IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

SECURITIES AND EXCHANGE COMMISSION	§ §	
Plaintiff,	§ §	
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V.	§	Case 04:17-CV-00336-ALM
	§	
THURMAN P. BRYANT, III and	§	
BRYANT UNITED CAPITAL FUNDING,	§	
INC., ARTHUR F. WAMMEL, WAMMEL	§	
GROUP, LLC, CARLOS GOODSPEED	§	
a/k/a SEAN PHILLIPS a/k/a GC d/b/a TOP	§	
AGENT ENTERTAINMENT d/b/a/ MR.	§	
TOP AGENT ENTERTAINMENT,	§	
	§	
Defendants,	§	
	§	
and	§	
	§	
THURMAN P. BRYANT, JR.,	§	
	§	
Relief Defendant.	§	

RECEIVER'S TENTH QUARTERLY REPORT FOR RECEIVERSHIP ESTATES OF
(A) THURMAN P. BRYANT, III; (B) BRYANT UNITED CAPITAL FUNDING, INC.;
(C) ARTHUR F. WAMMEL; (D) WAMMEL GROUP, LLC; AND
(E) WAMMEL GROUP HOLDINGS PARTNERSHIP
(QUARTER ENDING SEPTEMBER 30, 2019)

Jennifer Ecklund, the Court-appointed Receiver (the "Receiver") for Defendants Thurman P. Bryant, III ("Bryant") and Bryant United Capital Funding, Inc. ("BUCF") (Bryant and BUCF, collectively, the "Bryant Defendants") and Defendant Arthur F. Wammel ("Wammel"), Defendant Wammel Group, LLC (the "Wammel Group"), and Wammel Group Holdings Partnership ("WGHP") (together Wammel, Wammel Group, and WGHP, the "Wammel Defendants") receivership estates (together, the "Receivership Estate" or the

"Receivership") in the above-captioned case (the "Case"), by and through undersigned counsel, hereby files this *Receiver's Tenth Quarterly Report*.

I. BACKGROUND

- 1. On May 15, 2017 (the "SEC Application Date"), Plaintiff, the Securities and Exchange Commission ("SEC"), filed its application for the appointment of a receiver for Defendants, Thurman P. Bryant, III and Bryant United Capital Funding, Inc. [Dkt. No. 4] (the "SEC Application").
- 2. Specifically, Bryant and BUCF promised investors their funds would be safely preserved in secure escrow accounts and used for the sole purpose of serving as proof of funds to enable BUCF to secure a line of credit with which to pursue a mortgage-related investment program resulting in 30% returns. As Bryant, BUCF, and Wammel knew, these promises were false. No secure escrow accounts existed, and there was no mortgage-related investment program. Amended Complaint, Dkt. No. 154 (the "Amended Complaint"), at ¶ 4. In reality, and directly contrary to representations they made, the Receivership Defendants commingled investor funds in a single deposit account controlled by Bryant, from which he, among other things, (a) funneled approximately \$16.1 million to the Wammel Defendants; (b) misappropriated \$4.8 million to fund his personal living expenses; and (c) transferred more than \$1.5 million to Defendant Goodspeed and Relief Defendant Bryant, Jr., all without investors' consent or knowledge. Id.
- 3. On May 15, 2017, after the Court's review of the SEC Application and upon the Court's conclusion that the Court has subject matter jurisdiction over this case and personal jurisdiction over the Bryant Defendants, the Court determined that entry of an order appointing a receiver over the Bryant Defendants was both necessary and appropriate to marshal, conserve,

hold, and operate all of the Bryant Defendants' assets pending further order of the Court. Accordingly, the Court entered the *Order Appointing Receiver* on May 15, 2017, naming Jennifer Ecklund as the Receiver over the Receivership Estate of the Bryant Defendants. *See* Dkt. No. 17. The same day, the Court entered the Order Granting *Ex Parte Temporary Restraining Order, Freezing Assets, Granting Other Equitable Relief*, and Setting Hearing for Preliminary Injunction. *See* Dkt. No. 16.

- 4. The SEC negotiated and the Court entered on June 2, 2017 the *Agreed Order Granting Preliminary Injunction and Other Relief* [Dkt. No. 27] (the "**Agreed Preliminary Injunction**") among Defendant Bryant, the Receiver, and the SEC.
- 5. On June 8, 2017, the Wammel Defendants filed an Answer to the Complaint [Dkt. No. 29]. On June 9, 2017, Relief Defendant Thurman P. Bryant, Jr. filed an Answer to the Complaint [Dkt. No. 30]. Despite having been personally served with notice of the suit [see Dkt. No. 28], Relief Defendant Carlos Goodspeed has wholly failed to answer the allegations in the Complaint.
 - 6. On July 10, 2017, Bryant filed an Answer to the Complaint [Dkt. No. 40].
- 7. The May 15 Order Appointing Receiver was expanded on July 19, 2017 [Dkt. No. 48] (the "Receivership Order"), to add the Wammel Defendants to the Receivership. The Receivership Order did not change the substance of the Receiver's original powers as set forth in the May 15th Order.
- 8. Pursuant to the Receivership Order, the Receiver is charged with marshaling and preserving all the assets of the Receivership Estate (as defined in the Receivership Order). The Receivership Order directed that the Receiver file an initial report within the first 30 days following her appointment (the "Initial Status Reports"), which the Receiver filed on behalf of

the Bryant Defendants Receivership on June 14, 2017 and on behalf of the Wammel Defendants Receivership on August 18, 2017. The Receiver herein incorporates the Initial Status Reports [Dkt. Nos. 32 and 95]. The Receivership Order further directs that the Receiver report on a quarterly basis her activities within 30 days after the end of each calendar quarter (defined in the Order as the "Quarterly Status Report"). The Receiver filed the First Quarterly Report on July 31, 2017, the Second Quarterly Report on October 30, 2017, the Third Quarterly Report on January 30, 2018, the Fourth Quarterly Report on April 30, 2018, the Fifth Quarterly Report on July 30, 2018, the Sixth Quarterly Report on October 30, 2018, the Seventh Quarterly Report on January 30, 2019, the Eighth Quarterly Report on April 30, 2019, and the Ninth Quarterly Report on July 30, 2019, and incorporates Dkt. Nos. 72, 132, 156, 202, 273, 290, 300, 317, and 332 herein. Receivership Order at ¶ 52.

- 9. In compliance with the Receivership Order, this Quarterly Status Report (the "**Tenth Quarterly Report**") contains the following information at Section III:
 - (a) A summary of the operations of the Receiver;
 - (b) The amount of cash on hand, the amount and nature of accrued administrative expenses, and the amount of unencumbered funds in the estate;
 - (c) A schedule of all the Receiver's receipts and disbursements (attached as **Exhibit A** to the [Tenth] Quarterly Status Report), with one column for the quarterly period covered and a second column for the entire duration of the receivership;
 - (d) A description of all known Receivership Property, including approximate or actual valuations, anticipated or proposed dispositions, and reasons for retaining assets where no disposition is intended¹:

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¹ In further compliance with the Receivership Order, the information contained herein reflects the existence, value, and location of all Receivership Property, and of the extent of liabilities, both those claimed to exist by others and those the Receiver believes to be legal obligations of the Receivership Estate, to the best of the Receiver's knowledge as of the Reporting Period. *See* Receivership Order, ¶ 52.

- (e) 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);
- (f) A list of all known creditors with their addresses and the amounts of their claims;
- (g) The status of Creditor Claims Proceedings, after such proceedings have been commenced; and
- (h) The Receiver's recommendations for a continuation or discontinuation of the receivership and the reasons for the recommendations.

Receivership Order, ¶ 53.

Quarterly Report covered the period May 15, 2017 through June 30, 2017 (the "First Reporting Period"). The Second Quarterly Report covered the period July 1, 2017 through September 30, 2017 (the "Second Reporting Period"). The Third Quarterly Report covered the period October 1, 2017 through December 31, 2017 (the "Third Reporting Period"). The Fourth Quarterly Report covered the period January 1, 2018 through March 31, 2018 (the "Fourth Reporting Period"). The Fifth Quarterly Report covered the period April 1, 2018 through June 30, 2018 (the "Fifth Reporting Period"). The Sixth Quarterly Report covered the period July 1, 2018 through September 30, 2018 (the "Sixth Reporting Period"). The Seventh Quarterly Report covered the period October 1, 2018 through December 31, 2018 (the "Seventh Reporting Period"). The Eighth Quarterly Report covered the period January 1, 2019 through March 31, 2019 (the "Eighth Reporting Period"). The Ninth Quarterly Report covered the period April 1, 2019 through June 30, 2019 (the "Ninth Reporting Period"). The Tenth Quarterly Report covers the period July 1, 2019 through September 30, 2019 (the "Reporting Period").

II. GENERAL OVERVIEW

During the Reporting Period, the Receiver actively participated in the ongoing litigation against certain Winning Investors in Ancillary Civil Action No. 4:18-cv-00359 and against certain Transferees in Ancillary Civil Action No. 4:18-cv-00360. Also, when necessary, the Receiver analyzed documents, corresponded with creditors and investors, and worked with various other individuals and counsel. Many of the tasks performed by the Receiver apply equally to the Bryant Defendants and the Wammel Defendants. Accordingly, the statements and reports contained within this Eighth Quarterly Report should be read to apply equally to the Bryant Defendants and the Wammel Defendants unless specifically noted to apply to a specific Receivership Estate.

III. REPORT SPECIFIC TO RECEIVERSHIP ESTATE

A. Summary of Receiver's Operations

- 12. At the commencement of the Reporting Period, the Receiver and her team have been working diligently to liquidate the remaining assets of the Receivership Estate, participate in the ongoing clawback and fraudulent transfer litigation, and make the first interim distribution to the Net Losing Investors in the amounts set forth in the Receiver's Amended Net Losing Investor Distribution Schedule. Some of the actions the Receiver and her team took included:
 - (a) Successfully moving to close the ancillary action against certain Transferees in Ancillary Civil Action No. 4:18-cv-00360;
 - (b) Prepare for and attending the meeting of creditors in the bankruptcy instituted by Defendant Hossein Seddighi in Ancillary Civil Action No. 4:18-cv-00359;
 - (c) Analyzing the Receiver's claims in the bankruptcy actions instituted by certain Winning Investors in Ancillary Civil Action No. 4:18-cv-00359;

- (d) Preparing for and making approved interim distribution to Net Losing Investors and responding to investor inquiries relating to same;
- (e) Continuing liquidation of the remaining Receivership assets;
- Continuing efforts to enforce and collect on the Court's Agreed Judgment (f) as to Defendant Carlos Goodspeed in Ancillary Civil Action No. 4:17-cv-00856;
- Continuing efforts to enforce and collect on the default judgments against (g) certain Transferees in Ancillary Civil Action No. 4:18-cv-00360;
- (h) Working with a financial consultant to perform forensic accounting and related analysis regarding, among other things, intricate, overlapping Ponzi scheme operated by the Bryant and Wammel Defendants identified as part of the Receiver's investigation and related fraudulent transfer analysis;
- (i) Maintaining a line of communication with investors by updating the Receiver's website (http://bucfreceivership.tklaw.com);
- Working with Veritas Advisory Group, Inc. ("Veritas") to perform (j) forensic accounting and coordinating appropriate follow up with respect to various identified accounts and/or persons or entities of interest discovered, as well as to investigate and determine identifying information as to the BUCF and Wammel Group investors, including amounts invested;
- (k) Conducting research as to persons and entities of interest based on the Receiver's investigation;
- (1) Seeking and/or reviewing information from named persons and entities of interest based on the Receiver's investigation;
- Conferring with Defendant Wammel's counsel to discuss going-forward (m) issues;
- Conferring with Defendant Stephen Garrett's counsel to discuss issues (n) relating to the real property located at 8101 South Humble Road, Texas City, Texas 77591;
- (o) Conferring with Defendant Goodspeed's counsel to discuss going-forward issues;
- Identifying and analyzing investors and third parties that received (p) fraudulent transfers from the Receivership Defendants;

- (q) Negotiating and coordinating settlements with investors and third parties relating to funds received from the Receivership Defendants;
- (r) Maintaining the Receiver's bank account in accordance with the Receivership Order;
- (s) Satisfying on-going, ordinary course obligations of the Receivership Estate in order to maintain the status quo;
- (t) Responding to investor inquiries and reviewing information submitted by investors in furtherance of the Receiver's duties pursuant to the Receivership Order; and
- (u) Preparing for and actively participating in ongoing litigation against Carlos Goodspeed, certain Winning Investors, and certain Transferees.
- The Receivership Order provided for an asset freeze, which resulted in approximately \$12,425.00² in funds in accounts located at various financial institutions where Defendant Bryant has signing authority on the accounts being frozen (hereinafter, the "Bryant Defendants' Frozen Funds"). The Receiver filed a Motion to Liquidate and Terminate [Dkt. No. 66] (the "Motion to Liquidate"), which included a request to liquidate and deposit the Bryant Defendants' Frozen Funds into the Receiver's bank account (the "Receivership Account" or "Receiver's Account"). On August 27, 2017, the Court granted the Receiver's Motion to Liquidate and Terminate [Dkt. No. 106].
- 14. Similarly, the Receivership Order provided for an asset freeze of the Wammel Defendants' assets, which resulted in approximately \$250,000 in funds in accounts located at various financial institutions where the Wammel Defendants have signing authority on the accounts being frozen (hereinafter, the "Wammel Defendants' Frozen Funds"). The Receiver filed her Motion to Enter Agreed Order (1) Authorizing Liquidation of Real Property, Aircraft, Vehicles, Furniture, Fixtures, Equipment, and Other Items and Termination of Certain Leases,

² Amount does not include frozen accounts where Defendant Bryant was a signatory but the account was in a name other than that of Bryant or Bryant United Capital Funding.

(II) to Approve Procedures to Sell Receivership Assets, and (III) to Release Funds from Certain

Frozen Bank Accounts into the Receiver's Account [Dkt. No. 131] (the "Motion to Enter

Agreed Order"), which included a request to liquidate and deposit the Wammel Defendants'

Frozen Funds into the Receiver's Account. On November 6, 2017, the Court granted the Motion

to Enter Agreed Order [Dkt. No. 133]. In addition, the Receiver identified funds held by various

individuals that she believes are Receivership funds and is working to have those funds brought

into the Receiver's Account.

To the extent necessary, the Receiver will continue to collect and/or review 15.

financial records and statements from financial institutions that may have accounts related to the

Receivership Estate. To the extent the Receiver receives any supplemental document

production, and the Receiver will analyze such information to locate, preserve, and obtain all

available assets belonging to the Receivership Estate.

16. To the extent necessary, the Receiver will continue her endeavors to analyze and

collect evidence and information produced by various individuals and institutions. The Receiver

remains in close contact with counsel to the SEC. The Receiver also endeavors to interview

every interested person willing to be interviewed by the Receiver or her counsel. Several

persons previously agreed to be interviewed and have been helpful in locating relevant

information. Further, pursuant to this Court's Order granting the Receiver's Motion to Liquidate

and Terminate [Dkt. No. 106], Order granting the Motion to Enter Agreed Order [Dkt. No. 133],

and Order granting the Receiver's Emergency Agreed Motion to Approve Private Sale of Real

Property Free and Clear of All Liens, Claims, and Encumbrances [Dkt. No. 174], the Receiver

has accomplished significant liquidation of the Wammel Defendants' assets and the Bryant

Defendants' assets in the Receiver's possession in order to bring additional funds into the

Receivership Estate and alleviate the burden of maintaining the property itself.

B. Cash on Hand / Administrative Expenses

17. The Receiver continues her investigation into assets and liabilities of the

Bryant Defendants and Wammel Defendants. The Receiver is actively supplementing her

investigation by reviewing mail received (as a result of the mail forwards), documents submitted,

and requesting additional information from various sources, including, if necessary, pursuant to

subpoenas issued to financial institutions or representatives of entities of interest and/or

depositions of persons or representatives of entities of interest. With the liquidation phase of the

Receivership nearing an end, the Receiver's focus going forward will be on clawback and

fraudulent transfer litigation to bring additional funds into the Receivership Estate and then to

bring the Receivership Estate to a conclusion.

18. At or near the date the Receiver was appointed, the Receivership Estate held

almost no cash on hand. At the end of the First Reporting Period, the known assets of the

Receivership Estate were comprised of: (a) approximately \$30,000 cash on hand in the

Receivership Account; (b) funds totaling approximately \$12,425 to be received by the Estate in

the near future; (c) illiquid personalty; and (d) potential (and as-yet uninvestigated) causes of

action against third parties. See First Quarterly Report at ¶¶ 8, 18.

19. At the end of the Second Reporting Period, the known assets of the Receivership

Estate were comprised of: (a) approximately \$44,000 cash on hand in the Receivership Account;

(b) funds totaling approximately \$350,000 to be received by the Estate in the near future;

(c) illiquid personalty; (d) personalty and real property seized from the Bryant Defendants and

the Wammel Defendants, including more than seven (7) motor vehicles, a 1990 Cessna 650

Receiver's Tenth Quarterly Report Ending September 30, 2019 - Page 10

Citation, and two residential properties with each being over 2,700 square feet; and (e) potential causes of action against third parties (which the Receiver is actively investigating).

At the end of the Third Reporting Period, the known assets of the Receivership Estate were comprised of: (a) approximately \$214,000 cash on hand in the Receivership Account; (b) funds totaling approximately \$3,000 to be received by the Estate in the near future;³ (c) illiquid personalty; (d) personalty and real property seized from the Bryant Defendants and the Wammel Defendants, including a 1990 Cessna 650 Citation, two residential properties with each being over 2,700 square feet, and various motor vehicles; (e) causes of action against Thurman P. Bryant, Jr. and Carlos Goodspeed; and (f) potential causes of action against third parties (which the Receiver is actively investigating). Of note, although there was approximately \$214,000 cash on hand in the Receivership Account at the end of the Third Reporting Period, the Receiver prepared three checks during the Reporting Period totaling \$104,884.68, which were not deposited by the recipients during the Reporting Period.⁴

21. At the end of the Fourth Reporting Period, the known assets of the Receivership Estate were comprised of: (a) approximately \$473,546.98 cash on hand in the Receivership Account; (b) funds totaling approximately \$1,700, which the Receiver will work to release into the Estate in the future; (c) illiquid personalty; (d) personalty and real property seized from the Wammel Defendants, including a 1990 Cessna 650 Citation, one residential property – a 3,500 square-foot residence near Houston, and various firearms; (e) causes of action against

³ This amount accounts for the funds that are being transferred from the Bryant Defendants' and the Wammel Defendants' bank accounts.

⁴ The three checks totaling \$104,884.68 were the following: (1) check for \$96,339.68 to Veritas pursuant to this Court's Order Approving the Second Interim Fee Application [Dkt. No. 142]; (2) check for \$8,500.00 to Wammel's prior landlord at 3 Mariners Ln., League City, Kemah, Texas 77565; and (3) check for \$45.00 for statutory fees associated with subpoena documentation.

⁵ This amount includes frozen accounts where Defendant Bryant was a signatory but the account was in a name other than that of Bryant or Bryant United Capital Funding.

Thurman P. Bryant, Jr. and Carlos Goodspeed; and (f) potential causes of action against third parties (which the Receiver is actively investigating). Of note, although there was approximately \$473,546 cash on hand in the Receivership Account at the end of the Fourth Reporting Period, the Receiver prepared two checks during the Reporting Period totaling \$9,500.00, which were not deposited by the recipients during the Reporting Period, and one check totaling \$45.00 prepared during the Third Reporting Period that still has not been deposited by the recipient.

- At the end of the Fifth Reporting Period, the known assets of the Receivership Estate were comprised of: (a) approximately \$735,516.40 cash on hand in the Receivership Account; (b) funds totaling approximately \$1,700, which the Receiver will work to release into the Estate in the future; (c) illiquid personalty; (d) personalty and real property seized from the Wammel Defendants, including a 1990 Cessna 650 Citation and one residential property a 3,500 square-foot residence near Houston; and (e) causes of action against Carlos Goodspeed, various third parties, and a financial institution. Of note, although there was approximately \$735,516.40 cash on hand in the Receivership Account at the end of the Fifth Reporting Period, the Receiver prepared one check totaling \$45.00 prepared during the Third Reporting Period that still has not been deposited by the recipient.
- 23. At the end of the Sixth Reporting Period, the known assets of the Receivership Estate were comprised of: (a) approximately \$1,347,858.08 cash on hand in the Receivership Account; (b) funds totaling approximately \$1,700, which the Receiver will work to release into

⁶ The two checks totaling \$9,500 were the following: (1) check for \$9,400.00 for payment related to the Wammel Group residence and (2) check for \$100.00 for payment related to the Wammel Group residence. The check for \$45.00 prepared during the Third Reporting Period is for statutory fees associated with subpoena documentation.

⁷ This amount includes frozen accounts where Defendant Bryant was a signatory but the account was in a name other than that of Bryant or Bryant United Capital Funding.

⁸ The check for \$45.00 prepared during the Third Reporting Period is for statutory fees associated with subpoena documentation.

the Estate in the future; (c) illiquid personalty; (d) real property seized from the Wammel Defendants, including one residential property – a 3,500 square-foot residence near Houston; (e) causes of action against various third parties and a financial institution; and (f) agreed judgment against Defendant Carlos Goodspeed in Ancillary Civil Action No. 4:17-cv-00856. Of note, although there was approximately \$1,347,858.08 cash on hand in the Receivership Account at the end of the Sixth Reporting Period, the Receiver prepared one check during the Sixth Reporting Period totaling \$9,400.00, which was not deposited by the recipient during the Sixth Reporting Period, and one check totaling \$45.00 prepared during the Third Reporting Period that still has not been deposited by the recipient.

At the end of the Seventh Reporting Period, the known assets of the Receivership Estate were comprised of: (a) approximately \$758,826.34 cash on hand in the Receivership Account; (b) funds totaling approximately \$1,700, which the Receiver will work to release into the Estate in the future; (c) illiquid personalty; (d) real property seized from the Wammel Defendants, including one residential property – a 3,500 square-foot residence near Houston; (e) causes of action against various third parties and a financial institution; and (f) agreed judgment against Defendant Carlos Goodspeed in Ancillary Civil Action No. 4:17-cv-00856. Of note, although there was approximately \$758,826.34 cash on hand in the Receivership Account at the end of the Seventh Reporting Period, the Receiver prepared one check totaling \$45.00 prepared during the Third Reporting Period that still has not been deposited by the recipient. ¹⁰

⁹ The check for \$9,400 prepared during the Reporting Period is for payment related to the Wammel Group residence. The check for \$45.00 prepared during the Third Reporting Period is for statutory fees associated with subpoena documentation.

¹⁰ The check for \$45.00 prepared during the Third Reporting Period is for statutory fees associated with subpoena documentation.

25. At the end of the Eighth Reporting Period, the known assets of the Receivership Estate were comprised of: (a) approximately \$808,886.34 cash on hand in the Receivership Account; (b) illiquid personalty; (c) real property seized from the Wammel Defendants, including one residential property – a 3,500 square-foot residence near Houston; (d) causes of action against various third parties and a financial institution; and (e) agreed judgment against Defendant Carlos Goodspeed in Ancillary Civil Action No. 4:17-cv-00856. Of note, although there was approximately \$808,886.34 cash on hand in the Receivership Account at the end of the Eighth Reporting Period, the Receiver prepared one check during the current Reporting Period totaling \$9,400.00, which was not deposited by the recipient during the current Reporting Period, and one check totaling \$45.00 prepared during the Third Reporting Period that still has not been deposited by the recipient.¹¹

At the end of the Ninth Reporting Period, the known assets of the Receivership Estate were comprised of: (a) approximately \$970,279.84 cash on hand in the Receivership Account; (b) illiquid personalty; (c) personalty seized from the Bryant Defendants and real property seized from the Wammel Defendants, including one residential property – a 3,500 square-foot residence near Houston; (d) causes of action against various third parties and a financial institution; (e) agreed judgment against Defendant Carlos Goodspeed in Ancillary Civil Action No. 4:17-cv-00856; and (f) default judgments against certain Transferees in Ancillary Civil Action No. 4:18-cv-00360. Of note, although there was approximately \$970,279.84 cash on hand in the Receivership Account at the end of the Ninth Reporting Period, the Receiver

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¹¹ The check for \$9,400 prepared during the Reporting Period is for payment related to the Wammel Group residence. The check for \$45.00 prepared during the Third Reporting Period is for statutory fees associated with subpoena documentation.

prepared one check totaling \$45.00 prepared during the Third Reporting Period that still has not been deposited by the recipient.¹²

At the end of the current Reporting Period, the known assets of the Receivership Estate include the following: (a) approximately \$362,354.03 cash on hand in the Receivership Account; (b) illiquid personalty; (c) personalty seized from the Bryant Defendants and real property seized from the Wammel Defendants, including one residential property – a 3,500 square-foot residence near Houston; (d) causes of action against various third parties and a financial institution; (e) agreed judgment against Defendant Carlos Goodspeed in Ancillary Civil Action No. 4:17-cv-00856; and (f) default judgments against certain Transferees in Ancillary Civil Action No. 4:18-cv-00360. Of note, although there was approximately \$362,354.03 cash on hand in the Receivership Account at the end of the current Reporting Period, the Receiver prepared one check totaling \$45.00 prepared during the Third Reporting Period that still has not been deposited by the recipient. ¹³

Summary of Present Cash on Hand in the Receiver's Account Until the End of the Reporting Period			
Cash on Hand in the Receiver's Account (at the end of the current	\$362,354.03		
Reporting Period)			
Checks <u>Prepared</u> by the Receiver But <u>Not Deposited</u> by Recipients	(\$45.00)		
During the Reporting Period			
Estimated Total Cash on Hand in the Receiver's Account at the	\$362,309.03		
End of the Reporting Period			

28. The Receiver's investigation has not had the benefit of the reports that Defendant Bryant and Defendant Wammel were required to file pursuant to the Receivership Order (*i.e.*, the initial statement regarding property or the second statement regarding property). *See* Receivership Order at ¶¶ 9, 10. Defendant Bryant submitted a sworn statement to the Receiver

¹² The check for \$45.00 prepared during the Third Reporting Period is for statutory fees associated with subpoena documentation.

¹³ The check for \$45.00 prepared during the Third Reporting Period is for statutory fees associated with subpoena documentation.

late in the day on June 12, 2017 (the "June Statement"), which the Receiver reviewed and utilized in preparation of the First Quarterly Report, in particular in its identification of potential non-investor creditors. The Receiver understands that Defendant Wammel has invoked his Fifth Amendment privilege against self-incrimination in response to these provisions in the Receivership Order. Nevertheless, however, counsel for the Wammel Defendants have been cooperative and continue to confer with the Receiver and her counsel with respect to the location, identification, securing, and return of various Receivership assets.

i. Ordinary Course Expenses.

- 29. During the Reporting Period, expenditures made from the Receivership Account were for expenses relating to the Receiver's assets, approved fees and expenses, and banking fees, which totaled \$267,255.11. *See* Lines 10a-e of the attached Exhibit A.
- 30. Certain expenses incurred in the ordinary course of business by the Receiver during the Reporting Period remain outstanding and will be identified in the reporting period in which they are paid. The Receiver has identified certain ongoing expenses that the Receivership Estate is incurring on a regular and continuing basis in the ordinary course. Of note, pursuant to this Court's Order granting the Receiver's Motion to Liquidate and Terminate [Dkt. No. 106], Order granting the Motion to Enter Agreed Order [Dkt. No. 133], and Order granting the Receiver's Emergency Agreed Motion to Approve Private Sale of Real Property Free and Clear of All Liens, Claims, and Encumbrances [Dkt. No. 174], the Receiver terminated or is in the process of terminating as many of these recurring charges as possible to preserve value of the Receivership Estate.

ii. Receiver and Retained Professional Fees.

- 31. In accordance with the Receivership Order, the Receiver and her Retained Professionals are entitled to compensation for services rendered on behalf of the Receivership As will be detailed in the interim fee applications of the applicable Retained Estate. Professional, the Receiver and her Retained Professionals have worked diligently during the Reporting Period to address the myriad issues that have arisen, including, but not limited to, correspondence with interested persons, investigation of assets and liabilities, investigation of invested amounts by investors, preparation of motions, responses, and reports to advance the goals of the Receivership, analysis of causes of action against third parties, participation in the ongoing litigation against certain Winning Investors in Ancillary Civil Action No. 4:18-cv-00359, participation in the ongoing litigation against certain Transferees in Ancillary Civil Action No. 4:18-cv-00360, and other related matters.
- 32. During the Reporting Period, the Receivership Estate incurred expenses for the services of the Receiver and her Retained Professionals (Thompson & Knight LLP and Veritas) (the "Reporting Period Professional Fees"). These amounts are subject to the hold back guidelines established in the Receivership Order. See Receivership Order at ¶ 60. The Receiver and her Retained Professionals have filed and will be filing additional fee applications that provide further detail regarding these fees, and no Reporting Period Professional Fees will be paid without express Court approval.
- 33. The Receiver is concerned by the continued administrative costs associated with this Case and continues to be cost-conscious while balancing the needs of the interested investors and other stakeholders.

C. Receiver's Receipts and Disbursements

34. At the beginning of this Reporting Period, the Receiver had \$970,279.84 in the Receiver's Account. The Receiver received and deposited \$91,200.00 in the Receiver's Account during the Reporting Period, each detailed below and reflected in Exhibit A at Lines 3-8.

Date	Source	Amount	Notes
7/1/2019		\$1,000.00	Settlement ¹⁴
7/2/2019		\$3,000.00	Settlement ¹⁵
7/11/2019		\$7,500.00	Settlement ¹⁶
7/11/2019		\$100.00	Settlement ¹⁷
7/11/2019		\$100.00	Settlement ¹⁸
7/11/2019	Coastal Bay Construction, LLC	\$9,300.00	Payment: Stephen Garrett
	(signatory Stephen Garrett)		
7/11/2019		\$7,500.00	Settlement ¹⁹
7/25/2019		\$100.00	Settlement ²⁰
7/25/2019		\$22,500.00	Settlement ²¹
7/25/2019		\$22,500.00	Settlement ²²
8/1/2019		\$1,000.00	Settlement ²³
8/6/2019		\$3,000.00	Settlement ²⁴
8/12/2019	Coastal Bay Construction, LLC	\$9,300.00	Payment: Stephen Garrett
	(signatory Stephen Garrett)		
8/30/2019		\$100.00	Settlement ²⁵
8/30/2019		\$100.00	Settlement ²⁶
9/3/2019		\$3,000.00	Settlement ²⁷
9/3/2019		\$1,000.00	Settlement ²⁸
9/23/2019		\$100.00	Settlement ²⁹

¹⁴ The terms and conditions of the referenced settlement are confidential.

¹⁵ The terms and conditions of the referenced settlement are confidential.

¹⁶ The terms and conditions of the referenced settlement are confidential.

¹⁷ The terms and conditions of the referenced settlement are confidential.

¹⁸ The terms and conditions of the referenced settlement are confidential.

¹⁹ The terms and conditions of the referenced settlement are confidential.

²⁰ The terms and conditions of the referenced settlement are confidential.

²¹ The terms and conditions of the referenced settlement are confidential.

²² The terms and conditions of the referenced settlement are confidential.

²³ The terms and conditions of the referenced settlement are confidential.

²⁴ The terms and conditions of the referenced settlement are confidential.

²⁵ The terms and conditions of the referenced settlement are confidential.

²⁶ The terms and conditions of the referenced settlement are confidential.

²⁷ The terms and conditions of the referenced settlement are confidential.

²⁸ The terms and conditions of the referenced settlement are confidential.

²⁹ The terms and conditions of the referenced settlement are confidential.

35. As previously stated, disbursements that have been made by the Receiver from the Receiver's Account are identified in Exhibit A at Lines 10a-e for expenses relating to the Receiver's assets, approved fees and expenses, and banking fees.

D. Receivership Property

- 36. Pursuant to this Court's Order granting the Receiver's Motion to Liquidate and Terminate [Dkt. No. 106], Order granting the Motion to Enter Agreed Order [Dkt. No. 133], and Order granting the Receiver's Emergency Agreed Motion to Approve Private Sale of Real Property Free and Clear of All Liens, Claims, and Encumbrances [Dkt. No. 174], the Receiver has accomplished significant liquidation of the Wammel Defendants' assets and the Bryant Defendants' assets in the Receiver's possession in order to bring additional funds into the Receivership Estate and alleviate the burden of maintaining the property itself.
- Upon her appointment, the Receiver took possession of a (former) secondary residence of Wammel. Wammel's wife lived in a 2,700 square-foot home located in a gated community near Houston (the "Wammel Secondary Residence"). In early October 2017, the Receiver asked Samantha Wammel to vacate the Wammel Secondary Residence. The Receiver engaged the services of a real estate agent, and the Wammel Secondary Residence was sold in March 2018 in accordance with the Court's Order granting the Receiver's Emergency Agreed Motion to Approve Private Sale of Real Property Free and Clear of All Liens, Claims, and Encumbrances [Dkt. No. 174].
- 38. Mr. Wammel also purchased a 3,500 square-foot residence near Houston owned by the Wammel Group (the "Wammel Group Residence").³⁰ Stephen Garrett occupies the

Receiver's Tenth Quarterly Report Ending September 30, 2019 - Page 19 $524662.000002\ 22805010.1$

³⁰ The Wammel Group Residence is potentially encumbered by various liens, and there are questions about the validity of those liens that require further investigation and resolution. The Receiver is working to confirm the nature and extent of the liens on the Wammel Group Residence.

Wammel Group Residence pursuant to an agreement, and thus the Receiver is working with Mr. Garrett regarding payments and residency. On January 24, 2019, the Receiver filed her Motion to Liquidate Property and Void or Clarify Contract for Deed [Dkt. No. 298] regarding the Wammel Group Residence. On February 13, 2019, Ancillary Defendant Stephen Garrett filed his Motion for Leave and Extension of Time to Respond to Motion to Liquidate Property [Dkt. No. 302], which this Court granted on February 15, 2019 [Dkt. No. 305]. On March 1, 2019, Ancillary Defendant Stephen Garrett filed his Response and Objection to Receiver's Motion to Liquidate Property [Dkt. No. 307]. On March 8, 2019, the Receiver filed her Motion for Leave to File Reply in Support of the Receiver's Motion to Liquidate Property and Void or Clarify Contract for Deed in Excess of Page Limit [Dkt. No. 308] and her Reply in Support of the Receiver's Motion to Liquidate Property and Void or Clarify Contract for Deed [Dkt. No. 309]. On March 11, 2019, the Court granted the Receiver's Motion for Leave to File Reply in Support of the Receiver's Motion to Liquidate Property and Void or Clarify Contract for Deed in Excess of Page Limit [Dkt. No. 312]. On May 7, 2019, Ancillary Defendant Stephen Garrett filed his Motion for Leave to File Late Sur-Reply in Excess of Page Limit [Dkt. No. 319] and Sur-Reply in Opposition to Receiver's Motion to Liquidate Property [Dkt. No. 320]. On May 31, 2019, the Receiver filed her Response to Defendant Garrett's Motion for Leave, Motion to Strike Defendant Garrett's Sur-Reply and/or, in the Alternative, Motion for Leave to Respond [Dkt. No. 328]. On August 19, 2019, the Court entered its Memorandum Opinion and Order [Dkt. No. 335]. On August 30, 2019, the Receiver and Ancillary Defendant Stephen Garrett jointly filed an Agreed Motion for Entry of Expedited Discovery Schedule Related to 8101 South Humble Road, Texas City, Texas 77591 [Dkt. No. 340], which this Court granted on October 21, 2019 [Dkt. No. 341].

39. The Receiver contracted with a broker to assist in the sale of the 1990 Cessna 650

Citation owned by Wammel. This Aircraft has been the subject of multiple Orders of this Court,

which provided the Receiver with authorization to liquidate this valuable Receivership Asset for

the benefit of the aggrieved investors. In July 2018, the sale of the Aircraft closed and the

purchaser submitted its application for registration of the Aircraft to the FAA. On September 5,

2018, the Receiver received the payment for the sale of the Aircraft.

40. In February 2018, the Receiver sold a motorcycle from Defendant Bryant's

(previously) rented storage units.³¹

41. The Receiver has worked with various consultants to estimate the value of the

property belonging to the Bryant Defendants and the Wammel Defendants and to develop a plan

for liquidating same. The liquidation of the Bryant Defendants' assets resulted in approximately

\$85,000 coming into the Receivership Estate. The liquidation of the Wammel Defendants'

assets resulted in more than \$963,000 coming into the Receivership Estate. The Receiver

anticipates additional funds will come into the Receivership Estate once the remaining

Receivership assets are liquidated.

42. On April 11, 2019, the Receiver filed her Motion for Return of Receivership

Property [Dkt. No. 315], which this Court granted on May 3, 2019 [Dkt. No. 318].

43. The Receiver has prepared a summary listing of the remaining property of the

Receivership Estate, which is attached as **Exhibit B** hereto. There are some items of interest,

including real property.

44. The Receiver previously identified approximately \$1,700.00 in additional frozen

accounts at various financial institutions where Defendant Bryant was a signatory, but the

³¹ The Receiver coordinated with the lienholder regarding the sale of the motorcycle.

accounts holding these funds were in a name other than that of Bryant or Bryant United Capital

Funding. Because the frozen accounts were not in the name of one of the Receivership

Defendants, the Receiver, at this time, has ceased her efforts to obtain these frozen funds.

Additionally, the Receiver identified, and became named as the beneficiary of, a life insurance

policy on the life of Defendant Bryant with \$1,500,000 death benefit (though the policy has no

apparent cash value).

45. In accordance with this Court's Order Extending the Deadline set forth in

28 U.S.C. § 754 [Dkt. No. 55], the Receiver continued investigating whether the Receivership

Estate had any additional leases or property outside of the Eastern District of Texas and

ultimately filed a copy of the Receivership Order and the Complaint in the Southern District of

Texas and in the Western District of Texas.

46. To the extent necessary, the Receiver will continue to search for the existence of

additional property and assets and track down any leads regarding same. At this time, the

Receiver does not anticipate discovering any additional material assets of the Bryant Defendants

and the Wammel Defendants and will focus on the clawback and fraudulent transfer litigation

and bringing the Receivership Estate to a conclusion. The Receiver will continue to detail her

findings and relevant updates as to the Bryant Defendants and the Wammel Defendants in future

quarterly reports.

E. Claims Held By Receivership Estate

47. The Receiver's investigation is ongoing and includes the review of documents

produced by financial institutions or otherwise. The Receiver is also working with Veritas to

perform certain forensic analyses. At this time, the Receiver will focus on the clawback and

fraudulent transfer litigation and bringing the Receivership Estate to a conclusion.

Receiver's Tenth Quarterly Report Ending September 30, 2019 - Page 22

48. On December 14, 2017, the Receiver commenced litigation against Thurman P. Bryant, Jr. and Carlos Goodspeed, in the Eastern District of Texas, Ancillary Civil Action No. 4:17-cv-00856 [Dkt. No. 1]. On July 27, 2018, the Receiver filed her Motion for Entry of Agreed Final Judgment and Agreed Asset Freeze Against Defendant Carlos Goodspeed [Dkt. No. 25] in Ancillary Civil Action No. 4:17-cv-00856, which this Court granted on August 14, 2018 [Dkt. No. 26]. On April 3, 2019, the Receiver's counsel traveled to Frisco, Texas and deposed Carlos Goodspeed. The Receiver continues her efforts to enforce and collect on the Court's Agreed Judgment as to Defendant Carlos Goodspeed in Ancillary Civil Action No. 4:17-cv-00856.

- 49. On May 15, 2018, the Receiver commenced litigation against certain Winning Investors, in the Eastern District of Texas, Ancillary Civil Action No. 4:18-cv-00359 [Dkt. No. 1]. On April 8, 2019, Defendants Roland and Holly Maldonado filed their Notice of Bankruptcy [Dkt. No. 77] in Ancillary Civil Action No. 4:18-cv-00359. On April 9, 2019, the Receiver participated in the mediation in Ancillary Civil Action No. 4:18-cv-00359. On June 24, 2019, Defendant Hossein Seddighi filed his Notice of Bankruptcy [Dkt. No. 88] in Ancillary Civil Action No. 4:18-cv-00359. As of the date of the filing of this Tenth Quarterly Report, the Receiver has either dismissed or settled with the majority of defendants in this ancillary litigation.
- 50. On May 15, 2018, the Receiver commenced litigation against certain Transferees, in the Eastern District of Texas, Ancillary Civil Action No. 4:18-cv-00360 [Dkt. No. 1]. On April 16, 2019, the Receiver participated in the mediation in Ancillary Civil Action No. 4:18-cv-00360. On May 9, 2019, the Court entered default judgments against Tracey Murray [Dkt. No. 125], against ProLiquidation Services LLC [Dkt. No. 126], and against C&C Flowers and

Landscaping LLC [Dkt. No. 127] in Ancillary Civil Action No. 4:18-cv-00360. On July 29,

2019, the Receiver filed her Motion to Close Ancillary Action [Dkt. No. 142] in Ancillary Civil

Action No. 4:18-cv-00360, which this Court on July 30, 2019 [Dkt. No. 143]. The Receiver

continues her efforts to enforce and collect on the default judgments against certain Transferees

in Ancillary Civil Action No. 4:18-cv-00360.

51. On June 26, 2018, Potts Law Firm filed suit in the Eastern District of Texas, on

the Receiver's behalf, against Wells Fargo Bank, N.A. (Case No. 4:18-cv-00452). On August 6,

2018, this Court entered its Order Appointing Special Receiver [Dkt. No. 274], in which

Timothy Micah Dortch of Potts Law Firm was appointed as Special Receiver for the limited

purpose of overseeing the Receivership Estate's pursuit of claims and defenses against Wells

Fargo Bank, N.A.

52. **Non-Investor Creditors.** The Receiver has identified potential non-investor

creditors based on her investigation to date, including review of Receivership Defendants' bank

statements, records provided by financial institutions, telephone conversations with creditors,

and mail received by the Receivership Estate. The Receiver has taken steps to reduce, as much

as possible, recurring charges. Attached hereto as **Exhibit C** is a list of identified or potential

non-investor creditors of both the Bryant Defendants and Wammel Defendants. This list does

not cover accounts that are solely in the name of Defendant Bryant's wife or Defendant

Wammel's wife.

53. **Investors.** The Receiver has compiled the attached list of presumed investors

with the assistance of Veritas' review of financial records and based on the Receiver's review of

other records, including investor statements and records seized and provided to the Receiver. 32 The investor list is attached as **Exhibit D** hereto.

- 54. The Receiver has taken steps to ensure she has up-to-date contact information for each investor identified, including updating investor information as investors contact the Receiver or her counsel.
- 55. During the Reporting Period, the Receiver received numerous emails and phone calls from investors. The Receiver has asked that all investor communications be made through e-mail or mail.
 - 56. The Receiver has identified approximately 171 investors.³³
- During the Reporting Period, in accordance with this Court's Order Granting Motion to Approve Amended Interim Distribution List [Dkt. No. 324], the Receiver made a first interim distribution to the Net Losing Investors in the amounts set forth in the Receiver's Amended Net Losing Investor Distribution Schedule. During the Reporting Period, Net Losing Investors collectively deposited \$431,870.70 of the total \$450,000.00 approved amount to be distributed. *See* Line 9 of the attached Exhibit A. The Receiver continues her efforts to contact and send the remaining interim distribution checks to the Net Losing Investors who have yet to deposit their respective interim distributions.

F. Creditor Claims Proceedings

58. During the Third Reporting Period, the Receiver established a claims process for investors. Investors were notified by mail and electronic distribution. To the extent necessary, the Receiver and her team continue to review submitted claim notification forms and supporting

³² The June Statement included the names of seven (7) investors that may not have been included in the list of investors located in ESI seized from Bryant's home.

³³ During the Reporting Period, the Receiver was notified of an additional potential net losing investment with the Wammel Defendants. The Receiver is currently investigating the circumstances surrounding this alleged investment.

documentation. During the Fourth Reporting Period, the Receiver established a claims process for non-investor creditors in this Case. Non-investor creditors were notified by mail distribution. To the extent necessary, the Receiver and her team continue to review submitted claim notification forms and supporting documentation. Further, the Receiver's Liquidation Plans for the Bryant Defendants and the Wammel Defendants provided the Receivership Estate with additional liquid assets, and the Receiver anticipates additional funds will come into the Receivership Estate once the remaining Receivership assets are liquidated.

59. On January 30, 2019, the Receiver filed her Request for Interim Distribution [Dkt. No. 299], which outlined a proposed pro rata interim distribution to Net Losing Investors, which this Court granted on March 11, 2019 [Dkt. No. 311]. On March 15, 2019, the Receiver filed her Notice Regarding Amended Request for Interim Distribution [Dkt. No. 313]. On April 23, 2019, the Receiver filed her Motion to Approve Amended Interim Distribution List [Dkt. No. 316], which this Court granted on May 28, 2019 [Dkt. No. 324]. During the Reporting Period, in accordance with this Court's Order Granting Motion to Approve Amended Interim Distribution List [Dkt. No. 324], the Receiver made a first interim distribution to the Net Losing Investors in the amounts set forth in the Receiver's Amended Net Losing Investor Distribution Schedule. The Receiver continues her efforts to contact and send the remaining interim distribution checks to the Net Losing Investors who have yet to deposit their respective interim distributions.

G. **Receiver's Recommendations**

While the Receiver seized control of readily identifiable assets and operations, continued her diligence of identifying additional assets and liabilities, accomplished significant liquidation of the Receivership assets, and participated in ongoing litigation, it is too soon to make a final recommendation as to how the Receivership Estate should be resolved. The Receiver anticipates

recommending administrative closure of the Receivership in the next quarterly report. Accordingly, the Receiver recommends that the Receivership continue in order to allow the Receiver additional time to liquidate the remaining Receivership assets, collect on judgments obtained in ongoing clawback and fraudulent transfer litigation, and determine how to resolve the Receivership Estate. The Receiver further continues her efforts to enforce and collect on the Court's Agreed Judgment as to Defendant Carlos Goodspeed in Ancillary Civil Action No. 4:17cv-00856 and the default judgments against certain Transferees in Ancillary Civil Action No. 4:18-cv-00360. Once the Receiver has liquidated the remaining Receivership assets and the ongoing clawback and fraudulent transfer litigation has concluded, the Receiver anticipates preparing and filing a plan for final distribution of Receivership proceeds to the aggrieved investors.

Court Proceedings/Case Administration H.

- 60. On July 2, 2019, the Court entered its Order on the Receiver's Motion for Summary Judgment Against Certain Winning Investors [Dkt. No. 90] in Ancillary Civil Action No. 4:18-cv-00359.
- 61. In accordance with this Court's Order Granting Motion to Approve Amended Interim Distribution List [Dkt. No. 324], on July 12, 2019, the Receiver made a first interim distribution to the Net Losing Investors in the amounts set forth in the Receiver's Amended Net Losing Investor Distribution Schedule.
- 62. On July 16, 2019, the Court entered its Order Granting Motion to Dismiss Defendant Fresh Start Legal Advocates, Inc. Without Prejudice [Dkt. No. 141] in Ancillary Civil Action No. 4:18-cv-00360.

63. On July 17, 2019, the Receiver's team attended the meeting of creditors in the

bankruptcy instituted by Defendant Hossein Seddighi in Ancillary Civil Action No. 4:18-cv-

00359.

64. On July 29, 2019, the Receiver filed her Motion to Close Ancillary Action [Dkt.

No. 142] in Ancillary Civil Action No. 4:18-cv-00360, which this Court granted on July 30,

2019 [Dkt. No. 143].

65. On July 30, 2019, the Receiver filed her Ninth Quarterly Report for the

Receivership Estates [Dkt. No. 332] (the "Ninth Quarterly Report").

66. On August 14, 2019, the Receiver filed her Motion for Leave to File Ninth

Interim Fee Application in Excess of Page Limit [Dkt. No. 333] and her Ninth Interim Fee

Application for Allowance of Fees and Reimbursement of Expenses [Dkt. No. 334]. On August

19, 2019, the Court granted the Receiver's Motion for Leave to File Ninth Interim Fee

Application in Excess of Page Limit [Dkt. No. 336].

67. On August 19, 2019, the Court entered its Memorandum Opinion and Order [Dkt.

No. 335].

68. On August 23, 2019, the Court entered its Order [Dkt. No. 337].

69. On August 30, 2019, the Receiver and Ancillary Defendant Stephen Garrett

jointly filed an Agreed Motion for Entry of Expedited Discovery Schedule Related to 8101 South

Humble Road, Texas City, Texas 77591 [Dkt. No. 340], which this Court granted on October 21,

2019 [Dkt. No. 341].

Dated: October 30, 2019.

Respectfully submitted,

By: /s/ Timothy E. Hudson

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COUNSEL TO RECEIVER

CERTIFICATE OF SERVICE

I hereby certify that on October 30, 2019, I electronically filed the foregoing document with the Clerk for the United States District Court, Eastern District of Texas. The electronic case filing system (ECF) will send a Notice of Electronic Filing (NEF) to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means. The foregoing document will also be sent to all counsel of record via the method identified below.

/s/ Timothy E. Hudson
Timothy E. Hudson

Via Electronic Mail:

COUNSEL FOR PLAINTIFF:

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PRO SE

By Electronic Mail and by Certified Mail, Return Receipt Requested at both known addresses:

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COUNSEL FOR CARLOS GOODSPEED

Via Electronic Mail (where possible) or U.S. Mail (if no e-mail was available):

All presumed investors included in **Exhibit D** attached hereto.

EXHIBIT ASTANDARDIZED FUND ACCOUNTING REPORT

Receivership in SEC v. Thurman P. Bryant III, et al. Civil Court Docket No. 04:17-CV-00336-ALM

Tenth Quarterly Reporting Period - 07/01/2019 - 09/30/2019

		Reporting Period	Subtotal Prior Periods	Grand Total
Line 1	Beginning Balance (As of 07/01/2019)	\$970,279.84	\$808,886.34	\$0.00
	Increases in Fund Balance:			
Line 2	Business Income	\$0.00	\$0.00	\$0.00
Line 2	Cash and Securities	\$0.00	\$424,219.65	\$424,219.65
Line 4	Interest/Dividends Income	\$0.00	\$0.00	\$0.00
Line 5	Business Asset Liquidation	\$0.00	· ·	\$0.00
Line 5	Personal Asset Liquidation	\$0.00	\$1,048,774.62	\$1,048,774.62
Line 7	Third-Party Litigation Income	\$72,600.00	\$968,652.00	\$1,041,252.00
Line 7	Miscellaneous - Other	\$18,600.00	\$250,027.49	\$268,627.49
Line 8a	Total Funds Available (Lines 1 -8):	\$1,061,479.84	\$2,691,673.76	\$2,782,873.70
	Decreases in Fund Balance:			
Line 9	Disbursements to Investors	\$431,870.70	\$0.00	\$431,870.70
Line 10	Disbursements for Receivership Operations	\$0.00	\$0.00	\$0.00
Line 10a	Disbursements to Receiver or Other Professionals	\$38,774.61	\$397,188.71	· ·
Line 10b	Business Asset Expenses	\$0.00		
Line 10c	Personal Asset Expenses	\$28,200.00	\$269,811.90	
Line 10d	Investment Expenses	\$280.50	\$1,344.11	\$1,624.63
Line 10e	Third-Party Litigation Expenses	,	4-/-	7 = 7 = 11 = 1
	1. Attorney Fees	\$200,000.00	\$1,050,072.33	\$1,250,072.33
	2. Litigation Expenses	\$0.00	\$0.00	\$0.00
	Total Third-Party Litigation Expenses	\$200,000.00	\$1,050,072.33	\$1,250,072.33
Line 10f	Tax Administrator Fees and Bonds	\$0.00	\$0.00	\$0.00
Line 10g	Federal and State Tax Payments	\$0.00	\$0.00	\$0.00
Line 106	Total Disbursements for Receivership Operations	\$699,125.81	\$1,721,393.92	\$2,420,519.73
Line 11	Disbursements for Distribution Expenses Paid by the Fund:			
Line 11a	Distribution Plan Development Expenses:			
Line 11a	1. Fees:			
	Fund Administration	\$0.00	\$0.00	\$0.00
	Independent Distribution Consultant (IDC)	\$0.00	\$0.00	\$0.00
	Distribution Agent	\$0.00		
	Consultants	\$0.00	\$0.00	\$0.00
	Legal Advisers	\$0.00		\$0.00
	Tax Advisers	\$0.00	\$0.00	\$0.00
	2. Administrative Expenses	\$0.00	\$0.00	\$0.00
	3. Miscellaneous	\$0.00		\$0.00
	Total Plan Development Expenses	\$0.00	\$0.00	\$0.00
Line 11b	Distribution Plan Implementation Expenses 1. Fees			
	Fund Administration	\$0.00	\$0.00	\$0.0
	Independent Distribution Consultant (IDC)	\$0.00		

	Distribution Agent	\$0.00	\$0.00	\$0.00
	Consultants	\$0.00	\$0.00	\$0.00
	Legal Advisers	\$0.00	\$0.00	\$0.00
	Tax Advisers	\$0.00	\$0.00	\$0.00
	2. Administrative Expenses	\$0.00	\$0.00	\$0.00
	3. Investor Identification:			
	Notice/Publishing Approved Plan	\$0.00	\$0.00	\$0.00
	Claimant Identification	\$0.00	\$0.00	\$0.00
	Claims Processing	\$0.00	\$0.00	\$0.00
	4. Fund Administrator Bond	\$0.00	\$0.00	\$0.00
	5. Miscellaneous	\$0.00	\$0.00	\$0.00
	6. Federal Account for Investor Restitution	\$0.00	\$0.00	\$0.00
	(FAIR) Reporting Expenses			
	Total Plan Implementation Expenses	\$0.00	\$0.00	\$0.00
	Total Disbursements for Distribution Expenses Paid by the Fund	\$0.00	\$0.00	\$0.00
Line 12	Disbursements to Court/Other			
Line 12a	Investment Expenses/Court Registry Investment			
	System (CRIS) Fees	\$0.00	\$0.00	\$0.00
Line 12b	Federal Tax Payments	\$0.00	\$0.00	\$0.00
	Total Disbursement to Court/Other:	\$0.00	\$0.00	\$0.00
	Total Funds Disburses (Line 9 - 11):	\$699,125.81	\$1,721,393.92	\$2,420,519.73
Line 13	Ending Balance (As of 09/30/2019):	\$362,354.03	\$970,279.84	\$362,354.03
Line 14	Ending Balance of Fund - Net Assets:			
Line 14a	Cash & Cash Equivalents	\$362,354.03	\$970,279.84	\$362,354.03
Line 14b	Investments	\$0.00	\$2,053.87	\$0.00
Line 14c	Other Assets or Uncleared Funds (Frozen Accounts)	\$0.00	\$359,199.09	\$0.00
	Total Ending Balance of Fund - Net Assets	\$362,354.03	\$1,331,532.80	\$362,354.03

OTHER SU	PPLEMENTAL INFORMATION:	Reporting Period	Subtotal Prior Periods	Grand Total
Line 45	Report of Items NOT To Be Paid by the Fund:	From do		
Line 15	Disbursements for Plan Administration Expenses Not Paid by the	runa: I		
Line 15a	Plan Development Expenses Not Paid by the Fund:	40.00	40.00	40.00
	1. Fees	\$0.00	\$0.00	\$0.00
	Fund Administrator	\$0.00	\$0.00	\$0.00
	IDC	\$0.00	\$0.00	\$0.00
	Distribution Agent	\$0.00	\$0.00	\$0.00
	Consultants	\$0.00	\$0.00	\$0.00
	Legal Advisers	\$0.00	\$0.00	\$0.00
	Tax Advisers	\$0.00	\$0.00	\$0.00
	2. Administrative Expenses	\$0.00	\$0.00	\$0.00
	3. Miscellaneous	\$0.00	\$0.00	\$0.00
	Total Plan Development Expenses Not Paid by the Fund	\$0.00	\$0.00	\$0.00
Line 15b	Plan Implementation Expenses Not Paid by the Fund:]
	1. Fees			
	Fund Administrator	\$0.00	\$0.00	\$0.00
	IDC	\$0.00	\$0.00	\$0.00
	Distribution Agent	\$0.00	\$0.00	\$0.00
	Consultants	\$0.00	\$0.00	\$0.00
	Legal Advisers	\$0.00	\$0.00	\$0.00
	Tax Advisers	\$0.00	\$0.00	\$0.00
	2. Administrative Expenses	\$0.00	\$0.00	\$0.00
	3. Investor Identification:	·		·
	Notice/Publishing Approved Plan	\$0.00	\$0.00	\$0.00
	Claimant Identification	\$0.00	\$0.00	\$0.00
	Claims Processing	\$0.00	\$0.00	\$0.00
	Web Site Maintenance/Call Center	\$0.00	· ·	

I	4. Fund Administrator Bond	\$0.00	\$0.00	\$0.00
	5. Miscellaneous	\$0.00	\$0.00	\$0.00
	6. FAIR Reporting Expenses	\$0.00	\$0.00	\$0.00
	Total Plan Implementation Expenses Not Paid by the Fund	\$0.00	\$0.00	\$0.00
Line 15c	Tax Administrator Fees & Bonds Not Paid by the Fund	\$0.00	\$0.00	\$0.00
	Total Disbursements for Plan Administration Expenses Not Paid	\$0.00	\$0.00	\$0.00
Line 16	Disbursements to Court/Other Not Paid by the Fund			
Line 16a	Investment Expenses/CRIS Fees	\$0.00	\$0.00	\$0.00
Line 16b	Federal Tax Payments	\$0.00	\$0.00	\$0.00
	Total Disbursements to Court/Other Not Paid by Fund:	\$0.00	\$0.00	\$0.00
Line 17	DC & State Tax Payments	\$0.00	\$0.00	\$0.00
Line 18	No. of Claims:			
Line 18a	# of Claims Received This Reporting Period	0	86	86
Line 18b	# of Claims Received Since Inception of Fund	86	86	86
Line 19	No of Claimants/Investors			
Line 19a	# of Claimants/Investors Paid This Reporting Period	91	0	91
Line 19b	# of Claimants/Investors Paid Since Inception of Fund	91	0	91

Exhibit B: Summary of Receivership Assets¹

I. <u>Summary of the Wammel Defendants' Receivership Assets²</u>

A. Real Property

i. the real property located at 8101 South Humble Road, Texas City, Texas 77591.³

II. Summary of the Receivership Assets included in the Receiver's Motion for Return of Receivership Property [Dkt. No. 315]⁴

A. Bryant Defendants' Receivership Assets

i. Ladies Rolex Datejust Two Tone Model No. 178273, Serial No. C44J1151;

¹ The Receiver herein incorporates by reference the First Quarterly Report [Dkt. No. 72], the Initial Status Report for the Bryant Defendants' Receivership Estate [Dkt. No. 32], the Motion for Order Authorizing Liquidation [Dkt. No. 66], the Appendix to the Motion for Order Authorizing Liquidation [Dkt. No. 67], the Emergency Motion of Receiver for Expedited Order Authorizing Liquidation [Dkt. No. 71], the Initial Status Report for the Wammel Defendants' Receivership Estate [Dkt. No. 95], the Motion to Enter Agreed Order Authorizing Liquidation [Dkt. No. 131], the Second Quarterly Report [Dkt. No. 132], the Third Quarterly Report [Dkt. No. 156], the Fourth Quarterly Report [Dkt. No. 202], the Fifth Quarterly Report [Dkt. No. 273], the Sixth Quarterly Report [Dkt. No. 315], the Eighth Quarterly Report [Dkt. No. 317], and the Ninth Quarterly Report [Dkt. No. 332].

² The items listed provide illustrative examples of assets in the Wammel Defendants' Receivership Estate following the beginning rounds of liquidation sales.

³ On January 24, 2019, the Receiver filed her Motion to Liquidate Property and Void or Clarify Contract for Deed [Dkt. No. 298] regarding this real property. On February 13, 2019, Ancillary Defendant Stephen Garrett filed his Motion for Leave and Extension of Time to Respond to Motion to Liquidate Property [Dkt. No. 302], which this Court granted on February 15, 2019 [Dkt. No. 305]. On March 1, 2019, Ancillary Defendant Stephen Garrett filed his Response and Objection to Receiver's Motion to Liquidate Property [Dkt. No. 307]. On March 8, 2019, the Receiver filed her Motion for Leave to File Reply in Support of the Receiver's Motion to Liquidate Property and Void or Clarify Contract for Deed in Excess of Page Limit [Dkt. No. 308] and her Reply in Support of the Receiver's Motion to Liquidate Property and Void or Clarify Contract for Deed [Dkt. No. 309]. On March 11, 2019, the Court granted the Receiver's Motion for Leave to File Reply in Support of the Receiver's Motion to Liquidate Property and Void or Clarify Contract for Deed in Excess of Page Limit [Dkt. No. 312]. On May 7, 2019, Ancillary Defendant Stephen Garrett filed his Motion for Leave to File Late Sur-Reply in Excess of Page Limit [Dkt. No. 319] and Sur-Reply in Opposition to Receiver's Motion to Liquidate Property [Dkt. No. 320]. On May 31, 2019, the Receiver filed her Response to Defendant Garrett's Motion for Leave, Motion to Strike Defendant Garrett's Sur-Reply and/or, in the Alternative, Motion for Leave to Respond [Dkt. No. 328]. On August 19, 2019, the Court entered its Memorandum Opinion and Order [Dkt. No. 335]. On August 30, 2019, the Receiver and Ancillary Defendant Stephen Garrett jointly filed an Agreed Motion for Entry of Expedited Discovery Schedule Related to 8101 South Humble Road, Texas City, Texas 77591 [Dkt. No. 340], which this Court granted on October 21, 2019 [Dkt. No. 341].

⁴ On April 11, 2019, the Receiver filed her Motion for Return of Receivership Property [Dkt. No. 315], which this Court granted on May 3, 2019 [Dkt. No. 318].

- ii. Ladies Rolex Datejust Two Tone Model No. 178273, Serial No. G481454;
- iii. Man's Rolex Datejust Two Tone Model No. 116333, Serial No. G548227; and
- iv. One (1) Evolution 660 Motorized Six Passenger Cart, Metallic Purple in Color, Bearing VIN 1H9H4082910568944 and Serial No. 210689814.

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Creditor Name	Last 4 Digits of Account No.	<u>Creditor's Address</u>	Estimated Amount of Claim	<u>Defendant</u>
Credit Cards				
AllianceOne Receivables		AllianceOne Receivables Management, Inc.		
Management	0.405	PO Box 3110	01.711.74	D
[PayPal Credit Account]	8405	Southeastern, PA 19398-3110	\$1,711.74	Bryant
		American Express		
American Express	1004	P.O. Box 297879 Ft. Lauderdale, FL 33329	\$63,672.00	Wammel
			400,07=100	
		American Express		
American Express	1002	P.O. Box 297879 Ft. Lauderdale, FL 33329	\$70,609.71	Wammel
		American Express P.O. Box 981535		
American Express	1009	El Paso, TX 79998	Unknown	Bryant
		Barclaycard P.O. Box 8801		
Barclaycard Luxury Card	6051	Wilmington, DE 19899	\$943.36	Wammel
AW 17		Synchrony Bank		
Allied Interestate LLC [Synchrony Bank]		PayPal Extras MasterCard P.O. Box 960080		
[PayPal]	7954	Orlando, FL 32896	\$3,870.45	Wammel
		Cavalry SPV I, LLC		
Cavalry SPV I, LLC		500 Summit Lake Drive, Suite 400		
[Citi]	7290	Valhalla, NY 10595	\$12,416.49	Wammel
		Citi Bank		
		P.O. Box 790131		
Citi Bank	7290	St. Louis, MO 63179	\$6,862.00	Wammel
		Chase: Card Services		
Chase	(227	P.O. Box 15548	006.041.17	W ⁷ 1
[Slate]	6227	Wilmington, DE 19886	\$26,941.17	Wammel
		Chase: Card Services		
Chase	1001	P.O. Box 15548	011 170 62	W 1
[Marriott]	1981	Wilmington, DE 19886	\$11,178.62	Wammel

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Creditor Name	Last 4 Digits of Account No.	Creditor's Address	Estimated Amount of Claim	<u>Defendant</u>
		Wells Fargo: Payment Remittance Center		
W. H. F.	0024	P.O. Box 6426	00.00	W.
Wells Fargo	9924	Carol Stream, IL 60197	\$0.00	Wammel
Nationwide Credit, Inc.		Nationwide Credit, Inc. PO Box 14581		
[American Express]	1009	Des Moises, IA 50306	\$74,674.47	Wammel
		BarclayCard Services		
BarclayCard	2395	P.O. Box 13337 Philadelphia, PA 19101-3337	Unknown	Bryant
BaiciayCaiu	2393	r iniaucipina, 1 A 19101-3337	Ulikilowii	Diyant
		500 Summit Lake Drive Suite 400		
Calvary [Citibank]	2829	Valhalla, NY 10595-1340	\$13,965.67	Wammel
		Chase Card Services		
		P.O. Box 15298		
Chase Bank Credit Card	1805	Wilmington, DE 19850	\$12,300.00	Bryant
		Citibank		
Citibank Card	2469	P.O. Box 6500 Souix Falls, SD 57117-6500	\$38,032.43	Bryant
		Citibank P.O. Box 6500		
Citibank Card	5899	Souix Falls, SD 57117-6500	Unknown	Bryant
		Comenity Captial Bank		
Comenity Capital Bank [Blue Nile]	2623	PO Box 183003 Columbus, OH 43218-3003	\$13,955.00	Bryant
[Blue Princ]	2023	Columbus, 011 13210 3003	\$13,755.00	Diyan
Convergent Outsourcing, Inc.	6964 suntrust acct no.	800 SW 39th St. Suite 100/P.O. Box 9004		
(Suntrust Bank)	3581 convergent acct. no.	Renton, WA 98057	\$18,569.22	Wammel
		CCS Payment Processing Center		
Credit Collection Services	5200	P. O. Box 55126	064.50	W
[Farmers Ins. Group]	5398	Boston, MA 02205-5126	\$64.50	Wammel

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Creditor Name	Last 4 Digits of Account No.	Creditor's Address	Estimated Amount of Claim	<u>Defendant</u>
Credit Control LLC d/b/a CC		Credit Control, LLC P.O. Box 546 Hazelwood MO		
Collections, LLC	6166	63042-0546	\$18,569.22	Wammel
		RGS Financial, Inc.		
RGS Financial [PayPal Credit]	8405	PO Box 852039 Richardson, TX 75085	\$2,852.90	Bryant
. ,		,	, ,	· · · · · · · · · · · · · · · · · · ·
MCM (Midland Credit		Midland Credit Management, Inc. P.O. Box 2000		
Management) [Synchrony Bank]	7954	Warren, MI 48090-2000	\$3,870.45	Wammel
		MBC BBO 11 Close of A Cl Hill		
MRS BPO, LLC	their acct# 8813 for acct. #6227	MRS BPO, LLC1930 Olney Avenue Cherry Hill NJ, 08003 (city is Cherry Hill)	\$27,408.15	Wammel
			·	
		MRS BPO, LLC1930 Olney Avenue Cherry Hill		
MRS BPO, LLC	Their acct# 8813 for acct. #1981	NJ, 08003 (city is Cherry Hill)	\$11,178.62	Wammel
Synchrony Bank		Synchrony Bank P.O. Box 965048		
[Discount Tire]	5705	Orlando, FL 32896	Unknown	Bryant
		SIMM Associates, Inc		
CD O ([Cl Dl-]	0210	P.O. Box 7526	¢2.852.00	Dt
SIMM [Synchrony Bank]	9319	Newark, De 19714-7526	\$2,852.90	Bryant
		m v 1 1 0 1 1 2 1 1 1 1 1 1 1 1 1 1 1 1 1 1		
		The Leader's Choice Financial 8711 Fallbrook Drive		
The Leader's Choice Financial	BU00	Houston, TX 77064	\$1,483.13	Bryant
		USAA		
USAA	8361	10750 McDermott Freeway San Antonio, TX 78288	Unknown	Bryant
USAA	0301	San Amonio, 1A /0200	CHKHOWH	Bryant
		USAA 10750 McDermott Freeway		
USAA	9735	San Antonio, TX 78288	Unknown	Bryant

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Creditor Name	Last 4 Digits of Account No.	Creditor's Address	Estimated Amount of Claim	<u>Defendant</u>
GC Services		GC Services Limited Partnership P.O. Box 3346		
[USAA] (Consumer Loan)	0966	Houston, TX 77253	\$4,244.52	Bryant
ACI (American Coradius Internatiional LLC) [USAA]	966	AmericanCoradius Internationl LLC 2420 Sweet Home Rd. Ste. 150 Amherst, NY 14228-2244	\$4,244.52	Bryant
	700	110110 1011 2011 1011 1111 1111 1111 11	ψ 1,2 1 1122	Diyani
United Collection Bureau, Inc.		United Collection Bureau, Inc. P.O. Box 1418		
[Chase Bank]	1981	Maumee, OH 43537	\$11,178.62	Wammel
		United Collection Bureau, Inc.		
United Collection Bureau, Inc. [Chase Bank]	6227	P.O. Box 1418 Maumee, OH 43537	\$27,408.15	Wammel
[Chase Bank]	0227	Maumee, On 45557	\$27,408.13	waninei
		USAA		
[Chase Bank]	4591	10750 McDermott Freeway San Antonio, TX 78288	Unknown	Bryant
		USAA		
	•	10750 McDermott Freeway		_
USAA [Credit Card]	5809	San Antonio, TX 78288	\$763.00	Bryant
		USAA		
USAA [Credit Card]	3497	10750 McDermott Freeway San Antonio, TX 78288	Unknown	Bryant
		TIGAA		
		USAA 10750 McDermott Freeway		
USAA [Credit Card]	94	San Antonio, TX 78288	Unknown	Bryant
		USAA		
USAA [Credit Card]	351	10750 McDermott Freeway San Antonio, TX 78288	\$11,800.00	Bryant
-				
		USAA 10750 McDermott Freeway		
USAA [Loan]	5011	San Antonio, TX 78288	Unknown	Bryant

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Creditor Name	Last 4 Digits of Account No.	Creditor's Address	Estimated Amount of Claim	<u>Defendant</u>
		Wells Fargo		
		P.O. Box 29482		
Wells Fargo	2572	Phoenix, AZ 85038	Unknown	Bryant
		Wells Fargo		
Wells Fargo	4113	P.O. Box 29482 Phoenix, AZ 85038	\$2,342.71	Bryant
Wells Fargo [Bryant Financial		Wells Fargo P.O. Box 29482		
Credit Card]	7206	Phoenix, AZ 85038	Unknown	Bryant
		Wells Fargo		
Wells Fargo [Business Line Mastercard]	9851	P.O. Box 29482 Phoenix, AZ 85038	\$19,709.44	Bryant
		Wells Fargo		
Wells Fargo [Business Line		P.O. Box 29482	***	
Mastercard]	4390	Phoenix, AZ 85038	\$36,788.72	Wammel
Financial Recovery Services, Inc.				
[Current Creditor: Cavalry SPV I, LLC		P.O. Box 385908		
Original Creditor: CitiBank]	2829	Minneapolis, MN 55438-5908	\$13,965.67	Wammel
Vehicle Liens				
Rauch Sturm (Attorney) for TD Auto Finance, LLC (Chrysler)	4194	250 North Sunnyslope Road, Suite 300 Brookfield, WI 53005	\$42,555.05	Wammel
			, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
TD Auto Finance		TD Auto Finance P.O. Box 16035		
[Rolls Royce]	8035	Lewiston, ME 04243	\$179,430.19	Wammel
		SunTrust Bank		
SunTrust Bank	8374	P.O. Box 305053 Nashville, TN 37230	Unknown	Wammel
		0. T. (D.)		
SunTrust Bank		SunTrust Bank P.O. Box 305053		
[Range Rover]	6964	Nashville, TN 37230	\$18,569.22	Wammel
		TD Ameritrade		
TD Ameritrade	8908	P.O. Box 2209 Omaha, NE 68102	Unknown	Bryant

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Creditor Name	Last 4 Digits of Account No.	Creditor's Address	Estimated Amount of Claim	<u>Defendant</u>
		BB Consumer Finance		
BB Consumer Finance [1936 Roadster]	Unknown	8000 Maryland Ave, Ste 100 Clayton, MD 63105	\$99,446.16	Bryant
rouserj	CHAROWI	Chayton, NID 05105	\$77,110.10	Bryant
		GM Corp. Office		
GM Financial Leasing (Cadillac) [2015 Escalade]	3212	801 Cherry Street, Suite 3600 Fort Worth, TX 76102	\$2,892.38	Bryant
[2013 Escalade]	3212	Tott Wordt, 174 70102	\$2,672.36	Diyant
		GM Corp. Office		
GM Financial Leasing (Cadillac)	2214	801 Cherry Street, Suite 3600 Fort Worth, TX 76102	Halmann	D
[2015 Escalade]	3214	FOR WORTH, 1X /0102	Unknown	Bryant
		GM Corp. Office		
GM Financial Leasing (Cadillac)	0025	801 Cherry Street, Suite 3600		D
[2015 SRX] Utilities	8035	Fort Worth, TX 76102	Unknown	Bryant
		GC Services Limited Partnership		
GC Services [TXU Energy]	8279	P.O. Box 3346 Houston, TX 77253	\$1,958.64	Wammel
		800 SW 39th St.		
Convergent Outsourcing, Inc. (TXU)	8279	Suite 100/P.O. Box 9004 Renton, WA 98057	\$1,958.64	Wammel
		Coserv Electric		
Coserv Electric (re: home account)	255	P.O. Box 650785 Dallas, TX 75265-0785	\$1,318.42	Bryant
				•
		Frisco Utility District		
Frisco Utility District (re: home)	Unknown	P.O. Box 2730 Frisco, TX 75034	\$1,133.64	Bryant
,,		,	. ,	ž
Southwest Credit Systems, LP		Southwest Credit Systems, LP		
[Time Warner Cable] (5775 Parkwood property)	4644	PO Box 650543 Dallas, TX 75265	\$1,884.18	Bryant
a and room property)	1011	Dunus, 1A 15205	Ψ1,500Τ.10	Dijani
		Time Warner Cable		
Time Womer C-h1- (1	7005	3301 W. Royal Lane	TT1	P4
Time Warner Cable (re: home)	7085	Irving, TX 75063	Unknown	Bryant

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Creditor Name	Last 4 Digits of Account No.	Creditor's Address	Estimated Amount of Claim	<u>Defendant</u>
Time Warner Cable c/o Eastern		Time Warner Cable		
Account System of Connecticut, Inc.	EAS Acct No. 9311	PO Box 837 Newtwon, CT 06470	1884.18 (Spectrum)	Bryant
Insurance		,		,
		Primerica Life Insurance Company 1 Primerica Parkway		
Primerica Life Insurance Company	5522	Duluth, Georgia 30099	\$138.25	Wammel
		Farmers Insurance Exchange		
		c/o Matthew W. Hill P.O. Box 58725		
Farmers Insurance	1925	Houston, TX 77258	\$503.50	Wammel
		Hagerty Insurance Agency, LLC P.O. Box 1302		
Hagerty Insurance Agency	5907	Traverse City, MI 49685	\$1,489.00	Wammel
		Geico		
Geico	7254	One Geico Boulevard Fredericksburg, VA 22412	\$428.97	Wammel
		Farm Bureau Insurance		
Texas Farm Bureau Insurance		Brazoria-Galveston County Farm Bureau		
Companies	4694	401 FM 517 Rd. W., Suite C Dickinson, TX 77539	\$3,876.00	Wammel
		Progressive Insurance P.O. Box 31260		
Progressive Insurance	25522764-3	Tampa, FL 33631	\$81.43	Bryant
		USAA		
USAA [Car Insurance]	1063	10750 McDermott Freeway San Antonio, TX 78288	Unknown	Bryant
IISAA II ifa Ingumana B-1:		USAA		
USAA [Life Insurance Policy, Level Term Series V]	5409	9800 Fredericksburg Road San Antonio, TX 78288	\$302.10	Bryant
		Humana Insurance Company P.O. Box 3024		
Humana	3366	P.O. Box 3024 Milwaukee, WI 53201	\$3,731.89	Wammel

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Creditor Name	Last 4 Digits of Account No.	Creditor's Address	Estimated Amount of Claim	Defendant
	Last 4 Digits of Account 110.	Creditor s Address	Estimated Amount of Claim	Detendant
Other				
		Perdue Brandon Fielder Collins & Mott, LLP		
G 1	0.50	1235 North Loop West, Suite 600	00.504	W/ 1
Galveston County Tax Office	8535	Houston, TX 77008	\$96.84	Wammel
		701 4 15 Y		
		Fidelity Investments P.O. Box 673001		
Fidelity Investments	5941	Dallas, TX 75267	\$0.01	Wammel
			43131	
		City of Frisco		
		P.O. Box 2730		
City of Frisco	Unknown	Frisco, TX 75034	\$1,133.64	Bryant
		Culligan of DFW		
		3201 Premier Drive, Suite 300		
Culligan of DFW	7775	Irving, TX 75063	\$698.64	Bryant
Customer Care Center		Customer Care Center		
[Discount Tire / Synchrony Car		P.O. Box 740237		
Care]	5705	Atlanta, GA 30374	Unknown	Bryant
		Dell Financial Services		
		P.O. Box 80409		
Dell Financial Services	3523	Austin, TX 78708-0409	\$120.00 (min. due)	Bryant
		Diversified Consultants, Inc.		
		P.O. Box 1391		
Diversified Consultants, Inc.	4600	Southgate, MI 48195	\$1,884.18	Bryant
		Extreme Pest Management		
	***	P.O. Box 1722		_
Extreme Pest Management	531	Midlothian, TX 76065	\$178.61	Bryant
		Factual Data		
E . ID.	=	5100 Hahns Peak Drive		.
Factual Data	718A	Loveland, CO 80538	\$16.19	Bryant
Linebarger Goggan Blair &				
Sampson, LLP [951 E FM 646 B10		Attorneys at Law		
Business Personal Property Fee	0525	PO Box 2789	001.01	W/ .
	8535	Texas City, TX 77592-2789	\$91.96	Wammel

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Creditor Name	Last 4 Digits of Account No.	Creditor's Address	Estimated Amount of Claim	<u>Defendant</u>
		Marlin Landscape 411 W. Commerce Street		
Marlin Landscape	Unknown	Dallas, TX 75208	Unknown	Bryant
NCS - National Credit Services, INC. [US Dept of Education]	9483	National Payment Center P.O. Box 105028 Atlanta, GA 30348-5028	\$24,378.87	Bryant
ire. [00 Dept of Education]	7403	Addina, 611363 to 3626	φ2-1,0 / 0.0 /	Diyan
		Nebraska Furniture Mart		
		P.O. Box 3456		_
Nebraska Furniture Mart	8171	Omaha, NE 68103-0456	\$355.00	Bryant
		NITTA C		
North TX Tollway Authority		NTTA Customer Service Center P.O. Box 260928		
(TollTag)	4035	Plano, TX 75026-0928	\$41.45	Bryant
		NTTA Texas Tollway Authority P.O. Box 660244		
North TX Tollway Authority	9603	Dallas, TX 75266-0244	\$39.85	Bryant
		CD. ID		
Southwest Credit Systems, LP		CPA, LP C/O NTTA Collections		
[Time Warner Cable] (5775 Parkwood property)	84460	P. O. Box 207899 Addison, TX 75320-7899	\$42.62	Wammel
Tarkwood property)	04400	radison, 11 13320 1099	φ 1 2.02	Walling.
Southwest Credit [NTTA]	7242 [NTTA Acct. No. 7134]	4120 International Pkwy. Suite 1100 Carrollton, TX 75007-1958	\$426.62	Wammel
Boutiwest Credit [WTTA]	7242 [NTTA ACCI. NO. 7134]	Carronton, 1X 75007-1750	9420.02	Wallinier
Professional Account Management,	9270	Professional Account Mangement, LLC- NTTA	\$42.62	Womer-1
LLC	8279	PO Box 866608 Plano, TX 75086-6608	\$42.62	Wammel
		One Worth I to the		
Our North Internal	TY 1	One North Interactive 222 N Lasalle, Suite 1500		Davis (
One North Interactive	Unknown	Chicago, IL 60601	Unknown	Bryant
		OnStar PO Box 77000, DEPT # 77246		
OnStar	4764	Detroit, MI 48277-0246	Unknown	Bryant

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Creditor Name	Last 4 Digits of Account No.	Creditor's Address	Estimated Amount of Claim	<u>Defendant</u>
		Pitney Bowes Corporate HQ		
		3001 Summer St.		_
itney Bowes	1825	Stanford, CT 06905	\$127.51	Bryant
		Poop Troop		
oon Troon	Linkmoven	3245 Main Street, # 235-208 Frisco, TX 75034	Unknown	Bryant
oop Troop	Unknown	Ready Refresh	Unknown	Біуапі
leady Refresh (by Nestle)	Unknown	6661 Dixie Hwy. Suite 4, Louisville, KY 40258	Unknown	Bryant
		US Department of Education National Payment		
tudent Loan	6421	Center P.O. Box 105028 Atlanta, GA 30348-5028	\$20,669.16	Bryant
		TXDMV		
X Department of Motor Vehicles	N	P.O. Box 149251 Austin, TX 78714	\$75.50	Bryant
•		,	2.000	,
Veems & Stephens Equine		Weems & Stephens Equine Hospital 5960 Hospital Road		
Iospital	1359	Aubrey, TX 76227	\$159.94	Bryant
		Whispering Farms		
Whispering Farms Equestrian	** 1	5933 Pebblestone Lane	***	D
Center, LLC	Unknown	Plano, TX 75093	Unknown	Bryant
American Medical Collection Agency		American Medical Collection Agency P.O. Box 1235		
Quest Diagnostics]	Unknown	Elmsford, NY 10523	\$158.79	Bryant
		Financial Corporation of America P.O. Box 203500		
inancial Corporation of America	6448	Austin, TX 78720	\$294.13	Bryant
		Pure Water Pool Services 2718 Pirates Gold Circle		
Pure Water Pool Services	Unknown	Friendswood, TX 77546	\$600.78	Wammel
		Reagin Law Firm, PLLC 1415 South Voss, Suite #110-145		
LC Office Systems	0357	Houston, TX 77057	\$2,086.26	Bryant

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Last 4 Digits of Account No.	Creditor's Address	Estimated Amount of Claim	<u>Defendant</u>
	United Revenue Corp.		
5669	204 Billings, Ste. 120 Arlington, TX 76010	\$174.93	Bryant
	Million Air Houston		
Unknown	Houston, TX 77061	\$1,850.00	Wammel
7134	Plano, TX 75266-0244	\$17.62	Wammel
	Verliance		
9226	43406 Business Park Dr, Temecula, CA 92590	\$7,900.00	Wammel
	4620 Woodland Corporate Blvd		
2090	Tampa, FL 33614	\$355.62	Bryant
	The Stevens-Lloyd Group, Inc.		
	9420 East Golf Links Road, #122		
6565	Tucson, Arizona 85730	\$92,225.23	Wammel
	AllianceOne Receivables Management, Inc.		
2722	PO Box 1007	642.62	Wammel
3723	Armigion, 17 70004	\$42.02	waninei
	Appleto M. J. T. D. C. T.		
	Ayala's Mobile Detail c/o Fredy Rodriguez		
Unknown	15215 Empanada Drive Houston, TX 77083	\$1.276.00	Wammel
	,	, - , - , - , - ,	<u> </u>
	646 Development LLC		
Linkearre	2302 Post Office Street, Suite 601	\$5,280,00	Wammel
UIIKIIOWII	Gaivesion, 1A //337	\$3,200.00	vv attilitiCi
	Fort David County To- A/C-II		
	c/o Patsy Schultz, PCC		
8914		\$311.95	Bryant
0,11	Sugar Zana, 17. 11 101	# 3.1.70	Dijun
	II E Investors Inc. d/b/a Associated Mortages		
	Investors		
	710 North Post Oak Road, Suite 208		
	5669 Unknown 7134	United Revenue Corp. 204 Billings, Ste. 120	United Revenue Corp. 204 Billings, Ste. 120 Arlington, TX 760110 S174.93 Million Air Houston 7555 Ipswich Road Houston, TX 77061 Unknown Houston, TX 77061 S1,850.00 NTTA P.O. Box 660244 Plano, TX 75266-0244 S17.62 Verliance 9226 43406 Business Park Dr. Temecula, CA 92590 Huster Warfeld 4420 Woodland Corporate Blvd Tampa, FL 33614 S355.62 The Stevens-Lloyd Group, Inc. cio kaymond Lloyd 9420 East Golf Links Road, #122 Tueson, Arizona 85730 S92,225.23 AllianceOne Receivables Management, Inc. PO Box 1007 Arlington, TX 76004 S42.62 Ayala's Mobile Detail cio Fedy Rodriguez 15215 Empanada Drive Houston, TX 77083 S1,276.00 Unknown For Bear County Tax Assessor/Collector cio Passy Schultz, PCC PO BOX 1028 - Payment Processing Dept Sugar Land, TX 77487 S11.95 JLE Investors, Inc. d/b'a Associated Mortgage Investors

EXHIBIT D – INVESTOR LIST

Investor Name	Estimated Investment Amount ¹	Invested In
Akber and Shirin Malik	\$50,000	BUCF
Alice and Kenneth Shafer	\$600,000	BUCF
Always Stay Balanced LLC	\$80,000	BUCF
Alys Maldonado	\$13,000	BUCF
Andrew Fossler	\$400,000	BUCF
Angelo and Gay Mascheri	\$200,000	BUCF
Anthony Reyes [3]	\$80,000	BUCF
Aragonesa LLC	\$550,000	BUCF
Barbara Toczek	\$150,000	BUCF
Bettye Smith	\$150,000	BUCF
Blair Knapp	\$40,000	BUCF
Brett Bowling	\$50,000	BUCF
Brian Craft	\$300,000	BUCF
Calehr & Associates	\$290,000	BUCF
Chet and Cynthia Williams	\$50,000	BUCF
Chico's Venture, LLC	\$520,000	BUCF
Chris and Karin LaBauve [3]	\$102,700	BUCF
Chuck Evans	\$70,000	BUCF
Connie Silvey	\$200,000	BUCF
Danny and Glenda Childers	\$40,000	BUCF
David and Dawnette Joines	\$100,000	BUCF
David Ko	\$50,000	BUCF
Eric Dysart	\$320,000	BUCF
Erin Cunningham-Small	\$200,000	BUCF
Esperanza Landry	\$220,000	BUCF
Eugene Broadway	\$100,000	BUCF
Frances DesBiens	\$100,000	BUCF
Francis O'Laughlin	\$480,000	BUCF
Frank Rambin	\$50,000	BUCF
Gary and Tammy Tibbals	\$560,000	BUCF
Gary Hyman	\$180,000	BUCF
Grandchildren Fund (de Pedro) [3]	\$20,000	BUCF
Grandchildren Fund (Solis) [3]	\$20,000	BUCF
Grandchildren Trust (Lehmann)	\$155,000	BUCF

¹ The Receiver and her team are continuing their review of submitted claim notification forms and supporting documentation from investors. Accordingly, the investment amounts included herein are estimates. This investor list includes both Net Winning Investors and Net Losing Investors.

Investor Name	Estimated Investment Amount ¹	Invested In
Greg and Alix Wren	\$200,000	BUCF
Harco Development LLC	\$150,000	BUCF
Hari Rahardjo	\$50,000	BUCF
Heather Gula	\$60,000	BUCF
Highway 6 Interest LLC	\$75,000	BUCF
Holly Peters	\$100,000	BUCF
Hossein Seddighi	\$70,000	BUCF
Howard and Karen Acton	\$300,000	BUCF
Idn Suhani	\$60,000	BUCF
IL Ponte Enterprises LLC [3]	\$300,000	BUCF
Jack King [3]	\$190,000	BUCF
Jason and Michelle Williams [3]	\$400,000	BUCF
Javier de la Garza	\$130,000	BUCF
Jeffrey Gilliam	\$60,000	BUCF
Jeffrey Russell	\$150,000	BUCF
John Ezell	\$150,000	BUCF
Joseph Solis	\$230,000	BUCF
Juan Veldsman	\$240,000	BUCF
Jurgen and Jennifer Revenig	\$60,000	BUCF
Kassh Kocian [3]	\$26,000	BUCF
Kenneth and Chelsea Hughes	\$750,000	BUCF
Kenneth and Kerri Zschappel	\$400,000	BUCF
Kenneth and Kerrie Dwyer	\$400,000	BUCF
Kenneth Shaffer	\$200,000	BUCF
Kevin and Kimberly Gallagher	\$400,000	BUCF
Laura Cook	\$25,000	BUCF
Maria de la Garza	\$20,000	BUCF
Mark Canatore	\$77,000	BUCF
Mark Chetty	\$245,000	BUCF
Mark Senft	\$150,000	BUCF
Mary and Bruce Bryant	\$150,000	BUCF
Michael and Carmen Ockenfels	\$100,000	BUCF
Michael and Lorena Delapaz	\$450,000	BUCF
Michael Reyes [3]	\$50,000	BUCF
Michelle Williams	\$100,000	BUCF
Mike and Janice Kocian [3]	\$35,000	BUCF
Mitja and Tina Peterman	\$50,000	BUCF
Neal Barnes	\$205,000	BUCF
Neva Terry	\$36,000	BUCF

Investor Name	Estimated Investment Amount ¹	Invested In
Norrie Foundation [3]	\$1,360,000	BUCF
Patrick and Cheryl Perry	\$20,000	BUCF
Peter and Michelle Lehmann	\$240,000	BUCF
Peter Solis	\$50,000	BUCF
Petrus Luyt	\$450,000	BUCF
Quentin and Marilyn Lehmann	\$145,000	BUCF
Randi Cahill	\$52,250	BUCF
Randy and Georgia Hinze	\$100,000	BUCF
Raymond Anthony Reyes	\$50,000	BUCF
RBSynergy [3]	\$300,000	BUCF
Rebecca Seeber	\$100,000	BUCF
Robert (Trust) Zschappel	\$50,000	BUCF
Robert Bradley Zschappel	\$240,000	BUCF
Robert Surmon	\$320,000	BUCF
Roberta Williams	\$144,000	BUCF
Rodney and Lisa Hradil	\$130,000	BUCF
Roland and Holly Maldonado	\$259,000	BUCF
Roland and Isabel Solis	\$300,000	BUCF
Ronald Carter	\$50,000	BUCF
Ronaldo and Maria Garcia	\$140,000	BUCF
Rosalean and Richard Hadaway	\$50,000	BUCF
Samira Calehr	\$120,000	BUCF
Sardah Soekahi	\$34,500	BUCF
Scott and Cheryl Hendricks	\$56,000	BUCF
Silene and Robbert Fredriksz	\$50,000	BUCF
Solis Synergy	\$200,000	BUCF
Stanley and Brenda Emmons	\$550,000	BUCF
Stephen and Shirley Hoselton	\$180,000	BUCF
Steven Foley	\$150,000	BUCF
Susan and Ray Wren	\$1,000,000	BUCF
Teddi Dysart	\$400,000	BUCF
Teresa Ezell	\$100,000	BUCF
Theo and Engela Meintjes	\$420,000	BUCF
Thomas Schnabel	\$320,000	BUCF
Thomas Senft	\$600,000	BUCF
Thomas Shearer	\$50,000	BUCF
Thurman and Judy Bryant	\$550,000	BUCF
Trina Reyes [3]	\$50,000	BUCF
Walker and Amber Ross	\$60,000	BUCF

Investor Name	Estimated Investment Amount ¹	Invested In
Wayna Cargant	\$200,000	BUCF
Wayne Sargent	<u> </u>	
Blake Ducharme <i>also known as</i> Black Gold Investments	\$25,903,650	Wammel Group
	¢50,000	Wammal Crawn
Brent Cantalope	\$50,000	Wammel Group
Brian and Laurie Swift	\$587,000	Wammel Group
Brooke Green Holdings, LLC also known	\$50,000	Wammel Group
as Jein Gadson	4.0.00	
Cody Black	\$38,000	Wammel Group
Cynthia Wade	\$200,000	Wammel Group
Danny Hardy	\$80,000	Wammel Group
David and Sherry Bryan	\$110,000	Wammel Group
Dorothy Madison	\$25,000	Wammel Group
Jein Gadson	\$40,000	Wammel Group
Joseph and Kristina Bauer	\$108,500	Wammel Group
Kirby Ross	\$86,600	Wammel Group
Paul and Karen Smith	\$53,750	Wammel Group
Richard Engel	\$150,000	Wammel Group
Robert and Sandra Bailey	\$200,000	Wammel Group
Steve Garrett also known as Gret	\$1,409,760	Wammel Group
Investments; League City Boat & RV;		
Southern Grant Ranch; Coastal		
Construction		
Swift Tree Holdings, LLC also known as	\$1,225,000	Wammel Group
Brian Swift		
Tim Johnson	\$150,000	Wammel Group
Warren Trahan	\$100,000	Wammel Group
TOTAL 171	\$53,542,710	