. In early 2024, 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 Receiver's Supplemental Interim Report Regarding the Continuing Obstruction of the Receivership and Possible Recovery Scam Targeting Investor Victims (see Doc. 811), which was submitted to law enforcement and is also available on the Receivership website. The Receiver continues to bring these matters to the Court's and the claimants' 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.

On August 16, 2024, the Receiver filed a motion for contempt against Mr. Preziosi for his failure to comply with the subpoena, which Mr. Preziosi opposed. See Docs. 834, 835, 840, and 843. On December 3, 2024, the Court denied the Receiver's motion on jurisdictional grounds, stating that the matter should be litigated where Mr. Preziosi resides – i.e., the United States District Court for the Southern District of New York. See Doc. 850. On December 10, 2024, Mr. Preziosi initiated an action in the Southern District of New York and filed a motion to modify the Receiver's subpoena, which the Receiver opposed. See In re Subpoena by a Receiver in Commodity Futures Trading Commission

v. Oasis Int'l Group. Ltd. et al., Case No. 1:24-mc-00577 (S.D.N.Y.). On February 4, 2025, the Receiver filed a motion for an order of indirect civil contempt against Mr. Preziosi for his failure to comply with the subpoena. All motions are fully briefed and pending before the New York court.

The Receiver believes that, during this reporting quarter, the "Oasis Helpers" and Mr. Melick continued to fraudulently raise money from the victims of DaCorta's fraud. This was done in part through the preposterous representation that by appealing DaCorta's civil case and pursuing his defense DaCorta would be able to recover over \$700 million dollars from the government, the Receiver, and recovered assets to repay all of the victims all their losses. This flagrant misrepresentation was used to dupe unsophisticated victims despite that in addition to any civil penalties pending against DaCorta, he stands convicted of egregious fraud and was ordered to pay over \$50 million in restitution for his crimes. Those attempts to further defraud the victims are despicable and any lawyers who receive money derived from these victims based on this conduct have abandoned the honorable and equitable standards of conduct required of those privileged to practice law.

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 IPM and Mr. Preziosi 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 ¶ 56.A.

#### III. Securing The Receivership Estate

Attached as **Exhibit A** to this Interim Report is a cash accounting report showing (1) the amount of money on hand from January 1, 2025, less operating expenses plus revenue, through March 31, 2025, and (2) the same information from the beginning of the Receivership (as opposed to the current reporting period). See Doc. 177 ¶ 56.B. & C. The cash accounting report does not reflect non-cash or cash-equivalent assets. Thus, the value of any uncollected or unsold property discussed below is not included in the accounting report. From January 1, 2025, through March 31, 2025, the Receiver collected \$35,433.08. <sup>11</sup> See Ex. A.

# A. 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

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<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 March 31, 2024, to give the Court and others the most current overview of the Receiver's activities. Money collected after that date, however, is not reflected in Exhibit A. Those collections will be included in the Receiver's next interim report.

States, the United Kingdom, and Belize. The Receiver opened a money market account for the Receivership at ServisFirst Bank (the "Receivership Account"). 12 The Receiver has 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. 13

#### 1. The ATC Account in the United Kingdom

On April 18, 2019, the Receiver served London-based ATC Brokers LTD ("ATC") with a copy of the SRO and requested that ATC freeze all accounts associated with the defendants and relief defendants. In cooperation with domestic law enforcement and the United Kingdom's National Crime Agency, ATC identified and froze one account in the name of Oasis Global FX, S.A., which contained \$2,005,368.28. During October 2021, the DOJ recovered those funds pursuant to certain international agreements. As discussed in prior interim reports, 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.

12 The Receiver also opened a checking/operating account

 $<sup>^{\</sup>rm 12}$  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.

#### 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.

#### B. Securing Real Property

The Receivership Estate contained numerous parcels of real property, including single-family homes, condominiums, and a waterfront office building. In the Consolidated Order and its predecessors, the Court directed the Receiver to "[t]ake all steps necessary to secure the business and other premises under the control of the Receivership Defendants" (Doc. 7 at 15-16) and to "take immediate possession of all real property of the Receivership Defendants, wherever located, including but not limited to all ownership and leasehold interests and fixtures" (Doc. 44 ¶ 19; Doc. 177 ¶ 19).

# 1. All Receivership Real Estate Has Been Sold

The Receiver has sold all real property in the Receivership Estate. 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

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<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.

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	\$2,100,000.00	\$1,994,155.06
13318 Lost Key Place Lakewood Ranch, Florida	\$1,100,000.00	\$1,038,704.75
6922 Lacantera Circle Lakewood Ranch, Florida	\$2,050,000.00	\$372,823.83
4064 Founders Club Drive Sarasota, Florida	\$1,875,000.00	\$581,712.41
4058 Founders Club Drive Sarasota, Florida	\$195,000.00	\$186,252.37
7312 Desert Ridge Glen Lakewood Ranch, Florida	\$846,000.00	\$774,740.08
16804 Vardon Terrace #307 Lakewood Ranch, Florida	\$198,000.00	\$187,542.50
16804 Vardon Terrace #108 Lakewood Ranch, Florida	\$212,000.00	\$204,312.38
16904 Vardon Terrace #106 Lakewood Ranch, Florida	\$184,000.00	\$177,104.89
17006 Vardon Terrace #105 Lakewood Ranch, Florida	\$198,000.00	\$187,813.91

6300 Midnight Pass Rd., No. 1002, Sarasota, Florida	\$913,000.00	\$863,654.69
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# 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 efforts would produce more than the cost of collection.

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

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<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.

#### 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 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.

#### D. 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.

## E. 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.

#### 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,

<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.

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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 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.a. below, the Receiver was pursuing litigation against numerous defendants, but that litigation is now substantially complete, and the Receiver has begun collecting the judgments obtained.

On March 31, 2021, the Receiver filed a second motion seeking to retain the Sallah Firm on a contingency fee basis to investigate and pursue claims against ATC Brokers Ltd. and its affiliates and principals. Doc. 385. On April 23, 2021, the Court granted the Receiver's motion, thereby approving his second engagement of the Sallah Firm. Doc. 390. On July 13, 2021, the Court also granted the Receiver's motion to approve the engagement of Thomas Bakas as a litigation consultant. See Docs. 412, 415.

In 2022, Jared Perez left 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 n/k/a Elam & Burke as local counsel in Idaho to enforce the subpoena served on IPM 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 and the litigation over the Receiver's subpoena to Mr. Preziosi.

# 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 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 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, paid 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 filed to a motion to approve this settlement (Doc. 826), which the Court granted on August 13, 2024 (Doc. 830).

#### g. 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 Receiver's website (the "Clawback Action"). Through the Clawback Action, the Receiver obtained post-suit or post-judgment settlements worth approximately \$1,214,917.09, and default judgments worth approximately \$2,145,880.47. The liability portion of the Clawback Action is complete, but the Receiver continues to register default judgments, seek writs of garnishment, and employ other collection mechanisms. On April 24, 2025, the Receiver filed a motion to approve the sale of default judgments that the Receiver has deemed to be cost-prohibitive for

collection and/or unlikely to be collectable. Doc. 863. The Receiver seeks to sell the pertinent judgments for the total of \$22,000.00 to a distressed assets liquidator. The price is a small percentage of the aggregate amount of the judgments, but the cost of continued effort for the Receivership to try to collect on these obligations is prohibitive.

#### 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 litigation consultant. On May 28, 2021, the Receiver filed suit against ATC Brokers Ltd., David Manoukian, and Spotex LLC. The complaint asserts claims for aiding and abetting fraud, aiding and abetting breaches of fiduciary duties, recovery of fraudulent transfers from ATC, gross negligence, and simple negligence. The Receiver is seeking both compensatory and punitive damages. A copy of the complaint was attached as Exhibit D to the Receiver's Ninth Interim Report and is also available on the Receiver's website.

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.

On August 8, 2024, the Receiver filed a motion for compliance with the Eleventh Circuit's opinion and mandate. See Wiand v. ATC Brokers, Ltd., et al., Case No. 8:21-cv-01317-MSS-ASS (M.D. Fla.) On October 22, 2024, the Receiver filed a motion for leave to file a second amended complaint. On February 14, 2025, the court granted the Receiver's motion for compliance and his motion to file a second amended complaint in most part. On March 13, 2025, the Receiver file a motion for reconsideration of the court's denial of leave to

file a proposed count in the second amended complaint. This motion has been fully briefed and is pending before the court. 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.). 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

The Receiver believes he has already initiated and, in most instances, resolved the vast majority of actions which he believed would be of economic benefit to the Receivership. As mentioned above and herein, however, the Receiver may assert a small number of claims against sales agents and others

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 and in prior interim reports. See supra § V.1.d-g. The Receiver will continue to issue demand letters and bring litigation when and if necessary.

#### VI. Claims Process

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

On December 9, 2022, the Receiver moved the Court for an order (1) approving a first interim distribution of \$10 million; (2) approving the Receiver's final determinations regarding unperfected or incomplete claims; and (3) overruling limited objections to certain claim determinations. Doc. 695. No party or nonparty timely opposed the motion or any of the matters discussed therein.

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<sup>&</sup>lt;sup>17</sup> See <u>www.oasisreceivership.com</u>.

On January 27, 2023, the presiding Magistrate Judge issued an order recommending that the Receiver's distribution motion be granted. Doc. 705. 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. The first interim distribution of \$10 million provided approximately 17.51% of the "Allowed Amounts" (see Doc. 439 at 10) of claims entitled to receive the distribution (as set forth in Exhibits 1 and 2 of the motion). For more information, please see the Receiver's status report on the first interim distribution, which was filed on July 13, 2023. Doc. 747.

The Court's orders regarding distribution provide specific procedures that claimants must follow. On previous occasions, Mr. Winters and/or the "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. At this time any additional documentation provided

is untimely and any request for relief must be made to the Court and will be opposed by the Receiver.

On February 28, 2024, the Receiver moved the Court to approve a second interim distribution of \$9,000,000 to approved claimants, bringing the total recovery for claimants participating in both distributions to approximately 33.28% of their allowed amounts. 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. The second interim distribution is complete. Additional funds on hand will be retained for continued operation of the Receivership and potential exposure from ongoing litigation.

#### VII. The Next Ninety Days

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 (<a href="www.oasisreceivership.com">www.oasisreceivership.com</a>) 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 the Receiver or his professionals. 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 <a href="mailto:Edwina@BurtonWWiandPA.com">Edwina@BurtonWWiandPA.com</a>. The Receiver can be contacted by phone at 727-460-4679 or by email <a href="mailto:Burt@BurtonWWiandPA.com">Burt@BurtonWWiandPA.com</a>.

Dated this 30th day of April 2025.

Respectfully submitted,

s/ Burton W. Wiand

Burton W. Wiand, Receiver

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 30, 2025, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system.

#### s/ Maya Lockwood

Maya Lockwood, FBN 0175481

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and

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Attorneys for Receiver, Burton W. Wiand

# Amended EXHIBIT A

**Standardized Accounting Report Form** 

Standardized Accounting Report Form										
	Standardized Accounting Report for Oasis Management LLC Receivership									
Civil Court Docket No. 8:19-cv-00886-VMC-SPF										
	Reporting Period 01/01/2025 to 03/31/2025									
							Grand	3.7		
			Details		Subtotal		Total	Notes		
Line 1	Beginning Balance (As of 01/01/2025)					\$	1,893,790.81			
	<b>Increases in Fund Balance</b>									
Line 2	Business Income									
Line 3	Cash and Securities									
Line 4	Interest/Dividend Income	\$	8,597.85					Interest Income		
Line 5	Asset Liquidation	\$	-							
Line 6	Third-Party Litigation Income	\$	26,835.23					Settlements		
Line 7	Other Miscellaneous									
	<b>Total Funds Available - Totals Line 1 - 7</b>			\$	35,433.08	\$	1,929,223.89			
	<b>Decreases in Fund Balance</b>									
Line 9	Disbursements to Investors									
Line 10	Disbursements for Receivership Operations	_								
	Receiver	\$	5,974.40					D 6 : 15		
	Guerra King	\$	20,059.38					Professional Fees		
	KapilaMukamal LLP PDR Certified Public Accts	φ.	7 106 00					Professional Fees Professional Fees		
	RPM Financial	\$	7,186.88					Professional Fees Professional Fees		
	Englander Fisher	\$	20,187.26					Professional Fees		
	The RWJ Group	Ψ	20,107.20					Professional Fees		
	E Hounds	\$	11,550.00					Professional Fees		
	Maples Group	\$	3,800.00					Professional Fees		
	Jared J Perez PA	\$	14,144.00					Professional Fees		
10.a.11	Other Professional Fees	\$	12,912.09					Professional Fees		
Line 10	Total Disbursements to Receiver/Professionals			\$	95,814.01					
10b	Third-Party Litigation Expenses									
10c	Asset Expenses									
10d	Tax Payments									
	<b>Total Disbursements for Receivership Ops.</b>			\$	95,814.01					
Line 11	Disbursements Related to Distribution Expenses	S I								
1 . 10	D. 1									
Line 12	Disbursement to Court/Other									
Line 13	Other									
	<b>Total Funds Disbursed - Total Lines 9 - 13</b>					\$	95,814.01			
Line 14	Ending Balance (as of 03/31/2025)					\$	1,833,409.88			
	5 ····· ( ···· ··· ··· ··· ··· ··· ··· ·						, ,			

**Standardized Accounting Report Form** 

	Standardized Accounting Report Form								
	Standardized Account		_	-					
	Civil Court Docket No. 8:19-cv-00886-VMC-SPF								
	From Inception to 03/31/2025								
	Grand								
		Details	Subtotal	Total	Notes				
Line 1	Beginning Balance								
Line	degining datance			_					
	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	\$ 792,742.39			Interest Income				
Line 5	Asset Liquidation	\$ 7,900,700.41			Sale of Real Estate/Misc.				
Line 6	Third-Party Litigation Income	\$ 5,634,772.90			Settlements, etc				
Line 7	Other Miscellaneous	\$ 7,788,374.26			Remitted Funds & Misc.				
Line /	Other Miscentaneous	Ψ 7,700,374.20			Remitted I tilds & Wilse.				
	Total Funds Available - Totals Line 1 - 7		\$31,328,507.42	\$ 31,328,507.42					
	Total Tallas Available Totals Ellie 1		Ψ31,320,307.12	Ψ 31,320,307.12					
	Decreases in Fund Balance								
Line 9	Disbursements to Investors		\$18,824,628.07						
Line 10			Ψ 10,02 1,020.07						
	Receiver	\$ 589,145.44			Professional Fees				
	Guerra King	\$ 2,225,901.97			Professional Fees				
	KapilaMukamal LLP	\$ 320,452.44			Professional Fees				
	PDR Certified Public Accts	\$ 115,965.26			Professional Fees				
	RPM Financial	\$ 84,036.92			Professional Fees				
	Englander Fisher	\$ 562,121.44			Professional Fees				
	The RWJ Group	\$ 100,688.80			Professional Fees				
	E Hounds	\$ 181,562.97			Professional Fees				
	Maples Group-	\$ 59,112.85			Professional Fees				
	Jared J. Perez	\$ 156,818.06			Professional Fees				
	Other Professional Fees	\$ 124,454.13			Professional Fees				
-	Total Disbursements to Receiver/Professionals	Ψ 12 1, 13 1.13	\$ 4,520,260.28		Trofessional Tees				
	Third-Party Litigation Expenses		\$ 42,160.00						
	Asset Expenses		\$ 358,853.05		Condo Fees, Insurance				
					Repairs, Maint & Utilities				
10d	Tax Payments		\$ 109,117.36		County Sales & Propery Tax				
100	Total Disbursements for Receivership Ops.		\$ 5,030,390.69		y see ee ee ee ee				
	у оры		,,						
Line 11	Disbursements Related to Distribution Expense	S							
	<u>'</u>								
Line 12	Disbursement to Court/Other		\$ 5,637,625.12		Remission to USMS				
Line 13	Other		\$ 2,453.66		Cayman Registration Fee				
	<b>Total Funds Disbursed - Total Lines 9 - 13</b>			\$ 29,495,097.54					
Line 14	Ending Balance (as of 03/31/2025)			\$ 1,833,409.88					

### 

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	733 Second Interim Distribution Checks Issued
	No. of Claimants/Investors Paid	732 First Interim Distribution Checks Issued;
16b	Since Inception of Estate	733 Second Interim Distribution Checks Issued

Receiver:	
By: Towkellers	Burton W. Wiand, Receiver
Signature	Printed Name

Date: 4/30/2025

# EXHIBIT B

### Caase8199:v:008860/WMCSSPF DDoormenn860422 FFFdd006/1290235 Plagge62 of \$8PlaggeDD 29988

Account Name by Party or Affiliate	Account	Authorized Signer(s)	Bank	Account Type	Status	Still Frozen	Liquidated
13318 Lost Key Place, LLC	*2850	Michael Dacorta	Wells Fargo	Simple Business Checking	Liquidated	\$0.00	\$490.97
4064 Founders Club Drive, LLC	*3975	Joseph S. Anile II; MaryAnne E. Anile	Wells Fargo	Business Choice Checking	Liquidated	\$0.00	\$10,383.26
4064 Founders Club Drive, LLC	*1807	Joseph S. Anile II; MaryAnne E. Anile	Wells Fargo	Business Platinum Savings	Closed	\$0.00	\$0.00
444 Gulf of Mexico Drive, LLC	*3967	Michael Dacorta; Joseph S. Anile II	Wells Fargo	Simple Business Checking	Liquidated	\$0.00	\$15,600.10
4Oaks, LLC	*2572	Joseph S. Anile II; MaryAnne E. Anile	Wells Fargo	Business Choice Checking	Liquidated	\$0.00	\$30,910.45
6922 Lacantera Circle, LLC	*2805	Michael Dacorta	Wells Fargo	Simple Business Checking	Liquidated	\$0.00	\$37,929.49
Bowling Green Capital Management	*7485	Joseph S. Anile II; MaryAnne E. Anile	Capital One	Small Business Rewards Checking	Liquidated	\$0.00	\$6,173.59
Face days D	*0453	Farada Dana	IDMA Change	Table Charles	15. Salata d	60.00	<b>\$200.24</b>
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	*1192	Francisco Duran	JPMorgan Chase	Total Checking	Liquidated	\$0.00	\$4,174.69
Francisco Duran	*8083	Francisco Duran	M&I/BMO Harris	Checking	Closed	\$0.00	\$0.00
Francisco Duran	*9788	Francisco Duran	M&I/BMO Harris	Checking	Closed	\$0.00	\$0.00
Francisco Duran or Rebecca C. Duran	*2550	Francisco Duran; Rebecca C. Duran	SunTrust	Checking	Closed	\$0.00	\$0.00
John J. Haas	*0245	John J. Haas	TD Bank	Checking	Liquidated	\$0.00	\$31,065.79
John J. Haas	*5029	John J. Haas	Jovia (f/k/a Nassau Educators Federal Credit Union)	Go Green Checking	Income Account, Settlement	\$0.00	\$0.00
John J. Haas	TBD	John J. Haas	Equity Trust	IRA	Settlement	\$0.00	\$0.00
John J. Haas; Lillian Haas	*2105	John J. Haas	TD Bank	Checking	Liquidated	\$0.00	\$4,362.80
John J. Haas; Lillian Haas	*9201	John J. Haas	TD Bank	Savings	Liquidated	\$0.00	\$1,001.23
John J. Haas, Inc.	*2488	John J. Haas	TD Bank	TD Business Convenience Plus	Liquidated	\$0.00	\$517.83
John J. Haas	*1211	John J. Haas	Knights of Columbus Insurance	Cash Surrender Value	Settlement	\$0.00	\$0.00

### Caase8199:v:008866/WMCSSPF DDoormenn860422 FFFdd006/1290235 Plagge63 of \$8PlaggeDD 29989

Account Name by Party or Affiliate	Account	Authorized Signer(s)	<b>Ban</b> k	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; Joseph S. Anile II.	Regions	Business Checking	Liquidated	\$0.00	\$17,889.07
Mainstream Fund Services, Inc.	*1174	Denise DePaola; Michael Nolan	Citibank	Savings	Unfrozen by Agreement	\$0.00	\$0.00
Mainstream Fund Services, Inc.	*5606	Denise DePaola; Michael Nolan	Citibank	Checking	Unfrozen by Agreement	\$0.00	\$0.00
Mainstream Fund Services, Inc.	*0764	Denise DePaola; Michael Nolan	Citibank	Checking	Liquidated	\$0.00	\$6,012,397.78
Michael DaCorta	*1424	Michael Dacorta	Wells Fargo	Everyday Checking	Liquidated	\$0.00	\$751.54
Michael DaCorta	*0387	Michael Dacorta	AXA	Annuity Policy	Terminated 7/15/16	\$0.00	\$0.00
Michael DaCorta	TBD	Michael Dacorta	PNC	N/A	N/A	\$0.00	\$0.00
Michael DaCorta; Carolyn DaCorta	*0386	Michael Dacorta	People's United	N/A	N/A	\$0.00	\$0.00
Oasis Management, LLC	*9302	Michael Dacorta	Wells Fargo	Business Package Checking	Liquidated	\$0.00	\$2,149,654.18
Oasis Management, LLC Oasis Capital Management S.A.	*3887 *6058	Michael Dacorta TBD	Wells Fargo British Caribbean Bank International	Market Rate Savings N/A	Liquidated Closed	\$0.00 \$0.00	\$605.33 \$0.00
Oasis Capital Management S.A.	*1200	TBD	Belize Bank International, Ltd.	N/A	Closed	\$0.00	\$0.00
Oasis Global (Nevis) Ltd.	*9631	TBD	Bank of America	Busines Checking	Closed	\$0.00	\$0.00
Oasis Global FX Limited	*4622	Joseph S. Anile II	Choice Bank (Belize)	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
Raymond P. Montie	*1510	Raymond P. Montie	AXA/Equitable	401k Plan	Settlement	\$0.00	\$0.00
Raymond P. Montie	*8414	Raymond P. Montie	Federal Savings Bank; First SeaCoast Bank	Checking	Income Account, Settlement	\$0.00	\$0.00
Raymond P. Montie	*1574	Raymond P. Montie	Fidelity Investments	IRA Account	Settlement	\$0.00	\$0.00

### Caase8199:v:0008860/WM055PFF DDoormenn860422 FFFdd006/1290235 Plagge64 of \$8PlaggeDD 29059

Account Name by Party or Affiliate	Account	Authorized Signer(s)	Bank	Account Type	Status	Still Frozen	Liquidated
Raymond P. Montie	*4500	Raymond P. Montie	Fidelity Investments	Investment Account	Underwater	-\$24.82	\$0.00
Raymond P. Montie	*2805	Raymond P. Montie	TD Bank	Premier Checking	Liquidated	\$0.00	\$138,508.73
Raymond P. Montie	*3802	Raymond P. Montie	TD Bank	Savings	Settlement	\$0.00	\$0.00
Raymond P. Montie	*2148	Raymond P. Montie	TD Bank	TD Beyond Checking; Old Income Account; Closed by TD Bank	Closed	\$0.00	\$0.00
Raymond P. Montie;	*3934	Raymond P. Montie	TD Bank	Relationship Checking	Closed	\$0.00	\$0.00
Danielle TerraNova							
RPM 7 LLC	*6068	Raymond P. Montie	TD Bank	<b>Business Convenience Plus</b>	Liquidated	\$0.00	\$2,395.63
RPM 7 LLC	*1952	Raymond P. Montie	TD Bank	<b>Business Convenience Plus</b>	Liquidated	\$0.00	\$7,834.46
RPM 7 LLC	*6076	Raymond P. Montie	TD Bank	N/A	Closed	\$0.00	\$0.00
RPM 7 LLC	*6430	Raymond P. Montie	TD Bank	N/A	Closed	\$0.00	\$0.00
RPM 7 LLC	*6638	Raymond P. Montie	TD Bank	N/A	Closed	\$0.00	\$0.00
Diamond BOA LLC	*0306	Raymond P. Montie	TD Bank	<b>Business Convenience Plus</b>	Liquidated	\$0.00	\$8,130.54
Goose Pond Consulting	*9658	Raymond P. Montie; Danielle TerraNova	NBT Bank	Free Business Checking	Settlement	\$0.00	\$0.00
Roar of the Lion Fitness, LLC	*1396	Michael Dacorta;	Wells Fargo	Business Choice Checking	Liquidated	\$0.00	\$17,704.97
Roar of the Lion Fitness, LLC	1390	Andrew Dacorta	Wells Faigo	business choice checking	Liquidated	<b>90.00</b>	317,704.37
Satellite Holdings Company	*8808	John Haas	Wells Fargo	Market Rate Savings	Liquidated	\$0.00	\$500.42
Satellite Holdings Company	*5347	John Haas	Wells Fargo	General Operating Checking	Liquidated	\$0.00	\$127,921.13

# EXHIBIT C

### Caase8199:v:v008866/WM055PF DDoormenn860423 FFFddd06/429025 PAgge60 of 68PAggeDD 29962

		Estimated Value			Actual Value
Property	Units	or Purchase Price	Lien	Status or Disposition	or Sale Price
Defended A : It / 4004 En					
Defendant Anile/4064 Founders Club Drive	1	¢20.050.00	¢0.00 Ff-	Stade Calde Date on a de Danald	¢22.000.00
2015 Mercedes Benz SLK 350	1	\$28,050.00		eited; Sold; Returned; Resold	\$23,000.00
2016 Mercedes Benz GLE 400	1	\$37,000.00	\$0.00 Forfe	•	\$31,027.50
100 Ounce Silver Bars	100	\$150,900.00	•	eited; Sold; Listed Price is for all Metals	\$657,382.25
One Ounce Gold Coins	200	\$255,320.00		eited; Sold; Listed Price is for all Metals	\$657,382.25
U.S. Currency	N/A	\$62,750.00		eited; In USMS/FBI Custody; Remission TBD	\$62,750.00
Quietsource 48KW Generator	1	\$28,017.00	\$0.00 Sold	•	\$12,500.00
Pool Table	1	TBD		iver Seeking Return from Anile	TBD
Piano	1	\$1,000.00	\$0.00 Sold	•	\$1,000.00
Jewelry	Misc.	\$60,749.00		iver 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 Rece	iver 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 Auct	oned (Gross Sale Price)	\$17,875.00
Defendant DaCorta/13318 Lost Key Place/69	22 Lacante	ra Circle			
2017 Maserati Ghibli S Q4	1	\$60,800.00	\$43,528.88 Forfe	eited; Abandoned After Further Investigation	\$0.00
2018 Land Rover Range Rover Velar	1	\$57,825.00	\$0.00 Forfe	ited; Sold	\$48,462.00
2015 Land Rover Range Rover Evoque	1	\$25,100.00	\$26,129.29 Abar	doned Due to Lack of Value Given Lien	\$0.00
100 Ounce Silver Bars	64	\$96,576.00	\$0.00 Forfe	eited; Sold; Listed Price is for all Metals	\$657,382.25
\$1.00 Silver One Ounce Coins	1,500	\$22,635.00	\$0.00 Forfe	eited; Sold; Listed Price is for all Metals	\$657,382.25
Credit Suisse One Ounce Gold Ingots	3	\$3,829.80	\$0.00 Forfe	eited; Sold; Listed Price is for all Metals	\$657,382.25
APMEX.com One Ounce Silver Coins	5	\$75.45	\$0.00 Forfe	eited; Sold; Listed Price is for all Metals	\$657,382.25
Lady Liberty \$50 Gold One Ounce Coins	7	\$8,629.80	\$0.00 Forfe	eited; Sold; Listed Price is for all Metals	\$657,382.25
Lady Liberty \$50 Gold One Ounce Coins	40	\$48,000.00	\$0.00 Forfe	eited; Sold; Listed Price is for all Metals	\$657,382.25
Lady Liberty \$1.00 Silver One Ounce Coins	120	\$2,400.00	\$0.00 Forfe	eited; Sold; Listed Price is for all Metals	\$657,382.25
"Bitcoin" One Ounce Gold-Plated Coin	1	\$1.00		eited; Sold; Listed Price is for all Metals	\$657,382.25
U.S. Currency	N/A	\$160,000.00		eited; In USMS/FBI Custody; Remission TBD	\$160,000.00
Handgun	1	\$517.00		iver Seeking Return from DaCorta	TBD
Coffee Table	1	\$200.00	\$0.00 Sold	_	\$200.00
Televisions	2	\$200.00		by Receiver	\$200.00
Safe	1	\$200.00		by Receiver	\$200.00
Outdoor Speakers	2	\$150.00		by Receiver	\$150.00

### Caase8199:v:0008860/WMCSSPF DDoormen1860423 FFFddd06/4790725 PAgge67 of 68PAggeDD 29962

Pool Table Chairs	2	\$300.00	\$0.00 Sold by Receiver	\$300.00
Sauna	1	\$4,200.00	\$0.00 Sold by Receiver	\$4,200.00
Quietsource 48KW Generator	1	\$24,969.81	\$0.00 Not Delivered; Unrecoverable	\$0.00
Misc. Household Items and Furniture	50	\$2,000.00	\$0.00 Auctioned (Gross Sale Price)	\$1,465.00
Defendant Duran/7312 Desert Ridge Glen				
2018 Porsche 911 C4 Targa	1	\$113,375.00	\$90,898.75 Forfeited; Sold	\$104,902.50
2018 Mercedes Benz Convertible SL 450R	1	\$65,825.00	\$83,611.29 Abandoned Due to Lack of Value Given Lien	\$0.00
2019 Land Rover Range Rover Sport	1	\$0.00	\$0.00 Leased; Not Seized Due to Lack of Value	\$0.00
Swiss Watch	1	\$10,900.00	\$0.00 Receiver Seeking Return from Duran	TBD
Golf Cart	1	\$5,500.00	\$0.00 Sold by Receiver	\$4,750.00
Televisions	2	\$200.00	\$0.00 Sold by Receiver	\$200.00
Misc. Household Items and Furniture	28	\$1,000.00	\$0.00 Auctioned (Gross Sale Price)	\$2,160.00
Defendant Montie				<u>.</u>
1996 Mercedes Benz 500SL	1	\$2,167.00	\$0.00 Sold; Escrowed	\$10,500.00
2016 Toyota 4Runner	1	\$22,885.00	\$12,180.85 Disclosed in 8/30/19 Financial Affidavit	Settlement
2009 South Bay Pontoon Boat	1	\$11,590.00	\$0.00 Disclosed in 8/30/19 Financial Affidavit	Settlement
Furniture Located in PA House	Misc.	TBD	\$0.00 Disclosed in 8/30/19 Financial Affidavit	Settlement
Furniture Located in NH House	Misc.	TBD	\$0.00 Disclosed in 8/30/19 Financial Affidavit	Settlement
Furniture Located in NY House	Misc.	\$0.00	\$0.00 Mostly Abandoned Due to Lack of Value	\$50.00
Standard Oil Company, Inc. Stock	60,606	TBD	\$0.00 Disclosed in 8/30/19 Financial Affidavit;	Settlement
			Purchased for \$100,000 in 2015	
Ounces of Silver	990	\$17,087.00	\$0.00 Disclosed in 8/30/19 Financial Affidavit	Settlement
Firearms	19	\$8,290.00	\$0.00 Disclosed in 8/30/19 Financial Affidavit	Settlement
Defendant Haas				
2012 Mercedes Benz GLK 350 (black)	1	\$2,800.00	\$0.00 Disclosed in 6/24/19 Financial Affidavit; Updated	Settlement
2012 Mercedes Benz GLK 350 (silver)	1	\$10,000.00	\$0.00 Disclosed in 6/24/19 Financial Affidavit; Updated	Settlement
1966 Ford LTD (gold)	1	\$2,500.00	\$0.00 Disclosed in 6/24/19 Financial Affidavit; Updated	Settlement
1966 Ford LTD (green)	1	\$500.00	\$0.00 Disclosed in 6/24/19 Financial Affidavit; Disposed	Settlement
1959 GMC 100 Truck	1	\$6,000.00	\$0.00 Disclosed in 6/24/19 Financial Affidavit; Repairs	Settlement
2014 Ford Escape	1	\$12,000.00	\$0.00 Disclosed in 6/24/19 Financial Affidavit; L. Haas	Settlement
2013 Horton Trailer	1	\$400.00	\$0.00 Disclosed in 6/24/19 Financial Affidavit; Updated	Settlement
Household Furniture	Misc.	TBD	\$0.00 Disclosed in 6/24/19 Financial Affidavit	Settlement
Auto Parts	Misc.	\$1,000.00	\$0.00 Disclosed in 6/24/19 Financial Affidavit; Varies	Settlement

### Caase8199:v:v008866/WM055PFF DDoormenn860423 FFFdd006/129025 Plagge68 of \$8PlaggeDD 29963

Relief Defendant 4Oaks, LLC (Anile)				
2015 Ferrari California T	1	\$174,300.00	\$0.00 Forfeited; Sold	\$100,470.00
Relief Defendant Roar of the Lion Fitness,	, LLC			
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

### **EXHIBIT 3**

### Burton W. Wiand, P.A.

1114 Turner Street Clearwater FL 33576 Telephone: 727-235-3769 Facsimile: 727-447-7196

May 14, 2025

Client: 025305 Matter: 001921 Invoice #: 21753

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

RE: CFTC Oasis Receivership( Receiver)

Travel is half rate outside of 20 miles.

For Professional Services Rendered Through March 31, 2025

Date	TKPR	Description of Services	Hours	Amount
ASDIS	Asset [	Disposition		
1/29/2025	BWW	Correspond with Strategic Liquidity Fund regarding purchase of judgments (.1).	0.1	\$36.00
3/3/2025	BWW	Communicate with D. Fava regarding purchase of judgments and provide information to M. Lockwood for further action (.2).	0.2	\$72.00
3/4/2025	BWW	Exchange correspondence with M. Lockwood and J. Perez regarding asset purchase agreement for Oasis judgments from D. Fava (.2).	0.2	\$72.00
3/17/2025	BWW	Review draft asset purchase agreement for purchase of judgments and correspondence from M. Lockwood, J. Perez and, D. Fava regarding same (.2).	0.2	\$72.00
3/20/2025	BWW	Review correspondence from D. Fava and J. Perez regarding asset purchase agreement for judgments (.2).	0.2	\$72.00
		Total: Asset Disposition	0.90	\$324.00
ASSET	Asset A	Analysis and Recovery		
1/3/2025	BWW	Review, edit, and add comments to draft response in opposition to motion to modify subpoena and exchange correspondence with B. McConnell regarding same (1.5); research New York, Indiana, and Illinois law and provide summary of same to B. McConnell and J. Perez (1.2).	2.7	\$972.00

Document 869-3 20066 Filed 05/29/25

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Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset A	Analysis and Recovery		
1/6/2025	BWW	Exchange correspondence with J. Perez and B. McConnell regarding response in opposition to motion to modify subpoena (.3); review revised response (.5).	0.8	\$288.00
1/7/2025	BWW	Review confirmation of wire received from J. Haas for settlement payment (.1); edit response in opposition to motion to modify subpoena and exchange correspondence with J. Perez and B. McConnell regarding same (1.0).	1.1	\$396.00
1/9/2025	BWW	Review final, filed response in opposition to motion to modify subpoena and exhibits (1.0).	1.0	\$360.00
1/10/2025	BWW	Review order denying motion to reconsider in the IPM matter filed in Idaho and exchange correspondence with J. Perez regarding same (.3).	0.3	\$108.00
1/21/2025	BWW	Review reply affirmation in response to receiver's response in opposition to motion to modify subpoena by S. Preziosi (.5).	0.5	\$180.00
1/24/2025	BWW	Exchange correspondence with A. Auxter regarding status of DaCorta appeal argument (.2).	0.2	\$72.00
1/30/2025	BWW	Review M. DaCorta's appeal brief and reply by CFTC (1.0).	1.0	\$360.00
2/14/2025	BWW	Review order reopening case and granting motion for compliance with 11th Circuit's opinion and mandate and motion for leave to file second amended complaint (1.0); communicate with J. Sallah, P. Rengstl, J. Katz, and J. Perez regarding same (.5).	1.5	\$540.00
2/18/2025	BWW	Review notice of lead counsel designation in ATC case (.1).	0.1	\$36.00
3/3/2025	BWW	Exchange correspondence with J. Sallah regarding scheduling meeting with P. Rengstl, J. Katz, and J. Perez regarding order and amended complaint in ATC case (.2); review notice of wired funds by Wilsons for settlement payment (.1).	0.3	\$108.00
3/4/2025	BWW	Prepare for and attend ATC meeting with J. Sallah, J. Perez, J. Katz, and P. Rengstl (1.0); review opposition to motion for indirect civil contempt filed by S. Preziosi and correspondence from B. McConnell regarding same (.3).	1.3	\$468.00
3/10/2025	BWW	Exchange correspondence with A. Auxter regarding status of appeal (.2); exchange correspondence with P. Rengstl, J. Sallah, and J. Katz regarding draft reconsideration motion (.5).	0.7	\$252.00
3/11/2025	BWW	Communicate with B. McConnell regarding motion to strike S. Preziosi's response in SDNY case (.3); review letter motion to strike in opposition to contempt papers filed in SDNY case provided by B. McConnell (.1).	0.4	\$144.00
3/12/2025	BWW	Review and approve draft reconsideration motion (.5).	0.5	\$180.00

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Client: 025305 Matter: 001921 Invoice #: 21753

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Date	TKPR	Description of Services	Hours	Amount	
ASSET Asset Analysis and Recovery					
3/13/2025	BWW	Review filed motion for reconsideration of February 14, 2025 order and for extensions of time to file second amended complaint (.2).	0.2	\$72.00	
3/14/2025	BWW	Exchange correspondence with P. Rengstl regarding need for motion for extension of time to submit case management report/scheduling order in ATC case (.2).	0.2	\$72.00	
3/17/2025	BWW	Exchange correspondence with P. Rengstl regarding timeline for filing motion for extension of time to submit case management report and scheduling order in ATC case (.2).	0.2	\$72.00	
3/20/2025	BWW	Review correspondence and information regarding insider attorney and forward same to J. Perez (.3).	0.3	\$108.00	
3/21/2025	BWW	Review correspondence from J. Perez and letter from Supreme Court clerk regarding notice of filing petition for writ of certiorari filed in IPM matter (.2).	0.2	\$72.00	
3/22/2025	BWW	Correspond with J. Perez regarding filing Rule 11 motion in IPM matter (.2).	0.2	\$72.00	
3/24/2025	BWW	Review petition for writ of certiorari documents filed by IPM (.9).	0.9	\$324.00	
3/26/2025	BWW	Review draft reply in support of motion for contempt against S. Preziosi and call with B. McConnell regarding same (.5).	0.5	\$180.00	
3/28/2025	BWW	Review response in opposition to motion for reconsideration filed by ATC Brokers and D. Manoukian (.5).	0.5	\$180.00	
3/31/2025	BWW	Review endorsed order granting motion for extension of time to file case management report (.1); review reply in support of motion for indirect civil contempt against S. Preziosi filed by B. McConnell (.3).	0.4	\$144.00	
		Total: Asset Analysis and Recovery	16.00	\$5,760.00	
BUSIN	Busine	ess Operations			
1/2/2025	BWW	Review December bank statements (.2); confirm payment of RAD Technology invoice (.2).	0.4	\$144.00	
1/6/2025	BWW	Review correspondence from E. Tate and R. Rohr regarding status of Amazon Web Designs account and maintenance of same (.2); review correspondence from M. Lockwood and Maples firm regarding payment of fees and status of 2024 annual return (.2).	0.4	\$144.00	
1/13/2025	BWW	Review correspondence from M. Lockwood to Maples firm requesting confirmation of 2025 annual return filing (.1).	0.1	\$36.00	

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Client: 025305 Matter: 001921 Invoice #: 21753

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Date	TKPR	Description of Services	Hours	Amount			
BUSIN	BUSIN Business Operations						
1/16/2025	BWW	Exchange correspondence with M. Lockwood, J. Sallah, J. Perez, and E. Tate regarding Cayman beneficial ownership transparency act (.3).	0.3	\$108.00			
1/22/2025	BWW	Review invoice from Maples firm and response from M. Lockwood providing contact information and requesting additional information (.2).	0.2	\$72.00			
1/23/2025	BWW	Review correspondence from M. Lockwood, Maples firm, PDR, and E. Tate regarding 2025 annual return invoice and pending beneficial ownership information filing and status of good standing (.3).	0.3	\$108.00			
1/24/2025	BWW	Review and approve international wire transfer to Maples firm (.3); exchange correspondence with E. Tate regarding transfer of funds for same and review and approve request for same (.4).	0.7	\$252.00			
1/27/2025	BWW	Review correspondence and documents from M. Lockwood and W. Price regarding beneficial ownership information reporting in the Cayman Islands (.3).	0.3	\$108.00			
1/28/2025	BWW	Review 1099-INT tax document (.1); review correspondence from M. Lockwood and Maples firm regarding status of OIG good standing in the Caymans and beneficial ownership transparency act compliance (.2).	0.3	\$108.00			
1/30/2025	BWW	Review correspondence from M. Lockwood and E. Tate regarding invoices (.3).	0.3	\$108.00			
1/31/2025	BWW	Review BOTA reporting spreadsheet and correspondence from Maples firm and M. Lockwood regarding status of OIG in the Caymans (.3); review and approve vendor invoices (1.0).	1.3	\$468.00			
2/3/2025	BWW	Review January bank account statements (.2); confirm payment of RAD Technology invoice (.1).	0.3	\$108.00			
2/5/2025	BWW	Review and approve invoice from J. Perez and exchange correspondence with M. Lockwood regarding same (.2).	0.2	\$72.00			
2/6/2025	BWW	Review correspondence from M. Lockwood to Maples firm regarding filing BOTA spreadsheet in the Caymans (.1).	0.1	\$36.00			
2/10/2025	BWW	Review correspondence from Maples firm confirming necessity of filing BOTA spreadsheet (.1).	0.1	\$36.00			
3/3/2025	BWW	Confirm payment of RAD Technology invoice (.1); review bank statements (.2).	0.3	\$108.00			
3/11/2025	BWW	Exchange correspondence with E. Tate regarding status of tax returns (.2); correspond with E. Tate, M. Lockwood and B. McConnell regarding payment of professionals (.2); approve transfer of funds and process payment of invoices (.8).	1.2	\$432.00			

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Client: 025305 Matter: 001921 Invoice #: 21753

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#### **SERVICES**

Date	TKPR	Description of Services	Hours	Amount
BUSIN	Busine	ess Operations		
3/12/2025	BWW	Exchange correspondence with E. Tate and R. Rohr regarding cancellation of GoDaddy auto-renewal for Roar of the Lion (.2).	0.2	\$72.00
3/28/2025	BWW	Review correspondence from E. Tate regarding GoDaddy double billing and response to same by R. Rohr (.2).	0.2	\$72.00
		Total: Business Operations	7.20	\$2,592.00
CASE	Case A	Administration		
1/14/2025	BWW	Review process for updating website with 2025 court filings and confirmation of successful completion of same (.2).	0.2	\$72.00
1/30/2025	BWW	Review and approve twenty-third interim report and sign accounting report (1.0); correspond with E. Tate regarding same (.1).	1.1	\$396.00
		Total: Case Administration	1.30	\$468.00
CLAIM	Claims	Administration and Objections		
1/6/2025	BWW	Review correspondence from K. Paulson and certificate of voluntary admission submitted by survivor of claimant (.2).	0.2	\$72.00
1/9/2025	BWW	Review H. and A.F.'s claim documentation and background summary (.5); review order denying motion for reconsideration of denial of claim (.2).	0.7	\$252.00
1/23/2025	BWW	Review correspondence from M.U. requesting information regarding denied claims and exchange correspondence with claims team regarding same (.3); gather and review claim determination documents and provide same and summary of events to M.U. (.5).	0.8	\$288.00
1/24/2025	BWW	Exchange correspondence with M.U. regarding claim process (.2).	0.2	\$72.00
2/8/2025	BWW	Communicate with claimant G.M. regarding status of future distributions (.2).	0.2	\$72.00
3/8/2025	BWW	Communicate with claimant D.P. regarding status of next distribution (.2).	0.2	\$72.00
		Total: Claims Administration and Obje	2.30	\$828.00
		Total Professional Services	27.7	\$9,972.00

#### **DISBURSEMENTS**

Date Description of Disbursements Amount

Document 869-3 20070

#### Filed 05/29/25

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Client: 025305 Matter: 001921 Invoice #: 21753

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#### **DISBURSEMENTS**

Date	Description of Disbursements	Amount
E123 Web-Related E	Expenses	
1/1/2025	Web-related expenses - RAD Technology - Website Hosting	\$50.00
1/1/2025	Web-related expenses - GoDaddy - Web Hosting Plus 1 Month Renewal	\$42.98
1/2/2025	Web-related expenses - Amazon Web Services - Web Services	\$287.35
1/31/2025	Web-related expenses - RAD Technology - Extra Work on Website	\$300.00
2/1/2025	Web-related expenses - GoDaddy - Web Hosting Plus 1 month Renewal	\$42.98
2/1/2025	Web-related expenses - RAD Technology - Website Hosting	\$50.00
2/2/2025	Web-related expenses - Amazon Web Services - Web Services	\$287.35
3/1/2025	Web-related expenses - RAD Technology - Website Hosting	\$50.00
3/1/2025	Web-related expenses - GoDaddy - Web Hosting Plus 1 Month Renewal Plus Support Renewal	\$42.98
3/2/2025	Web-related expenses - Amazon Web Services - Web Services	\$274.70
3/28/2025	Web-related expenses - GoDaddy - Microsoft 365 Email Plus Renewals	\$719.22
	Total Disbursements	\$2,147.56
	Total Services	\$9,972.00
	Total Disbursements	\$2,147.56
	Total Current Charges	\$12,119.56
	Previous Balance	\$15,223.10
	PAY THIS AMOUNT	\$27,342.66

Document 869-3 20071

Filed 05/29/25

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Client:

Matter:

Invoice #:

025305 001921 21753

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#### **TASK RECAP**

**Services Disbursements** 

Project No.	Hours	Amount	Project No.	Amount
ASDIS - ASDIS	0.90	\$324.00	Web-Related Expenses	\$2,147.56
ASSET - ASSET	16.00	\$5,760.00		\$0.00
BUSIN - BUSIN	7.20	\$2,592.00		\$0.00
CASE - CASE	1.30	\$468.00		\$0.00
CLAIM - CLAIM	2.30	\$828.00		\$0.00
	27.70	\$9,972.00		\$2,147.56

#### **BREAKDOWN BY PERSON**

Person		Project No.	Hours	Amount
BWW	Burton W. Wiand	ASDIS - ASDIS	0.90	\$324.00
BWW	Burton W. Wiand	ASSET - ASSET	16.00	\$5,760.00
BWW	Burton W. Wiand	BUSIN - BUSIN	7.20	\$2,592.00
BWW	Burton W. Wiand	CASE - CASE	1.30	\$468.00
BWW	Burton W. Wiand	CLAIM - CLAIM	2.30	\$828.00
			27.70	\$9,972.00

### **EXHIBIT 4**

#### **Burton W. Wiand PA**

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

#### **INVOICE**

Matter: CFTC Oasis Receivership - Le al Team

Responsible: Burton W. Wiand

#### For Professional Services Rendered 01 01 2025 Throu h 03 31 2025

Date	Time eeper	Description of Services	Hours	Amount
	BUSIN -	Business Operations		
1/2/25	EPT	Pull December bank account statements and send to Receiver, M. Lockwood, and PDR (.2).	0.2	\$25.00
1/7/25	EPT	Review correspondence from J. Haas regarding settlement payment, review incoming wire notification from ServisFirst Bank, and prepare correspondence to J. Haas confirming receipt (.2); communicate with Receiver, M. Lockwood, J. Perez, M. Gura, and PDR regarding incoming wire and update record regarding same (.2).	0.4	\$50.00
1/16/25	EPT	Prepare settlement check from F. Nagel for deposit and cover letter for same (.2); send copies of letter and check to Receiver, M. Lockwood, M. Gura, and PDR and update record regarding same (.2).	0.4	\$50.00
1/24/25	ЕРТ	Review invoice from Maples Calder and Receiver approval to process payment (.2); initiate international wire transfer for approval by Receiver (.5); review notification of successful completion of international wire transfer, forward same to Receiver, M. Lockwood, and PDR, and update record (.3); exchange correspondence with Receiver regarding transfer of funds (.1); prepare and send request for same to ServisFirst Bank (.3).	1.4	\$175.00
1/28/25	EPT	Prepare settlement check from R. Montie for deposit and cover letter for same for mailing (.2); send copies of same to Receiver, M. Lockwood, M. Gura, and PDR and update record regarding same (.2).	0.4	\$50.00
1/29/25	EPT	Review correspondence from M. Lockwood regarding confirming payment of certain invoices, research bank records, and exchange correspondence with M. Lockwood regarding same (.4).	0.4	\$50.00
2/3/25	EPT	Pull January bank statements, send same to Receiver, M. Lockwood, M. Gura, and PDR, and update record (.2).	0.2	\$25.00
3/3/25	EPT	Pull February bank statements, send same to Receiver, M. Lockwood, M. Gura, and PDR, and update record (.2); review and confirm incoming wire notification of settlement payment from G. and C. Wilson, communicate with Receiver, M. Lockwood, M. Gura, and PDR regarding same, and update record (.3).	0.5	\$62.50
3/10/25	EPT	Prepare settlement check from F. Nagel for deposit and cover letter for mailing (.2); send copies of same to Receiver, M. Lockwood, M. Gura, and PDR and update record regarding same (.2); exchange correspondence with Receiver regarding status of tax returns (.2); correspond with Receiver regarding status of credit cards (.1).	0.7	\$87.50
3/12/25	EPT	Review GoDaddy auto-renewal notice and exchange correspondence with Receiver and R. Rohr regarding same (.2).	0.2	\$25.00

### April 15, 2025 8:19-cv-00886-VMC-SPF Document 869-4 Filed 05/29/25 Page 3 of 4 PageID 20074

3/16/25	EPT	Prepare settlement check from F. Nagel for deposit and cover letter for mailing (.2); send copies of same to Receiver, M. Lockwood, M. Gura, and PDR and update record (.2).	0.4	\$50.00
3/28/25	EPT	Review GoDaddy renewal receipt and update record regarding same (.1); correspond with Receiver and R. Rohr regarding double billing issues (.1).	0.2	\$25.00
		Total: Business Operations	5.4	\$675.00

	CLAIM -	Claims Administration and Objections		
1/13/25	EPT	Review and verify information on replacement distribution check and prepare for mailing (.2); correspond with claims team regarding final approval of same and update record (.1).	0.3	\$37.50
1/16/25	EPT	Review correspondence from M. Gura regarding approval of replacement check and attached cover letter and update record (.1); print cover letter and prepare check and letter for mailing and process same (.5).	0.6	\$75.00
		Total: Claims Administration and Objections	0.9	\$112.50

Total Professional Services \$787.50

#### **TASK RECAP**

<u>Person</u>		<u>Rate</u>
EPT	Edwina P. Tate	\$125.00

 Cate ory
 Hours

 BUSIN CLAIM
 5.4 0.9

 TOTAL
 6.3

TOTAL AMOUNT \$787.50

### **EXHIBIT 5**

## Burton W. Wiand, P.A.

1114 Turner Street Clearwater FL 33576 Telephone: 727-235-3769 Facsimile: 727-447-7196

May 14, 2025

Client: 025305
Matter: 002096
Invoice #: 21756

Page:

1

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

RE: Oasis Recovery from Investors (Receiver)

For Professional Services Rendered Through March 31, 2025

Date	TKPR	Description of Services	Hours	Amount
ASSET	Asset A	Analysis and Recovery		
1/16/2025	BWW	Review correspondence and settlement payment from F. Nagel for deposit (.2).	0.2	\$72.00
2/6/2025	BWW	Review and respond to request from M. Lockwood regarding status of Arduini case (.2).	0.2	\$72.00
3/6/2025	BWW	Communicate with B. McConnell regarding status of R. Garbellano property (.3).	0.3	\$108.00
3/10/2025	BWW	Review F. Nagel settlement check and correspondence to ServisFirst Bank for deposit of same (.1); review status of property sale provided by counsel for R. Garbellano (.1).	0.2	\$72.00
3/17/2025	BWW	Review F. Nagel settlement check and correspondence to ServisFirst Bank for deposit of same (.1).	0.1	\$36.00
		Total: Asset Analysis and Recovery	1.00	\$360.00
		Total Professional Services	1.0	\$360.00

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Invoice #:

Client: 025305 Matter: 002096

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21756

Total Services \$360.00

Total Current Charges \$360.00
Previous Balance \$802.80
PAY THIS AMOUNT \$1,162.80

Case 8:19-cv-00886-VMC-S	PF
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# Document 869-5 20079

## Filed 05/29/25

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Client: 025305 Matter: 002096 Invoice #: 21756

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**TASK RECAP** 

Project No.	<u>Hours</u>	Amount	Project No.	Amount
ASSET - ASSET	1.00	\$360.00		\$0.00
	1.00	\$360.00		\$0.00

### **BREAKDOWN BY PERSON**

Person		Project No.	Hours	Amount	
BWW	Burton W. Wiand	ASSET - ASSET	1.00	\$360.00	
			1.00	\$360.00	

# **EXHIBIT 6**

## Burton W. Wiand, P.A.

1114 Turner Street Clearwater FL 33576 Telephone: 727-235-3769 Facsimile: 727-447-7196

May 14, 2025

Client: 025305
Matter: 002097
Invoice #: 21757

Page:

1

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

RE: Oasis Raymond Montie, III. (Receiver)

For Professional Services Rendered Through March 31, 2025

Date ASSET	TKPR Asset A	Description of Services Analysis and Recovery	Hours	Amount
1/28/2025	BWW	Review correspondence and check for deposit from R. Montie (.1).	0.1	\$36.00
		Total: Asset Analysis and Recovery	0.10	\$36.00
		Total Professional Services	0.1	\$36.00
		Total Services	\$36.00	
		Total Current Charges		\$36.00
		Previous Balance		\$612.00
		PAY THIS AMOUNT		\$648.00

Case 8:19-cv-00886-VMC-S	SPF
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# Document 869-6 20082

## Filed 05/29/25

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Client: 025305 Matter: 002097 Invoice #: 21757

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**TASK RECAP** 

Services	Disbursements
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Project No.	Hours	Amount	Project No.	Amount
ASSET - ASSET	0.10	\$36.00		\$0.00
	0.10	\$36.00		\$0.00

### **BREAKDOWN BY PERSON**

Person		Project No.	Hours	Amount
BWW	Burton W. Wiand	ASSET - ASSET	0.10	\$36.00
			0.10	\$36.00

# **EXHIBIT 7**



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

#### **EXHIBIT B**

FIRM MEMBERS	STANDARD RATES	DISCOUNTED RATE	
Burton Wiand (Sr. Member)	\$500	\$360	
Members	\$315-\$475	\$320	
Associates	\$235-\$290	\$240	
Paralegals	\$165-\$170	\$135	

We carry malpractice (\$5 million) as well as fidelity and general liability coverage.

# **EXHIBIT 8**

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

Tampa, FL 33607 Telephone: 813-347-5100 Facsimile: 813-347-5198

Federal Tax ID # 27-0937962

Burton W. Wiand May 14, 2025

Attention:Burton W. Wiand, as ReceiverClient:025305Burton W. Wiand PAMatter:001922114 Turner StreetInvoice #:21754

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Clearwater, FL 33756

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

For Professional Services Rendered Through March 31, 2025

Date ASDIS	TKPR Asset I	Description of Services Disposition	Hours	Amount
3/3/2025	MML	Correspond with Receiver and J. Perez regarding sale of judgments (.1).	0.1	\$24.00
3/14/2025	MML	Revise judgment spreadsheet (.2); prepare correspondence to D. Fava with same and request for purchase agreement (.1); review revised offer from D. Fava (.1); communicate with Receiver and J. Perez regarding same (.1).	0.5	\$120.00
3/17/2025	MML	Communicate with Receiver regarding sale of judgments (.1); correspond with J. Perez regarding same (.1); review correspondence from D. Fava regarding asset purchase agreement (.1).	0.3	\$72.00
3/20/2025	MML	Review correspondence from J. Perez regarding revised asset purchase agreement for sale of judgments (.1); review additional correspondence from J. Perez and D. Fava regarding assignment of judgments (.1).	0.2	\$48.00
3/22/2025	MML	Assist J. Perez with research for motion to sell judgments (.2).	0.2	\$48.00
3/24/2025	MML	Review correspondence from J. Perez regarding motion to sell judgments (.1); correspond with J. Perez regarding D. Clark's judgments (.1); review file for same (.1).	0.3	\$72.00
3/31/2025	MML	Correspond with J. Perez regarding sale of judgments (.2); research and review documents for D. Clark judgment (.2).	0.4	\$96.00

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Client:

Matter:

Invoice #:

025305 001922 21754

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Date ASDIS	TKPR Asset	Description of Services Disposition	Hours	Amount
		Total: Asset Disposition	2.00	\$480.00
ASSET	Asset	Analysis and Recovery		
1/7/2025	MML	Review settlement payment from J. Haas (.1).	0.1	\$24.00
1/10/2025	MML	Review order denying IPM's motion to reconsider (.1).	0.1	\$24.00
1/13/2025	MML	Review invoices for preparation of fees sought pursuant to IPM sanctions (.4); prepare correspondence to J. Perez regarding same (.1).	0.5	\$120.00
1/16/2025	MML	Review settlement payment from F. Nagel (.1).	0.1	\$24.00
1/20/2025	MML	Prepare declaration in support of fees and costs from IPM (1.8); review invoices to create exhibits (.4); communicate with M. Gura regarding redaction needed (.1).	2.3	\$552.00
1/22/2025	MML	Revise exhibits in support of declaration for fees (.5); review revised exhibits from M. Gura (.2); communicate with J. Perez regarding declaration and exhibits (.1); review invoices for Receiver for time spent on motion to compel (.2); communicate with M. Gura regarding additional redactions needed (.2); review correspondence and documents from J. Manwaring regarding local rules and forms (.2).	1.4	\$336.00
1/25/2025	MML	Review additional fees for Guerra Partners and Receiver and revise exhibits in support of declaration for fees (.5); revise declaration regarding fees and costs per review of documents from J. Manwaring (.5); prepare correspondence to J. Perez regarding draft declaration and exhibits (.1).	1.1	\$264.00
3/3/2025	MML	Review incoming settlement payment (.1).	0.1	\$24.00
3/17/2025	MML	Review settlement check from F. Nagel and deposit (.1).	0.1	\$24.00
3/21/2025	MML	Review correspondence from J. Manwaring and J. Perez regarding petition for writ of certiorari filed in Idaho (.1).	0.1	\$24.00
3/26/2025	MML	Review correspondence from M. Gura and E. Tate regarding settlement payment history (.1).	0.1	\$24.00
		Total: Asset Analysis and Recovery	6.00	\$1,440.00
BUSIN	Busine	ess Operations		
1/2/2025	MML	Review December bank statements (.1); review correspondence regarding reinstatement of CTA injunction (.1).	0.2	\$48.00
1/3/2025	MML	Review correspondence from Maples Group regarding annual filing and respond to same (.2).	0.2	\$48.00

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Filed 05/29/25

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Client: 025305 Matter: 001922 Invoice #: 21754

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Date	TKPR	Description of Services	Hours	Amount
BUSIN	Busine	ess Operations		
1/13/2025	MML	Prepare follow-up correspondence to Maples Group regarding annual filings in the Caymans (.1); prepare correspondence to B. Price regarding Caymans Beneficial Ownership Transparency Act (.1).	0.2	\$48.00
1/14/2025	MML	Communicate with B. Price and J. Perez regarding Caymans Beneficial Ownership Transparency Act (.2).	0.2	\$48.00
1/16/2025	MML	Communicate with J. Perez regarding disclosure to Cayman Islands (.2); prepare correspondence to J. Sallah and Receiver regarding same (.1); communicate with Receiver regarding ownership status (.1); call with B. Price regarding required disclosure and status (.2); correspond with Receiver regarding permission to share passport (.1).	0.7	\$168.00
1/17/2025	MML	Review additional Oasis International Group documents provided by E. Tate (.2); communicate with M. Gura regarding documents to provide to Cayman Islands (.2); prepare correspondence to B. Price regarding same (.1).	0.5	\$120.00
1/20/2025	MML	Prepare correspondence to E-Hounds regarding platform users (.1); communicate with J. Perez regarding website services for Receivership Entities (.1); communicate with B. Price regarding disclosure for Caymans (.1).	0.3	\$72.00
1/22/2025	MML	Communicate with D. Bukas regarding active users of platform (.1).	0.1	\$24.00
1/23/2025	MML	Exchange correspondence with J. Bush regarding company standing in Caymans (.2); review correspondence from B. Price and E. Tate regarding same (.1).	0.3	\$72.00
1/27/2025	MML	Review correspondence from B. Price regarding information to provide to Caymans (.1); communicate with J. Perez regarding same (.2); communicate with E. Tate regarding payment of funds to Maples Group (.1); conduct research regarding the Caymans' Beneficial Ownership Transparency Act (1.0); prepare spreadsheet of information for Maples Group (.5); call with B. Price regarding additional shareholders (.2); prepare correspondence to Receiver, J. Perez, and B. Price regarding disclosure (.2); conduct additional research regarding beneficial owners (.4); prepare correspondence to Receiver regarding same (.1).	2.8	\$672.00
1/28/2025	MML	Review correspondence from E. Tate regarding disclosure to the Cayman Islands (.1); prepare correspondence to Maples Group regarding same and annual filings (.2).	0.3	\$72.00
1/29/2025	MML	Review correspondence from F. O'Hegarty regarding the Caymans' beneficial ownership act (.1).	0.1	\$24.00

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Client: 025305 Matter: 001922 Invoice #: 21754

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Date	TKPR	Description of Services	Hours	Amount
BUSIN	Busine	ess Operations		
1/30/2025	MML	Prepare correspondence to Maples Group regarding status of OIG and beneficial ownership disclosure (.4); correspond with E. Tate regarding question on payment of an invoice (.2).	0.6	\$144.00
1/31/2025	MML	Review correspondence from B. Cousins regarding beneficial ownership disclosure requirements (.2); revise spreadsheet for same (.2); prepare correspondence to B. Cousins regarding revised spreadsheet updated per her direction (.1).	0.5	\$120.00
2/5/2025	MML	Correspond with B. Price regarding Cayman Islands beneficial ownership disclosure (.1).	0.1	\$24.00
2/6/2025	MML	Review legal guidance provided by B. Cousins (.2); prepare correspondence to B. Cousins regarding beneficial ownership disclosure (.1).	0.3	\$72.00
2/10/2025	MML	Review correspondence from B. Cousins regarding required filing confirmation (.1).	0.1	\$24.00
2/14/2025	MML	Review beneficial ownership reporting update from B. Price (.1).	0.1	\$24.00
2/28/2025	MML	Correspond with J. Waechter and B. Price regarding W-9 (.1).	0.1	\$24.00
3/3/2025	MML	Correspond with J. Waechter and B. Price regarding W-9 request (.1); review bank statements (.1).	0.2	\$48.00
		Total: Business Operations	7.90	\$1,896.00
CASE	Case A	Administration		
1/9/2025	MML	Communicate with M. Gura regarding website updates (.1).	0.1	\$24.00
1/13/2025	MML	Review correspondence from M. Gura regarding website update (.1).	0.1	\$24.00
1/14/2025	MML	Review correspondence from M. Gura regarding website updates (.1); review correspondence from S. O'Brien regarding accounting reports for interim report (.1); correspond with J. Perez regarding same (.1).	0.3	\$72.00
1/23/2025	MML	Communicate with M. Gura regarding website question (.1); review correspondence from R. During regarding same (.1).	0.2	\$48.00
1/29/2025	MML	Review correspondence from R. During regarding website updates (.1); correspond with J. Perez regarding interim report and exhibits (.1); communicate with M. Gura regarding same (.1).	0.3	\$72.00

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Filed 05/29/25

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Client:

Matter:

Invoice #:

025305 001922 21754

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Date	TKPR	Description of Services	Hours	Amount
CASE	Case A	Administration		
1/30/2025	MML	Communicate with M. Gura regarding exhibit for interim report (.2); review correspondence from M. Gura regarding same (.1); communicate with M. Gura regarding website updates (.1); review notice of filing interim report (.1).	0.5	\$120.00
2/7/2025	MML	Communicate with A. Cruz regarding motion to withdraw (.1); review filing of motion and order on same (.1).	0.2	\$48.00
3/4/2025	KAP	Attend Zoom status meeting with Receiver and legal team (1.0).	1.0	\$135.00
3/4/2025	MML	Attend status conference with Receiver and team (1.0).	1.0	\$240.00
		Total: Case Administration	3.70	\$783.00
CLAIM	Claims	s Administration and Objections		
1/2/2025	KAP	Exchange emails with D.N. regarding new contact person at firm (.1).	0.1	\$13.50
1/2/2025	MML	Correspond with S. O'Brien regarding uncleared distribution checks (.1); communicate with M. Gura regarding same (.1); review correspondence from M. Gura and K. Paulson regarding T.B. and G.D. (.1).	0.3	\$72.00
1/3/2025	KAP	Communicate with claims team regarding two outstanding checks (.1); exchange emails with D.N. regarding status of next distribution (.1).	0.2	\$27.00
1/6/2025	KAP	Review court certificate from K.D. authorizing Receiver to issue second distribution check for estate (.1); forward same to claims team with check request (.1); prepare email to K.D. regarding same (.1); update claims spreadsheet with new address for R.B. (.1).	0.4	\$54.00
1/6/2025	MML	Review correspondence from K. Paulson regarding G.D. (.1).	0.1	\$24.00
1/8/2025	JR	Review email correspondence from investor with updated contact information (.1); prepare correspondence to investor confirming receipt of same (.1).	0.2	\$27.00
1/8/2025	KAP	Exchange emails with J.C. regarding address change and update claims spreadsheet per same (.1).	0.1	\$13.50
1/8/2025	MML	Review correspondence from J.C. (.1).	0.1	\$24.00
1/9/2025	MML	Call with Receiver regarding H.F. (.2); review order denying motion for reconsideration of claim determination (.1).	0.3	\$72.00
1/10/2025	MML	Review check reissue request (.1).	0.1	\$24.00
1/13/2025	JR	Communicate with investor regarding status of next distribution (.2).	0.2	\$27.00

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Client: 025305 Matter: 001922 Invoice #: 21754

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Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claims	Administration and Objections		
1/13/2025	KAP	Telephone call with M.E. regarding status of third distribution (.1).	0.1	\$13.50
1/13/2025	MML	Review correspondence regarding M.E. (.1).	0.1	\$24.00
1/14/2025	KAP	Telephone call to C.G. regarding status of third distribution (.1).	0.1	\$13.50
1/16/2025	MML	Review multiple correspondence from claims team regarding check reissue for G.D. (.2).	0.2	\$48.00
1/21/2025	KAP	Review email from M.U. regarding documentation supporting claim denial and prepare email to M. Gura regarding same (.1).	0.1	\$13.50
1/23/2025	MML	Review correspondence from M.U. requesting documents (.1); communicate with M. Gura regarding same (.1); review Receiver's response to M.U. (.1).	0.3	\$72.00
1/30/2025	KAP	Communicate with M. Lockwood and M. Gura regarding outstanding check for T.B. (.1).	0.1	\$13.50
1/30/2025	MML	Communicate with M. Gura regarding T.B. (.1); review summary of status on same from K. Paulson (.1).	0.2	\$48.00
2/4/2025	KAP	Telephone call with M. Lockwood regarding outstanding check for T.B. (.1).	0.1	\$13.50
2/4/2025	MML	Communicate with K. Paulson regarding T.B. (.1).	0.1	\$24.00
2/25/2025	KAP	Telephone call with C.S. regarding future distributions (.1).	0.1	\$13.50
2/26/2025	KAP	Exchange emails with M. Gura regarding IRA questions from investor who did not submit proof of claim (.1).	0.1	\$13.50
2/26/2025	MML	Review correspondence from M. Gura regarding M.M. (.1); call with M. Gura regarding same (.1); review follow-up correspondence from K. Paulson (.1).	0.3	\$72.00
2/27/2025	KAP	Exchange emails with C.M. regarding discovery of check believed to be lost (.1).	0.1	\$13.50
2/27/2025	MML	Review correspondence from C.M. (.1); review response to same from K. Paulson (.1).	0.2	\$48.00
3/3/2025	KAP	Communicate with claimant regarding status of third distribution (.1).	0.1	\$13.50
3/4/2025	KAP	Exchange emails with claimant regarding status of third distribution (.1); review claims spreadsheet and saved emails regarding status of second distribution check for T.B. (.1); prepare email to E. Tate regarding same (.1); review T.B. s voided check and update claims spreadsheet for same (.1); telephone call with T.B. regarding signing declaration (.1); prepare declaration for same and send to M. Lockwood (.5).	1.0	\$135.00

Document 869-8 20092

Filed 05/29/25

Page 8 of 12 PageID May 14, 2025

Client: 025305 Matter: 001922 Invoice #: 21754

7 Page:

Date	TKPR	Description of Services	Hours	Amount
CLAIM	Claim	s Administration and Objections		
3/7/2025	KAP	Exchange emails with C.G. regarding status of third distribution (.1).	0.1	\$13.50
3/10/2025	MML	Review correspondence from M. Gura regarding M.M.'s inquiry (.1).	0.1	\$24.00
3/11/2025	KAP	Exchange emails with M. Gura regarding inquiry from M.M. (.1); prepare emails to M.M. regarding closing his Equity Trust IRA (.1).	0.2	\$27.00
3/11/2025	MML	Correspond with K. Paulson regarding T.B. (.1).	0.1	\$24.00
3/14/2025	MML	Review draft declaration for T.B. (.1); provide comments to K. Paulson regarding same (.1).	0.2	\$48.00
3/17/2025	KAP	Exchange emails with J.C. regarding address change and update claims spreadsheet per same (.1); revise declaration for T.B. per M. Lockwood s edits (.1); prepare cover letter for same and send both to E. Tate for mailing (.1).	0.3	\$40.50
3/19/2025	KAP	Exchange emails with T.B. regarding mailing date of declaration (.1).	0.1	\$13.50
3/20/2025	KAP	Exchange emails with claimant regarding status of next distribution (.1).	0.1	\$13.50
3/25/2025	KAP	Telephone call with L.B. regarding past and future distributions (.1).	0.1	\$13.50
		Total: Claims Administration and Obje	6.70	\$1,188.00
WFEE	Wor	on Fees Motions		
1/2/2025	MML	NO CHARGE: Review correspondence from E-Hounds regarding December invoice (.1).	0.1	\$0.00
1/3/2025	MML	NO CHARGE: Review correspondence from PDR regarding December invoice (.1).	0.1	\$0.00
1/13/2025	MML	NO CHARGE: Communicate with K Paulson regarding fees motions and prebills (.2); correspond with E. Tate regarding same (.1).	0.3	\$0.00
1/14/2025	KAP	NO CHARGE: Review and revise team prebills for November and December and send revisions to M. Lockwood (.4).	0.4	\$0.00
1/16/2025	KAP	NO CHARGE: Review and edit Receiver's October time entries (.4).	0.4	\$0.00
1/16/2025	MML	NO CHARGE: Review correspondence from Elam Burke regarding December invoice (.1); review correspondence from K. Paulson and E. Tate regarding Receiver's time and costs (.2).	0.3	\$0.00

Document 869-8 20093

Filed 05/29/25

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Client:

Matter:

Invoice #:

025305 001922 21754

8 Page:

Date	TKPR	Description of Services	Hours	Amount
WFEE	Wor	on Fees Motions		
1/17/2025	KAP	NO CHARGE: Review and edit Receiver's November time entries and send October and November entries to C. Henderson for entry (.7); exchange emails with C. Henderson and M. Lockwood regarding same (.1); review and edit Receiver's December time entries and send to C. Henderson for entry (.8).	1.6	\$0.00
1/17/2025	MML	NO CHARGE: Communicate with K. Paulson regarding invoices (.1).	0.1	\$0.00
1/20/2025	KAP	NO CHARGE: Review and edit E. Tate s fourth-quarter invoice (.6).	0.6	\$0.00
1/20/2025	MML	NO CHARGE: Draft motion for fees (1.0); review invoices from PDR, Englander Fischer, and E-Hounds (.5); correspond with R. Jernigan regarding invoices (.1); review expenses for fourth quarter (.2).	1.8	\$0.00
1/22/2025	MML	NO CHARGE: Prepare correspondence to Elam Burke regarding outstanding invoices (.1).	0.1	\$0.00
1/23/2025	MML	NO CHARGE: Review E. Tate's invoice (.2); review December invoice from Englander Fischer (.1); review invoices from Philips Lytle (.2); exchange correspondence with Elam Burke regarding invoices and outstanding amount owed (.2).	0.7	\$0.00
1/27/2025	KAP	NO CHARGE: Review and edit Receiver s fourth-quarter prebills and send same to M. Lockwood (.6).	0.6	\$0.00
1/27/2025	MML	NO CHARGE: Review correspondence from J. Manwaring regarding outstanding invoice and research same (.2); review invoices from Phillips Lytle (.1); prepare correspondence to J. Sonner regarding previous payment of submitted invoice (.1); revise E. Tate invoice (.1).	0.5	\$0.00
1/28/2025	MML	NO CHARGE: Review and edit prebills (1.0); review invoice from JND (.1); communicate with M. Gura regarding revisions to same (.1).	1.2	\$0.00
1/29/2025	KAP	NO CHARGE: Review and make comments on draft fees motion and send to M. Lockwood (1.0).	1.0	\$0.00
1/29/2025	MML	NO CHARGE: Continue drafting motion for fees (1.5); correspond with K. Paulson regarding same (.2); revise motion for fees for same (.4); prepare correspondence to Receiver regarding draft motion and exhibits (.1).	2.2	\$0.00
1/31/2025	MML	NO CHARGE: Review Receiver's approval of invoices (.1); revise fees motion for same and interim report (.4); prepare correspondence to A. Auxter regarding revised draft and exhibits (.1).	0.6	\$0.00
2/3/2025	MML	NO CHARGE: Review correspondence from J. Waechter regarding invoice (.1); review January invoice from E-Hounds (.1).	0.2	\$0.00

Document 869-8 20094

Filed 05/29/25

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Client: 025305 Matter: 001922 Invoice #: 21754

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Date	TKPR	Description of Services	Hours	Amount
WFEE	Wor	on Fees Motions		
2/5/2025	MML	NO CHARGE: Review invoice from J. Perez (.1); communicate with J. Perez regarding same (.1); revise motion for same (.1); exchange correspondence with Receiver regarding approval (.1); prepare correspondence to CFTC regarding revised motion and additional invoice (.1).	0.5	\$0.00
2/6/2025	MML	NO CHARGE: Review correspondence from A. Auxter regarding fees motion conferral (.1); review invoice from PDR (.1).	0.2	\$0.00
2/7/2025	MML	NO CHARGE: Revise, finalize, and file motion for fees (.7); prepare correspondence for service of same to J. Haas and R. Montie (.1).	0.8	\$0.00
2/12/2025	KAP	NO CHARGE: Review and revise January prebills and send edits to M. Lockwood (.5).	0.5	\$0.00
2/12/2025	MML	NO CHARGE: Communicate with K. Paulson regarding January prebills (.1).	0.1	\$0.00
2/24/2025	MML	NO CHARGE: Review order requesting additional information for fees motion (.1).	0.1	\$0.00
2/28/2025	MML	NO CHARGE: Communicate with Receiver, J. Perez, and B. McConnell regarding response to order (.3).	0.3	\$0.00
3/4/2025	KAP	NO CHARGE: Telephone call with M. Lockwood regarding reviewing certain prebills (.2); review prebills for Receiver, Guerra King, Jared Perez, and invoices for E. Tate, pull and compile select entries pursuant to Court's order, and send spreadsheet of same to Receiver, M. Lockwood, and J. Perez (1.5); prepare email to M. Gura regarding same (.1).	1.8	\$0.00
3/4/2025	MML	NO CHARGE: Communicate with K. Paulson regarding time entries (.2).	0.2	\$0.00
3/6/2025	MML	NO CHARGE: Review time entries (.5); communicate with B. McConnell regarding same (.1); review correspondence from Receiver (.2).	0.8	\$0.00
3/10/2025	MML	NO CHARGE: Revise response to Court's order and correspond with team regarding same (1.0); review correspondence from E-Hounds regarding February invoice (.1).	1.1	\$0.00
3/11/2025	MML	NO CHARGE: Review notice of filing corrected response to Court's fees order (.1).	0.1	\$0.00
3/14/2025	MML	NO CHARGE: Review correspondence from J. Waechter regarding February invoice (.1); prepare correspondence to J. Waechter regarding revisions needed to same (.1).	0.2	\$0.00

Document 869-8 20095

Filed 05/29/25

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Client:

Matter:

025305 001922 21754

Invoice #:

10 Page:

Date	TKPR	Description of Services	Hours	Amount
WFEE	Wor	on Fees Motions		
3/18/2025	MML	NO CHARGE: Review correspondence from B. McConnell regarding Phillips Lytle invoice (.1); review revised Englander Fischer invoice (.1).	0.2	\$0.00
3/26/2025	KAP	NO CHARGE: Review and edit February team prebills (.3).	0.3	\$0.00
		Total: Wor on Fees Motions	20.00	\$0.00
		Total Professional Services	46.3	\$5,787.00
		Total Services	\$5,787.0	0
		Total Current Charges		\$5,787.00
		Previous Balance		\$5,394.00
		Less Payments		(\$5,394.00)
		PAY THIS AMOUNT		\$5,787.00

### 

20096

Filed 05/29/25

## Page 12 of 12 PageID May 14, 2025

Client: 025305 Matter: 001922 21754 Invoice #:

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Page:

**TASK RECAP** 

**Services Disbursements** 

Project No.	Hours	Amount	Project No.	Amount
ASDIS - ASDIS	2.00	\$480.00		\$0.00
ASSET - ASSET	6.00	\$1,440.00		\$0.00
BUSIN - BUSIN	7.90	\$1,896.00		\$0.00
CASE - CASE	3.70	\$783.00		\$0.00
CLAIM - CLAIM	6.70	\$1,188.00		\$0.00
WFEE - WFEE	20.00	\$0.00		\$0.00
	46.30	\$5,787.00		\$0.00

### **BREAKDOWN BY PERSON**

Person		Project No.	Hours	Amount
JR	Jeffrey Rizzo	CLAIM - CLAIM	0.40	\$54.00
KAP	Kimberly A. Paulson	CASE - CASE	1.00	\$135.00
KAP	Kimberly A. Paulson	CLAIM - CLAIM	3.60	\$486.00
KAP	Kimberly A. Paulson	WFEE - WFEE	7.20	\$0.00
MML	Maya M. Lockwood	ASDIS - ASDIS	2.00	\$480.00
MML	Maya M. Lockwood	ASSET - ASSET	6.00	\$1,440.00
MML	Maya M. Lockwood	BUSIN - BUSIN	7.90	\$1,896.00
MML	Maya M. Lockwood	CASE - CASE	2.70	\$648.00
MML	Maya M. Lockwood	CLAIM - CLAIM	2.70	\$648.00
MML	Maya M. Lockwood	WFEE - WFEE	12.80	\$0.00
			46.30	\$5,787.00

# **EXHIBIT 9**



### **INVOICE**

Invoice # 9736 Date: 04/30/2025

## 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

Туре	Date	Description	Attorney	Quantity	Rate	Total
Service	01/02/2025	Review G.W. and C.W. clawback settlement payment (.2); communicate with an investor regarding the claims process (.1).	MG	0.30	\$135.00	\$40.50
Service	01/03/2025	Review status of outstanding distribution checks (.4).	MG	0.40	\$135.00	\$54.00
Service	01/06/2025	Communicate with J.H. regarding his clawback payments (.1); review and organize claimant communications (.4).	MG	0.50	\$135.00	\$67.50
Service	01/07/2025	Initial review J.H. clawback payment (.1).	MG	0.10	\$135.00	\$13.50
Service	01/09/2025	Review updated claimant contact information (.1).	MG	0.10	\$135.00	\$13.50
Service	01/10/2025	Revise the Receivership website with recent filings (.4); review and organize claimants communications (.2); request check reissue from PDR (.2); review the order denying the motion for reconsideration (.2).	MG	1.00	\$135.00	\$135.00
Service	01/13/2025	Communicate with Ron During regarding receivership website updates (.1).	MG	0.10	\$135.00	\$13.50
Service	01/14/2025	Review receivership website updates (.1).	MG	0.10	\$135.00	\$13.50

Invoice # 9736 - 04/30/2025

Service	01/16/2025	Review reissued second distribution check (.3); draft second distribution letter for reissued check (.1); initial review of clawback settlement check (.1).	MG	0.50	\$135.00	\$67.50
Service	01/17/2025	Assist M. Lockwood with preparation of documents for production to Maples Group for compliance with Cayman Islands' beneficial ownership law (.2).	MG	0.20	\$135.00	\$27.00
Service	01/21/2025	Review and compile exhibits to the motion to compel fees from IPM (2.2).	MG	2.20	\$135.00	\$297.00
Service	01/22/2025	Revise exhibits to the motion to compel fees from IPM (.8).	MG	3.90	\$135.00	\$526.50
Service	01/23/2025	Compile communication of denied claimants for their tax purposes (.4); communicate with a claimant regarding the status of the claims process (.1); review website inquiries (.2).	MG	0.70	\$135.00	\$94.50
Service	01/28/2025	Review R.M. clawback payment (.1).	MG	0.10	\$135.00	\$13.50
Service	01/30/2025	Review status of second distribution (.6); compile exhibit A to the interim report (.3); update Receiver's website (.2).	MG	1.10	\$135.00	\$148.50
Service	02/06/2025	Communicate with a claimant regarding the status of the claims process (.1).	MG	0.10	\$135.00	\$13.50
Service	02/07/2025	Update the Receiver's website (.3); review January bank account statement (.2).	MG	0.50	\$135.00	\$67.50
Service	02/26/2025	Communicate with an investor who did not submit a proof of claim form regarding his status with the receivership (.6).	MG	0.60	\$135.00	\$81.00
Service	03/04/2025	Attend the receivership status conference Zoom meeting (1.1).	MG	1.10	\$135.00	\$148.50
Service	03/10/2025	Review clawback payments (.2).	MG	0.20	\$135.00	\$27.00
Service	03/17/2025	Review of F.N. settlement payment (.1); communicate with an investor regarding the status of the claims process (.1).	MG	0.20	\$135.00	\$27.00
Service	03/26/2025	Review the G.W. and C.W. clawback payment (.3).	MG	0.30	\$135.00	\$40.50

Invoice # 9736 - 04/30/2025

Service	03/27/2025	Communicate with a claimant regarding the status of the claims process (.1).	MG	0.10	\$135.00	\$13.50

Time Keeper	Position	Quantity	Rate	Total
Mary Gura	Paralegal	14.4	\$135.00	\$1,944.00
			Subtotal	<b>\$1</b> ,944 <b>.00</b>
			Total	<b>\$1,</b> 944. <b>00</b>

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

A convenience fee of 2% will be charged on all payments made by credit or debit card. This fee will be billed on the following month's invoice.

Invoice # 9736 - 04/30/2025

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

**INVOICE** 

Invoice # 9736

Date: 04/30/2025

3242 Henderson Boulevard, Suite 210 Tampa, FL 33609



## 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.

# **EXHIBIT 10**

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

Tampa, FL 33607 Telephone: 813-347-5100 Facsimile: 813-347-5198

Federal Tax ID # 27-0937962

Burton W. Wiand May 14, 2025

Attention:Burton W. Wiand, as ReceiverClient:025305Burton W. Wiand PAMatter:002095114 Turner StreetInvoice #:21755

Clearwater, FL 33756

Page: 1

RE: Oasis Raymond Montie, III. (Legal Team)

For Professional Services Rendered Through March 31, 2025

Date ASSET	TKPR Asset	Description of Services Analysis and Recovery	Hours	Amount
1/28/2025	MML	Review settlement payment from R. Montie (.1).	0.1	\$24.00
		Total: Asset Analysis and Recovery	0.10	\$24.00
		Total Professional Services	0.1	\$24.00
		Total Services Total Current Charges	\$24.0	00 \$24.00
		Previous Balance		\$336.00
		Less Payments		(\$33 .00)
		PAY THIS AMOUNT		\$24.00

Case 8:19-cv-00886	-VMC-SPF
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### Document 869-10 20104

### Filed 05/29/25

## Page 3 of 3 PageID May 14, 2025

Client:

025305 002095

Matter: Invoice #: 21755

2 Page:

**TASK RECAP** 

**Services Disbursements** 

Project No.	Hours	Amount	Project No.	Amount
ASSET - ASSET	0.10	\$24.00		\$0.00
	0.10	\$24.00		\$0.00

#### **BREAKDOWN BY PERSON**

Person		Project No.	Hours	Amount
MML	Maya M. Lockwood	ASSET - ASSET	0.10	\$24.00
			0.10	\$24.00

# **EXHIBIT 11**



## **INVOICE**

Invoice # 41 Date: 05/15/2025 Due On: 06/14/2025

## Law Office of Jared J. Perez

301 Druid Rd W Clearwater, Florida 33756

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

### 00003-Wiand

## Oasis Receivership

Туре	Date	Notes	Quantity	Rate	Total
Service	01/02/2025	AAR: Correspond with Englander Fischer regarding subpoena contempt issues (.1).	0.10	\$320.00	\$32.00
Service	01/06/2025	AAR: Correspond with Englander Fischer regarding subpoena contempt issues (.1).	0.10	\$320.00	\$32.00
Service	01/08/2025	AAR: Correspond with Englander Fischer regarding subpoena contempt issues (.2).	0.20	\$320.00	\$64.00
Service	01/09/2025	CLAIMS: Review order on Dalman motion for reconsideration and communicate with Receiver (.3).	0.30	\$320.00	\$96.00
Service	01/10/2025	AAR: Review order from District of Idaho denying IPM motion for reconsideration regarding subpoena contempt and sanctions (.3).	0.30	\$320.00	\$96.00
Service	01/29/2025	CASE MGMT: Draft twenty-third interim report (3.1).	3.10	\$320.00	\$992.00
Service	01/30/2025	CASE MGMT: Revise, finalize, and file twenty-third interim report, incuding exhibits (2.5).	2.50	\$320.00	\$800.00
Service	03/04/2025	AAR: Zoom conference with Receiver and team regarding case management and strategy, including selling judgments and various recoveries (1.0); Zoom conference with ATC team regarding strategy and next steps (.5).	1.50	\$320.00	\$480.00
Service	03/11/2025	AAR: Draft email to N. Young of IPM regarding compliance with subpoena (.2).	0.20	\$320.00	\$64.00
Service	03/17/2025	ASSET DISP: Communicate with buyer of default	0.10	\$320.00	\$32.00

	, ,	nents regarding asset purcha notion for approval (.1).	se agreement			
Service 03/2	judgr and r	ET DISP: Communicate with I nents regarding asset purcha notion for approval (.3); revisionase agreement (.8).	se agreement	1.10	\$320.00	\$352.00
Service 03/2	regar corre	Telephone conference with ording B. Winters (.8); review for spondence (.1); communicate eam (.1).	ollow-up	1.00	\$320.00	\$320.00
Service 03/2	IPM v Rece comr regar	Identify and review writ of ce with US Supreme Court (.5); o viver regarding IPM subpoena nunicate with team and local rding IPM and subpoena (.2); on to approve sale of default j	call with I and writ (.2); counsel draft and revise	3.10	\$320.00	\$992.00
Service 03/2		ET DISP: Revise motion to apult judgments and purchase a	•	1.30	\$320.00	\$416.00

\$4,768.00 Total

### **Detailed Statement of Account**

#### **Other Invoices**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
38	03/07/2025	\$10,400.00	\$0.00	\$10,400.00

#### **Current Invoice**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
41	06/14/2025	\$4,768.00	\$0.00	\$4,768.00
			Outstanding Balance	<b>\$15,16</b> 8. <b>00</b>
			Total Amount Outstanding	<b>\$15,16</b> 8. <b>00</b>

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

Please pay within 30 days.

# **EXHIBIT 12**



## **INVOICE**

Page 2 of 10 PageID

Invoice # 465 Date: 02/03/2025 Due On: 02/18/2025

## **Englander Fischer**

721 1st Ave N St. Petersburg, FL 33701 United States

Wiand Guerra King Wiand Guerra King PA 5505 W. Gray Street Tampa 33609

### 2020-00727

## Burton W. Wiand v. Chris Arduini, et al.

Date	Attorney	Notes	Quantity	Rate	Total
01/02/2025	BSM	Correspondence with attorney Perez (0.10); correspondence with local counsel re: motion for contempt (0.20); correspondence with client (0.10); draft motion for contempt (2.20)	2.60	\$335.00	\$871.00
01/03/2025	BSM	Correspondence with client (0.30); revise and edit response (4.50)	4.80	\$335.00	\$1,608.00
01/06/2025	BSM	Correspondence with client and attorney Perez (0.20); revise and edit response (2.90).	3.10	\$335.00	\$1,038.50
01/07/2025	BSM	Correspondence with client (0.40); revise and edit response to Preziosi motion (0.70); correspondence with attorney Perez and local counsel (0.50).	1.60	\$335.00	\$536.00
01/08/2025	BSM	Correspondence with attorney Perez and edit response (1.10); correspondence with local counsel (0.20); revise and edit response (0.90).	2.20	\$335.00	\$737.00
01/09/2025	BSM	Correspondence with local counsel (0.20); edit and finalize response (0.50); correspondence with client (0.10).	0.80	\$335.00	\$268.00
01/10/2025	BSM	Correspondence with client.	0.10	\$335.00	\$33.50
01/17/2025	BSM	Draft and edit Motion for Contempt; legal research re: same.	1.50	\$335.00	\$502.50
01/21/2025	BSM	Correspondence with counsel (0.20); review reply filed by Preziosi (0.20).	0.40	\$335.00	\$134.00

Invoice # 465 - 02/03/2025

01/27/2025 BSM	1 Correspondence with counsel re: motion for sanctions and edit same.	0.80	\$335.00	\$268.00
01/28/2025 BSM	Correspondence with local counsel re: contempt motion.	0.20	\$335.00	\$67.00
01/29/2025 BSM	1 Correspondence re: judgments (0.10); correspondence with local counsel and revise motion for contempt (0.60); correspondence with client (0.10).	0.80	\$335.00	\$268.00
01/31/2025 BSM	1 Correspondence with local counsel (0.20); correspondence with client (0.10).	0.30	\$335.00	\$100.50

Time Keeper	Quantity	Rate	Total
Beatriz McConnell	19.2	\$335.00	\$6,432.00
		Subtotal	\$6,432.00
		Total	\$6,432.00

### **Statement of Account**

	Outstanding Balance		New Charges		Payments Received		<b>Total Amount Outstanding</b>	
(	\$4,958.00	+	\$6,432.00	) - (	\$0.00	) = [	\$11,390.00	

Please make checks payable to: Englander Fischer

Payment terms are Net 15. Payments made via wire will be charged a \$30 fee. Please contact Alicia Farber at afarber@eflegal.com for ACH/Wire information or to make a payment by phone.

To remit a payment online, go to https://eflegal.com/make-a-payment/

Invoice # 465 - 02/03/2025

## **Englander Fischer**

**INVOICE** 

721 1st Ave N St. Petersburg, FL 33701 United States

Invoice # 465 Date: 02/03/2025 Due On: 02/18/2025



## 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.



### **INVOICE**

Invoice # 1001 Date: 03/07/2025 Due On: 03/22/2025

## **Englander Fischer**

721 1st Ave N St. Petersburg, FL 33701 United States

Wiand Guerra King Wiand Guerra King PA 5505 W. Gray Street Tampa 33609

### 2020-00727

## Burton W. Wiand v. Chris Arduini, et al.

Date	Attorney	Notes	Quantity	Rate	Total
02/04/2025	BSM	Correspondence with local counsel.	0.10	\$335.00	\$33.50
02/10/2025	BSM	Correspondence with local counsel (0.20); review filings provided by local counsel (0.20).	0.40	\$335.00	\$134.00
02/11/2025	BSM	Correspondence with local counsel.	0.20	\$335.00	\$67.00
02/11/2025	IMR	Research to obtain certificate of good standing with Florida Supreme Court and obtained same.	0.30	\$185.00	\$55.50
02/17/2025	BSM	Correspondence with local counsel.	0.10	\$335.00	\$33.50
02/21/2025	BSM	Correspondence with local counsel.	0.10	\$335.00	\$33.50
02/25/2025	BSM	Correspondence with counsel.	0.20	\$335.00	\$67.00
02/27/2025	BSM	Correspondence with local counsel, review order granting pro hac admission, and directives re: notice of appearance (0.20); correspondence with counsel (0.10).	0.30	\$335.00	\$100.50
02/27/2025	IMR	Draft Notice of Appearance for Southern District of NY	0.10	\$185.00	\$18.50

Time Keeper	Quantity	Rate	Total
Beatriz McConnell	1.4	\$335.00	\$469.00
Iris Munguia-Revollo	0.4	\$185.00	\$74.00

Filed 05/29/25

Page 6 of 10 PageID

Invoice # 1001 - 03/07/2025

Subtotal \$543.00

Total \$543.00

# **Statement of Account**

Outstanding Balance New Charges Payments Received **Total Amount Outstanding**( \$11,390.00 + \$543.00 ) - ( \$0.00 ) = **\$11,933.00** 

Approved by:

Please make checks payable to: Englander Fischer

Payment terms are Net 15. Payments made via wire will be charged a \$30 fee. Please contact Tara Reese at treese@eflegal.com for ACH/Wire information or to make a payment by phone.

To remit a payment online, go to https://eflegal.com/make-a-payment/

Invoice # 1001 - 03/07/2025

# **Englander Fischer**

# **INVOICE**

721 1st Ave N St. Petersburg, FL 33701 United States

Invoice # 1001 Date: 03/07/2025 Due On: 03/22/2025



# 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.



# **INVOICE**

Invoice # 1165 Date: 04/08/2025 Due On: 04/23/2025

# **Englander Fischer**

721 1st Ave N St. Petersburg, FL 33701 United States

Wiand Guerra King Wiand Guerra King PA 5505 W. Gray Street Tampa 33609

# 2020-00727

# Burton W. Wiand v. Chris Arduini, et al.

Date	Attorney	Notes	Quantity	Rate	Discount	Total
02/24/2025	BSM	Correspondence with local counsel	0.20	\$335.00	-	\$67.00
03/03/2025	BSM	Correspondence with counsel.	0.10	\$335.00	-	\$33.50
03/04/2025	BSM	Zoom conference with client and counsel (1.10); draft response to order (1.20).	2.30	\$335.00	100.0%	\$0.00
03/05/2025	BSM	Draft response	1.70	\$335.00	100.0%	\$0.00
03/06/2025	BSM	Correspondence with counsel (0.20); correspondence with Garbellano's counsel and note file (0.20); correspondence with client re: Garbellano (0.10); call with client re: Reply (0.10).	0.60	\$335.00	-	\$201.00
03/10/2025	BSM	Correspondence with counsel (0.20); correspondence with Garbellano's counsel and client (0.10); draft reply in support of motion for contempt in SDNY (1.10)	1.40	\$335.00	-	\$469.00
03/10/2025	IMR	Review and edit 10 page receiver's response to court's order (.3) along with 3 Exhibits (.3) in preparation for filing.	0.60	\$185.00	100.0%	\$0.00
03/11/2025	BSM	Draft, edit and finalize reply (0.90); correspondence with counsel (0.20); correspondence with client (0.20);	1.40	\$335.00	-	\$469.00

Invoice # 1165 - 04/08/2025

		revise letter motion to strike (0.10).				
03/11/2025	IMR	Drafted Notice of Filing Receiver's corrected response to court order.	0.20	\$185.00	100.0%	\$0.00
03/11/2025	IMR	Review and edit Notice of Filing Receiver's corrected response to court order in preparation for filing.	0.10	\$185.00	100.0%	\$0.00
03/11/2025	IMR	Review and edit Receiver's corrected response to court order along with 3 Exhibits in preparation for filing.	0.30	\$185.00	100.0%	\$0.00
03/12/2025	BSM	Draft reply.	1.90	\$335.00	-	\$636.50
03/13/2025	BSM	Draft and edit reply	0.20	\$335.00	-	\$67.00
03/14/2025	BSM	Draft reply	0.40	\$335.00	-	\$134.00
03/18/2025	BSM	Correspondence with local counsel re: reply (0.20); draft reply (1.70).	1.90	\$335.00	-	\$636.50
03/19/2025	BSM	Correspondence with local counsel re: reply (0.20); review order re: motion to strike (0.10); correspondence with client (0.10).	0.40	\$335.00	-	\$134.00
03/20/2025	BSM	Correspondence with local counsel.	0.20	\$335.00	-	\$67.00
03/24/2025	BSM	Correspondence with local counsel (0.20); correspondence with attorney Perez (0.20); revise and edit draft motion to sell judgments and correspondence with counsel re: same (0.90).	1.30	\$335.00	-	\$435.50
03/25/2025	BSM	Correspondence with attorney Perez.	0.20	\$335.00	-	\$67.00
03/26/2025	BSM	Correspondence with local counsel re: Garbellano settlement (0.20); correspondence with counsel for Garbellano (0.10); call with client (0.10); edit and finalize reply and correspondence with counsel (0.40)	0.80	\$335.00	-	\$268.00
03/28/2025	BSM	Correspondence with Garbellano's counsel re: sale of property.	0.10	\$335.00	-	\$33.50
03/31/2025	BSM	Correspondence with client.	0.10	\$335.00	-	\$33.50

**Line Item Discount Subtotal** 

-\$1,562.00

Time Keeper	Quantity	Rate	Discount	Total
Beatriz McConnell	15.2	\$335.00	-\$1,340.00	\$3,752.00
Iris Munguia-Revollo	1.2	\$185.00	-\$222.00	\$0.00

Filed 05/29/25 Page 10 of 10

Invoice # 1165 - 04/08/2025

**Subtotal** \$3,752.00

Total \$3,752.00

# **Statement of Account**

Outstanding Balance New Charges Payments Received Total Amount Outstanding

( \$6,975.00 + \$3,752.00 ) - ( \$0.00 ) = \$10,727.00

Approved by: BSM

Please make checks payable to: Englander Fischer

Payment terms are Net 15. Payments made via wire will be charged a \$30 fee. Please contact Tara Reese at treese@eflegal.com for ACH/Wire information or to make a payment by phone.

To remit a payment online, go to https://eflegal.com/make-a-payment/

# **EXHIBIT 13**

Case 8:19-cv-00886-VMC-SPF 251 E. Front Street, Suite 300

Boise, Idaho 83702 Tax ID No. 82-0451327 Telephone 208-343-5454 Fax 208-384-5844



January 31, 2025

Burton W. Wiand, Receiver c/o Maya Lockwood Guerra & Partners, PA The Towers of Westshore 1408 N. Westshore Blvd., Ste. 1019

Tampa, FL 33607

Invoice No.

212822

Client No. Matter No. 10247 1

Billing Attorney:

JWM

# **INVOICE SUMMARY**

Document 869-13

20119

For Professional Services Rendered from January 9, 2025 through January 31, 2025.

### **RE: Intermountain Precious Metals LLC**

Total Professional Services Total Costs Advanced	\$ 420.00 \$ 1.70
TOTAL THIS INVOICE	\$ 421.70
Previous Balance	\$ 2,378.24
TOTAL BALANCE DUE	\$ 2,799.94

# **ELAM & BURKE**

January 31, 2025

Invoice No.

212822

Client No.

10247

Matter No.

1

Billing Attorney: JWM

# **PROFESSIONAL SERVICES**

Date	Atty	Description	Hours	Amount
1/09/25	JWM	Receive and review mandate from 9th Circuit Court.	.20	70.00
1/10/25	JWM	Receive and review order denying motion to reconsider, and forward to co-counsel Jared Perez.	.30	105.00
1/22/25	JWM	Email exchange with Maya Lockwood sorting out invoices for her application for fees.	.30	105.00
1/23/25	JWM	Provide documents to M. Lockwood for her motion for attorney fees.	.40	140.00

### **TOTAL PROFESSIONAL SERVICES**

\$ 420.00

### **SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Rate	Billed Hours	Billed Amount	Non-Chargeable Hours	Non-Chargeable Amount
Manwaring, Jed W.	Of Counsel	350.00	1.20	420.00	.00	.00
Total			1.20	\$ 420.00	.00	\$ .00

### **COSTS ADVANCED**

Description	Amount
PACER (records searches from 10/1-12/31/24)	1.70

**TOTAL COSTS ADVANCED** 

\$ 1.70

**TOTAL THIS INVOICE** 

\$ 421.70

January 31, 2025

Invoice No.

10247

Client No. Matter No.

1

212822

Billing Attorney:

JWM

### **OUTSTANDING INVOICES**

Invoice Number	Date	Invoice	Payments	Ending
		Total	Received	Balance
211174	10/31/24	525.00	.00	525.00
211718	11/30/24	941.30	.00	941.30
212228	12/31/24	911.94	.00	911.94

Previous Balance \$ 2,378.24

Balance Due This Invoice \$421.70

TOTAL BALANCE DUE \$ 2,799.94

### **AGED ACCOUNTS RECEIVABLE**

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
\$ .00	\$ 911.94	\$ 941.30	\$ 525.00	\$ .00	\$ 2,378.24

251 E. Front Street, Strike 3086-VMC-SPF

Boise, Idaho 83702 Tax ID No. 82-0451327 Telephone 208-343-5454

Fax 208-384-5844



January 31, 2025

Burton W. Wiand, Receiver

c/o Maya Lockwood Guerra & Partners, PA The Towers of Westshore

1408 N. Westshore Blvd., Ste. 1019

Tampa, FL 33607

Invoice No. 212822 Client No. 10247 Matter No. Billing Attorney: **JWM** 

# **REMITTANCE**

20122

Intermountain Precious Metals LLC

**BALANCE DUE THIS INVOICE** 

**Previous Balance** 

**TOTAL BALANCE DUE** 

\$ 421.70

\$ 2,378.24

\$ 2,799.94

#### **ONLINE PAYMENTS**

Elam & Burke is committed to offering safe, secure, and convenient options to pay your bill using Visa, MasterCard, Discover, American Express, Apple Pay, Google Pay, and eCheck. NOTE: A 3% convenience surcharge will be applied to all of these transactions.

To pay online, please click here: Pay Now or go to: www.elamburke.com/payments

#### **ACH PAYMENTS IN USD**

Account Holder:

Elam & Burke, PA

Bank Name:

U.S. Bank

**Branch Name:** 

Meridian CenterPoint Office

Account Number:

82982196

**ABA Routing Number:** 

021052053

**CHECK PAYMENTS** 

All checks should be made payable to:

Elam & Burke, PA

**ATTN: Accounts Receivable** 

251 E. Front Street, Suite 300

Boise, ID 83702

(Please return this advice with payment.)

Please reference: Invoice 212822, File # 10247 - 1 on all payments.

INVOICES ARE PAYABLE UPON RECEIPT Thank you! Your business is greatly appreciated. Case 8:19-cv-00886-VMC-SPF 251 E. Front Street, Suite 300

Boise, Idaho 83702 Tax ID No. 82-0451327 Telephone 208-343-5454 Fax 208-384-5844



March 31, 2025

Burton W. Wiand, Receiver c/o Maya Lockwood Guerra & Partners, PA The Towers of Westshore 1408 N. Westshore Blvd., Ste. 1019 Invoice No. 213915
Client No. 10247
Matter No. 1
Billing Attorney: JWM

Tampa, FL 33607

# **INVOICE SUMMARY**

Document 869-13

20123

For Professional Services Rendered from March 5, 2025 through March 31, 2025.

# **RE: Intermountain Precious Metals LLC**

Total Professional Services Total Costs Advanced	\$ 315.00 \$ .00
TOTAL THIS INVOICE	\$ 315.00
Previous Balance	\$ 563.55
TOTAL BALANCE DUE	\$ 878.55

March 31, 2025

Invoice No.

213915

Client No.

10247 1

Matter No.

Billing Attorney: JWM

### **PROFESSIONAL SERVICES**

Date	Atty	Description	Hours	Amount
3/05/25	JWM	Email exchange with Perez re no contact with Young or IPM.	.20	70.00
3/21/25	JWM	Receive and review letter from USSC re filing of petition for certification and forward same to co-counsel.	.20	70.00
3/24/25	JWM	Receive and review petition for certification to USSC and related pleadings.	.50	175.00

### **TOTAL PROFESSIONAL SERVICES**

\$ 315.00

### **SUMMARY OF PROFESSIONAL SERVICES**

Name	Staff Level	Rate	Billed Hours	Billed Amount	Non-Chargeable Hours	Non-Chargeable Amount
Manwaring, Jed W.	Of Counsel	350.00	.90	315.00	.00	.00
Total			.90	\$ 315.00	.00	\$ .00

**TOTAL THIS INVOICE** 

\$ 315.00

March 31, 2025

Invoice No.

213915 10247

Client No. Matter No.

1

Billing Attorney:

JWM

# **OUTSTANDING INVOICES**

Invoice Number	Date	Invoice Total	Payments Received	Ending Balance
212228	12/31/24	911.94	770.09	141.85
212822	1/31/25	421.70	.00	421.70
	Previous Balance			\$ 563.55
	Balance Due This	Invoice		\$ 315.00
	TOTAL BALANCE	DUE		\$ 878.55

# **AGED ACCOUNTS RECEIVABLE**

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
\$ .00	\$ .00	\$ 421.70	\$ 141.85	\$ .00	\$ 563.55

251 E. Front Street, Suite 300

Boise, Idaho 83702 Tax ID No. 82-0451327 Telephone 208-343-5454 Fax 208-384-5844 Document 869-13 20126



March 31, 2025

Burton W. Wiand, Receiver

c/o Maya Lockwood Guerra & Partners, PA The Towers of Westshore

1408 N. Westshore Blvd., Ste. 1019

Tampa, FL 33607

Invoice No. 213915 Client No. 10247 Matter No. 1 Billing Attorney: JWM

#### REMITTANCE

RE: Intermountain Precious Metals LLC

BALANCE DUE THIS INVOICE

Previous Balance \$ 563.55

TOTAL BALANCE DUE \$ 878.55

**ONLINE PAYMENTS** 

Elam & Burke is committed to offering safe, secure, and convenient options to pay your bill using Visa, MasterCard, Discover, American Express, Apple Pay, Google Pay, and eCheck.

NOTE: A convenience surcharge will be applied to all of these transactions.

To pay online, please click here: Pay Now or go to: www.elamburke.com/payments

### **ACH PAYMENTS IN USD**

Account Holder: Elam & Burke, PA

Bank Name:

U.S. Bank

Branch Name:

Meridian CenterPoint Office

**Account Number:** 

82982196

**ABA Routing Number:** 

021052053

#### **CHECK PAYMENTS**

All checks should be made payable to:

Elam & Burke, PA

ATTN: Accounts Receivable 251 E. Front Street, Suite 300

\$ 315.00

Boise, ID 83702

(Please return this advice with payment.)

Please reference: Invoice 213915, File # 10247 - 1 on all payments.

INVOICES ARE PAYABLE UPON RECEIPT Thank you! Your business is greatly appreciated.

# **EXHIBIT 14**

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 Number

01/16/25

Client Number

45310

Matter Number

00001

J B Schwartz

### **Re: RECEIVER SUBPOENA MATTER**

# FOR PROFESSIONAL SERVICES RENDERED THROUGH DECEMBER 31, 2024:

<u>Date</u> 12/11/24	<u>Tkpr</u> JSS2	Analyzed motion to modify subpoena and discussed same with B. McConnell	Hours 0.5
12/12/24	JSS2	Email correspondence to P. Goldberg regarding SDNY subpoena matter	0.2
12/13/24	P-G2	Review 36-page motion to modify subpoena and corresponding exhibits as necessary to serve as local counsel in the New York Southern District	0.7
12/16/24	JSS2	Email correspondence to B. McConnell regarding subpoena matter	0.1
12/16/24	P-G2	Research regarding proper procedure when filing subpoena challenges, Local Rules in the Southern District of New York regarding the same, motions to quash or modify based on privilege, privilege claims involving paralegals, decision history of Judge Torres for discovery disputes, and other items; prepare research memorandum regarding the same	4.9

Case 8:19	-cv-00886-V	MC-SPF	Document 86		29/25	Page 3 c	of 10 PageID
	ton W. Wiand	l, as receive		.23	Iı	nvoice Nun	nber 1132518
Intl., et al. 00001 Receiver Subpoena Matter January 16, 2025					Page 2 of 2		
<u>Date</u> 12/16/24	<u>Tkpr</u> P-G2	-		th Bea McConnell g subpoena challer		SS	<u>Hours</u> 0.3
		CUR	RENT FEES				\$2,883.50
			TOTAL AMO	OUNT OF THIS IN	VOICE		\$2,883.50
~							
	of Accoun	t Receiva			DAI	ANGE	
<u>DATE</u> 09/12/24	<u>INV#</u> 1123572		<u>AMOUNT</u> 697.00	PAYMENTS 0.00		ANCE 697.00	
		PRIO	R BALANCE D	OUE			697.00

TOTAL BALANCE DUE UPON RECEIPT

\$3,580.50

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 Number

02/11/25

Client Number

45310

Matter Number

00001

J B Schwartz

### **Re: RECEIVER SUBPOENA MATTER**

# FOR PROFESSIONAL SERVICES RENDERED THROUGH JANUARY 31, 2025:

<u>Date</u> 01/08/25	<u>Tkpr</u> JSS2	Revised opposition to motion to modify subpoena and drafted email to P Goldberg regarding same.	<u>Hours</u> 0.9
01/08/25	P-G2	Prepare first round of revisions to co-counsel's draft response to motion to modify subpoena, including research regarding a receiver's interests in Ponzi scheme cases	1.4
01/09/25	P-G2	Prepare additional round of revisions to co-counsel's draft response to motion to modify subpoena, including research regarding waiver of objection when untimely made; finalize motion for filing	2.3
01/21/25	P-G2	Review reply in support of motion to modify subpoena filed by opposing counsel	0.4
01/21/25	P-G2	Prepare notice of motion, affidavit, and proposed order regarding pro hac vice admission to the Southern District of New York for Florida co-counsel	0.6

Case 8:19-	-cv-00886-V	MC-SPF	Document 86		iled 05/29/2	5 Page 5 o	of 10 PageID
	ton W. Wiand	l, as receive	201 er for Oasis	.31		Invoice Nur	mber 1134376
Intl., et al. 00001 Reco February 11	eiver Subpoer , 2025	na Matter					Page 2 of 2
<u>Date</u> 01/21/25	<u>Tkpr</u> P-G2		regarding South		t of New You	k's local	<u>Hours</u> 0.3
01/28/25	JSS2	Reviewed contempt	l and prepared p	roposed re	visions on mo	otion for	0.5
01/28/25	P-G2	incorpora comply w	otion for indirection of research ith a subpoena; onnell regarding	regarding oprepare an	contempt for	failure to	2.1
01/29/25	P-G2		evise motion for l edits and case l		-		0.6
		CUF	RRENT FEES				\$3,930.50
			TOTAL AMO	OUNT OF T	THIS INVOI	CE	\$3,930.50
Summary	of Accoun	t Receiva	ble:				
DATE 09/12/24 01/16/25	<u>INV#</u> 1123572 1132518		AMOUNT 697.00 2,883.50	PAYMI	ENTS B 0.00 0.00	697.00 2,883.50	
		PRIO	R BALANCE D	<b>D</b> UE		· 	3,580.50
		TOT	AL BALANCE	DUE UPO	ON RECEIP	Γ	\$7,511.00

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 Number

03/11/25

Client Number

45310

Matter Number

00001

J B Schwartz

### **Re: RECEIVER SUBPOENA MATTER**

# FOR PROFESSIONAL SERVICES RENDERED THROUGH FEBRUARY 28, 2025:

<u>Date</u> 02/04/25	<u>Tkpr</u> P-G2	Finalize motion for indirect civil contempt	Hours 0.3
02/07/25	P-G2	Analyze opposing counsel's ex parte email and letter request sent to the court seeking clarification; email to co-counsel, Bea McConnell regarding same	0.4
02/10/25	K-K	Docket response deadline to B Wiand's motion for civil contempt	0.2
02/10/25	P-G2	Emails with co-counsel regarding analysis of local rules and judge's individual practice rules in comparison to opposing counsel's filing	0.3
02/10/25	P-G2	Finalize motion for admission pro hac vice on behalf of co- counsel, Bea McConnell; emails with co-counsel regarding same	1.2
02/21/25	JSS2	Correspondence with B. McConnell re: pro hac vice motion.	0.2

Case 8:19	-cv-00886-V	MC-SPF Document 869-14 Filed 05/29/25 Page 7 20133	of 10 PageID	
45310 Burton W. Wiand, as receiver for Oasis Intl., et al.  Invoice Nur				
00001 Rec March 11, 2	eiver Subpoer 025	na Matter	Page 2 of 2	
<u>Date</u> 02/24/25	<u>Tkpr</u> JSS2	Finalized supplement to pro hac motion for B. McConnell for filing	Hours 0.2	
02/25/25	JSS2	Email correspondence to co-counsel re: pro hac vice motion filing	0.1	
02/25/25	ERF	Review and coordinate filing pro-hac vice motion	0.5	
02/25/25	LBW	Call clerk's office and submit pro hac vice papers; draft and file notice of appearance	0.9	
02/27/25	JSS2	Email correspondence to co-counsel re: order granting pro hac vice motion	0.1	
		CURRENT FEES	\$1,696.50	
		TOTAL AMOUNT OF THIS INVOICE	\$1,696.50	
Summary	of Accoun	t Receivable:		
DATE	INV#	AMOUNT PAYMENTS BALANCE		
09/12/24	1123572	697.00 0.00 697.00		
01/16/25	1132518	2,883.50 0.00 2,883.50 2,030.50 0.00 3,030.50		
02/11/25	1134376	3,930.50 0.00 3,930.50		
		PRIOR BALANCE DUE	7,511.00	

TOTAL BALANCE DUE UPON RECEIPT

\$9,207.50

Page 1 of 1



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.	Invoice Number	1138645
Beatriz McConnell	Invoice Date	04/11/25
Englander Fischer	Client Number	45310
721 First Avenue North	Matter Number	00000
St. Petersburg, FL 33701	J B Schwartz	

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

# F

FOR PROF	ESSIONAL	SERVICES RENDERED THROUGH MARCH 31, 2025:	
<u>Date</u> 03/10/25	<u>Tkpr</u> JSS2	Email correspondence to co-counsel re: request for briefing extension.	<u>Hours</u> 0.1
		CURRENT FEES	\$47.00
FOR COST	S ADVANC	ED AND EXPENSES INCURRED:	
	Recordi	ing Fees	<u>VALUE</u> -10.00
		CURRENT EXPENSES	-10.00

TOTAL AMOUNT OF THIS INVOICE \$37.00

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.	Invoice Number	1138649
Beatriz McConnell	Invoice Date	04/11/25
Englander Fischer	Client Number	45310
721 First Avenue North	Matter Number	00001
St. Petersburg, FL 33701	J B Schwartz	

# **Re: RECEIVER SUBPOENA MATTER**

# FOR PROFESSIONAL SERVICES RENDERED THROUGH MARCH 31, 2025:

<u>Date</u> 03/11/25	<u>Tkpr</u> P-G2	Prepare letter motion to the court seeking to strike opposing counsel's improper opposition to contempt filing; incorporate co-counsel's edits regarding same and finalize for filing	Hours 3.1
03/17/25	P-G2	Review co-counsel's draft reply in support of contempt motion and prepare responsive email regarding strategy for same	0.6
03/19/25	P-G2	Review and revise reply in support of contempt motion prepared by co-counsel, Bea McConnell; conduct and include research into same	1.1
03/20/25	JSS2	Revised reply in support of motion for contempt and drafted email to P Goldberg regarding same	0.6
03/24/25	P-G2	Review client's redlines to co-counsel's draft reply in support of contempt motion	0.4
03/26/25	P-G2	Finalize reply in support of motion for indirect civil contempt	0.9

45310 Burton W. Wiand, as receiver for Oasis Intl., et al.00001 Receiver Subpoena Matter April 11, 2025

Page 2 of 2

Invoice Number 1138649

**CURRENT FEES** 

\$2,874.50

FOR COSTS ADVANCED AND EXPENSES INCURRED:

Filing Fee  $\frac{\text{VALUE}}{200.00}$ 

CURRENT EXPENSES 200.00

TOTAL AMOUNT OF THIS INVOICE \$3,074.50

**Summary of Account Receivable:** 

DATE	<u>INV#</u>	AMOUNT	<b>PAYMENTS</b>	<b>BALANCE</b>
02/11/25	1134376	3,930.50	0.00	3,930.50
03/11/25	1136260	1,696.50	0.00	1,696.50

PRIOR BALANCE DUE 5,627.00

TOTAL BALANCE DUE UPON RECEIPT \$8,701.50

# **EXHIBIT 15**

# Case 8:19-cv-00886-VMC-SPF

Document 869-15 20138

# Filed 05/29/25 Page 2 of 4 PageID

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

#### **OASIS MANAGEMENT** January 1, 2025 through January 31, 2025

Date	Activity Category	Timekeeper	Description	Hours	Rate	4	Mount
			Reconciled MM bank statement, reconciled checking account, recorded				
1/3/2025	Accounting & Auditing	SAO	bank activity, prepared court reports	1.90	\$ 125.00	\$	237.50
1/6/2025	Accounting & Auditing	SAO	Updated account records, researched 1099 vendor information	0.60	\$ 125.00	\$	75.00
1/6/2025	Accounting & Auditing	GAH	Reviewed 1099s	0.50	\$ 155.00	\$	77.50
1/7/2025	Accounting & Auditing	GAH	Reviewed and e-filed updated 1099s	0.50	\$ 155.00	\$	77.50
1/7/2025	Accounting & Auditing	SAO	Recorded bank activity, recorded deposits	0.60	\$ 125.00	\$	75.00
1/9/2025	Accounting & Auditing	SAO	Reviewed 4th quarter reports	0.75	\$ 155.00	\$	116.25
1/10/2025	Accounting & Auditing	AAM	Printed check	0.50	\$ 125.00	\$	62.50
1/14/2025	Accounting & Auditing	GAH	Updated and reprinted 4th quarter accounting report	0.25	\$ 155.00	\$	38.75
1/14/2025	Accounting & Auditing	WEP	Reviewed 4th quarter SFAR	1.00	\$ 320.00	\$	320.00
1/16/2025	Accounting & Auditing	SAO	Recorded bank activity	0.30	\$ 125.00	\$	37.50
1/24/2025	Accounting & Auditing	SAO	Recorded bank activity	0.30	\$ 125.00	\$	37.50
1/30/2025	Accounting & Auditing	SAO	Recorded bank activity, reviewed tax document received	0.55	\$ 125.00	\$	68.75
	<b>Total Accounting &amp; Auditing</b>			7.75		\$	1,223.75
1/10/2025	Consulting	PDR	FedEx check to Edwina			\$	33.87
1/20/2025	Consulting	WEP	Researched Cayman BOI filing questions	1.00	\$ 320.00	\$	320.00
1/22/2024	Consulting	WEP	Assisted with BOI reporting	1.00	\$ 320.00	\$	320.00
1/24/2025	Consulting	WEP	Assisted with Cayman BOI filing	1.25	\$ 320.00	\$	400.00
	Total Consulting			1.25		\$	1,073.87

Total Burton Wiand as Receiver, Oasis Management

9.00

\$ 2,297.62



# Case 8:19-cv-00886-VMC-SPF Document 869-15

4023 Tampa Road, Suite 2000 Oldsmar, FL 34677

20139

Filed 05/29/25 Page 3 of 4 PageID

Phone (727) 785-4447 Fax (727) 784-5491 **OASIS MANAGEMENT** February 1, 2025 through February 28, 2025

Date	Activity Category	Timekeeper	Description	Hours	Rate	An	nount
2/3/2025	Accounting & Auditing	DRH	Updated 1099 status to accepted by IRS	0.08	\$ 150.00	\$	12.00
2/3/2025	Accounting & Auditing		Reconciled #4299 and #3838 bank statements, recorded bank activity	1.20	\$ 125.00		150.00
2/12/2025	Accounting & Auditing  Total Accounting & Auditing	SAO	Recorded bank activity	0.30 <b>1.58</b>	\$ 155.00		46.50 <b>208.50</b>
2/11/2025	Tax	GAH	Packaged data for tax return preparation	0.25	\$ 150.00	\$	37.50
2/11/2025	Tax	WEP	Reviewed and finalized tax return	3.00	\$ 320.00	\$	960.00
	Total Tax			1.25		\$	997.50

Total Burton Wiand as Receiver, Oasis Management

2.83

\$ 1,206.00



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

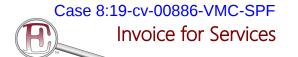
# OASIS MANAGEMENT March 1, 2025 through March 31, 2025

Date	Activity Category	Timekeeper	Description	Hours	R	Rate	Amount	
3/1/2025	Accounting & Auditing	SAO	Updated Quickbooks	0.30	\$ ^	150.00	\$	45.00
3/3/2025	Accounting & Auditing	SAO	Reconciled #4299 and MM statements, recorded bank activity	0.90	\$ ^	125.00	\$	112.50
3/10/2025	Accounting & Auditing	SAO	Recorded bank activity	0.30	\$	155.00	\$	46.50
	Total Accounting & Auditing			1.50			\$	204.00

**Total Burton Wiand as Receiver, Oasis Management** 

<u>1.50</u> \$ 204.00

# **EXHIBIT 16**



### Document 869-16 20142

Filed 05/29/25

All funds payable to:

Page 2 of 4\_PageID E-Hounds, Inc.

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

Open Date	Close Date	Invoice #	Balance Due	Case Reference (E9295)	Terms
01/01/2025	01/31/2025	59772	\$1715.00	CFTC v. Oasis, et al.	Due on Receipt

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

Case Contact: Burton W Wiand PA **Burt Wiand** 727-460-4679

Q	Date	Expedited	All quantities are based Hourly unless otherwise noted	Tech	Price	Ext
2	01/01/2025	E-Hound	ls Review Platform (Courtesy Rate Monthly)		\$595.00	\$1190.00
1	01/01/2025	E-Hound	ls Review Platform Add'l Users (per user) Legacy Rate Eflegal user		\$125.00	\$125.00
2	01/01/2025	E-Hound	ds Review Platform Add'l Users (per user) Legacy Rate GK users (astephens; burt@burtonwwiandpa.com		\$125.00	\$250.00
1	01/23/2025	E-Hound	ls Review Platform Add'l Users (per user) jessica@sallahlaw.com		\$150.00	\$150.00

All balances are due upon receipt. Thank you!

**SUBTOTAL** 

\$1715.00

Payments Applied

TOTAL

\$1715.00

**Balance Due** 

\$1715.00

Please note: Our fees are subject to change annually.

### Statement of Limited Liability and Financial Responsibility

E-Hounds, Inc. shall not be liable under any circumstances for any special, consequential, or exemplary damages arising from the use or misuse of data or equipment after it has been returned to the client and/or owner(s). E-Hounds shall not be liable for the continued storage of recovered data for more than 30 days unless otherwise specified in writing by the client. Any problems with recovered data storage of recovered data for more than 30 days unless otherwise specified in writing by the client. Any problems with recovered data must be reported to E-Hounds within 5 business days of receipt. Property and/or equipment held for legal matters is held for 1 Year at the client's request or upon case closure. Additional storage fees may apply to extended storage/maintenance. ABSOLUTELY NO REFUNDS. This invoice is made under the fee agreement signed on behalf of the above listed client. As stated in the Fee Agreement for E-Hound's services, Final billing must be satisfied before the final release of equipment or finding/reporting. All billing is DUE ON RECEIPT, unless stated otherwise above. All unpaid balances over 30 days will be subject to a 1.5% fee per month. Any unpaid balances over 60 days will be subject to equipment liquidation, collection process and reasonable attorney's fees incurred in collection. Services by E-Hounds is responsibility of that agency, agent, or party contracting for the services, and payment for such services is the sole liability and responsibility of that agency, agent, or party, and is not transferrable or assignable.

E-Hounds also accepts:





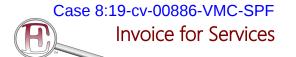


Venmo: @ehounds support@ehounds.com





venmo



# Document 869-16 20143

# Filed 05/29/25

All funds payable to:

# Page 3 of 4\_PageID E-Hounds, Inc.

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

Open Date	Close Date	Invoice #	Balance Due	Case Reference (E9295)	Terms
02/01/2025	02/28/2025	60630	\$1715.00	CFTC v. Oasis, et al.	Due on Receipt

Invoice to: Burton W Wiand PA 114 Turner Street Clearwater, Fl 33756 Case Contact: Burton W Wiand PA **Burt Wiand** 727-460-4679

Q	Date	Expedited All quantities are based Hourly unless oth	nerwise noted Tech	Price	Ext
2	02/01/2025	E-Hounds Review Platform (Courtesy Rate Monthly)		\$595.00	\$1190.00
1	02/01/2025	E-Hounds Review Platform Add'l Users (per user) Legacy Rate Eflegal use	r	\$125.00	\$125.00
2	02/01/2025	E-Hounds Review Platform Add'l Users (per user) Legacy Rate GK users (	astephens; burt@burtonwwiandpa.com	\$125.00	\$250.00
1	02/23/2025	E-Hounds Review Platform Add'l Users (per user) jessica@sallahlaw.com		\$150.00	\$150.00

All balances are due upon receipt. Thank you!

**SUBTOTAL** 

\$1715.00

Payments Applied

TOTAL

\$1715.00

**Balance Due** 

\$1715.00

Please note: Our fees are subject to change annually.

### Statement of Limited Liability and Financial Responsibility

E-Hounds, Inc. shall not be liable under any circumstances for any special, consequential, or exemplary damages arising from the use or misuse of data or equipment after it has been returned to the client and/or owner(s). E-Hounds shall not be liable for the continued storage of recovered data for more than 30 days unless otherwise specified in writing by the client. Any problems with recovered data storage of recovered data for more than 30 days unless otherwise specified in writing by the client. Any problems with recovered data must be reported to E-Hounds within 5 business days of receipt. Property and/or equipment held for legal matters is held for 1 Year at the client's request or upon case closure. Additional storage fees may apply to extended storage/maintenance. ABSOLUTELY NO REFUNDS. This invoice is made under the fee agreement signed on behalf of the above listed client. As stated in the Fee Agreement for E-Hound's services, Final billing must be satisfied before the final release of equipment or finding/reporting. All billing is DUE ON RECEIPT, unless stated otherwise above. All unpaid balances over 30 days will be subject to a 1.5% fee per month. Any unpaid balances over 60 days will be subject to equipment liquidation, collection process and reasonable attorney's fees incurred in collection. Services by E-Hounds is responsibility of that agency, agent, or party contracting for the services, and payment for such services is the sole liability and responsibility of that agency, agent, or party, and is not transferrable or assignable.

E-Hounds also accepts: Venmo: @ehounds



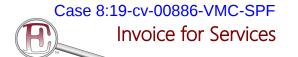


support@ehounds.com





venmo



### Document 869-16 20144

Filed 05/29/25

All funds payable to:

# Page 4 of 4 PageID E-Hounds, Inc.

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

Open Date	Close Date	Invoice #	Balance Due	Case Reference (E9295)	Terms
03/01/2025	03/31/2025	61290	\$1715.00	CFTC v. Oasis, et al.	Due on Receipt

Invoice to: Burton W Wiand PA 114 Turner Street Clearwater, Fl 33756 Case Contact: Burton W Wiand PA **Burt Wiand** 727-460-4679

Q	Date	Expedited All quantities are based Hourly unless otherwise noted	Tech	Price	Ext
2	03/01/2025	E-Hounds Review Platform (Courtesy Rate Monthly)		\$595.00	\$1190.00
1	03/01/2025	E-Hounds Review Platform Add'l Users (per user) Legacy Rate Eflegal user		\$125.00	\$125.00
2	03/01/2025	E-Hounds Review Platform Add'l Users (per user) Legacy Rate GK users (astephens; burt@burtonwwiandpa.com		\$125.00	\$250.00
1	03/01/2025	E-Hounds Review Platform Add'l Users (per user) jessica@sallahlaw.com		\$150.00	\$150.00

All balances are due upon receipt. Thank you!

**SUBTOTAL** 

\$1715.00

Payments Applied

TOTAL

\$1715.00

**Balance Due** 

\$1715.00

Please note: Our fees are subject to change annually.

# Statement of Limited Liability and Financial Responsibility

E-Hounds, Inc. shall not be liable 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 or owner. Recovered data will be stored for 30 days unless otherwise specified in writing by the client. All issues with recovered data must be reported within 5 business days of receipt. Property or equipment held for legal matters will be retained for up to 1 year upon case closure or at the client's written request. Additional fees may apply for extended storage or maintenance. ABSOLUTELY NO REFUNDS.

This invoice is issued under the Fee Agreement signed by the client. Final payment must be received before the release of any equipment, findings, or reporting. All invoices are due upon receipt, unless otherwise stated. Unpaid balances over 30 days are subject to a 1.5% monthly late fee. Balances unpaid after 60 days may result in equipment liquidation, initiation of collections, and recovery of reasonable attorney's fees. All services are provided on behalf of the contracting agency, agent, or party, who is solely responsible for payment. Payment responsibility is not transferable or assignable.

E-Hounds also accepts:







Venmo: @ehounds

support@ehounds.com





# **EXHIBIT 17**



Oasis International Group, Ltd.

 PO Box 309
 Invoice No.
 4633929

 Ugland House
 Date
 10-Apr-25

 Grand Cayman
 Client No.
 679481.000001

 KY1-1104
 Contact
 Finn OHegarty

 Cayman Islands
 Page
 1

#### INVOICE

Legal Fees (see below)	
To our charges for professional services rendered by this firm for the period ending on 10 April 2025.	3,337.50
Total Fees	3,337.50
TOTAL BALANCE DUE	US\$3,337.50

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

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

Beneficiary Bank: Butterfield Bank (Cayman) Ltd, PO Box 705, 12 Albert Panton Street, Grand Cayman KY1-1107 SWIFT BIC: BNTBKYKYXXX | Beneficiary: Maples and Calder (Cayman) LLP | Beneficiary Account: 0110103434400 Intermediary Bank: BNY Mellon, One Wall Street, New York, NY 10286 | SWIFT BIC: IRVTUS3NXXX

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

Remitter's full physical address must be included to avoid funds being returned.

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

Or

A USD draft drawn on a United States bank which should be couriered to our address quoting our reference 679481 - 4633929

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

Case 8:19-cv-00886-VMC-SPF Document 869-17 Filed 05/29/25 Page 3 of 3 PageID 20147

 Invoice No.
 4633929

 Date
 10-Apr-25

 Client No.
 679481.000001

 Contact
 Finn OHegarty

 Page
 2

**Fee Detail** 

29-Jan-25 Cousins, Brittany
Discussions with Finn O'Hegarty concerning company's BOTA analysis.
Review company's records and prepare BOTA analysis.

29-Jan-25 OHegarty, Finn Internal discussions re beneficial ownership analysis. E-mail

correspondence.

30-Jan-25 OHegarty, Finn Attention to beneficial ownership. Internal discussions re the same.

31-Jan-25 Cousins, Brittany Send prepared BOTA analysis to client. Respond to Maya Lockwood's

comments concerning the obligations of beneficial owners.

31-Jan-25 OHegarty, Finn Attention to beneficial ownership register. E-mail correspondence.

10-Feb-25 Cousins, Brittany Confirm filing of BOTA spreadsheet with Maya Lockwood.

Total US\$ 3,337.50

# 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,

Kelief Defendant	s.
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**ORDER** 

This cause comes before the Court for consideration of the Receiver's Twenty-Fourth 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-Fourth 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	\$13,303.06
Guerra & Partners, P.A.	\$5,811.00
Johnson Newlon & DeCort	\$1,944.00
Jared J. Perez P.A.	\$4,768.00
Englander Fischer	\$10,727.00
Elam & Burke	\$736.70
Phillips Lyte LLP	\$11,622.00
PDR CPAs	\$3,707.62
E-Hounds, Inc.	\$5,145.00
Maples Group	\$3,337.50

DONE AND ORDERED at Tampa, Florida, this day of

2025.