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

CECLIDITIES AND EVOLANCE

SECURITIES AND EXCHANGE	§	
COMMISSION	§	
Plaintiff,	§	
	§	
	§	
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 ELEVENTH 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 DECEMBER 31, 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 Eleventh 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, the Ninth Quarterly Report on July 30, 2019, and the Tenth Quarterly Report on October 30, 2019, and incorporates Dkt. Nos. 72, 132, 156, 202, 273, 290, 300, 317, 332, and 344 herein. Receivership Order at ¶ 52.

- 9. In compliance with the Receivership Order, this Quarterly Status Report (the "Eleventh 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 [Eleventh] 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;

_

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 "Tenth Reporting Period").

The Eleventh Quarterly Report covers the period October 1, 2019 through December 31, 2019 (the "**Reporting Period**").

II. GENERAL OVERVIEW

During the Reporting Period, the Receiver worked diligently to liquidate the remaining assets of the Receivership Estate, participate in the ongoing clawback and fraudulent transfer litigation, and continue making the first interim distribution to the Net Losing Investors in the amounts set forth in the Receiver's Amended Net Losing Investor Distribution Schedule. 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 continue making 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) Continuing to make the approved interim distribution to Net Losing Investors and responding to investor inquiries relating to same;

- (b) Continuing liquidation of the remaining Receivership assets;
- (c) Continuing 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:
- (d) Continuing efforts to enforce and collect on the default judgments against certain Transferees in Ancillary Civil Action No. 4:18-cv-00360;
- (e) 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;
- (f) Maintaining a line of communication with investors by updating the Receiver's website (http://bucfreceivership.tklaw.com);
- (g) Working with Veritas Advisory Group, Inc. ("Veritas") to perform 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;
- (h) Conducting research as to persons and entities of interest based on the Receiver's investigation;
- (i) Seeking and/or reviewing information from named persons and entities of interest based on the Receiver's investigation;
- (j) Conferring with Defendant Wammel's counsel to discuss going-forward issues;
- (k) Conferring with Defendant Stephen Garrett's counsel to discuss issues relating to the real property located at 8101 South Humble Road, Texas City, Texas 77591;
- (l) Conferring with Defendant Goodspeed's counsel to discuss going-forward issues:
- (m) Coordinating settlements with investors and third parties relating to funds received from the Receivership Defendants;
- (n) Maintaining the Receiver's bank account in accordance with the Receivership Order;

- (o) Satisfying on-going, ordinary course obligations of the Receivership Estate in order to maintain the status quo; and
- (p) Responding to investor inquiries and reviewing information submitted by investors in furtherance of the Receiver's duties pursuant to the Receivership Order.
- 13. 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, (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].

_

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.

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

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. To the extent necessary, the Receiver will continue 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 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).

20. 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

-

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

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

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 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.

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.

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.

22. 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.

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 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

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.

Reporting Period, and one check totaling \$45.00 prepared during the Third Reporting Period that still has not been deposited by the recipient.⁹

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

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

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.

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

27. At the end of the Tenth Reporting Period, the known assets of the Receivership Estate were comprised of: (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

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.

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

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

At the end of the current Reporting Period, the known assets of the Receivership Estate include the following: (a) approximately \$388,139.20 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 \$388,139.20 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.¹⁴

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	\$388,139.20		
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	\$388,094.20		
End of the Reporting Period			

29. 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

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

¹⁴ The check for \$45.00 prepared during the Third Reporting Period is for statutory fees associated with subpoena documentation.

Receivership Order at ¶¶ 9, 10. Defendant Bryant submitted a sworn statement to the Receiver 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.

- 30. During the Reporting Period, expenditures made from the Receivership Account were for expenses relating to the Receiver's assets and banking fees, which totaled \$20,342.00. *See* Lines 10a-e of the attached Exhibit A.
- 31. 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. <u>Receiver and Retained Professional Fees</u>.

32. In accordance with the Receivership Order, the Receiver and her Retained

Professionals are entitled to compensation for services rendered on behalf of the Receivership

Estate. As will be detailed in the interim fee applications of the applicable Retained

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, and other related matters.

33. 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.

34. 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

35. At the beginning of this Reporting Period, the Receiver had \$362,354.03 in the

Receiver's Account. The Receiver received and deposited \$50,064.50 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
10/2/2019		\$1,000.00	Settlement ¹⁵
10/2/2019		\$3,000.00	Settlement ¹⁶
10/15/2019	Coastal Bay Construction, LLC	\$9,300.00	Payment: Stephen Garrett
	(signatory Stephen Garrett)		
10/15/2019	Coastal Bay Construction, LLC	\$9,300.00	Payment: Stephen Garrett
	(signatory Stephen Garrett)		
10/24/2019		\$100.00	Settlement ¹⁷
11/1/2019	Coastal Bay Construction, LLC	\$9,300.00	Payment: Stephen Garrett
	(signatory Stephen Garrett)		
11/4/2019		\$1,000.00	Settlement ¹⁸
11/4/2019		\$3,000.00	Settlement ¹⁹
11/15/2019		\$100.00	Settlement ²⁰
12/2/2019		\$1,000.00	Settlement ²¹
12/3/2019	United States Marshals Service	\$3,564.50	Proceeds from Golf Cart
			Liquidation
12/5/2019	Coastal Bay Construction, LLC	\$9,300.00	Payment: Stephen Garrett
	(signatory Stephen Garrett)		_
12/26/2019		\$100.00	Settlement ²²

36. 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 and banking fees.

D. Receivership Property

37. 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

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.

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.

38. 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].

39. Mr. Wammel also purchased a 3,500 square-foot residence near Houston owned by the Wammel Group (the "Wammel Group Residence"). Stephen Garrett occupies the 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

²³ 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.

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]. The Receiver continues to confer with Stephen Garrett's counsel to discuss issues relating to the Wammel Group Residence.

40. 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.

Case 4:17-cv-00336-ALM Document 348 Filed 01/30/20 Page 21 of 30 PageID #: 6026

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

(previously) rented storage units.²⁴

42. 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

\$89,000 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.

43. 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].

44. 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.

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

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

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).

²⁴ The Receiver coordinated with the lienholder regarding the sale of the motorcycle.

46. 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.

47. 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

- 48. 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.
- 49. 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.

- 50. 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 Eleventh Quarterly Report, the Receiver has either dismissed or settled with the majority of defendants in this ancillary litigation.
- 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.

52. 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.

53. **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.

54. **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.²⁵

The investor list is attached as **Exhibit D** hereto.

55. 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.

²⁵ 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.

Receiver's Eleventh Quarterly Report Ending December 31, 2019 - Page 24 524662.000002 23044413.1

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.

57. The Receiver has identified approximately 171 investors. ²⁶

During the Reporting Period, in accordance with this Court's Order Granting Motion to Approve Amended Interim Distribution List [Dkt. No. 324], the Receiver continued to 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. During the Reporting Period, Net Losing Investors collectively deposited \$3,937.33, which brings the total amount deposited to \$435,808.03 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

59. 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 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

-

²⁶ During the Reporting Period, the Receiver continued her efforts to investigate an additional potential net losing investment with the Wammel Defendants. The Receiver is currently investigating the circumstances surrounding this alleged investment.

additional liquid assets, and the Receiver anticipates additional funds will come into the Receivership Estate once the remaining Receivership assets are liquidated.

60. 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]. 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. The Receiver further anticipates requesting Court approval for the next distribution to Net Losing Investors within the next 30 days.

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 before the end of the next reporting period. 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. 4:17-

cv-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.

H. **Court Proceedings/Case Administration**

61. On October 21, 2019, the Court entered its Order Granting the Agreed Motion for

Entry of Expedited Discovery Schedule Related to 8101 South Humble Road, Texas City, Texas

77591 [Dkt. No. 341].

62. On October 30, 2019, the Receiver filed her Tenth Quarterly Report for the

Receivership Estates [Dkt. No. 344] (the "**Tenth Quarterly Report**").

63. On November 14, 2019, the Receiver filed her Motion for Leave to File Tenth

Interim Fee Application in Excess of Page Limit [Dkt. No. 345] and her Tenth Interim Fee

Application for Allowance of Fees and Reimbursement of Expenses [Dkt. No. 346]. On

November 15, 2019, the Court granted the Receiver's Motion for Leave to File Tenth Interim

Fee Application in Excess of Page Limit [Dkt. No. 347].

Dated: January 30, 2020.

Respectfully submitted,

By: /s/ Timothy E. Hudson

Timothy E. Hudson State Bar No. 24046120 Tim.Hudson@tklaw.com

Mackenzie S. Wallace State Bar No. 24079535 Mackenzie.Wallace@tklaw.com

Mackenzie M. Salenger State Bar No. 24102451 Mackenzie.Salenger@tklaw.com

THOMPSON & KNIGHT LLP One Arts Plaza 1722 Routh Street, Suite 1500 Dallas, Texas 75201 Telephone: (214) 969-1700 Facsimile: (214) 969-1751

COUNSEL TO RECEIVER

CERTIFICATE OF SERVICE

I hereby certify that on January 30, 2020, 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:

Jason P. Reinsch
U.S. SECURITIES AND EXCHANGE COMMISSION
Fort Worth Regional Office
Burnett Plaza, Suite 1900
801 Cherry Street, Unit #18
Fort Worth, TX 76102-6882
Telephone: (817) 900-2601
Facsimile: (917) 978-4927

reinschi@sec.gov

PRO SE

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

Thurman P. Bryant, III <u>Treybryant03@gmail.com</u>

1535 Sun Mountain, San Antonio, TX 78258

2054 Hidalgo Lane, Frisco, TX 75034

Via Electronic Mail:

James Ardoin
JONES WALKER, LLP
811 Main Street, Suite 2900
Houston, Texas 77002
Phone: (713) 437-1811

Fax: (713) 437-1946 jardoin@joneswalker.com

COUNSEL FOR CERTAIN RELIEF DEFENDANTS

PRO SE

By Electronic Mail and by Certified Mail, Return Receipt Requested:

Thurman P. Bryant, Jr. sonny_103@hotmail.com

2 Dogwood Lane, Hilltop Lakes, TX 77871

Via Electronic Mail:

Mark L. Hill Anna S. Brooks SCHEEF & STONE, L.L.P. 2600 Network Blvd., Suite 400 Frisco, Texas 75034 Phone: (214) 472-2100

Phone: (214) 472-2100 Fax: (214) 472-2150

Mark.Hill@solidcounsel.com Anna.Brooks@solidcounsel.com

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

Eleventh Quarterly Reporting Period - 10/01/2019 - 12/31/2019

		Reporting Period	Subtotal Prior Periods	Grand Total
Line 1	Beginning Balance (As of 10/01/2019)	\$362,354.03	\$970,279.84	\$0.00
	Increases in Fund Balance:			
Line 2	Business Income	\$0.00	\$0.00	\$0.00
Line 2 Line 3	Cash and Securities	\$0.00	\$424,219.65	·
Line 3 Line 4	Interest/Dividends Income	\$0.00		
	Business Asset Liquidation	\$0.00		
Line 5	·	•	•	
Line 6	Personal Asset Liquidation	\$3,564.50		
Line 7	Third-Party Litigation Income	\$9,300.00		
Line 8	Miscellaneous - Other	\$37,200.00		
Line 8a	Total Funds Available (Lines 1 -8):	\$412,418.53	\$2,782,873.76	\$2,832,938.20
	Decreases in Fund Balance:			
Line 9	Disbursements to Investors	\$3,937.33	\$431,870.70	\$435,808.03
Line 10	Disbursements for Receivership Operations	\$0.00	\$0.00	\$0.00
Line 10a	Disbursements to Receiver or Other Professionals	\$1,250.00	\$435,963.32	\$437,213.3
Line 10b	Business Asset Expenses	\$0.00	\$2,976.87	\$2,976.8
Line 10c	Personal Asset Expenses	\$18,800.00	\$298,011.90	\$316,811.9
Line 10d	Investment Expenses	\$292.00	\$1,624.61	\$1,916.6
Line 10e	Third-Party Litigation Expenses			
	1. Attorney Fees	\$0.00	\$1,250,072.33	\$1,250,072.3
	2. Litigation Expenses	\$0.00		
	Total Third-Party Litigation Expenses	\$0.00	\$1,250,072.33	\$1,250,072.3
Line 10f	Tax Administrator Fees and Bonds	\$0.00	\$0.00	\$0.0
Line 10g	Federal and State Tax Payments	\$0.00	\$0.00	\$0.00
0	Total Disbursements for Receivership Operations	\$24,279.33	\$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	\$0.0
	Independent Distribution Consultant (IDC)	\$0.00	•	
	Distribution Agent	\$0.00		
	Consultants	\$0.00		
	Legal Advisers	\$0.00		
	Tax Advisers	\$0.00		
	2. Administrative Expenses		\$0.00	
	,	\$0.00		
	3. Miscellaneous	\$0.00		
	Total Plan Development Expenses	\$0.00	\$0.00	\$0.00
Line 11b	Distribution Plan Implementation Expenses			
	1. Fees			
	Fund Administration	\$0.00		
	Independent Distribution Consultant (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
	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):	\$24,279.33	\$2,420,519.73	\$2,444,799.06
Line 13	Ending Balance (As of 12/31/2019):	\$388,139.20	\$362,354.03	\$388,139.20
Line 14	Ending Balance of Fund - Net Assets:			
Line 14a	Cash & Cash Equivalents	\$388,139.20	\$362,354.03	\$388,139.20
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	\$388,139.20	\$723,606.99	\$388,139.20

OTHER SU	PPLEMENTAL INFORMATION:	Reporting Period	Subtotal Prior Periods	Grand Total
	Report of Items NOT To Be Paid by the Fund:			
Line 15	Disbursements for Plan Administration Expenses Not Paid by the	Fund:		
Line 15a	Plan Development Expenses Not Paid by the Fund:			
	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	
	Web Site Maintenance/Call Center	\$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. 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	5	91	96
Line 19b	# of Claimants/Investors Paid Since Inception of Fund	96	91	96

Exhibit B: Summary of Receivership Assets¹

I. Summary of the Wammel Defendants' Receivership Assets

A. <u>Real Property</u>

i. the real property located at 8101 South Humble Road, Texas City, Texas 77591.²

II. Summary of the Receivership Assets included in the Receiver's Motion for Return of Receivership Property [Dkt. No. 315]³

A. Bryant Defendants' Receivership Assets

- i. Ladies Rolex Datejust Two Tone Model No. 178273, Serial No. C44J1151;
- ii. Ladies Rolex Datejust Two Tone Model No. 178273, Serial No. G481454; and

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. 390], the Seventh Quarterly Report [Dkt. No. 315], the Eighth Quarterly Report [Dkt. No. 317], the Ninth Quarterly Report [Dkt. No. 332], and the Tenth Quarterly Report [Dkt. No. 344].

² 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]. The Receiver continues to confer with Stephen Garrett's counsel to discuss issues relating to the Wammel Group Residence.

³ 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].

iii. Man's Rolex Datejust Two Tone Model No. 116333, Serial No. G548227.

Case 4:17-cv-00336-ALM Document 348-3 Filed 01/30/20 Page 1 of 11 PageID #: 6041 BUCF Receivership Bryant/Wammel - Non-Investor Creditors

<u>Creditor Name</u>	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	©1 711 74	ъ.
[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	\$1,102.00	Wammel
		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	\$13,965.67	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	00001117	W
[Slate]	6227	Wilmington, DE 19886	\$26,941.17	Wammel
		Chase: Card Services		
Chase	1001	P.O. Box 15548	Ø11 170 CO	W ⁷ 1
Marriott]	1981	Wilmington, DE 19886	\$11,178.62	Wammel

Case 4:17-cv-00336-ALM Document 348-3 Filed 01/30/20 Page 2 of 11 PageID #: 6042 BUCF Receivership Bryant/Wammel - Non-Investor Creditors

	Creditor's Address	Estimated Amount of Claim	Defendant
Last 4 Digits of Account No.	Creditor's Address	Estimated Amount of Claim	Detendant
9924	Carol Stream, IL 60197	\$0.00	Wammel
	Nationwide Credit Inc		
1000	PO Box 14581	\$74.674.47	W1
1009	Des Moises, 1A 50506	\$/4,6/4.4/	Wammel
	BarclayCard Services		
2395	P.O. Box 1333/ Philadelphia, PA 19101-3337	Unknown	Bryant
	500 0 11 1 7 1		
	Suite 400		
2829	Valhalla, NY 10595-1340	\$13,965.67	Wammel
	Chase Card Services		
1805		\$12.300.00	Bryant
	9 /	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	, , , , , , , , , , , , , , , , , , ,
	Citibank P.O. Box 6500		
2469	Souix Falls, SD 57117-6500	\$38,032.43	Bryant
	Citibank		
5800	P.O. Box 6500	Unknown	Bryant
3077	50aix 1 aiio, 5D 5 / 11 / -0500	CHKHOWH	Dryant
	Comenity Captial Bank		
2623	Columbus, OH 43218-3003	\$13,955.00	Bryant
	800 SW 20th St		
6964 suntrust acct no.	Suite 100/P.O. Box 9004	010.500.22	W
5581 convergent acct. no.	Renton, WA 98057	\$18,569.22	Wammel
	CCS		
	Payment Processing Center		
5398	P. O. Box 55126 Boston, MA 02205-5126	\$64.50	Wammel
	2395 2829 1805 2469 5899 2623	Nationwide Credit, Inc. PO Box 14581 Des Moises, IA 50306	P.O. Box 6426 Carol Stream, IL 60197 Nationwide Credit, Ine. PO Box 14581 Dox Moises, IA 5006 P.O. Box 15281 Barelay Card Services P.O. Box 1337 Philadelphia, PA 19101-3337 Unknown 500 Summit Lake Drive Suite 400 2829 Valhalla, NY 10595-1340 S13,965.67 Chase Card Services P.O. Box 15298 Wilmington, DE 19850 S12,300.00 Clubrak P.O. Box 6500 Souix Falls, SD 57117-6500 S38,032.43 Crithank P.O. Box 6500 Souix Falls, SD 57117-6500 Comentity Capital Bank P.O. Box 6500 Columbus, OH 43218-3003 Columbus, OH 43218-3003 S13,955.00 Columbus, OH 43218-3003 S13,955.00 Columbus, OH 43218-3003 S18,569.22 CCS Payment Processing Center P.O. Box 55126

Case 4:17-cv-00336-ALM Document 348-3 Filed 01/30/20 Page 3 of 11 PageID #: 6043 BUCF Receivership Bryant/Wammel - Non-Investor Creditors

Creditor Name	Last 4 Digits of Account No.	Creditor's Address	Estimated Amount of Claim	<u>Defendant</u>
Creditor Ivanic	Dast 4 Digits of Account No.	Citation's Address	Estimated Amount of Claim	Detendant
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		RGS Financial, Inc. PO Box 852039		
PayPal Credit]	8405	Richardson, TX 75085	\$2,852.90	Bryant
ACM (Midland Credit		Midland Credit Management, Inc. P.O. Box 2000		
Management) [Synchrony Bank]	7954	Warren, MI 48090-2000	\$3,870.45	Wammel
		MRS BPO, LLC1930 Olney Avenue Cherry Hill		
MRS BPO, LLC	their acct# 8813 for acct. #6227	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		
ynchrony Bank Discount Tire]	5705	P.O. Box 965048 Orlando, FL 32896	Unknown	Bryant
Discount Tirej	3703	Oriando, FL 32896	Unknown	Bryant
		SIMM Associates, Inc		
SIMM [Synchrony Bank]	9319	P.O. Box 7526 Newark, De 19714-7526	\$2,852.90	Bryant
[cynemeny Dank]	7317	1011414, 20 17/11 1720	W29002000	2.jun
		The Leader's Choice Financial		
he Leader's Choice Financial	BU00	8711 Fallbrook Drive Houston, TX 77064	\$1,483.13	Bryant
			4-,	
		USAA		
JSAA	8361	10750 McDermott Freeway San Antonio, TX 78288	Unknown	Bryant
-		-		·
		USAA		
JSAA	9735	10750 McDermott Freeway San Antonio, TX 78288	Unknown	Bryant

Case 4:17-cv-00336-ALM Document 348-3 Filed 01/30/20 Page 4 of 11 PageID #: 6044 BUCF Receivership Bryant/Wammel - Non-Investor Creditors

C Corvices	Creditor Name	Last 4 Digits of Account No.	Creditor's Address	Estimated Amount of Claim	<u>Defendant</u>
P.O. Bas 3346	Creditor Name	Last 4 Digits of Account No.	Creditor's Address	Estimated Amount of Claim	Detendant
P.O. Bira 3346					
P.O. Bas 3346					
			GC Services Limited Partnership		
CI (American Coradina American Coradina American Coradina International LLC 2420 Sweet S4,244.52 Beyand	GC Services	0000		PA 244 52	D
	[USAA] (Consumer Loan)	0966	Houston, 1X //253	\$4,244.52	Bryant
United Collection Bureau, Inc. 1981 Mammer, OH 43537 \$11,178.62 Wammed	ACI (American Coradius				_
P.O. Box 1418	International LLC) [USAA]	0966	Home Rd. Ste. 150 Amherst, NY 14228-2244	\$4,244.52	Bryant
P.O. Box 1418					
P.O. Box 1418					
P.O. Box 1418			United Collection Duncey Inc		
United Collection Bureau, Inc.	United Collection Bureau, Inc.				
P.O. Box 1418	[Chase Bank]	1981	Maumee, OH 43537	\$11,178.62	Wammel
P.O. Box 1418					
P.O. Box 1418					
P.O. Box 1418					
Case Dank	United Collection Bureau Inc				
10750 McDermott Freeway	[Chase Bank]	6227		\$27,408.15	Wammel
10750 McDermott Freeway					
10750 McDermott Freeway					
10750 McDermott Freeway					
SAA [Credit Card] S809					
USAA Credit Card 5809 San Antonio, TX 78288 \$763.00 Bryant	[Chase Bank]	4591		Unknown	Bryant
10750 McDermott Freeway San Antonio, TX 78288 S763.00 Bryant	-				-
10750 McDermott Freeway San Antonio, TX 78288 S763.00 Bryant					
10750 McDermott Freeway San Antonio, TX 78288 S763.00 Bryant					
SAA [Credit Card] 5809 San Antonio, TX 78288 \$763.00 Bryant					
SAA [Credit Card] 3497 San Antonio, TX 78288 Unknown Bryant USAA 10750 McDermott Freeway San Antonio, TX 78288 Unknown Bryant USAA 10750 McDermott Freeway San Antonio, TX 78288 Unknown Bryant USAA 10750 McDermott Freeway San Antonio, TX 78288 Unknown Bryant USAA 10750 McDermott Freeway San Antonio, TX 78288 \$11,800.00 Bryant	USAA [Credit Card]	5800		\$763.00	Bryant
10750 McDermott Freeway San Antonio, TX 78288 Unknown Bryant	OSAA [Cicuit Calu]	3609	San Antonio, 1A 70200	\$703.00	Bryant
10750 McDermott Freeway San Antonio, TX 78288 Unknown Bryant					
10750 McDermott Freeway San Antonio, TX 78288 Unknown Bryant					
10750 McDermott Freeway San Antonio, TX 78288 Unknown Bryant			USAA		
USAA 10750 McDermott Freeway San Antonio, TX 78288 Unknown Bryant	HOLA FO P. C. P.	2407	10750 McDermott Freeway	XX 1	ъ :
10750 McDermott Freeway San Antonio, TX 78288 Unknown Bryant	USAA [Credit Card]	3497/	San Antonio, TX 78288	Unknown	Bryant
10750 McDermott Freeway San Antonio, TX 78288 Unknown Bryant					
10750 McDermott Freeway San Antonio, TX 78288 Unknown Bryant					
10750 McDermott Freeway San Antonio, TX 78288 Unknown Bryant			LISAA		
SAA [Credit Card] 94 San Antonio, TX 78288 Unknown Bryant			10750 McDermott Freeway		
10750 McDermott Freeway SAA [Credit Card] 351 San Antonio, TX 78288 \$11,800.00 Bryant	USAA [Credit Card]	94		Unknown	Bryant
10750 McDermott Freeway SAA [Credit Card] 351 San Antonio, TX 78288 \$11,800.00 Bryant					
10750 McDermott Freeway SAA [Credit Card] 351 San Antonio, TX 78288 \$11,800.00 Bryant					
10750 McDermott Freeway SAA [Credit Card] 351 San Antonio, TX 78288 \$11,800.00 Bryant					
SAA [Credit Card] 351 San Antonio, TX 78288 \$11,800.00 Bryant					
10750 McDermott Freeway	USAA [Credit Card]	351		\$11,800.00	Bryant
10750 McDermott Freeway					
10750 McDermott Freeway					
10750 McDermott Freeway					
SAA [[oan] 5011 San Astonic TV 78788 Usbasum Dever					
Dara Leoning 17 /0200 Ulkilowii Bryant	USAA [Loan]	5011	San Antonio, TX 78288	Unknown	Bryant

Case 4:17-cv-00336-ALM Document 348-3 Filed 01/30/20 Page 5 of 11 PageID #: 6045 BUCF Receivership Bryant/Wammel - Non-Investor Creditors

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

Case 4:17-cv-00336-ALM Document 348-3 Filed 01/30/20 Page 6 of 11 PageID #: 6046 BUCF Receivership Bryant/Wammel - Non-Investor Creditors

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	Bryunt
		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, 1A 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

Case 4:17-cv-00336-ALM Document 348-3 Filed 01/30/20 Page 7 of 11 PageID #: 6047 BUCF Receivership Bryant/Wammel - Non-Investor Creditors

Creditor Name	Last 4 Digits of Account No.	Creditor's Address	Estimated Amount of Claim	Defendant
Creator Prante	East 4 Digits of Account 110:	Creditor 5 Address	Estimated Amount of Claim	Detendant
T W GIL / F		Tr. W. G.H.		
Time Warner Cable c/o Eastern Account System of Connecticut,		Time Warner Cable PO Box 837		
Inc. Insurance	EAS Acct No. 9311	Newtwon, CT 06470	1884.18 (Spectrum)	Bryant
		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		
Earmong Ingues	1025	P.O. Box 58725	0502 50	W1
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 One Geico Boulevard		
Geico	7254	Fredericksburg, VA 22412	\$428.97	Wammel
		Farm Bureau Insurance Brazoria-Galveston County Farm Bureau		
Texas Farm Bureau Insurance 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
osar [carmandice]	1003	5th 7thom0, 17t /0200	Chritown	Dijani
USAA [Life Insurance Policy,		USAA 9800 Fredericksburg Road		
Level Term Series V]	5409	San Antonio, TX 78288	\$302.10	Bryant
		Humana Insurance Company		
11	22//	P.O. Box 3024	62 721 00	W .
Humana	3366	Milwaukee, WI 53201	\$3,731.89	Wammel

Case 4:17-cv-00336-ALM Document 348-3 Filed 01/30/20 Page 8 of 11 PageID #: 6048 BUCF Receivership Bryant/Wammel - Non-Investor Creditors

Creditor Name	Last 4 Digits of Account No.	Creditor's Address	Estimated Amount of Claim	Defendant
		Creator 3 Hugi Uss		
Other				
		Perdue Brandon Fielder Collins & Mott, LLP		
	0.50	1235 North Loop West, Suite 600	******	W/ 1
Galveston County Tax Office	8535	Houston, TX 77008	\$96.84	Wammel
		Fidelity Investments		
Fidelity Investments	5941	P.O. Box 673001 Dallas, TX 75267	\$0.01	Wammel
Fidenty investments	3941	Danas, 1X /320/	30.01	wannie
		City of Prince		
		City of Frisco P.O. Box 2730		
City of Frisco	Unknown	Frisco, TX 75034	\$1,133.64	Bryant
			41,100.0	,
		Culligan of DFW		
		3201 Premier Drive, Suite 300		
Culligan of DFW	7775	Irving, TX 75063	\$698.64	Bryant
		<u> </u>		· · · · · · · · · · · · · · · · · · ·
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		
		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		PO Box 2789		
	8535	Texas City, TX 77592-2789	\$91.96	Wammel

Case 4:17-cv-00336-ALM Document 348-3 Filed 01/30/20 Page 9 of 11 PageID #: 6049 BUCF Receivership Bryant/Wammel - Non-Investor Creditors

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,		National Payment Center P.O. Box 105028		
INC. [US Dept of Education]	9483	Atlanta, GA 30348-5028	\$24,378.87	Bryant
		VI I F is W		
NI LE S M	0171	Nebraska Furniture Mart P.O. Box 3456	0255.00	р
Nebraska Furniture Mart	8171	Omaha, NE 68103-0456	\$355.00	Bryant
		NTTA Customer Service Center		
North TX Tollway Authority (TollTag)	4035	P.O. Box 260928 Plano, TX 75026-0928	\$41.45	Bryant
<i>G</i> /		,		
North TX Tollway Authority	9603	NTTA Texas Tollway Authority P.O. Box 660244 Dallas, TX 75266-0244	\$39.85	Bryant
		CPA, LP		
Southwest Credit Systems, LP [Time Warner Cable] (5775		CPA, LP C/O NTTA Collections P. O. Box 207899		
Parkwood property)	84460	Addison, TX 75320-7899	\$42.62	Wammel
		4120 International Pkwy. Suite 1100		
Southwest Credit [NTTA]	7242 [NTTA Acct. No. 7134]	Carrollton, TX 75007-1958	\$42.62	Wammel
Professional Account Management, LLC	8279	Professional Account Mangement, LLC- NTTA PO Box 866608 Plano, TX 75086-6608	\$42.62	Wammel
	0217	7.5 25.7 000000 Titalo, 177 75000-0000	ΨΤΔ.ΨΔ	Walinioi
		One North Interactive		
One North Interactive	Unknown	222 N Lasalle, Suite 1500 Chicago, IL 60601	Unknown	Bryant
		OnStar PO Box 77000, DEPT # 77246		
OnStar	4764	Detroit, MI 48277-0246	Unknown	Bryant

Case 4:17-cv-00336-ALM Document 348-3 $_{\rm Exh}$ Filed 01/30/20 Page 10 of 11 PageID #: 6050 $_{\rm BUCF\ Receivership}$ Bryant/Wammel - Non-Investor Creditors

Creditor Name	Last 4 Digits of Account No.	Creditor's Address	Estimated Amount of Claim	<u>Defendant</u>
Creator France	Dast 4 Digits of Account 10.	Creditor 3 Address	Estimated / timount of Claim	Detendant
		Pitney Bowes Corporate HQ		
Pitney Bowes	1825	3001 Summer St. Stanford, CT 06905	\$127.51	Bryant
,		,		,
		Poop Troop		
Poop Troop	Unknown	3245 Main Street, # 235-208 Frisco, TX 75034	Unknown	Bryant
1 1		Ready Refresh		,
Ready Refresh (by Nestle)	Unknown	6661 Dixie Hwy. Suite 4, Louisville, KY 40258	Unknown	Bryant
, , ,		,		<u> </u>
Student Loan	6421	US Department of Education National Payment Center P.O. Box 105028 Atlanta, GA 30348-5028	\$20,669.16	Bryant
Student Louis	0121	Center 1.0. Box 103020 Atlanta, G11 303 10 3020	Φ20,009.10	Diyunt
		TXDMV		
TV Department of Motor Vehicles	N	P.O. Box 149251	\$75.50	Derront
TX Department of Motor Vehicles	N	Austin, TX 78714	\$75.50	Bryant
		Weems & Stephens Equine Hospital		
Weems & Stephens Equine		5960 Hospital Road		_
Hospital	1359	Aubrey, TX 76227	\$159.94	Bryant
		WI F		
Whispering Farms Equestrian		Whispering Farms 5933 Pebblestone Lane		
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		
Financial Corporation of America	6448	P.O. Box 203500 Austin, TX 78720	\$294.13	Bryant
		Pure Water Pool Services		
Pure Water Pool Services	Unknown	2718 Pirates Gold Circle Friendswood, TX 77546	\$600.78	Wammel
		,		
		Reagin Law Firm, PLLC		
TLC Office Systems	0357	1415 South Voss, Suite #110-145 Houston, TX 77057	\$2,086.26	Bryant
120 Office Dysicins	0331	11000001, 174 / (03)	φ2,000.20	ப்புள்

Case 4:17-cv-00336-ALM Document 348-3 $_{\rm Exh}$ Filled 01/30/20 Page 11 of 11 PageID #: 6051 $_{\rm BUCF\ Receivership}$ Bryant/Wammel - Non-Investor Creditors

Creditor Name	Last 4 Digits of Account No.	Creditor's Address	Estimated Amount of Claim	Defendant
		H 's IP C		
		United Revenue Corp. 204 Billings, Ste. 120		
United Revenue Corp.	5669	Arlington, TX 76010	\$174.93	Bryant
		Million Air Houston		
		7555 Ipswich Road		
Million Air Houston	Unknown	Houston, TX 77061	\$1,850.00	Wammel
North TX Tollway Authority		NTTA P.O. Box 660244		
TollTag)	7134	Plano, TX 75266-0244	\$17.62	Wammel
		Verliance		
Verliance/Gary Hill	9226	43406 Business Park Dr, Temecula, CA 92590 Hunter Warfield	\$7,900.00	Wammel
Hunter Warfield		4620 Woodland Corporate Blvd		
Villas Chapel Creek]	2090	Tampa, FL 33614	\$355.62	Bryant
		77 C. VI 10 V		
		The Stevens-Lloyd Group, Inc. c/o Raymond Lloyd		
		9420 East Golf Links Road, #122		
Cessna Aircraft Company	6565	Tucson, Arizona 85730	\$92,225.23	Wammel
AllianceOne Receivables		AllianceOne Receivables Management, Inc.		
Management	2722	PO Box 1007	\$42.C2	Wammel
North TX Tollway Authority]	3723	Arlington, TX 76004	\$42.62	wammei
		Ayala's Mobile Detail		
		c/o Fredy Rodriguez		
Ayala's Mobile Detail	Unknown	15215 Empanada Drive Houston, TX 77083	\$1,276.00	Wammel
	23340 114	, , ,	¥-,	
roperties		(MC Parelle CLLC		
		646 Development LLC 2302 Post Office Street, Suite 601		
46 Development LLC	Unknown	Galveston, TX 77539	\$5,280.00	Wammel
		Fort Bend County Tax Assessor/Collector c/o Patsy Schultz, PCC		
Fort Bend County Tax		PO BOX 1028 - Payment Processing Dept		
Assessor/Collector	8914	Sugar Land, TX 77487	\$311.95	Bryant
		HEL		
		JLE Investors, Inc. d/b/a Associated Mortgage Investors		
LE Investors, Inc. d/b/a		710 North Post Oak Road, Suite 208		
Associated Mortgage Investors	2238	Houston, TX 77024	\$631,400.00	Wammel

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 Canaant	\$200,000	BUCF
Wayne Sargent	<u> </u>	
Blake Ducharme <i>also known as</i> Black Gold Investments	\$25,903,650	Wammel Group
	¢50,000	Warran al Crown
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	