FILED - USDC - FLMD - ORL
OCT 26 2026 PM 2:51

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

COMMODITY FUTURES TRADING COMMISSION, Plaintiff, v. OASIS INTERNATIONAL GROUP, LIMITED, ET AL., Defendants.	Case No. 8:19-cv-886-VMC-SPF

RESPONDENT MICHAEL J. DACORTA'S OBJECTION TO THE RECEIVER'S MOTION FOR ORDER AWARDING FEES, COSTS, AND REIMBURSEMENT OF COSTS RELATING TO CONTEMPT PROCEEDINGS (DOC. 1000)

Respondent Michael J. DaCorta, appearing pro se from FCI Coleman Camp, objects to the Receiver's Motion for Order Awarding Fees, Costs, and Reimbursement of Costs Relating to Contempt Proceedings (Doc. 1000) (the "Fee Motion"), which seeks a $239,306.36 award against him, jointly and severally. This objection is timely under Local Rule 3.01(d). His appeal of the September 4, 2026 Order (Doc. 989) is pending (11th Cir. No. 26-13417-A; Doc. 992). The Court denied his Motion to Vacate or, in the Alternative, for Reconsideration on October 21, 2026 (Doc. 1001). Nothing here concedes any finding in Doc. 989.

I. THE COURT SHOULD DEFER ANY AWARD AGAINST MR. DACORTA UNTIL THE APPEAL IS RESOLVED.

Any fee award under Doc. 989 depends on Doc. 989. If the Eleventh Circuit vacates or reverses, the Receiver's entitlement disappears and any judgment against Mr. DaCorta would have to be unwound.

Deferral costs the Receiver nothing. By his own account, the $63,125.15 in first- and second-quarter fees and costs has "already" been paid from the Receivership (*id.* at 3), and he asks that the $176,181.21 in third-quarter fees and costs be paid "initially from the Receivership" (*id.* at 12). He also says that, given Mr. DaCorta's incarceration, collection "might prove difficult." *Id.* Nothing is gained by entering a joint-and-several award against an incarcerated Respondent, unrepresented in this Court, while the order that supports it is under review. Mr. DaCorta asks the Court to defer ruling on the Fee Motion as to him, or deny it as to him without prejudice to renewal, and, if it rules, to stay enforcement pending the appeal, as addressed in his separately filed motion to stay.

II. THE AWARD MUST BE LIMITED TO REASONABLE FEES AND COSTS CAUSED BY THE VIOLATIONS FOUND.

Doc. 989 entitles the Receiver to "reasonable attorneys' fees and costs incurred in prosecuting Respondents' violations of the Consolidated Order," and directs Respondents to pay fees "reasonably and necessarily incurred in prosecuting Respondents' violations." Doc. 989 at 85–86. The Court grounded that

award in a compensatory sanction, "in an amount necessary to compensate the complainant . . . for losses and expenses . . . incurred because of the contemptuous act." *Id.* at 85 (quoting *In re Ocean Warrior, Inc.*, 835 F.3d 1310, 1320 (11th Cir. 2016)). Such a sanction is limited to fees that would not have been incurred but for the misconduct found. *Cf. Goodyear Tire & Rubber Co. v. Haeger*, 581 U.S. 101, 108–09 (2017). The party seeking fees must document the hours and show they were reasonably expended, and excessive, redundant, or unnecessary hours must be excluded. *Hensley v. Eckerhart*, 461 U.S. 424, 433–34 (1983). The Consolidated Order likewise makes the Receiver's fee applications "interim" and "subject to cost benefit and final reviews." Doc. 177 at 24 (¶ 62).

The Receiver's own submission shows why that scrutiny is needed. He concedes that "[n]ot all charges in the invoices relate to the show cause proceedings," and that he alone selected which entries to highlight as related. Doc. 1000 at 13 n.2. He certifies that "[n]o tasks were duplicated." *Id.* at 19. The invoices he attached show otherwise.

The Receiver has also said that this spending comes out of money available to victims. At the March 24 status conference he said he would "have gone gangbusters at it, but I can't do that because it's spending money." Doc. 907 at 14:20–15:2. The Court has voiced the same concern: in December 2022 it observed that "it's a lot of money" and "less money for the victims." Dec. 22, 2022 Hr'g Tr.

(hearing at Doc. 703), Ex. A at 10:15–16, 11:18–19. The Receiver's fiduciary responsibility to preserve and distribute estate assets does not make every investigative or enforcement expense compensable against an individual respondent.

The Court has asked the Receiver to account for contempt-related billing before. In February 2025, considering the Twenty-Third Interim Motion (Doc. 856), it noted that the Twenty-Second Interim Motion "billed extensively for work related to the Receiver's motion for contempt (Doc. # 834) filed in this Court," a motion denied because it "was filed in the incorrect court," and directed him to explain "why it is appropriate for these payments to be made from funds allocated for the victims." Doc. 859. The Receiver reduced his request by $10,315.00 and acknowledged that his decision "was incorrect," stating that he "will personally bear the cost of all attorneys' fees incurred in connection with filing the Motion for Contempt in this Court." Doc. 861-1 at 4; Doc. 862 at 2.

III. SPECIFIC OBJECTIONS

The figures below come from the highlighted entries in the Receiver's own exhibits (Docs. 1000-1 through 1000-6) and are stated as minimums.

A. Work on the March 2026 status conference is not work "prosecuting Respondents' violations."

The Receiver describes the first stage of his work as "preparation for a status conference, which led to a motion for an order to show cause." Doc. 1000 at 2. The

earliest highlighted entries concern the "27th interim report" and "upcoming status conference" (Doc. 1000-1 at 5); the conference took place on March 24, 2026 (Doc. 901). The Twenty-Seventh Interim Report was filed on January 27, 2026 (Doc. 889), so the first highlighted entry concerns a report completed weeks earlier, and Doc. 1000 was not filed until October 13, 2026, more than eight months after it. The Receiver says he "repeatedly and loudly warned" of the Helpers Group's conduct "for years" and, "[s]ince July 2024," has filed "an additional 7 interim reports addressing these matters." Doc. 919 at 2–4 & n.3. Those reports are required every quarter in any event, Doc. 177 at 21–22 (¶¶ 55–56), so preparing them is not prosecution of a violation. The Receiver did not move for an order to show cause until April 3, 2026 (Doc. 904), and the first entries referring to a show-cause motion are dated March 25 and 26 (Doc. 1000-2 at 4). Billing through March 24 includes:

Timekeeper	**Entries through 3/24/26**	**Hours**	**Fees**
B. Wiand (Receiver)	Doc. 1000-1 at 5–6	14.2	$5,112.00
M. Lockwood	Doc. 1000-2 at 3–10	26.6	$6,384.00
K. Paulson	Doc. 1000-2 at 3–10	5.6	$756.00
J. Perez (PowerPoint for status conference, 3/19–3/24)	Doc. 1000-3 at 2	23.6	$7,552.00
M. Gura	Doc. 1000-4 at 3–4	12.5	$1,687.50
Total		82.5	$21,491.50

The March 24 transcript confirms the sequence. The Court said it did not know what was appropriate "without a motion from you or a request from you," and invited a show-cause motion within about ten days. Doc. 907 at 62:10–20,

64:1–4. No such motion existed at the conference, and the Receiver did not identify Mr. DaCorta, who was in federal custody and did not attend, as its target. *Id.* at 54:24–55:3.

Preparing for a status conference on the Receiver's own 27th interim report is ordinary receivership administration; he would have prepared that report whether or not anyone violated the Consolidated Order. These fees should be disallowed as to Mr. DaCorta or, at a minimum, the Receiver should show why each entry was caused by the violations found in Doc. 989.

B. Fees for opposing Mr. Preziosi's motion and negotiating his settlement.

The Fee Motion includes the "negotiation and approval of a settlement with respondent Stephen Preziosi" (Doc. 1000 at 2) and the time spent opposing the reconsideration motion Mr. Preziosi himself filed (Doc. 940) (*id.* at 8), neither of which Mr. DaCorta brought. The Receiver says Mr. Preziosi was discharged in exchange for documents and information (*id.* at 8–9). Mr. Perez's invoice alone bills at least 24.6 hours ($7,872.00) to these tasks: 16.2 hours on the opposition (7/4–7/19) and 8.4 hours on "S. Preziosi settlement issues" and the joint motion to discharge (7/22–7/25). Doc. 1000-3 at 8–10. A settlement with another respondent, made for the Receivership's benefit, is not a cost of "prosecuting" Mr. DaCorta's violations.

The Receiver also says he "was required to investigate the veracity of" each affiant supporting Mr. Preziosi's motion (Doc. 1000 at 8), but the invoices fold that work into entries covering other tasks (*e.g.*, Doc. 1000-2 at 25–27, 30). The Receiver should identify those entries.

C. Costs of locating and serving the other Respondents.

According to the Receiver, three of the four Respondents never responded to counsel, did not attend the hearing, and made no filings. Doc. 1000 at 20. Much of the service effort was directed at them: $2,051.00 for process servers and $541.80 for "repeated attempts to locate Respondents" (*id.* at 13, 15), plus at least 6.1 hours ($1,952.00) on service on Mr. Melick alone (Doc. 1000-3 at 8–11) and 2.8 hours ($896.00) on June 11–12 on "service issues" (*id.* at 5). The Court continued the July 15 hearing "[i]n light of the service and authentication issues discussed by the Receiver" (Doc. 945), and the Receiver describes those issues as concerning Winters, Melick, and McKee, who "ignored the Receiver's communications and otherwise evaded service." Doc. 1000 at 6. Mr. DaCorta, by contrast, has been in federal custody since his October 20, 2022 sentencing, and locating him required no process servers or investigators. The Marshals took him from Coleman on July 10, 2026 for what was then a July 15 hearing. As he told the Court in Doc. 963, he was held at the Pinellas County Jail and then at the Federal Detention Center in

Miami and was not returned to Coleman until July 29, nineteen days later. Doc. 963 ¶¶ 1–31. None of these amounts was caused by Mr. DaCorta.

Mr. DaCorta is incarcerated and, in this Court, unrepresented. The criminal court, having "assessed [his] ability to pay," waived any fine and set payment at $25 per quarter, or 50% of any prison earnings, while he is in custody. Judgment, *United States v. DaCorta*, No. 8:19-cr-605-WFJ-CPT, Doc. 234 at 6 (M.D. Fla. Oct. 20, 2022). He is serving a 276-month (23-year) sentence and is subject to a criminal restitution order of $53,270,336.08. *Id.* at 2, 6. He was represented at sentencing by appointed counsel under the Criminal Justice Act (*id.* at 1), and the Receiver told the Court as early as 2019 that he "has a public defender." Doc. 199 at 2. Mr. DaCorta states that the criminal court determined him to be indigent, a finding reflected in that court's record. These circumstances raise a practical question about the purpose and proportion of further enforcement spending directed at him. The Receiver has not said what he expects to recover from him on a joint and several award of $239,306.36, and he should be required to explain what realistic recovery he expects and whether the cost of pursuing it is justified by any benefit to the estate.

D. Duplicated work by multiple timekeepers.

The Receiver says that "[n]o tasks were duplicated." Doc. 1000 at 19. The invoices show repeated, overlapping staffing of the same tasks.

Meetings and hearing. On July 10 the Receiver, Mr. Perez, and Ms. Lockwood each billed 5.5 hours for the same in-person hearing-planning meeting, and on August 3 each billed 4.0 hours for the same preparation meeting: 28.5 hours and $8,740.00 for two meetings. Doc. 1000-1 at 19, 22; Doc. 1000-2 at 27, 34; Doc. 1000-3 at 8, 10–11. Four timekeepers (the Receiver, Mr. Perez, Ms. Lockwood, and paralegal Ms. Gura) billed to attend the five-hour hearing on August 7, together 21.6 hours and $5,658.50, in addition to the expert's 4.0 hours. Doc. 1000-1 at 23; Doc. 1000-3 at 11; Doc. 1000-2 at 35; Doc. 1000-4 at 10. The transcript reflects that Mr. Perez conducted the examinations; Ms. Lockwood's only recorded statement was her appearance. Tr. 5:14–15.

Exhibits and filings. From July 3 through July 8, Ms. Gura billed 34.8 hours ($4,698.00) to compiling hearing exhibits, and on July 5–7 Mr. Perez billed 19.3 hours ($6,176.00) to "[r]eview dozens of lender update documents to identify exhibits." Doc. 1000-4 at 8–9; Doc. 1000-3 at 8. Mr. DaCorta's short pro se motion to dismiss (August 5) was reviewed and billed by the Receiver, Ms. Lockwood, Mr. Perez (0.5 hour "to consider whether any response is necessary"), and Ms. Gura. Doc. 1000-1 at 23; Doc. 1000-2 at 35; Doc. 1000-3 at 11; Doc. 1000-4 at 10.

The Receiver's testimony. The Receiver's testimony occupies pages 56 through 126 of the 138-page transcript, roughly half the record; Mr. DaCorta's cross-examination of him occupies two of those pages (Tr. 119–121). The Receiver

billed 5.0 hours at $360 to "[a]ttend and testify" and 0.6 hour to review his own direct outline, and Mr. Perez billed 12.1 hours to draft that outline and prepare the Receiver, a combined 17.7 hours and $5,888.00. Doc. 1000-1 at 22–23; Doc. 1000-3 at 10–11. Much of that testimony described the Receivership and the alleged scheme generally. *Cf. SEC v. Davison*, No. 8:20-cv-325-MSS-NHA, Doc. 1405 at 15 (M.D. Fla. Mar. 30, 2026) (Mr. Perez's meeting attendance "unnecessary"), *adopted and $910.00 denied*, Doc. 1410 (May 11, 2026). At a minimum, the Court should disallow duplicate attendance and review time and limit recovery for each meeting or event to the timekeeper necessary to do the work.

E. Attorney rates for clerical and investigative tasks.

Several entries bill clerical tasks at attorney rates, for example Mr. Perez's "[u]pdate service dossier . . . and research additional servers or private investigators" (Doc. 1000-3 at 9); the Receiver's "[r]eview docket text regarding deadline for requesting redaction of hearing transcript" (Doc. 1000-1 at 23); and Ms. Lockwood's "identify and resolve discrepancies in Receiver's and J. Perez's exhibit binders" (Doc. 1000-2 at 34–35). These entries should be reduced to the paralegal rate or disallowed.

F. The expert's fees.

KapilaMukamal seeks $20,578.65 for 45.0 hours. Doc. 1000-5 at 2–4. That includes 8.0 hours of Ms. Davis's travel from Fort Lauderdale to Tampa and back

($2,760.00) plus $399.76 in mileage, and 21.4 hours ($10,914.00) of Ms. Weiss's time on "reconstruction of Trust LLT" accounts. *Id.* at 3. Ms. Davis bills $690 an hour and Ms. Weiss $510 (Doc. 1000 at 17): 22.3 hours ($15,387.00) and 22.7 hours ($11,577.00), a subtotal of $26,964.00 before the discount and expenses that produce the sum sought. As Mr. DaCorta explained in Doc. 990, Ms. Davis's testimony did not connect him to the transfers at issue, and she was not asked to trace where the individual contributors obtained the money they contributed. *See* Tr. 48:8–13. At a minimum, the travel time and mileage should be disallowed, and entries giving no subject matter ("[t]c with counsel") should be described more fully.

G. Other costs.

Copying ($5,883.15). The Receiver lists two charges from Tampa Legal Copies with no page counts, rate, or description. Doc. 1000-1 at 25. JND's own invoice prices printing at $0.05 per page (Doc. 1000-4 at 11); at that rate $5,883.15 would represent roughly 117,000 pages. The charge should be itemized.

Devine travel and lodging ($1,569.51). Mr. Devine testified that Mr. DaCorta never contacted him and that he had no knowledge connecting Mr. DaCorta to the matters at issue. Tr. 44:10–45:3, 45:19–24. Sonja Devine did not testify; the transcript's witness index lists only Mr. Devine, Ms. Davis, and the Receiver (Tr. 3). The Receiver nonetheless billed travel and preparation time for

"T. and S. Devine" (Doc. 1000-1 at 23, 25; Doc. 1000-2 at 35). The cost should be itemized and not charged to Mr. DaCorta.

Video transcription ($1,539.00) and E-Hounds ($140.00). These charges relate to YouTube videos "made by Respondents" (Doc. 1000 at 13), but the Receiver does not say Mr. DaCorta made or appeared in them.

H. Billing guidelines and review.

The Receiver says one firm's time was billed "consistent with CFTC billing guidelines" (Doc. 1000 at 17) and that the CFTC does not oppose the motion (*id.* at 20). He does not say that the CFTC reviewed the underlying invoices, or that the entries described above comply with those guidelines. A statement that a party does not oppose a request is not a review of the time entries. In December 2022, addressing CFTC counsel, Ms. Auxter, about the Receiver's fee numbers, the Court said: "I just -- I just look at those numbers, I do get concerned about it and just hope that somebody is looking at it, you know, other than me. I mean, I hope you are because you're the one here who we look to to make certain as much money as possible is made available to those from whom it's been taken." Dec. 22, 2022 Hr'g Tr., Ex. A at 19:4–9. Ms. Auxter responded that the CFTC has "those discussions in the background, kind of the cost-benefit analysis of recovering certain sums," and is "really trying to make sure that the benefit that we're getting justifies the costs." *Id.* at 19:11–14. Itemized invoices are not a showing of

necessity: Part III.D shows several timekeepers billing the same meetings and hearing, and, as noted above, the Receiver concedes that some charges do not relate to the show cause proceedings. Doc. 1000 at 13 n.2. The Receiver bears the burden of documenting the amount and necessity of the fees he seeks, and he controls the records on which the request rests. Mr. DaCorta cannot independently verify undisclosed work records or internal allocations, and the Court should not treat an inability to identify hidden discrepancies as affirmative proof that the charges are reasonable.

IV. JOINT AND SEVERAL LIABILITY AND THE PREVIOUSLY APPROVED AMOUNTS

Joint and several liability. Doc. 989 makes Respondents jointly and severally liable, but only for fees "reasonably and necessarily incurred in prosecuting Respondents' violations." Doc. 989 at 85–86. Joint and several liability determines who may be called on to pay amounts that qualify; it does not enlarge what qualifies. The Receiver describes "violations committed by at least four people over several years" (Doc. 1000 at 19), and the categories in Part III were not "reasonably and necessarily incurred in prosecuting" the violations found, no matter who is held to pay. Mr. DaCorta, an incarcerated Respondent, unrepresented in this Court, who was brought to a single hearing from federal custody under a writ of habeas corpus ad testificandum (Doc. 928 at 1), asks that

the Court make specific findings excluding those amounts from any joint obligation.

Previously approved amounts. Doc. 1000 states that $63,125.15 of the amount sought was already approved in the Twenty-Eighth and Twenty-Ninth Interim Motions (Docs. 924, 930, 988, 991) and paid to the Receiver and his professionals from the estate, and that he now seeks reimbursement from Respondents. Doc. 1000 at 3–4, 11–12. Those motions were reviewed as ordinary quarterly applications, before the contempt finding. The Receiver attached the invoices to Doc. 1000 with his own highlighting added. Doc. 1000 at 13 n.2. Whether a given entry was "reasonably and necessarily incurred in prosecuting Respondents' violations" is therefore a question the Court has not decided as to Respondents. He asks that the Receiver identify the charges that do not relate to the show cause proceedings, as the Receiver acknowledges some do (Doc. 1000 at 13 n.2), and explain how any recovery from Respondents will be credited to the Receivership so that no expense is recovered twice.

Further fees. The Receiver states that Doc. 989 authorizes fees only through its date, September 4, 2026, and that he intends to seek more later. Doc. 1000 at 11. Mr. DaCorta objects in advance to any request for time after that date, including time spent preparing the Fee Motion, unless the Court first determines that such time is authorized and reasonable.

Continued cost of the Receivership. The Receiver's fee motions have been filed quarterly since 2019, and Doc. 988 was the twenty-ninth. A summary of all twenty-nine motions and the Court's orders is attached as Exhibit B. In opposing reconsideration, the Receiver's counsel, Ms. Lockwood, titled Section V of the opposition "THE RECEIVER'S FEES ARE NOT RELEVANT ASIDE FROM THE FACT THAT DACORTA SHOULD PAY THEM," and told the Court that "[t]he Court always scrutinizes the Receiver's fee applications, and DaCorta does not identify any charges that are purportedly incorrect or improper." Doc. 994 at 15. She called the concern about the share of fees devoted to the show cause proceedings "meaningless" twice, explaining that "*[o]f course, ongoing proceedings will generate more fees than completed proceedings*," while acknowledging that "most of the projects that required expenditures from the Receivership Estate have already been completed." *Id.* at 16 (emphasis in original). That answer misses the point. Ongoing proceedings can produce additional invoices, but their continuation is not proof that each hour was necessary or caused by a violation attributable to Mr. DaCorta. The Court has since said that it "cannot correct an unidentified error." Doc. 1001 at 14. This objection identifies the charges, and the Receiver himself predicts that more will follow.

The Receiver's reports also leave unexplained how some estate assets were handled. The asset schedule reports a single figure of $657,382.25 for "all Metals"

sold, without identifying the buyer, date, or price of any item, and lists 250 ounces of gold that, at the report's own July 2026 gold price, would alone be worth roughly $1.0 million. Doc. 988-2. The same report values $322,000 in gold coins it attributes to the Helpers Group at the July 28, 2026 spot price, "now valued at approximately $684,216." *Id.* at 16 & n.8. The Receiver values gold at today's price when it suits him, but the schedule gives no sale date or price for the metals the Receivership sold. The Receiver's liquidation of precious metals illustrates the need for transparent asset-level accounting. Mr. DaCorta has closely monitored precious-metals prices and maintains that silver accounted for the greater part of the subsequent appreciation of the seized metals, appreciating faster and more substantially than gold in percentage terms over the period he followed. In November 2019, Mr. DaCorta specifically raised concerns that selling the metals could deprive Oasis lenders of future appreciation. His emails with the Receiver's counsel of November 4–5, 2019 are attached as Exhibit C. Adding the quantities in its entries, the schedule lists about 18,025 ounces of silver (100-ounce bars and one-ounce coins) and 250 ounces of gold, every item marked "Forfeited; Sold," but gives no sale date or price for any of them. The schedule also lists a 2017 Maserati (estimated value $60,800.00; lien $43,528.88) as "Forfeited; Abandoned After Further Investigation," with $0.00 recovered, and does not say what the

investigation found. Doc. 331-23 at 52; Doc. 988-2. Mr. DaCorta asks only for an accounting.

The Receiver's own report states that, "[o]ther than efforts to stop the Helpers Group's continued fraud, interference with the Receivership, and violation of this Court's orders and the ATC Litigation, the work of Receiver is substantially complete." Doc. 988-2 § VI. What remains, in other words, is litigation, and the show-cause proceeding has become a principal source of new billing: it now supports a $239,306.36 request against individuals whom the Receiver himself says may be unable to pay. Doc. 1000 at 12. Until those fees are collected, the estate bears them. The Receiver also reports that the ATC case is set for jury trial in May 2028 and that he "intends to continue aggressively prosecuting this action." Doc. 988-2 at 22. Mr. DaCorta asks that, before further litigation at the estate's expense, the Court require an updated statement of the probable recovery, estimated cost, likelihood of success, and effect on the timing of final distributions, together with a proposed schedule for terminating the Receivership. The same is true of collection. Even if the Receiver is permitted to collect from an incarcerated respondent whose ability to pay the criminal court has already assessed (Part III.C above), doing so would cost the estate attorney time and is likely to return very little. A receivership should not continue indefinitely merely because continued litigation generates additional work for the professionals administering it.

The Consolidated Order makes the Receiver's authority to investigate and bring actions "[s]ubject to his obligation to expend receivership funds in a reasonable and cost-effective manner." Doc. 177 at 19 (¶ 44). It provides that every fee application is "interim" and "subject to cost benefit and final reviews," and that the Receiver will ultimately describe "in detail the costs and benefits associated with all litigation and other actions pursued." *Id.* at 24 (¶ 62). Doc. 1000 addresses neither standard. It acknowledges that "collection of any such award might prove difficult" (Doc. 1000 at 12), yet does not state what recovery the Receiver expects or why $239,306.36 in fees is cost-effective against it, although each quarterly report must address the "likelihood of success in . . . collecting such judgments." Doc. 177 at 22 (¶ 56(E)). Mr. DaCorta asks that the Receiver be required to state that expectation. Many of the entries in the supporting invoices are general in description, such as reviewing or exchanging correspondence, and are billed in tenths of an hour. Mr. DaCorta asks that the Receiver identify, for each highlighted entry, the contempt-related purpose it served, and reconcile the highlighted entries to the $63,125.15 and $176,181.21 stated in Doc. 1000. He also asks the Receiver to confirm that no time spent preparing or reviewing fee motions, including the September 10–30, 2026 entries on Wiand P.A. Invoice 183 (Doc. 1000-2 at 36–37) and the January 30, 2026 entry on the Receiver's first-quarter invoice, is included in the amounts sought here or in any later application, consistent with the CFTC

Billing Instructions referenced in Doc. 988 at 8 n.10. Finally, the Consolidated Order provides that a fee application "may be subject to a holdback in the amount of 20%." Doc. 177 at 24 (¶ 63). Mr. DaCorta asks whether any holdback has been applied and, if any amount is paid before the appeal and the cost-benefit review, asks the Court to consider one.

Service and conferral. The certificate of service lists, as his email address, an address belonging to a family member. On October 13, 2026, the Receiver's office emailed Doc. 1000 to that address. The Receiver has no direct way to email Mr. DaCorta, who has not consented in writing to email service, *see* Fed. R. Civ. P. 5(b)(2)(E); an email to a family member is not service on him. He received the mailed copy of Doc. 1000 on October 16, 2026, and asks that any time to supplement this objection run from the date he received the complete motion and exhibits.

V. REQUESTED RELIEF

Mr. DaCorta respectfully requests that the Court:

(1) defer ruling on the Fee Motion as to Mr. DaCorta until the pending appeal is resolved, or deny it as to him without prejudice to renewal;

(2) in the alternative, deny as to Mr. DaCorta the categories identified in Part III, including the status-conference work through March 24, 2026 ($21,491.50), the Preziosi opposition and settlement work, service costs

for other Respondents, duplicated meeting, hearing, and review time, and the expert's travel time;

(3) in the alternative, make specific findings, category by category, as to the amounts "reasonably and necessarily incurred in prosecuting Respondents' violations," and exclude the remainder from any joint and several obligation;

(4) order the Receiver to file, within fourteen days, (a) a reconciliation of previously approved, paid, unpaid, and newly requested amounts and how any recovery will be credited to the Receivership, (b) an itemization of the $5,883.15 copying charge and the $1,569.51 Devine reimbursement, (c) the CFTC billing instructions on which his certification relies and a statement whether the CFTC reviewed the underlying invoices, and (d) an explanation of any entries the Court finds insufficient, and permit Mr. DaCorta fourteen days thereafter to supplement this objection;

(5) require the Receiver, within thirty days, to file a proposed schedule for terminating the Receivership and, before undertaking further litigation at the estate's expense, a statement of its probable recovery, estimated cost, likelihood of success, and effect on the timing of final distributions;

(6) if it rules, stay enforcement of any award against Mr. DaCorta while the appeal is pending; and

(7) grant such other relief as the Court finds just.

LOCAL RULE 3.01(g) STATEMENT

The Receiver's motion states that Mr. DaCorta opposes the relief requested (Doc. 1000 at 20), and the Receiver did not confer with him before filing. This objection is Mr. DaCorta's response to that motion.

Respectfully submitted,
/s/ Michael J. DaCorta
Michael J. DaCorta
BOP Register No. 73181-018
Currently confined at:
FCI Coleman Camp
P.O. Box 1027
Coleman, FL 33521
Respondent, pro se

Attachments: Exhibit A, excerpts of the transcript of the December 22, 2022 hearing (Doc. 703); Exhibit B, summary of the Receiver's twenty-nine interim fee motions and the Court's orders; Exhibit C, emails between Receiver's counsel Eric R. Feld and Mr. DaCorta, Nov. 4–5, 2019.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 23, 2026, a copy of the foregoing was sent by electronic mail, at my direction, to counsel for Receiver Burton W. Wiand: Jared J. Perez, Esq. (jared.perez@jaredperezlaw.com) and Maya Lockwood, Esq. (maya@burtonwwiandpa.com).

/s/ Michael J. DaCorta
Michael J. DaCorta

CFTC v. Oasis International Group, Ltd., et al.
Case No. 8:19-cv-886-VMC-SPF (M.D. Fla.)

EXHIBIT A

Excerpts of the transcript of the December 22, 2022 hearing (Doc. 703)
Transcript pages 10, 11 and 19

10:13:47AM Mr. Kurpiers, but since you brought it up, it is always a
10:13:49AM concern. And I have seen it over and over again, when you do
10:13:52AM bring in a private entity, whether they're accountants or
10:13:56AM lawyers -- it's just that I don't know if this government
10:14:03AM entity -- and I mean the CFTC as opposed to the U.S. Attorney's
10:14:07AM Office where I worked and I did this -- I mean, I oversaw
10:14:10AM recuperating assets, and there was no additional charge to the
10:14:14AM government. So, you know, you recuperate -- except for limited
10:14:19AM times when you had to employ third parties, like a real estate
10:14:22AM broker or an auctioneer, for instance, but you recovered a
10:14:26AM million dollars, a million dollars went back into the pot for
10:14:29AM distribution to the victims.
10:14:30AM MR. KURPIERS: Right.
10:14:31AM THE COURT: And so I've really, you know, grappled
10:14:34AM with this, because -- I mean, gosh darn it, it's a lot of
10:14:41AM money. On the other hand, I'm not so certain that they have
10:14:45AM another way of doing it. I just don't think they do.
10:14:48AM MR. KURPIERS: I know. And the interesting dynamic
10:14:51AM here that there was, at least it appears -- and of course I was
10:14:55AM an assistant U.S. attorney myself and done a lot of stuff.
10:14:59AM THE COURT: I know you were.
10:15:00AM MR. KURPIERS: You know, there's an interesting
10:15:02AM blending of civil and criminal. I was a bit taken aback that
10:15:07AM the receiver was present at the search warrant of Mr. DaCorta's
10:15:15AM house. But I also understood the dynamic of, well, you do have

a forfeiture provision, but in addition, from the civil standpoint, the receiver has to come in and protect assets.

THE COURT: Right.

MR. KURPIERS: He has to not only identify the assets but then secure them and then take appropriate steps to liquidate the assets and return money to folks. So I understood that, and I understand why he was involved, but there was a pause there.

THE COURT: Yeah. No, I mean I've had my own pause there, not just on this case but on others. I just don't know who else locally has the experience and -- I mean, generally speaking, I think Mr. Wiand and his group have done a good job, I have to tell you that.

MR. KURPIERS: No, I agree. And they're very experienced.

THE COURT: But the dollar signs do bother me too.

MR. KURPIERS: Yes.

THE COURT: It's not as if I'm paying it, but I know it's less money for the victims --

MR. KURPIERS: Understood.

THE COURT: -- so I am bothered by it.

MR. KURPIERS: And I don't mean to go off on a separate tangent, and my apologies to you for that.

THE COURT: That's all right. I went right with you on it. No apologies.

Anyway, as I said, Mr. Wiand is really the only one I know of here. And he's done -- I think judges have been -- my discussion with judges -- have been quite pleased with him. I don't have anything to say other than positive. I just -- I just look at those numbers, I do get concerned about it and just hope that somebody is looking at it, you know, other than me. I mean, I hope you are because you're the one here who we look to to make certain as much money as possible is made available to those from whom it's been taken.

MS. AUXTER: That's our priority as well, Your Honor. And we do have those discussions in the background, kind of the cost-benefit analysis of recovering certain sums. We are really trying to make sure that the benefit that we're getting justifies the costs that it takes to -- you know, to recover the money.

THE COURT: Well, like I said, we used to do that work -- "we" at the U.S. Attorney's Office, so we didn't pay outside lawyers. I just don't think you are all equipped -- am I correct in that? -- or you're not set up to do that.

MS. AUXTER: That's correct, Your Honor. At our agency, this is -- when we have assets to recover -- that's not always the case. But when we have assets to recover, yes, we do really rely on receivers.

THE COURT: Well, that's exactly what I thought the situation was, so there's not much you can do. And at least in

EXHIBIT B

Summary of the Receiver's Interim Fee Motions and Orders

CFTC v. Oasis International Group, Ltd., et al., No. 8:19-cv-00886-VMC-SPF (M.D. Fla.)

Compiled October 6, 2026; Notes 4 and 5 added October 20, 2026; Note 6 added October 22, 2026

Basis. Every figure below is taken directly from the Receiver's interim fee motions and the Court's signed fee orders on the public docket. All 29 rounds have been verified against signed orders.

Round	Fee motion (Doc. / filed)	Period covered	Amount sought	Fee order (Doc. / entered / judge)	Amount awarded	Receiver's own compensation	Notes
1st	Doc. 114, 6/14/19	4/15/19–5/15/19	$130,386.81	Doc. 186, 8/13/19, Flynn	$130,386.81	$38,502.00	Granted in full. CFTC did not object; objections limited to pre-appointment fees.
2nd	Doc. 203, 11/14/19	5/16/19–9/30/19	$369,478.98	Doc. 207, 11/22/19, Flynn	$369,478.98	$47,340.00	Granted in full.
3rd	Doc. 234, 2/14/20	10/1/19–12/31/19	$185,107.02	Doc. 236, 2/21/20, Flynn	$185,107.02	$23,400.00	Granted in full.
4th	Doc. 272, 5/26/20	1/1/20–3/31/20	$256,350.73	Doc. 276, 6/3/20, Flynn	$255,500.26	$23,436.00	Reduced $850.47 (WGK costs) — see note 1.
5th	Doc. 311, 8/28/20	4/1/20–6/30/20	$372,770.18	Doc. 318, 9/14/20, Flynn	$372,770.18	$27,900.00	Montie's opposition (re $44,538.61 in clawback billing) overruled.
6th	Doc. 331, 11/20/20	7/1/20–9/30/20	$336,345.41	Doc. 337, 12/11/20, Flynn (MJ)	$336,345.41	$25,884.00	Granted in full.
7th	Doc. 377, 3/1/21	10/1/20–12/31/20	$318,574.27	Doc. 384, 3/31/21, Flynn	$318,574.27	$36,000.00	Granted in full.
8th	Doc. 410, 6/21/21	1/1/21–3/31/21	$350,135.48	Doc. 414, 7/9/21, Flynn	$350,135.48	$35,712.00	Granted in full.
9th	Doc. 431, 9/29/21	4/1/21–6/30/21	$358,001.67	Doc. 434, 10/14/21, Flynn	$358,001.67	$26,244.00	Granted in full.
10th	Doc. 459, 12/30/21	7/1/21–9/30/21	$154,196.30	Doc. 474, 2/4/22, Flynn	$154,196.30	$11,980.13	DaCorta's objection considered and overruled.
11th	Doc. 485, 3/17/22	10/1/21–12/31/21	$133,372.98	Doc. 587, 4/14/22, Flynn	$133,372.98	$9,912.00	Granted in full; no timely objections.
12th	Doc. 648, 6/16/22	1/1/22–3/31/22	$130,879.65	Doc. 653, 7/22/22, Flynn	$130,879.65	$27,986.11	Granted in full; no objections.
13th	Doc. 660, 8/15/22	4/1/22–6/30/22	$248,939.02	Doc. 676, 9/22/22, Flynn	$248,939.02	$39,586.95	Granted in full.
14th	Doc. 691, 11/22/22	7/1/22–9/30/22	$173,575.69	Doc. 692, 12/1/22, Flynn	$173,575.69	$13,505.16	Granted in full.
15th	Doc. 724, 2/15/23	10/1/22–12/31/22	$144,659.07	Doc. 729, 3/2/23, Flynn	$144,659.07	$18,675.56	Granted in full. Haas objected but missed the deadline; deemed unopposed.

Round	Fee motion (Doc. / filed)	Period covered	Amount sought	Fee order (Doc. / entered / judge)	Amount awarded	Receiver's own compensation	Notes
16th	Doc. 737, 5/30/23	1/1/23–3/31/23	$125,073.17	Doc. 740, 5/31/23, Flynn (MJ)	$125,073.17	$23,187.60	Granted in full. Haas objected.
17th	Doc. 764, 9/12/23	4/1/23–6/30/23	$171,141.30	Doc. 765, 9/27/23, Flynn (MJ)	$171,141.30	$27,281.51	Granted in full.
18th	Docs. 776/777, 11/28/23	7/1/23–9/30/23	$130,153.12	Doc. 779, 12/5/23, Flynn	$130,153.12	$18,802.44	Granted in full.
19th	Doc. 804, 2/28/24	10/1/23–12/31/23	$92,748.17	Doc. 807, 3/22/24, Flynn	$92,748.17	$20,353.43	Granted in full. Haas/Montie not consulted (settlements approved).
20th	Doc. 817, 5/22/24	1/1/24–3/31/24	$112,684.43	Doc. 820, 6/17/24, Flynn (MJ)	$112,684.43	$20,272.33	Granted (same figures).
21st	Doc. 837, 8/27/24	4/1/24–6/30/24	$127,026.63	Doc. 844, 10/16/24, Flynn	$127,026.63	$38,828.09	Granted (same figures).
22nd	Doc. 849, 12/2/24	7/1/24–9/30/24	$81,579.60	Doc. 853, 12/27/24, Covington	$81,579.60	$28,481.73	Granted (same figures).
23rd	Doc. 856, 2/7/25	10/1/24–12/31/24	$55,111.89	Doc. 862, 3/11/25, Covington	$44,796.89	$5,974.40	Voluntary reduction $10,315 (see note 2).
24th	Doc. 869, 5/29/25	1/1/25–3/31/25	$61,101.88	Doc. 870, 6/23/25, Covington	$61,101.88	$13,303.06	Granted (same figures).
25th	Doc. 878, 8/13/25	4/1/25–6/30/25	$33,668.32	Doc. 880, 9/5/25, Covington	$33,668.32	$9,013.50	Granted in full.
26th	Doc. 885, 12/4/25	7/1/25–9/30/25	$29,450.48	Doc. 887, 12/19/25, Covington	$29,450.48	$7,378.64	Granted in full.
27th	Doc. 890, 2/4/26	10/1/25–12/31/25	$23,397.20	Doc. 893, 2/24/26, Covington	$23,397.20	$5,747.07	Granted (same figures).
28th	Doc. 924, 5/29/26	1/1/26–3/31/26	$64,345.92	Doc. 930, 6/15/26, Covington	$64,345.92	$15,361.44	Granted (same figures).
29th	Doc. 988, 8/31/26	4/1/26–6/30/26	$47,220.23	Doc. 991, 9/22/26, Covington	$47,220.23	$12,685.56	Granted (same figures).
	Verified totals		**$4,817,475.60**		**$4,806,310.13**	**$652,734.71**	**See notes below.**

Key notes.

1. The Court reduced the requested amount once: $850.47 in the 4th round (Doc. 276, after questioning WGK cost line items in Doc. 274).

2. In the 23rd round the Receiver voluntarily reduced his own fee request by $10,315.00 (from $16,289.40 to $5,974.40) in his Corrected Response (Doc. 861-1, filed 3/11/25; original response Doc. 860, filed 3/10/25), after the Court took the motion under advisement (Doc. 859, endorsed order, 2/24/25) to question billing for the contempt motion filed in the wrong court (Doc. 834, denied on jurisdictional grounds in Doc. 850).

3. Actually disbursed to the Receiver and his professionals, inception through 6/30/26 (Doc. 988-1): $4,733,129.58. Disbursed to lenders over the same period: $18,824,628.07.

4. Between the 27th and 28th rounds, on 4/3/26, the Receiver filed his Verified Motion for an Order to Show Cause Why Respondents Should Not Be Held in Contempt (Doc. 904).

5. Doc. 1000, filed 10/13/26, asks for a further $239,306.36 in fees and costs for the contempt-related work. It is not included in the totals above. As of 10/20/26 the Court has not ruled on it.

6. *The Receiver's website.* The docket pages of www.oasisreceivership.com, as viewed on October 22, 2026, contain no entry for the following fee motions: Docs. 114, 203, 234, 272, 311, 377, 431, 459, 648, 660, 691, 776, 804 and 856. The entry for Doc. 764 links only to the Notice of Electronic Filing, not to the motion.

CFTC v. Oasis International Group, Ltd., et al.
Case No. 8:19-cv-886-VMC-SPF (M.D. Fla.)

EXHIBIT C

Emails between Receiver's counsel Eric R. Feld
and Mr. DaCorta, November 4–5, 2019
(sent through Carolyn DaCorta's email account; signed by Mr. DaCorta)

FW: Oasis - Motion to Sell Gold & Silver - LR 3.01(g)

Inbox

EF

Eric Feld
To: me · Mon, Nov 4, 2019 at 2:07 PM

Mr. DaCorta,

Please advise whether you have any objections to the attached motion to sell precious metals. We would like to file the motion today, so we appreciate if you could get back to us expeditiously.

Thank you

Eric R. Feld
Attorney
Wiand Guerra King PA
5505 W Gray Street
Tampa, FL 33609
Phone: 813.347.5107
Fax: 813.347.5198
efeld@wiandlaw.com
www.wiandlaw.com

W|G|K
WIAND GUERRA KING

Confidentiality Disclaimer: This e-mail message and any attachments are private communication sent by a law firm, Wiand Guerra King P.A., and may contain confidential, legally privileged information meant solely for the intended recipient. If you are not the intended recipient, you are hereby notified that any use, dissemination, distribution or copying of this communication is strictly prohibited. Please notify the sender immediately by replying to this message, then delete the e-mail and any attachments from your system. Thank you.

FW: Oasis - Motion to Sell Gold & Silver - LR 3.01(g)

Inbox

EF

Eric Feld
To: me · Mon, Nov 4, 2019 at 2:07 PM

To: Carolyn DaCorta <cdacorta@yahoo.com>

Please advise whether you have any objections to the attached motion to sell precious metals. We would like to file the motion today, so we appreciate if you could get back to us expeditiously.

Thank you

Eric R. Feld
Attorney
Wiand Guerra King PA
5505 W Gray Street
Tampa, FL 33609
Phone: 813.347.5107
Fax: 813.347.5198
efeld@wiandlaw.com
www.wiandlaw.com

W|G|K
WIAND GUERRA KING

Confidentiality Disclaimer: This e-mail message and any attachments are private communication sent by a law firm, Wiand Guerra King P.A., and may contain confidential, legally privileged information meant solely for the intended recipient. If you are not the intended recipient, you are hereby notified that any use, dissemination, distribution or copying of this communication is strictly prohibited. Please notify the sender immediately by replying to this message, then delete the e-mail and any attachments from your system. Thank you.

From: Carolyn DaCorta [mailto:cdacorta@yahoo.com]
Sent: Tuesday, November 5, 2019 8:05 AM
To: Eric Feld <efeld@wiandlaw.com>
Subject: Re: Oasis - Motion to Sell Gold & Silver - LR 3.01(g)

Mr. Feld,

I will not object, however, I do not feel it is in the best interest of the lenders for the metals to be sold at this time. They have increased substantially since the time they were seized and appear to have further to appreciate in the coming months.

Mike DaCorta

From: Eric Feld <efeld@wiandlaw.com>
To: 'Carolyn DaCorta' <cdacorta@yahoo.com>
Sent: Tuesday, November 5, 2019 at 11:07:19 AM EST
Subject: RE: Oasis - Motion to Sell Gold & Silver - LR 3.01(g)

Thank you, Mr. DaCorta. The Receiver intends to sell the metals in a manner which best benefits the estate.

Additionally—I do not believe that I received the mailed copies of the OIG share transfer and related documentation. Could you please confirm that you have mailed them to my attention?

Eric R. Feld

Attorney

Wiand Guerra King PA

5505 W Gray Street

Tampa, FL 33609

Phone: 813.347.5107

Fax: 813.347.5198

efeld@wiandlaw.com

www.wiandlaw.com

W|G|K

WIAND GUERRA KING

Confidentiality Disclaimer: This e-mail message and any attachments are private communication sent by a law firm, Wiand Guerra King P.A., and may contain confidential, legally privileged information meant solely for the intended recipient. If you are not the intended recipient, you are hereby notified that any use, dissemination, distribution or copying of this communication is strictly prohibited. Please notify the sender immediately by replying to this message, then delete the e-mail and any attachments from your system. Thank you.