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Court-Appointed Receiver, Peggy Hunt

# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff

v.

TRAFFIC MONSOON, LLC, a Utah Limited Liability Company, and CHARLES DAVID SCOVILLE, an individual,

Defendants.

RECEIVER'S NINTH STATUS REPORT

(APRIL 1, 2020 THROUGH JUNE 30, 2020)

2:16-cv-00832-JNP

The Honorable Jill N. Parrish

Peggy Hunt, the Court-appointed Receiver (the "Receiver") for Traffic Monsoon, LLC, and the assets of Charles David Scoville that were obtained directly or indirectly from Traffic Monsoon, hereby submits this *Ninth Status Report* (the "Status Report") for the period of April 1, 2020 through June 30, 2020 (the "Reporting Period"). This Status Report is posted on the website for the receivership at <a href="www.trafficmonsoonreceivership.com">www.trafficmonsoonreceivership.com</a> (the "Receivership Website").

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#### I. <u>Introduction</u>

This Status Report includes a brief summary of key events in this case to date as set forth in Part II below. Part III is a summary of the Receiver's work during the Reporting Period. Part IV provides a financial summary of the Receivership Estate, and administrative expenses that have been incurred and paid during the Reporting Period are discussed in Part V. All of the documents filed with the Court that are referenced in this Status Report are posted on the Receivership's website at <a href="https://www.trafficmonsoonreceivership.com">www.trafficmonsoonreceivership.com</a> (the "Receivership Website").

Please note that a more detailed discussion about the background in this case is set forth in the *Receiver's First Status Report (July 26, 2016 Through March 31, 2017)* (the "First Status Report"), 1 which incorporated the Receiver's *Declarations* outlining the initial findings of her investigation. 2 Since filing that First Status Report, the Receiver has continued to file Status Reports that, in addition to the updates posted on the Receivership Website, may be consulted for information about this case. To date the following additional Status Reports have been filed: *Receiver's Second Status Report (April 1, 2017 Through June 30, 2017)*; 3 *Receiver's Third Status Report (July 1, 2017 Through September 30, 2017)*; Receiver's Fourth Status Report (October 1, 2017 Through December 31, 2017); 5 *Receiver's Fifth Status Report (January 1,* 

<sup>&</sup>lt;sup>1</sup> Docket No. 91.

<sup>&</sup>lt;sup>2</sup> See Declaration of Receiver Peggy Hunt (Communications) (the "Communications Declaration"), Docket No. <u>54</u>; and the Declaration of Peggy Hunt (Business Operations) (the "Business Operations Declaration"), Docket No. <u>55</u>.

<sup>&</sup>lt;sup>3</sup> Docket No. <u>104</u>.

<sup>&</sup>lt;sup>4</sup> Docket No. 108.

<sup>&</sup>lt;sup>5</sup> Docket No. <u>122</u>.

2018 Through March 31, 2018); Receiver's Sixth Status Report (April 1, 2018 Through June 30, 2018) (the "Sixth Status Report"); Receiver's Seventh Status Report (July 1, 2018 Through June 30, 2019); and Receiver's Eighth Status Report (July 1, 2019 Through March 30, 2020) (the "Eighth Status Report") (collectively, the "Prior Status Reports"). The Prior Status Reports are posted on the Receivership Website.

#### II. Summary of Key Events in This Case

Persons interested in a detailed outline of the key events in this case should refer to the Receiver's Prior Status Reports and the Receivership Website. Among other things, information is provided about (a) the Receiver, her former legal counsel, Dorsey & Whitney LLP ("Dorsey"), her forensic and general accountants, Berkley Research Group ("BRG"), and the claims agent in this case, Epiq Global ("Epiq"); and (b) the Receiver's ongoing investigation and estate administration. Additionally, Prior Status Reports outline the facts giving rise to the commencement of this case by the United States Securities and Exchange Commission (the "SEC") against Traffic Monsoon, LLC ("Traffic Monsoon") and Charles David Scoville ("Scoville" and, together with Traffic Monsoon, the "Defendants"). They also outline the Court's various orders in this case, including its Temporary Restraining Order and Order Freezing Assets, the Order Appointing Receiver and amendments (collectively, the

<sup>&</sup>lt;sup>6</sup> Docket No. 153.

<sup>&</sup>lt;sup>7</sup> Docket No. <u>162</u>

<sup>&</sup>lt;sup>8</sup> Docket No. <u>194</u>.

<sup>&</sup>lt;sup>9</sup> Docket No. <u>239.</u> ACTIVE 52721459v2

"Receivership Order"), the proceedings related to and entry of a *Preliminary Injunction*, and the Defendants' appeals of the Court's Orders (collectively, the "Appeals").

As of the filing of this Status Report, the Defendants' Appeals of the Court's Orders in this case have concluded. The Orders, including the Receivership Order and the Preliminary Injunction, have been affirmed by the United States Court of Appeals for the Tenth Circuit, <sup>10</sup> and the Defendants' *Petition for a Writ of Certiorari* (the "Cert. Petition") filed in the United States Supreme Court has been denied. <sup>11</sup>

While the exact terms of the Preliminary Injunction should be reviewed, the Preliminary Injunction generally prohibits Scoville from operating Traffic Monsoon "or a business model substantially similar to Traffic Monsoon's sale of AdPacks." The Preliminary Injunction also imposes an asset freeze of all "assets, of whatever kind and wherever situated, of Traffic Monsoon, LLC and Charles D. Scoville that were obtained directly or indirectly from Traffic Monsoon, LLC. . " and stays all litigation in any court against either or both of the Defendants. In conjunction with the Preliminary Injunction, the Court entered a *Memorandum Decision and Order*, 15 which includes significant factual findings and a comprehensive legal

<sup>&</sup>lt;sup>10</sup> See SEC v. Scoville, 913 F.3d 1204 (10th Cir. 2019).

<sup>&</sup>lt;sup>11</sup> See S. Ct. Case No. 18-1566. The Court denied Scoville's requests for attorney's fees related to the Appeals. See Docket <u>244</u>.

<sup>&</sup>lt;sup>12</sup> Docket No. 80 (Preliminary Injunction, p. 1).

<sup>&</sup>lt;sup>13</sup> Docket No. 80 (Preliminary Injunction, p. 2).

<sup>&</sup>lt;sup>14</sup> Docket No. 80 (Preliminary Injunction, p. 3).

<sup>&</sup>lt;sup>15</sup> Docket No. <u>79</u>.

analysis that are summarized in part in the Receiver's First Status Report. Important is that the Court concluded that a clear showing had been made that the SEC was likely to succeed in establishing that Traffic Monsoon was a Ponzi scheme.

With the conclusion of the Appeals, Scoville was required to answer the SEC's Complaint in this case, seeking civil remedies against him. Scoville did not file an answer and thus, on April 2, 2020, the SEC filed a *Motion for Default Judgment*, which is currently pending before the Court. <sup>16</sup>

Criminal charges have also been brought against the Defendants. <sup>17</sup> Just after the close of the Reporting Period, on August 5, 2020, the United States obtained an indictment against the Defendants, charging them with wire fraud under 18 U.S.C. § 1343 and tax fraud under 26 U.S.C. § 7206. <sup>18</sup>

#### III. Work Done By the Receiver and Her Professionals During the Reporting Period

The primary work performed by the Receiver and her professionals during the Reporting Period is outlined below:

#### A. The Claims Process

After the Cert. Petition was denied, the Court informed the Receiver that a claims process would be authorized, and the Receiver filed a *Renewed and Amended Motion Seeking Approval* of (1) Claims Process; (2) Setting Claims Bar Date; and (3) Certain Notice Procedures, which

<sup>&</sup>lt;sup>16</sup> Docket Nos. 238, 243.

<sup>&</sup>lt;sup>17</sup> See United States v. Scoville et al., Case No. 2:20-cr-00242 (D. Utah).

<sup>&</sup>lt;sup>18</sup> *Id.* Docket No. <u>1</u>.

was granted by the Court by *Order* entered on December 20, 2019 (the "Claims Procedure Order"). <sup>19</sup> The Claims Procedure Order set 11:59 p.m. (Mountain Time) on April 10, 2020 as the deadline, or "Claims Bar Date", to submit Proofs of Claim to the Receiver electronically through the mechanism referred to as the "Claims Portal."

Since the entry of the Claims Procedure Order, the Receiver has worked diligently in conjunction with her professionals, to run a claims process, including communicating with investors about the process. A summary of the notice of the Claim Bar Date and service of notice as well as the summary of the Proofs of Claim submitted through June 22, 2020 is set forth in the *Receiver's Claim Status Report* filed on June 24, 2020 which is incorporated herein.<sup>20</sup>

The Receiver, together with her professionals, has engaged in an analysis during the Reporting Period of the best way to attend to objections to Proofs of Claim asserting contested or late-filed claims. The Receiver anticipates filing shortly a motion seeking approval of a claim objection process.

#### B. Litigation on Behalf of the Receivership Estate

During the Reporting Period, the Receiver and her professionals continued an investigation of claims against investors who profited from their involvement in Traffic Monsoon ("Net Winners") as well as others. The Court authorized the Receiver to commence litigation related to claims held by the Receivership Estate, 21 and based on her initial

<sup>&</sup>lt;sup>19</sup> Docket No. 232.

<sup>&</sup>lt;sup>20</sup> Docket No. <u>257</u>.

<sup>&</sup>lt;sup>21</sup> Docket No. <u>181</u>. *ACTIVE 52721459v2* 

investigation, the Receiver filed a *Class Action Complaint* (the "<u>Complaint</u>") in this Court against 11 named Net Winners (the "<u>Named Defendants</u>") and a proposed class of approximately 4,819 other Net Winners.<sup>22</sup> All of the Named Defendants have been served except Imtiaz Aslam. None of the Named Defendants who have been served have responded to the Complaint.

Now, because the uncontested claims asserted against the Receivership Estate are more than the approximately \$53 million currently held by the Receiver, <sup>23</sup> the Receiver has determined that it is necessary to further pursue this litigation. The Receiver spent time during the Reporting Period in conjunction with her professionals investigating the Named Defendants. She has also commenced the process of seeking default judgments against certain Named Defendants. After the close of the Reporting Period, on or about August 21, 2020, the Receiver filed *Motions for Default Judgment* against Named Defendants Ernest Ganz III and David Barker, both of whom reside in the United States, and those Motions are currently pending before the Court. <sup>24</sup>

The Receiver also has determined that there may be other claims held by the Receivership Estate. The Receiver and her professionals are evaluating those claims now that litigation has been determined to be necessary to maximize the value of the Receivership Estate.

<sup>&</sup>lt;sup>22</sup> Hunt v. Aslam, Case No. 2:19-cv-275 (D. Utah).

<sup>&</sup>lt;sup>23</sup> See Claim Status Report, Docket No. <u>257</u>.

<sup>&</sup>lt;sup>24</sup> See Hunt v. Aslam, Case No. 2:19-cv-275, Docket Nos. <u>57</u>, <u>60</u>. ACTIVE 52721459v2

### C. <u>Investigating Unauthorized Manchester Flat Transfer</u>

One of the assets of the Receivership Estate is an interest in a flat located in Manchester, United Kingdom, and a related parking space that Scoville purchased in August 2015 using funds obtained from Traffic Monsoon (the "Manchester Flat"). In the Sixth Status Report, the Receiver outlined facts she has discovered about an unauthorized transfer of the Manchester Flat, and her investigation of that unauthorized transfer. Obtaining information about this transfer has been drawn-out due to numerous factors discussed in Prior Status Reports. The Receiver has determined that monies related to the Manchester Flat were deposited to Santander Bank in the United Kingdom. During the current Reporting Period, the Receiver through her professionals has worked to prepare a letter of request to obtain further evidence relating to this matter.

#### D. Attending to General Administration of the Receivership Estate

During the Reporting Period, the Receiver and her professionals have attended to numerous matters related to the administration of the Receivership Estate. These tasks include, but are not limited to, seeking the employment of professionals deemed necessary to allow the Receiver to execute her duties; monitoring and managing bank accounts; negotiating, when appropriate, applicable interest rates for funds on deposit; reviewing professional billings and requesting adjustments when appropriate; following accounting protocols; preparing SFARs (as defined below); communicating with investors; managing the Receivership Website and information provided through the Call Center; evaluating and paying costs related to administration and litigation; evaluating issues related to compliance with applicable tax laws; filing papers required by applicable tax laws; interfacing with financial account institutions;

coordinating with governmental entities as requested; and, when necessary, responding to statements made or inquires by Scoville and/or his counsel.

Related to these matters is that during the Reporting Period, the Receiver left Dorsey and is now with the law firm of Greenberg Traurig, LLP ("GT"). The Receiver accordingly requested that GT be substituted as her counsel, and this request was approved by the Court.<sup>25</sup>

#### IV. Standardized Fund Accounting Report ("SFAR")

A summary of the financial condition of the Receivership Estate for each quarter of the Reporting Period is set forth in the SFAR attached hereto as **Exhibit 1**. At the end of the Reporting Period, the Receivership Estate had funds in the total amount of \$52,513,901.68.<sup>26</sup> Interest income has totaled \$1,316.28,<sup>27</sup> and expenses have totaled \$648,991.79.<sup>28</sup>

#### V. Administrative Expenses During the Reporting Period

The fees and out of pocket expenses of the Receiver, GT, Dorsey, and BRG must be approved by the Court prior to payment. The Court has entered an *Order Establishing*Administrative Expense Payment Procedures (the "Fee Procedures Order"), 29 setting forth procedures for the request and payment of professional fees and expenses in this case. Among

<sup>&</sup>lt;sup>25</sup> See Docket Nos. 258, 259, 260.

<sup>&</sup>lt;sup>26</sup> See Exh. 1 (SFAR for period ending June 30, 2020).

<sup>&</sup>lt;sup>27</sup> See id. (Line 4 recording interest). With the recent drop in interest rates, interest on the Receivership Estate's accounts dropped significantly. *Compare* Eighth Status Report, Exhibit 1. During the Reporting Period, the Receiver has been in negotiations with the bank holding the accounts to provide a more favorable rate given the amount on deposit.

<sup>&</sup>lt;sup>28</sup> See id. (Line 10 recording disbursements). These disbursements have been to Epiq for data hosting and services, including services related to the Website, the Call Center and the claims process.

<sup>&</sup>lt;sup>29</sup> Docket No. <u>101</u>.

other things, the Fee Procedures Order authorizes the Receiver and her professionals to file monthly "Notices of Request for Payment." Absent objection in accordance with the Fee Procedures Order, the Receiver may pay 80% of fees and 100% of out-of-pocket expenses requested in a Notice of Request for Payment. All monthly disbursements and any other requests for fees and expenses not requested pursuant to a Notice for Request for Payment are subject to Court approval through "Fee Applications".

### a. Approved Fee Applications Relevant to this Reporting Period

On or about April 9, 2020, the Receiver filed an *Eighth Interim Fee Application* for Receiver and Receiver's Professionals requesting fees and expenses for services rendered from July 1, 2019 through March 31, 2020.<sup>30</sup> The Court entered an *Order* during the Reporting Period, on June 18, 2020, approving that Fee Application.<sup>31</sup> The fees and expenses were not paid prior to the close of the Reporting Period, and payment thereof will be reported in the next Status Report and SFAR.

#### b. Fees and Expenses Incurred During the Current Reporting Period

Shortly after filing this Status Report, the Receiver intends to file a *Ninth Interim Fee*Application for the period of April 1, 2020 through June 30, 2020. That Application will outline the total hours spent by the Receiver, GT, Dorsey and BRG, the fees requested for their services, and reimbursement of out-of-pocket expenses incurred during the Reporting Period. None of these fees and expenses have been paid to date, other than those authorized to be paid under the

<sup>&</sup>lt;sup>30</sup> Docket No. 240.

<sup>&</sup>lt;sup>31</sup> Docket No. <u>246</u>.

Fee Procedures Order, all of which will be reported in the intended Fee Application.

Specifically, the Receiver filed Notices of Request for Payment for April, May and August of 2020,<sup>32</sup> and no objections to those Notices were filed. Accordingly, 80% of the fees outlined in those Notices were paid, and 100% of the expenses outlined were reimbursed as authorized by

the Fee Procedure Order.

VI. Conclusion

The Receiver currently holds over \$52 million which she would like to distribute to those with allowed claims against the Receivership Estate. Now that the Claims Bar Date has expired, the Receiver is working to develop the most effective and efficient procedures to attend to the Proofs of Claim that require objections. Once some of the objections have been resolved, the Receiver will be in a better position to propose a Plan of Distribution to Court for approval.

Dated this \_23rd\_\_\_ day of September, 2020.

RECEIVER

/s/ Peggy Hunt Peggy Hunt, Receiver

<sup>32</sup> Docket Nos. <u>261</u>, <u>262</u>, <u>264</u>.

ACTIVE 52721459v2

#### **CERTIFICATE OF SERVICE**

I hereby certify that on this 23rd day of September, 2020, I caused the foregoing *Ninth* Status Report (April 1, 2020 Through August 31, 2020) to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of the filing to all counsel of record in this case.

/s/ Candy Long	
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EXHIBIT 1

# STANDARDIZED FUND ACCOUNTING REPORT for Traffic Monsoon, LLC Receivership - Cash Basis

Receivership; Civil Court Case No. 2:16-00832 REPORTING PERIOD 04/01/2020 TO 06/30/2020

Fund Account	ting (See Instructions):	_		
Line 1	Positive in Park	Detail	Subtotal	Grand Total
rine 1	Beginning Balance (As of 04/01/20)			53,161,577.19
Line 2	Increases in Fund Balance:			
Line 2	Business Income	_	_	
Line 4	Cash and Securities	-		
Line 5	Interest/Dividend Income	1,316.28	1,316.28	
Line 6	Business Asset Liquidation	-	-	
Line 7	Personal Asset Liquidation		-	
Line 8	Third-Party Litigation Miscellaneous-Other	-	-	
Line 6	Total Funds Available (Lines 1-8):	-	-	
	Decreases in Fund Balance:		1,316.28	53,162,893.47
Line 9				
Line 10	Disbursements to Senior Secured Lenders/Investors	-	-	
Line 10	Disbursements for Receivership Operations Internal Loans		648,991.79	
Line 10	CONTROL AND	-		
Lineiou	Disbursements to Receiver or Other Professionals	648,991.79		
	1. Fees:	-		
	Receiver	-		
	Legal Advisors	-		
	Accountants	-		
Line 10b	Consultants	648,991.79		
Line 100	Business Asset Expenses			
Line 100 Line 10d	Personal Asset Expenses			
Line 10a Line 10e	Hospital Settlements & Investment Expenses	-	1	
Line 10e	Third Party Litigation Expenses	-		
	1. Attorney Fees	-		
	2 Litigation Expenses Total Third-party Litigation Expenses	-		
Line 10f	Tax Administrator Fees and Bonds		-	
_	Federal and State Tax Payments	-		
Line 10g	Total Disbursements for Receivership Operations	-		
Line 11	Dishursments for Distribution Functions		648,991.79	648,991.79
Line 11	Disbursments for Distribution Expenses Paid by the Fund: Distribution Plan Development Expenses	-	-	
Line 11a	Distribution Plan Development Expenses:	-		
Line 114	1. Fees:	*		
	Fund Administrator	-		
	Independent Distribution Consultant (IDC)	1		
	Receiver	-	1	
	Legal Advisors	-		
	Accountants	-		
	Consultants	-		
	2. Administrative Expenses	-		
	3. Approved Living Allowance	-		
	4. Miscellaneous	-		
	Total Plan Development Expenses	-		
	Distribution Plan Implementation Expenses:		-	
	1. Fees:	-		
	Fund Administrator	-		
1	IDC	-	- 1	
	Receiver		1	
	Legal Advisors		- 1	
	Accountants	-		
	Consultants	-		
	2. Administrative Expenses	-		
	3. Investor Identification:	-		
'	ovestor identification.	-	1	

I	Notice/Publishing Approved Plan			
	Claimant Identification	-		
	Claims Processing	-		
	Web Site Maintenance/Call Center	-		
	4. Fund Administrator Bond	-		
1	5. Miscellaneous	-		
	6. Federal Account for Investor Restitution (FAIR) Reporting	-		
1	Expenses			
	Total Plan Implementation Expenses	-		
	Total Disbursement for Distribution Expenses Paid by the Fund		-	
Line 12	Disbursements to Court/Other:		_	-
Line 12	Disbursements to Court		-	
	Investment Expenses/Court Registry Investment System (CRIS)	-	,	
Line 12a	Fees			
Line 12b	Federal Tax Payments			
	Total Disbursements to Court/Other:			
	Total Funds Disbursed (Lines 9-12)		-	C49 004 70
Line 13	Ending Balance (As of 06/30/20)			648,991.79 52,513,901.68
Line 14	Ending Balance of Fund - Net Assets:			32,313,901.68
Line 14a	Cash & Cash Equivalents			52,513,901.68
Line 14b	Investments			32,313,901.08
Line 14c	Other Assets or Uncleared Funds			-
	Total Ending Balance of Fund - Net Assets		-	52,513,901.68

	OTHER SUPPLEMENTAL INFORMATION:			
		Detail	Subtotal	Grand Total
	Report of Items NOT to be paid by the Fund:		Sustatu	Grand Total
	Disbursements of Plan Administration Expenses Not Paid by the			
Line 15	Fund:	_		
Line 15	Disbursements for Plan Administration Expenses	_		
Line 15a	Plan Development Expenses Not Paid bu the Fund:			
	1. Fees			
	Fund Administrator			
	IDC	_		
	Receiver			
	Legal Advisers			
	Accountants			
	Consultants			
	2. Administrative Expenses			
	3. Approved Living Allowance			
	4. Miscellaneous	_		
	Total Plan Development Expenses Not Paid by the Fund		_	5.
Line 15b	Plan Implementation Expenses Not Paid by the Fund:	_		
	1. Fees:			
	Fund Administrator			
	IDC			
	Receiver			
	Legal Advisers			
	Accountants			
	Consultants			
	2. Administrative Expenses			
	3. Investor Identification:			
	Notice/Publishing Approved Plan			
	Claimant Identification			
	Claims Processing		ı	
	Web Site Maintenance/Call Center			
	4. Fund Administrator Bond			
	5. Miscellaneous			
	6. FAIR Reporting Expenses			
-	Total Plan Implementation Expesnses Not Paid by the Fund		_	

Line 15c	Tax Administrator Fees & Bonds Not Paid by the Fund	T		
	Total Disbursements for Plan Administrative Expenses Not Paid			
	by the fund		_	_
Line 16	Disbursements to Court/Other Not Paid by the Fund:	-	-	
Line 16a	Investment Expenses/CRIS Fees		1	
Line 16b	Federal Tax Payments	_		
	Total Disbursements to Court/Other Not Paid by the Fund		-	-
Line 17	DC & State Tax Payments	-	-	
Line 18	No. of Claims			
Line 18a	# of Claims Received This Reporting Period			-
Line 18 b	# of Claims Received Since Inception of Fund			_
Line 19	No. of Claimants/Investors:			
Line 19a	# of Claimants/Investors Paid This Reporting Period			_
Line 19b	# of Claimants/Investors Paid Since Inception of Fund			

	/
By: pury prount the	K
(signature)	
Mary Margeret Hunt	
(printed Name)	
Receiver	
(title)	
Date: 4-22-2020	

# STANDARDIZED FUND ACCOUNTING REPORT for Traffic Monsoon, LLC Receivership - Cash Basis

Receivership; Civil Court Case No. 2:16-00832 REPORTING PERIOD 04/01/2020 TO 06/30/2020

	ing (See Instructions):			
Line 1	Desired B. J. Communication of the Communication of	Detail	Subtotal	Grand Total
rine 1	Beginning Balance (As of 04/01/20)			53,161,577.1
Line 2	Increases in Fund Balance:			, , , , , , , , , , , , , , , , , , , ,
Line 3	Business Income Cash and Securities	-	-	
Line 4		-	-	
Line 5	Interest/Dividend Income	1,316.28	1,316.28	
Line 6	Business Asset Liquidation		-	
Line 7	Personal Asset Liquidation	-	-	
Line 7	Third-Party Litigation	¥ .	-	
Lille 0	Miscellaneous-Other	-	-	
	Total Funds Available (Lines 1-8):  Decreases in Fund Balance:		1,316.28	53,162,893.4
ine 9				
ine 10	Disbursements to Senior Secured Lenders/Investors	-	-	
Line 10	Disbursements for Receivership Operations Internal Loans		648,991.79	
Line 10		-		
Line10a	Disbursements to Receiver or Other Professionals	648,991.79		
	1. Fees:	-		
	Receiver	-		
	Legal Advisors	-		
	Accountants	-		
	Consultants	648,991.79		
Line 10b	Business Asset Expenses	-		
Line 10c	Personal Asset Expenses			
Line 10d	Hospital Settlements & Investment Expenses			
Line 10e	Third Party Litigation Expenses			
	1. Attorney Fees			
	2 Litigation Expenses			
	Total Third-party Litigation Expenses			
Line 10f	Tax Administrator Fees and Bonds		_	
Line 10g	Federal and State Tax Payments	-		
	Total Disbursements for Receivership Operations		648,991.79	640,004,70
ne 11	Disbursments for Distribution Expenses Paid by the Fund:		048,991.79	648,991.79
Line 11	Distribution Plan Development Expenses		- 1	
Line 11a	Distribution Plan Development Expenses:			
	1. Fees:	1 - 1		
	Fund Administrator			
	Independent Distribution Consultant (IDC)			
	Receiver		1	
	Legal Advisors	- 1		
	Accountants	-	- 1	
	Consultants	-	1	
	2. Administrative Expenses	-		
	Approved Living Allowance	-		
	4. Miscellaneous	-	1	
	Total Plan Development Expenses	-	1	
			-	
rine 110	Distribution Plan Implementation Expenses:	~		
	1. Fees:	-		
	Fund Administrator	-		
	IDC			
	Receiver	-		
	Legal Advisors	-		
	Accountants	-		
	Consultants			
	2. Administrative Expenses			
	3. Investor Identification:	1		

I	Notice/Publishing Approved Plan			
	Claimant Identification	-		
	Claims Processing	-		
	Web Site Maintenance/Call Center	-		
	4. Fund Administrator Bond	-		
1	5. Miscellaneous	-		
	6. Federal Account for Investor Restitution (FAIR) Reporting	-		
1	Expenses			
	Total Plan Implementation Expenses	-		
	Total Disbursement for Distribution Expenses Paid by the Fund		-	
Line 12	Disbursements to Court/Other:		_	-
Line 12	Disbursements to Court		-	
	Investment Expenses/Court Registry Investment System (CRIS)	-	,	
Line 12a	Fees			
Line 12b	Federal Tax Payments			
	Total Disbursements to Court/Other:			
	Total Funds Disbursed (Lines 9-12)		-	C49 004 70
Line 13	Ending Balance (As of 06/30/20)			648,991.79 52,513,901.68
Line 14	Ending Balance of Fund - Net Assets:			32,313,901.68
Line 14a	Cash & Cash Equivalents			52,513,901.68
Line 14b	Investments			32,313,901.08
Line 14c	Other Assets or Uncleared Funds			-
	Total Ending Balance of Fund - Net Assets		-	52,513,901.68

	OTHER SUPPLEMENTAL INFORMATION:			
		Detail	Subtotal	Grand Total
	Report of Items NOT to be paid by the Fund:		Sustatu	Grand Total
	Disbursements of Plan Administration Expenses Not Paid by the			
Line 15	Fund:	_		
Line 15	Disbursements for Plan Administration Expenses	_		
Line 15a	Plan Development Expenses Not Paid bu the Fund:			
	1. Fees			
	Fund Administrator			
	IDC	_		
	Receiver			
	Legal Advisers			
	Accountants			
	Consultants			
	2. Administrative Expenses			
	3. Approved Living Allowance			
	4. Miscellaneous	_		
	Total Plan Development Expenses Not Paid by the Fund		_	5.
Line 15b	Plan Implementation Expenses Not Paid by the Fund:	_		
	1. Fees:			
	Fund Administrator			
	IDC			
	Receiver			
	Legal Advisers			
	Accountants			
	Consultants			
	2. Administrative Expenses			
	3. Investor Identification:			
	Notice/Publishing Approved Plan			
	Claimant Identification			
	Claims Processing		I	
	Web Site Maintenance/Call Center			
	4. Fund Administrator Bond			
	5. Miscellaneous			
	6. FAIR Reporting Expenses			
- 1	Total Plan Implementation Expesnses Not Paid by the Fund		_	

Line 15c	Tax Administrator Fees & Bonds Not Paid by the Fund	T - T		
	Total Disbursements for Plan Administrative Expenses Not Paid			
	by the fund		_	_
Line 16	Disbursements to Court/Other Not Paid by the Fund:	- 1	-	
Line 16a	Investment Expenses/CRIS Fees	- 1		
Line 16b	Federal Tax Payments	-	1	
	Total Disbursements to Court/Other Not Paid by the Fund		-	_
Line 17	DC & State Tax Payments	-	-	
Line 18	No. of Claims			
Line 18a	# of Claims Received This Reporting Period			
Line 18 b	# of Claims Received Since Inception of Fund			
Line 19	No. of Claimants/Investors:			
Line 19a	# of Claimants/Investors Paid This Reporting Period			_
Line 19b	# of Claimants/Investors Paid Since Inception of Fund			_

Recei	Signature) Mary Hu	L
	Mary Margeret Hunt (printed Name)	
	Receiver	
Date:	:: 9-22-2020	