

Rupinder Kaur (“Kaur”) (21% share), Harinder Singh (“Singh”) (15% share), Michael Meinzen (“Meinzen”) (15% share) and Chhatwal (49% share).

Source Pundit is a Missouri limited liability company formed in February 2007, with its principal place of business in St. Louis, Missouri. The business was operated out of the residence of Chhatwal. Chhatwal was the sole member of Source Pundit LLC until 2014 when Vivek Jain became a 49% partner and Chhatwal became a 51% partner. Source Pundit’s business operations are focused upon recruiting and staffing. Its major asset is its contracting relationship with a Japanese corporation engaged in a business requiring highly skilled temporary contractors, typically engineers. What is currently known as GATS began as a line of business within Source Pundit, d/b/a One Source Tech Support, but those operations were separated from Source Pundit when GATS was formed.

Helios is a Missouri limited liability company formed in January 2016, with its principal place of business at 15450 South Outer 40 Road, Suite 135, Chesterfield, Missouri 63017. Helios was established as a remote technical support services company. Chhatwal is the sole member of Helios.

On October 3, 2016, the United States Federal Trade Commission (the “FTC”) filed its Complaint against Chhatwal, Kaur, Neeraj Dubey (“Dubey”), the Receivership Defendants and VGlobal ITES Private Limited (collectively, the “FTC Defendants”) in the United States District Court for the Eastern District of Missouri (the “Missouri District Court”), Case No. 4:16-CV-1556-HEA (the “FTC Case”). Complaint (Dkt. No. 1). In the Complaint and other papers filed by the FTC on October 3, 2016, the FTC alleges various unfair or deceptive acts or practices in violation of the FTC Act, 15 U.S.C. § 45(a). *Id.*

Also, on October 3, 2016, the FTC moved for the entry of an order freezing the assets of the FTC Defendants, an order enjoining certain business activities of the FTC Defendants, an order requiring sworn financial statements from the FTC Defendants, an order prohibiting the destruction of documents, and an order expediting discovery. Memorandum in Support of Motion re Motion for Temporary Restraining Order filed by FTC (“Memorandum”) (Dkt. No. 6). The Court entered the requested relief by order entitled *Temporary Restraining Order with Asset Freeze, Appointment of a Receiver, Other Equitable Relief, and Order to Show Cause Why a Preliminary Injunction Should Not Issue* (the “Order”) dated October 4, 2016. *See* Order (Dkt. No. 10).

Also, on October 3, the FTC moved for the immediate appointment of a receiver over the Receivership Defendants to avert the likelihood of consumer injury during the pendency of the action and to preserve the possibility of effective final relief. Memorandum (Dkt. No. 6). On October, 4, 2016, the Court entered the requested relief in the Order and appointed Claire Schenk of Thompson Coburn as Temporary Receiver. *See* Order at 13 (Dkt. No. 10).

The Order directed the Receiver to (i) assume full control of the Receivership defendants; (ii) take exclusive custody, control, and possession of all assets and documents of, or in the possession custody, or under the control of, the Receivership Defendants, wherever situated; (iii) take possession of and secure all areas of the business premises of the Receivership Defendants; (iv) conserve, hold, and manage all receivership assets, and perform all acts necessary or advisable to preserve the value of those assets, in order to prevent any irreparable loss, damage, or injury to consumers or to creditors of the Receivership Defendants; (v) enter into contracts and purchase insurance; (vi) prevent inequitable distribution of assets and determine, adjust, and

protect the interests of consumers and creditors; and (vii) manage and administer the business of the Receivership Defendants, among other duties. Order at 14-15 (Dkt. No. 10).

On October 28, 2016, a Preliminary Injunction was entered as to Global sMind and the Receivership appointment was made permanent. *See* Preliminary Injunction as to Global sMind LLC at 13 (Dkt. No. 45). On October 28, 2016, a Preliminary Injunction was also entered into as to the Foreign Defendants, Neeraj Dubey and Vglobal ITES Private Limited. *See* Preliminary Injunction as to Neeraj Dubey and VGlobal ITES Private Limited (Dkt. No. 44). Pursuant to Section VII, the Foreign Defendants were ordered to “fully cooperate with and assist the Receiver.” *Id.* at 13 .

On November 15, 2016, a Stipulated Preliminary Injunction was entered as to Receivership Defendants GATS, Source Pundit, and Helios and Defendant Chhatwal. *See* Stipulated Preliminary Injunction as to Defendants Rajiv Chhatwal, et al (Dkt. No. 50). Section V of the Preliminary Injunction also made Claire Schenk the Permanent Receiver for the Stipulating Receivership Defendants. *Id.* at 12. The Receiver was directed to accomplish the tasks directed by the October 4 Order. *Id.* at 13-14. On that same day, a Stipulated Preliminary Injunction was also entered into as to Defendant Kaur. *See* Stipulated Preliminary Injunction as to Rupinder Kaur (Dkt. No. 49). Under Section VI, Defendant Kaur was also ordered to “fully cooperate with and assist the Receiver.” *Id.* at 14.

II. OPERATION OF THE RECEIVERSHIP

A. General Operations

The overall function of the Receiver as set out in the Receivership Order is to administer and manage the business affairs and assets of the Receivership Defendants, act as the managing member or partner of the Receivership Defendants, marshal and safeguard all of the assets of the

Receivership Entities and take such actions as are necessary to protect consumers and creditors. In furtherance of these objectives and following her appointment, the Receiver acted promptly to secure known assets, business records obtainable from the known business locations of the Receivership Defendants and other Receivership property.

The Receiver has allowed Receivership Defendant Source Pundit to continue its operations and has been actively managing its business affairs as they do appear to involve lawful activity which is not prohibited by the Order. As noted above, Source Pundit is involved in staffing operations and the Receiver has seen no evidence that Source Pundit is engaged in making representations that it services products of U.S. technology companies such as Apple or that it has detected problems with consumers' computers ("prohibited activity"). *See* Order at 6 (Dkt. No. 10). A more detailed discussion pertaining to Source Pundit is set out below.

Based upon the documents, consumer complaints and other information provided to her, the Receiver has concluded that the remaining Receivership Defendants, GATS, Helios and Global sMind were engaged in prohibited activity prior to the appointment of the Receiver. For this reason, and because the Receivership Defendants do not have appear to have a line of business separate from the prohibited activity, the Receiver has not allowed these entities to continue their pre-receivership operations and does not plan to resume operations. As noted below, the Receiver will move towards final tax return and other filings as she deems appropriate to document the termination of GATS, Helios and Global sMind. Counsel for GATS and Helios confirmed that they are in agreement that these entities not continue in operation. Global sMind is unrepresented. However, despite inquiry to counsel for its members, the Receiver has not received any information refuting this conclusion or urging a continuation of Global sMind.

Shortly after learning of the Receivership appointment, on October 5, 2016, the Receiver visited the known physical premises of the operations of the Receivership Defendants. Government agents and the Receiver gathered such documents, electronic data and Receivership assets as were identified by Defendants Kaur and Chhatwal. The Receivership property was removed and/or copied and relocated to the offices of the Receiver. Additionally, the Receiver acted promptly to file change of address cards and provided notices to banks, accountants and others so that future Receivership documents and information would be provided directly to the offices of the Receiver.

In addition to the actual sites of the Receivership operations listed above, the Receiver learned that GATS claimed to have an additional business location at 10756 Trenton Industrial Drive, St. Louis, Missouri 63132. On October 5, 2016, the Receiver's agent visited the Trenton location and removed all pertinent business records from the premises. Through her initial interview with the Trenton location's occupant, the Receiver's agent learned that GATS, as a tenant, leased the office from Greenberg Development Company LLC. The Receiver also learned that GATS did not conduct any business in that location, using the location only as a physical mailing address. The current occupant had no business connection to any of the FTC Defendants.

Through her review of documents, the Receiver learned that GATS leased the Trenton office in or around April 30, 2015 for an initial term of one year. That lease was subsequently renewed the following year, for a total base rental obligation of \$9,000 and a current monthly rental obligation of \$750 per month. Because the Trenton office was unnecessary to Receivership operations and in order to conserve Receivership funds, by letter dated October 26,

2016 the Receiver notified the landlord and the occupant of the Receivership's termination and rejection of the Trenton office lease.

B. Notice of Receivership

i. **Constructive Notice:** The Receiver gave constructive notice of the Receivership proceedings through a widely disseminated press release. That release provided information regarding the Receiver's website and email contact information. The Receiver's website, in turn, provides: (i) a notice and instructions to consumers; (ii) relevant filings including the FTC Complaint, Memorandum and the Court Order; and (iii) a link to the FTC press release. This website will be updated with additional relevant information, including this First Interim Status Report, as it becomes available. Also, as described in greater detail below, to the extent possible, the Receiver has redirected the live websites of the Receivership Defendants websites to the Receivership website.

ii. **Actual notice:** Immediately after the entry of the Receiver and the Asset Freeze Order, copies of the Order were served upon individuals and entities believed to have possession of any property of the Receivership estate. Termination letters were provided to each of the individual FTC Defendants on or about October 5, 2016 so that it was clear that the Receiver controlled the Receivership Defendants and that those individuals must cease and desist from engaging in unauthorized and prohibited activity.

To perfect jurisdiction pursuant to 28 U.S.C. § 754, the Receiver filed copies of the Complaint and Receivership Order with the Clerk of the District Courts for the: Southern District of Florida; District of Delaware; Central District of California; Northern District of Ohio; Eastern District of Pennsylvania; Central District of Illinois; Western District of Missouri; Eastern District of New York; District of Minnesota, and the Southern District of Texas. The

Receiver also completed and timely provided the requisite IRS Form 56 to the Internal Revenue Service on October 11, 2016.

Contacts and turn-over directives pursuant to the Order have been made to known account and property holders, including banks, merchant processing accounts, creditors, and former officers, directors, employees, attorneys, accountants, and others. These contacts will continue as additional relevant parties become known to the Receiver.

C. Personnel

Pursuant to Section VII.B., paragraph 8 of the Order, the Receiver may “employ attorneys, accountants, appraisers, and other independent contractors and technical specialists, as the Receiver deems advisable or necessary in the performance of duties and responsibilities under the authority granted by this Order.” *See* Order at 16 (Dkt. No. 10). In line with this authority, and following the receipt of proposals with service professionals, the Receiver made arrangements with those professionals listed and described below.

i. *Attorneys*: Pursuant to the Receiver’s proposal to the FTC and the subsequent submission to the Court, Thompson Coburn LLP is serving as legal counsel to the Receiver with a discount of fifteen percent from standard rates. Stephen B. Higgins is serving as Chief Counsel to the Receiver. The services of other attorneys, paralegals and staff at Thompson Coburn are utilized on an as needed basis. As required by the Court, a Fee Application will be submitted to the Court on or before December 5, 2016. *See* Order at 23 (Dkt. No. 10).

ii. *Accountants*: Segue Partners (“Segue”), a local firm, was selected to work with the Receiver based upon the October 6, 2016 proposal attached hereto as collective **Exhibit 1**, subject to the discounted arrangement referenced in the attached proposal. The Receiver selected Segue because Segue agreed to provide services in a cost effective, and efficient manner, it has

receivership experience and because the firm offers a range of accounting and bookkeeping services. The Receiver will rely upon Segue for “Back-Office” services in anticipation of the filing of tax returns for the Receivership Defendants by the accountants described below.

CliftonLarsonAllen LLP (“CLA”) was selected to work with the Receiver based upon the October 12, 2016 proposal attached hereto as **Exhibit 2** and subject to the flat rate for the preparation of tax returns referenced in the engagement letter attached hereto as part of Exhibit 2. The Receiver selected CLA because CLA agreed to provide services in a cost effective and efficient manner, has receivership experience and because the firm offers tax preparation and other services, including forensics and valuation services.

iii. *Former personnel*: Individuals employed by the Receivership Defendants at the time of the entry of the Receivership Order have been notified that, pursuant to the Order, they no longer possess any authority to act on behalf of the Receivership Defendants in any capacity except as otherwise authorized by the Receiver. These individuals have been directed to turnover any Receivership property. These individuals have also been notified that any contractual relationships with the Receivership Defendants have been terminated. The Receiver provided similar notification to known accountants and other service professionals formerly engaged by the Receivership Defendants.

D. Maintaining the Business of Source Pundit

Source Pundit entered into a Service Agreement on January 1, 2009, most recently amended April 1, 2016, whereby Source Pundit recruits, hires, dispatches and manages highly skilled agency workers (“contractors”) for a Japanese corporation (“JC”) located in Japan. JC pays Source Pundit for the salary of these contractors and Source Pundit, in turn, pays the contractors, retaining the difference in the salary rates as profit. JC also utilizes a Source Pundit

contractor at an offsite location. JC pays for mobilization, de-mobilization, and home trip travel expenses for these contractors. In order to carry on their business operations, Source Pundit utilizes services for managing the day to day operations and communications with the contractors in Japan provided by Source Pundit Japan and services from Source Pundit India for recruitment of contractors as needed to fulfill requested assignments. In order to continue the ongoing and from all appearances legitimate business of Source Pundit, the Receiver directly handles the following processes:

- Reconciling timesheets of contractors and invoicing JC
- Preparing and providing JC with salary data for monthly tax calculation for contractors
- Reconciling timesheets of offsite contractor and invoicing JC
- Reconciling expenses of contractors and invoicing JC
- Reconciling SP India expenses and invoices for payment
- Reconciling SP Japan expenses and invoices for payment
- Preparing monthly wire transfers to all contractors, SP India, SP Japan, and any third parties providing travel assistance to contractors (as reimbursed by JC)

Immediately after the Receiver was appointed, communications were initiated with JC to develop a working relationship subject to the Receiver's due diligence investigatory efforts to ensure that the ongoing business with Source Pundit was not prohibited under the Receivership Order. The Receiver also worked to consolidate and transfer the relevant bank accounts to East West Bank, a bank with a great deal of experience in handling accounts for fiduciaries, for future business operations. After some discussion and the receipt of a great deal of information provided by the Receiver at the request of JC, JC agreed to change the monthly remittances to

the new account for Source Pundit and to continue the relationship despite the changes imposed by the Order.

Vivek Jain continues to operate in the oversight of the contractors, as director of Source Pundit India. In this role, he compiles documentation such as timesheets, expense receipts and invoices from third parties. The Receiver reconciles the expenses and timesheet documentation and facilitates payment to the contractors and for outstanding invoices. Based on the financial data compiled during the Receiver's tenure over the last two months, the outlook of the company for the next three months and historic data, **Exhibit 3**, Source Pundit appears to be financially viable and operating at a profit. As seen in Exhibit 3, operating income for October was \$26,874.51 and was \$13,741.05 for November. Operating income for December is projected to be \$3,805.80. In the last two years, gross income was: 2015, \$548,117; and 2014, \$566,922. Given that the Receiver has determined that Source Pundit is not engaged in prohibited activity, that its current business operations appear lawful and that Source Pundit has operated at a profit, in keeping with the Order, the Receiver has made a good faith determination to continue Source Pundit operations.

However, given that Source Pundit is not engaged in prohibited activity, and in light of the fact that the extra layer of oversight by the Receiver lessens the available profit to the member owners of Source Pundit, the Receiver would not object to revising the Preliminary Injunction Order to remove Source Pundit from the Receivership. The Receiver considered whether liquidation of this business would potentially result in a return of additional funds to consumers and creditors and believes that the contrary is true. To be specific, a sale of this personal services business is not feasible and a return of the business to Defendant Chhatwal

may, if an agreement is reached with the FTC, ultimately result in a greater return of funds to defrauded consumers and creditors. *See* Order at 16-17 (Dkt. No. 10).

E. Miscellaneous Operational Matters

1. Financial Accounts

As of November 15, 2016 the Receivership Defendants' cash position is \$298,895.40. All known bank accounts belonging to the Receivership Defendants have been consolidated into bank accounts at East West Bank for the sake of efficiency, because this bank is experienced in serving fiduciaries and to avoid the possibility of any withdrawals or debits to the original accounts which are not authorized by the Receiver. The Receiver is continuing to obtain and examine bank statements and other financial records to update the records provided to the Receiver by the FTC. A chart of the bank accounts and merchant accounts transferred to East West Bank is attached as **Exhibit 4**. As reflected in this exhibit, the total funds transferred into the Receivership Defendants' accounts at East West Bank is \$272,020.89.¹

2. Tax Returns

Based upon information provided by the former accountants for the Receivership Defendants, the Receiver believes that federal, state, and local tax filings are current. However, all accounting information has been provided to Clifton Larson Allen so that they may review this information and advise the Receiver as to her filing obligations. Counsel for one FTC Defendant, Kaur, has recommended that an amended return be filed for Global sMind. The Receiver's accountants have requested documentation to support the requested amendment. However, the requested documentation has not been made available to the Receiver. Given that

¹ The ongoing operations of Source Pundit result in a fluctuating total.

(with the exception of Source Pundit) the Receivership Defendants will not continue in operation, the Receiver will work with her accountants to prepare final tax return filings.

F. Website

The Receiver has established and is continually updating a website (www.gatsreceivership.com) to provide relevant information to consumers, creditors and other interested individuals. As of the date of this Report, access to such information is being provided through a weblink on the website of Thompson Coburn LLP. To minimize the operating costs of the Receivership and conserve the Receivership estate, interested parties are encouraged to access this publicly available source of information.

The Receiver has taken control of websites administratively managed by Chhatwal, including the following:

- onesourcetechnicalsupport.com
- globalaccessstechsupport.com
- gatsupport.com
- global-computer-service.com

These websites have been redirected to the www.gatsreceivership.com website discussed above. The Receiver believes that the other websites utilized by the Receivership Defendants, which are not controlled by Chhatwal, are most likely to be controlled by another member of Global sMind. For this reason, the Receiver requested administrative access to these accounts from counsel for those members so that she may redirect any active websites to the www.gatsreceivership.com website. These websites include:

- globalsconnect.com
- globalsconnect.in

- globalsmind.com
- smindconnect.com
- smindloyalty.com

Counsel for Global sMind has not responded to the Receiver's request. For this reason, the Receiver directed correspondence to "Go Daddy" to obtain the relevant access necessary to redirect the websites.

G. Receivership Property

Other than the contractual rights controlled by Source Pundit, the assets of the Receivership estate are largely limited to the value of the accounts described above. Additionally, the Receiver has gathered an extensive document collection from the various sources and business locations described in this report. The total number of documents appears to exceed 20,000 pages.

III. RECEIVER'S COMPLIANCE WITH BOND POSTING

Pursuant to section VII.H of the Order, on October 6, 2016, the Receiver executed a Bond in the sum of \$10,000. Order at 23 (Dkt. No. 10). On October 12, 2016, the Receiver filed the Bond with the Clerk of this Court. (Dkt. No. 29).

IV. CLAIMS BROUGHT BY THE RECEIVERSHIP AND LITIGATION MATTERS

As of this date, the Receiver is unaware of any pending or threatened proceeding against the Receivership defendants. The Receiver is reviewing and gathering such information as is available to her so that she may assess the viability of any potential claims against individuals or entities.

SEGUE
PARTNERS™

PROPOSAL FOR
THOMPSON COBURN
(FTC MATTER)
OCTOBER 6, 2016

Submit

About Segue Partners

Segue Partners provides comprehensive, integrated financial consulting and accounting services for private funds and their portfolio companies. Our goal is to be your preferred outsourced partner as you segue through your lifecycle: from formation to wind-down and everything in between.

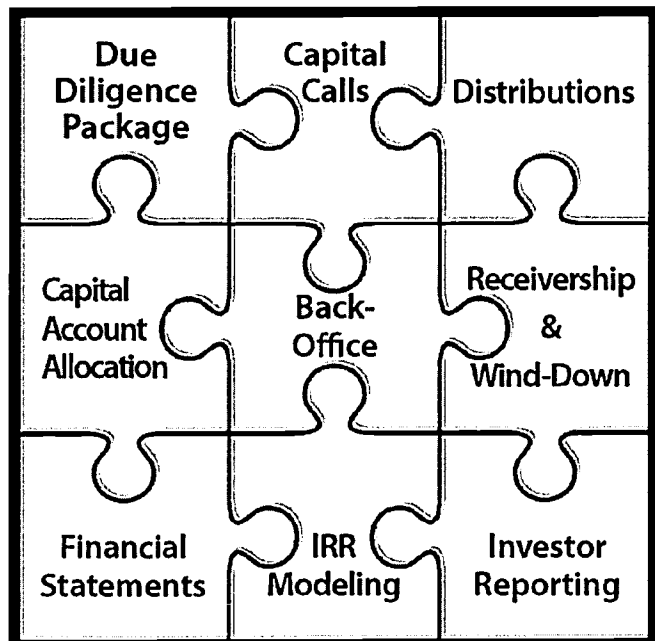
We offer a wide range of services with the help of a variety of software to deliver cost effective, efficient results that help you effectively manage and grow your private fund.

Segue is passionately dedicated to the success of private funds and their portfolios. We focus on clients that are private equity, venture capital, mezzanine and real estate funds, small fund-of-funds and family offices, as well as their portfolio companies.

Segue is more than a group of accountants, we have been "in the trenches" operating our own funds, raising capital, and reporting to investors. Our advice goes beyond the IRC Code, Dodd-Frank, and GAAP.

Our cost-effective process can help you save time, save money, and accomplish your goal of outsized returns to your investors.

Private Fund Services



Executive Profile

Segue Partners is led by our Founder and Managing Director, Michelle E. Murray, CPA. At Segue, Michelle has combined her unique talents in the investment world with her passion for client service. She has formed a team of experts who know the nuances of raising money from limited partners, reporting to and maintaining relationships with investors, the demands of fair value accounting, and the challenges as a Director of portfolio companies.

Michelle has over 20 years of proven success in accounting and corporate finance. Since 2001, she has focused her expertise in the private fund arena. Michelle has played an integral role in helping VC and PE firms raise over \$500 million collectively. She has a proven track record of success. For ten years, Michelle served as director and chief financial officer for Prolog Ventures, where she administered three private funds and over 30 investments. Michelle formerly served on the board of directors of Inoveon, Corp., a medical services firm focused on ophthalmology, was director and secretary of Symbionics, Inc., a therapeutic drug discovery company and was instrumental in the liquidation of the company and its minority holdings in ZyStor Therapeutics, Inc., during its 2010 acquisition by BioMarin, as well as Efficas, Inc., a nutritional food company based in Boulder, CO.

Michelle is an inaugural member of the NVCA CFO Task Force where she served on the FASB comment letter sub-committee and ILPA action committee.

Michelle graduated with honors from Saint Louis University with a bachelor's of science degree in business administration with an emphasis in accounting. She is a licensed CPA in Missouri and Colorado, and has passed the test for Certified Valuation Analyst.

Testimonials



"As the Managing Director of RiverVest, I know that Segue Partners is there if we need assistance with financial modeling, fair value analysis, or need an extra hand with a transaction. They are always available and knowledgeable. I would recommend Segue without hesitation."

Jay Schmelter
Managing Director
RiverVest Venture Partners



"I have known Michelle Murray for ten years while she was the director and CFO of Prolog. If you are looking to establish a relationship with a financial industry consultant or service provider, I can strongly recommend Michelle and her team at Segue Partners. We consistently received prompt, reliable and quality financial information from Michelle and think of her as "best-in-class"."

Barbara Feiner
Vice Chancellor for Finance and CFO
Washington University in St. Louis

"It's not every day that the PE industry can share a terrific resource previously enjoyed by just one competitor."

James F. O'Donnell, III
Senior Partner
O'Donnell Capital Company, LLC



"I want to thank you personally for your assistance to our staff. I am impressed with your efficiency and how much we've benefited from your work with us in just a short time. Your business insight is candid, refreshing, and impactful. Your passion -- for not only what you do, but for what we do -- is evident in every call, meeting, and email. You are exceeding our high expectations and are effectively one of the team. That makes all the difference in achieving our objectives and results."

Arnold Donald
President and CEO
Executive Leadership Council



"Working with the Segue team has allowed us to focus on deals and helping our portfolio company instead of spending time on the financial reporting of the fund. Segue Partners not only handles our financial reporting but because of their deep understanding of venture capital investing and fund structure, they have been a great resource for our team during our fund raising as well."

Keith Molzer
General Partner
Flyover Capital

Summary of Proposed Services

Investor Relations

Segue offers value add advice when it comes to “behind the scenes” services pertaining to investor and “constituent” relations. In addition, Segue services include “high touch” client services that are transparent to your constituents. We truly provide Partner level services and hence we are happy to handle questions from your investors and constituents that arise on a routine basis concerning financial and tax matters. However, we do recommend the investors/constituents seek tax professionals and therefore we do not provide tax advice ourselves. We will even go the extra mile to speak with your accountants or advisors if there are questions or concerns about the reporting on your behalf.

Reporting

We will help you track the details of investments, entity structures, etc. This can include maintaining proper records for fair value reporting, monitoring and/or preparing capitalization tables, ensuring compliance with the terms of your investment and helping you analyze exit and follow-on investment scenarios. Additional fees for these services may apply, including fees for Shareholder Insight modeling software.

Back-Office for Affiliated Entities

Segue provides clients with full-service accounting solutions including accounts payable, intercompany reporting, and back-office services. We are pleased to offer the following services:

- Maintain activity in general ledger and ensure bank reconciliations are completed monthly;
- Process accounts payable bills and manage any intercompany transactions;
- Provide cash analysis on an as needed basis to help determine each entity's cash flow;
- Prepare partner capital accounts to ensure proper tax reporting;
- Prepare quarterly Financial Statements;

Core Segue Team dedicated to serving Thompson Coburn (FTC Matter)

Michelle E. Murray, CPA, Founder and Managing Director

With over 20 years of proven success in accounting and corporate finance, Michelle founded Segue Partners in 2010 to provide comprehensive, integrated financial consulting and accounting solutions to private funds and their portfolio companies. Previously as director and CFO for Prolog Ventures, LLC, a St. Louis based Venture Capital firm with \$120 million under management, she oversaw audit and tax, risk management, legal agreements and investor compliance. She was responsible for investment reporting for over 30 portfolio companies and was director for three companies during their exits. She spent the early part of her career in public accounting with Ernst & Young and later Clifton Gunderson, where she oversaw internal and external financial reporting for one of the largest privately held companies in St. Louis, Knight Williams, Corp. See *additional details on page 1*.

Michelle graduated with honors from Saint Louis University with a Bachelor of Science in Business Administration with an emphasis in accounting. She is a licensed CPA in Missouri and Colorado and has passed the Certified Valuation Analyst exam.

Lisa McDonald, Director Communications

Lisa supports our marketing and communications efforts by crafting our message and managing the production of our print, electronic, and web communications. She also manages our investor relations services including our secure web portal and disbursement of reports to investors and constituents.

Lisa joined Segue Partners at its inception to lead our marketing and communications effort. She is a dedicated team-oriented professional with more than 20 years of achievement and demonstrated success driving multi-million dollar fund raising goals while providing leadership in highly competitive markets. Most recently, she worked as the director of development operations for the Missouri Botanical Garden and as vice president of resource development for the United Way of Greater St. Louis.

Lisa attended the University of Kansas where she earned her Bachelor of Arts degree in Communications.

Luke McGowan, Financial Associate

Luke focuses on bookkeeping and assists with developing reports for clients. He brings a strong work ethic, outstanding energy, and supports our efforts by focusing on detail oriented data entry, reconciling accounts, investments, preparing financial statements and monitoring investment transactions. Prior to Segue, Luke was a member of AmeriCorps St. Louis, where he served as part of the Emergency Response Team in Joplin, Missouri after the May 2011 tornado. His team coordinated 1,200 volunteers a day and tracked over one million volunteer hours. Luke returned to St. Louis and served as an Income Tax Preparer focused on communication with clients, educating them on tax law, and preparing and filing tax returns.

Luke earned his Bachelor of Science in Business Administration with concentrations in Accounting and Marketing from Saint Louis University.

John Branham, Accounting Assistant

John brings accounting experience, strong computer skills, and a passion for customer service to Segue Partners and provides administrative support including bookkeeping, reconciliation and database management to our clients.

John earned his Bachelor of Science in Business Administration from Saint Louis University.

Value-Add: Best Practices

Using best practices and developing solid techniques for proper management of Internal Controls is included in the Segue Partners model of client services. These are value add services that are provided to our clients at no additional cost. They help you maintain the integrity and security of your financial data and help you make informed business decisions based on quality data and provide your investors with transparency and the confidence that your financials are in order and will stand up to auditor scrutiny.

Internal Controls

Internal Controls are a specific set of policies, procedures, and activities designed to meet an objective. A control may exist within a designated function or activity in a process. A control's impact may be entity-wide or specific to an account balance, class of transactions or application. Controls have unique characteristics – for example, they can be automated or manual and include segregation of duties, reconciliations, authorization and approvals and safeguarding and accountability of assets. Controls are a means by which a firm's resources are directed, monitored and measured. It plays an important role in detecting and preventing errors and fraud, and protects the firm's resources including physical (property) and intangible (reputation).

Segregation of Duties

Segregation of Duties (SOD) is a basic building block of sustainable risk management and internal controls for a firm. It reduces the risk of mistakes, inappropriate actions and helps fight fraud by discouraging collusion.

SOD entails separation of specific duties in a given transaction cycle so no one person performs all of the areas of that cycle. SOD is critical in protecting the assets of your firm. To ensure SOD is achieved, the following areas are separated among different employees; Authorization, Approval, Recordkeeping, Custody of Assets, and Reconciliation.

Reconciliations

Reconciliation is the process of comparing information that exists in two separate forms such as general ledgers, reports, invoices, etc., and then analyzing differences and making the necessary corrections to ensure that the information is accurate, complete, and consistent. This is an underappreciated yet critical control to help ensure a firm's financial integrity. An efficient, accurate, and timely financial close cycle creates a foundation for evaluating business performance, supports organizational decisions, and satisfies external reporting requirements.

Authorizations & Approvals

Authorization is the basis by which the authority to complete various stages of a transaction is delegated.

All transactions and activities should be carried out and approved by employees acting within their range of knowledge and proper span of control. Proper authorization practices serve as a proactive approach for preventing invalid transactions from occurring. Policies and procedures within our clients firm are clearly identified as to which individuals have authority to initiate, submit, reconcile, view or approve different types of transactions.

Asset Security

Assets and records are kept secure at all times to prevent unauthorized access, loss or damage. The security of assets and records is essential for ongoing operations; accuracy of information, privacy of personal information included in some records and in many cases is a state or federal law.

We protect our client's assets and records including physical and electronic records by creating a varied structure of passwords, secure data storage systems, and through the use of our web portal.

Proposed Fees for Services

DESCRIPTION



Investor Relations Fee

Segue will work with the team at Thompson Coburn to identify investor/constituents pertinent to the engagement and provide communication and liaison services to help Thompson Coburn manage expectations for the FTC Matter.

Hourly

Reporting

Segue will track the details of investments and entity structures including maintaining proper records for fair value reporting, monitoring capitalization tables, ensuring compliance with the terms of the investment and analyzing exit and follow-on investment scenarios.

Hourly

Back-Office

Segue will administer and maintain the books and records for the FTC Matter. This includes accounts payable, intercompany reporting, cash management, and quarterly financial reporting.

Hourly

Capitalization Table preparation and exit analysis, as applicable

Hourly

One-time Set-Up Fee for use of QuickBooks Enterprise

Does not include clean-up of any records or adjustments.

\$1,500

¹Services outlined in this proposal assume standard hourly rates as follows:

Managing Director \$300, Director \$215, Senior Associate \$115, and Accounting Assistant \$60.

Detail Description of Scope of Services

One-time “Set up”:

- Review the Fund partnership agreement and offering documents to obtain information regarding accounting and other matters required for Segue to perform the services.
- Create partnership abstracts and discuss with Client certain specifics of the documents to clarify any ambiguities.
- Establish procedures and templates for communications with Client regarding capital calls, distributions, quarterly deliverables, and ad hoc management or limited partner requests.
- Populate partner and contact information in our software system.
- Setup web enabled reporting system.
- Create entities and chart of accounts in QuickBooks Enterprise accounting system.
- Load historical data into accounting system and reconcile to Client’s books and records, as applicable.
- Develop investor reporting and unaudited quarterly financial statements.
- Develop format of audited annual financial statements per discussions with audit firm, as applicable.
- **One-time Fund set-up fees typically are \$10,000, but have been discounted to \$1,500.**

Back Office and Investment Reporting Services, as applicable:

Calculate and process capital calls and distributions

Maintain general ledger for the Fund

Maintain schedules of investments

Record transactions of the Fund, including but not limited to the following:

- Capital Calls from partners
- Interest Income
- Investment income
- Operating expenses
- Distributions to partners
- Investment transactions
- Management fees
- Purchases and sales

Prepare and review bank reconciliations and required schedules on a monthly basis

Provide Fund cash analysis on as needed basis to help determine cash flow

Maintain partner capital accounts:

- Capital contributions and distributions
- Track remaining commitments
- Compute allocation of profits and losses (including carried interest)

Prepare internal Quarterly Financial Statements

Prepare GAAP based year-end financial statements

Coordinate and assist with tax advisors on filing of Form 1065 and Schedules K-1s

Process wire transfers for the Fund’s investments, expenses, and investor distributions

Maintain applicable legal documents (both Fund and investor level) within our software system

Maintain internal Quarterly Financial Statements and other Fund documentation (e.g. year-end audited financial statements, investor K-1s) via web-enabled for access by limited partners as long as Segue is providing Fund services .

Distribute correspondence (i.e. capital calls, distributions, quarterly reports, annual reports, K-1s) to investors via e-mail and web- enabled reports.

Assist in tracking details of investments, including monitor fair value and track and process loan payments, as applicable. Should the Fund(s) require an audit, we will prepare audit schedules and be the liaison with the auditors and track our time accordingly, which will be billed at standard hourly rates.

Thompson Coburn (FTC Matter)

October 6, 2016

Timing and Acceptance

By signing below, Thompson Coburn accepts the agreed upon the hourly fees outlined in this proposal.

Thank you for your confidence in Segue Partners. We look forward to a long and successful relationship and appreciate your business.

Michelle E. Murray

Michelle E. Murray, CPA
Managing Director
Segue Partners, LLC
October 5, 2016

Thompson Coburn (FTC Matter)

Customer Approval: _____

Title _____

Date: _____



Segue Partners

7905 Big Bend Blvd. | Suite 205 | St. Louis, MO 63119

MichelleM@SeguePartners.com

314.651.9524 cell | 314.984.5008 office | 800.734.8904 toll free

SeguePartners.com



October 17, 2016

VIA EMAIL AND REGULAR MAIL

Michelle E. Murray, CPA, Managing Director
Segue Partners
7905 Big Bend Blvd., Suite 205
St. Louis, MO 63119

Re: *Federal Trade Commission v. Global Access Technical Support, LLC, et al.*,
4:16-cv-1556 HEA

Dear Michelle:

Thank you for agreeing to provide accounting services for (Global Access Technical Support, LLC, d/b/a Global S Connect, Yubdata Tech and Technolive; Global Smind LLC d/b/a Global S Connect; Source Pundit, LLC d/b/a OneSource Tech Support; and Helios Digital Media, LLC) (“the Receivership entities”) as outlined in Segue Partner’s (“Segue”) Proposal of October 6, 2016 and subject to the terms delineated in this engagement letter. To be clear, you and your colleagues at Segue understand that each of you is working as an independent contractor in order to provide services for the benefit of the Receivership entities and that you do not have a direct or indirect contractual arrangement with Thompson Coburn LLP. You have agreed to work on the basis of a fee application to the Court subject to the availability of Receivership funds and have agreed to submit a monthly statement of your fees in accordance with the Receivership Order. We will assist you with the submission of your fees to the Court, however, all monthly statements will be initially submitted to me for my preliminary review and approval. I will coordinate with the FTC to the extent that it is required prior to submission to the Court. I will submit this arrangement for the approval of the Court as part of my first interim Receiver’s Report.

Your fees are set forth in your proposal of October 6, 2016. Any additional fees, *e.g.*, travel or other expert assistance, will require prior advance approval. Additionally, you have been provided a list of names of individuals and entities and searched your records for previous relationships and conflicts. Based upon your review, you are not aware of any conflicts or relationships requiring disclosure or further discussion. Finally, you are aware that the work that you are performing is of a privileged and/or sensitive and confidential nature and have signed the enclosed Non-Disclosure Agreement on behalf of Segue.

We have discussed the specific accounting services which are required and which Segue is able to provide. You have agreed that the hourly rates set out in the October 6, 2016 proposal are subject to a ten percent discount from Segue’s standard hourly rates. Pursuant to our discussions, you will provide “Back-Office” services in anticipation of the filing of returns by the tax preparer for the Receivership. Reporting and possibly additional services may be required. You have agreed to work subject to my direction so that we have very clear communications regarding the nature and scope of the services which Segue will provide. Additionally, you have represented that, Segue’s services will be performed by the individual possessing the lowest hourly rate so long as the service can be reasonably and efficiently performed by that individual. We have discussed the fact that the needs of the Receivership may change over time and that this understanding may be terminated by the Receiver, subject to payment as outlined above for services rendered prior to the time that notice is given of termination of the agreement.

October 17, 2016
Page 2

Please let me know if you have any questions or concerns regarding any of the points addressed in this letter. I look forward to working with you.

Very truly yours,

Thompson Coburn LLP



By

Claire M. Schenk

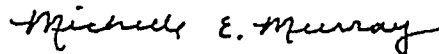
Enclosure

CONFIRMATION

I agree to provide services under the terms of this Engagement Letter.

Accepted:

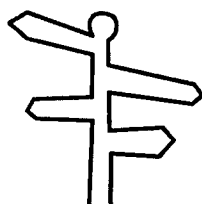
Dated: 10/18/16



Michelle E. Murray, CPA
Managing Director
Segue Partners



CLAconnect.com



October 12, 2016

Proposal to provide external accounting and tax services and forensic services (if needed) to:

**Claire M. Schenk, Receiver
for Global Access Technical
Support**

Prepared by:

Marion A. Hecht, CPA, CFF, CFE, CIRA, MBA

Principal, Fraud & Forensic Investigations, Receivership & Litigation

4250 N. Fairfax Drive, Suite 1020

Arlington, VA 22203

Marion.hecht@CLAconnect.com

Direct: 571-227-9613

Mobile: 202-701-3921



WEALTH ADVISORY | OUTSOURCING | AUDIT, TAX, AND CONSULTING

Exhibit
2

Investment advisory services are offered through CliftonLarsonAllen Wealth Advisors, LLC, an SEC-registered investment advisor.



CliftonLarsonAllen

CliftonLarsonAllen LLP
www.CLAconnect.com

October 12, 2016

Claire M. Schenk, Esq.
Thompson Coburn LLP
One U.S. Bank Plaza
St. Louis, MO 63101

schenk@thompsoncoburn.com

Re: *Federal Trade Commission v. Global Access Technical Support LLC, et al.* Case No. 4:16-cv-01556-HEA

Dear Ms. Schenk:

Thank you for inviting us to propose our services to you. We gladly welcome the opportunity to share our approach to helping you as the U.S. District Court appointed Receiver for insert name (the "Global Access Receivership"). The enclosed proposal responds to your request for tax and accounting services related to the Global Access Receivership as you may direct.

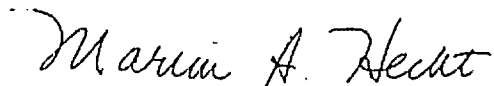
We understand your objectives, and are experienced accountants assisting court appointed Receivers such as yourself. We also understand the necessity for efficiency in these receivership matters. We are confident our proposal not only addresses your need for tax, accounting and potentially forensic services, but also demonstrates our strong credentials and capabilities in serving federal equity receivers.

CLA is focused on delivering an exceptional level of knowledge, insight, and industry experience. As our clients' most trusted business advisor, we:

- Take a genuine interest in your receivership challenges
- Proactively work with you to develop solutions based on our experiences with federal equity Receivers
- Address your receivership's financial, tax, and accounting challenges through our national and global resources

We welcome the opportunity to work with you, and to present our proposal in person as one of our team partners, Tim O'Shaughnessy, has his office across the street from your office and has worked with you on other receivership matters. This is convenient for both you as Receiver and CLA as the support for your receivership. If you have any questions about this proposal, please do not hesitate to contact me via phone at 571-227-9613, my cell at 202-701-3921 or by email at marion.hecht@claconnect.com.

Sincerely,

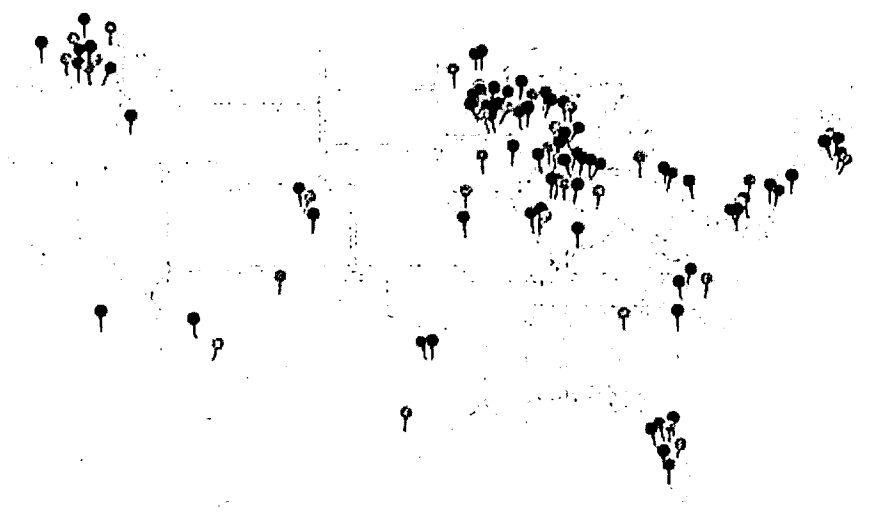
A handwritten signature in black ink that reads "Marion A. Hecht". The signature is written in a cursive style with a large initial 'M'.

Marion A. Hecht, CPA, CFF, CFE, CIRA, MBA
Principal, Fraud & Forensic Investigations
Receivership & Litigation
CliftonLarsonAllen LLP
571.227.9613 | Cell: 202.701.3921
marion.hecht@claconnect.com

EXECUTIVE SUMMARY

Firm Overview

CLA is a professional services firm delivering integrated wealth advisory, outsourcing, and public accounting capabilities to help enhance our clients' enterprise value and assist them in growing and managing their related personal assets — all the way from startup to succession and beyond. Our professionals are immersed in the industries they serve and have specialized knowledge of their operating and regulatory environments. With more than 4,600 people, nearly 100 U.S. locations, and a global affiliation, we bring a wide array of solutions to help clients in all markets, foreign and domestic. For more information visit CLAconnect.com.



Our mission:
Impactful
interactions
for success



SERVICES APPROACH

Tax compliance approach

CLA proposes to perform tax, accounting and preparation services for the Global Reach Receivership as well as forensic services if requested.

Deliverables

CLA will provide:

- Completed federal and applicable state tax returns by an agreed-upon deadline.
- Analysis and recommendations on the benefits of various tax credits.
- Strategies for streamlining your tax reporting process.

Ongoing insight

We are your business resource, so we encourage you to ask us for:

- Basic information throughout the year.
- Advice on new IRS announcements and their potential impact.

Benefits

You will receive the following benefits from our tax planning and preparation services:

- Ongoing assistance throughout the year, not just during the year-end procedures. This will help us recognize opportunities and resolve potential problems.
- Immediate communication of any changes in tax law that may affect the Global Reach Receivership and recommendations to address any resulting issues.
- Proactive planning to help you take advantage of any new opportunities.
- We go beyond compliance and investigate every tax benefit available to you.
- Thorough compliance with tax obligations means you avoid penalties and surprises.

Process

Our tax services process is simple:

- We help prepare and file tax returns accurately well in advance of deadlines. We review past returns to understand your tax situation and determine if there is a refund or planning opportunities.
- Keep you involved and informed to avoid errors and delays.



CLA's Forensic and Litigation Practice Group

The CLA Forensic and Litigation Group includes professionals who hold multiple credentials that include Certified Public Accountant, Certified Fraud Examiner, Certified in Financial Forensics, Certified Insolvency and Restructuring Advisor, Certified Information Technology Professional, Certified as Senior Accredited Appraiser, Certified in Business Valuation, as well as advanced degrees such as Executive MBA, Master in Public Accounting, Master in Forensic Accounting, and JD. Included among our expertise are appointments by multiple U.S. District Court Judges as Receiver for securities frauds and consumer frauds upon the motion of the SEC, CFTC, and FTC. In the receivership matters, we often assist in the investigation of parallel criminal investigations. Further, U.S. District Court Judges have appointed our professionals as Examiner and Special Master in complex litigation and financial matters. Federal equity Receivers, attorneys, senior government executives, audit Committees and CEO rely on the financial and accounting investigations undertaken by our team. Our team members have co-authored chapters in the American Bankruptcy Institute book entitled: *Fraud and Forensics: Piercing through the Deception in Commercial Fraud Cases* published 2015.

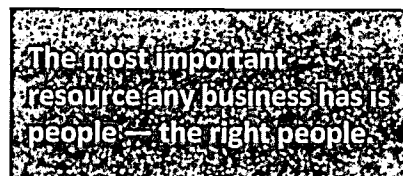
- **Extensive Forensic and Investigative Accounting Expertise.** Our Forensic Services team has dedicated forensic accounting professionals with deep experience in conducting proactive and reactive investigations, forensic investigations, financial consulting, and providing expert witness testimony and expert reports. Not only are team members experienced forensic investigation practitioners but also seasoned national instructors of topics such as forensic and financial investigation and forensic data analysis. These courses have been taught to audiences and organizations including Association of Certified Fraud Examiners, American Institute of Certified Public Accountants, National Association of Federal Equity Receivers, American Bankruptcy Institute, local CPA chapters, the IRS, regulatory agencies and other law enforcement agencies, local chapters of the Institute of Management Accountants, corporate boards, audit committees, and internal audit departments.
- **Cutting-edge Computer Forensic and Data Analytics Capabilities.** We use the most cutting edge data analysis technology and incorporate the knowledge and experience of trained investigators to identify fraud red flags and anomalies across all types of financial and non-financial information. Through our use of forensic data analysis, we are able to identify transactions related to potential inappropriate expenditures and activity. With our advanced technology, extensive case experience, and technical skills, we power through voluminous amounts of data and provide relevant results. This, in turn, accelerates the investigative process and controls cost. Our technological resources go beyond the analysis stage and into the presentation stage where we are able to distill massive amounts of data and complex tracing exercises into clear and concise demonstratives ready for inclusion in written or oral reports, in court, or for other audiences.



ENGAGEMENT TEAM EXPERIENCE

Roles and responsibilities

An experienced engagement team has been aligned to provide the most value to your organization. The team members have performed numerous engagements of this nature and will commit the resources necessary to provide top quality service throughout the engagement. Following are our proposed management team members:



Engagement Team	Title	Specific Experience	Years Experience
Marion Hecht, CPA/CFF, CFE, CIRA, MBA	Principal, Fraud & Forensic Investigations, Receivership & Litigation	Receiver experience: 18 private equity companies (Small Business Investment Companies “SBICs”); five SEC/CFTC /FTC federal equity receiverships; and accountant for a state receivership involving 70+ related real estate entities. Fraud expert in a 5+ year bankruptcy involving 300 entities and hundreds of bank accounts. Federal Court appointed Examiner and Special Master. Experienced in all aspects of receivership and has international experience.	25+
Timothy O’Shaughnessy, CPA	Managing Principal, Tax, St. Louis	Public accounting tax and consulting services, with extensive partnership and flow-through entity experience, including special allocations, entity formation, and termination.	15+

Detailed biographies are available at the end of this proposal.



RELEVANT SIMILAR ENGAGEMENTS

Selected highlights of relevant experience are provided below:

Marion Hecht currently serves as Receiver on four SEC matters and one FTC matter as identified in her resume. CLA staff provide the accounting and tax preparation and filing. In addition, Marion has served as Principal Agent for 18 SBIC receiverships. Further, she is a testifying expert. Marion is available as needed for forensic matters and as requested by the Receiver.

Tim O'Shaughnessy currently serves as the partner in charge of tax services for the St. Louis region, with special emphasis in partnership and flow-through entities and federal receivership. Tim will be the lead partner in this engagement.



PROFESSIONAL FEES

Our fees are based on the timely delivery of services provided, the experience of personnel assigned to the engagement, and our commitment to meeting your deadlines.

CLA understands the importance of providing our clients with value-added solutions.

We have the ability to meet the needs of the Global Access Receivership Entities based on our experience and understanding of the proposed engagement.

Our fees below represent a 15% discount from our standard rates for **accounting and tax services**. Our forensic rates are addressed separately in the event they are needed.

Service Provided	Rate
Preparation of QuickBooks accounting services	
Discounted Advanced Staff Rates	\$111 / hour
Preparation of Year-end Compilation Services	
Discounted Paraprofessional Rates	\$81 / hour
Discounted Associate Rates (most of the work to be performed at this level)	\$106 / hour
Discounted Senior Associate Rates	\$136 / hour
Discounted Manager Rates	\$170 / hour
Discounted Director/Principal Rates	\$315 / hour
Preparation of federal and state partnership tax returns	Not to exceed \$3,000 / return
Preparation of US Income Tax Return for Settlement Funds (IRS Form 1120-SF)	Not to exceed \$3,000 / return
Tax Services related to special allocations or other consulting matters outside routine tax preparation	
Discounted Associate Rates	\$106 / hour
Discounted Senior Associate Rates	\$136 / hour
Discounted Manager Rates	\$170 / hour
Discounted Director/Principal Rates	\$315 / hour



Forensic services – rates have been in effect since June 2014 on SEC and FTC Receivership engagements and represent a discount of 15% and higher. The following rates only apply to the extent forensic services are required. In addition, the rates below are the lowest forensic rates for all receivership and bankruptcy matters which involve specialized skills and knowledge.

Professional	Rate
Paraprofessional	\$100
Associate	\$150
Senior Associate	\$200
Manager	\$250
Senior Manager / Director	\$300 - \$350
Principal	\$425



SPECIAL TERMS AND CONDITIONS

CLA has conducted a conflicts search regarding the parties whose identification you provided. No conflicts or other representations have been found that would affect our ability to assist the Receiver in this matter. If any such conflict were to develop, we would promptly inform you of such. To the extent that additional parties are revealed by you, we will run additional conflict checks as soon as the identity of other potential parties is known.

We agree to execute a non-disclosure agreement and to keep confidential all information. We will comply with all applicable state and federal laws.





Marion A. Hecht, CPA, CFE, CIRA, CFF, MBA

CliftonLarsonAllen LLP

Principal
Arlington, VA

571-227-9613
marion.hecht@CLAconnect.com

Profile

Marion is a Principal of CliftonLarsonAllen LLP in the Forensic, Litigation & Valuation Division. She is a CPA in the State of Virginia and a Certified Fraud Examiner. She also holds the designations of CIRA – Certified Insolvency and Restructuring Advisor, and CFF – Certified in Financial Forensics.



Technical expertise

- Extensive experience tracing inappropriate disbursements involving fiduciary funds as well as illegal payments through slush funds and multi-tiered entities, and includes tracking and identifying shell companies and other entities used to divert funds for illegitimate purposes.
- Retained by Audit Committees and Lawyers to investigate and document improper payments involving grant funds and other capital of nonprofit and profit entities. Calculations of loss provided to clients for filing in criminal and civil matters, including insurance claims.
- Retained by a Bank to defend against Reg-O and other violations cited by the regulators. Interacted with the regulators, and resolved to their satisfaction the items mentioned in the Consent Order.
- Over 25 years experience working with attorneys in all phases of litigation beginning with pre-trial investigation and planning, discovery, fact and expert testimony at mediation, U.S. District Court settlement conferences, bankruptcy hearings, and trial. Experienced working with the FBI, IRS Criminal Investigation Division, Inspector Generals and US Attorneys offices on parallel criminal investigations. Experienced in consensus building in conflict scenarios and dispute resolution with diplomacy.
- Lead forensic fraud and financial examinations relating to civil and criminal investigations, bankruptcy fraud, receivership of venture capital companies and Ponzi schemes, fraudulent conveyances, constructive trust actions and preferences, white collar crimes, money laundering, mortgage and title company fraud, “piercing the corporate veil” analysis, misuse of federal funds, regulatory and compliance violations, civil RICO, conversion of assets, EEOC claims, insurance claims, kiting, kickbacks, and self-dealing and breach of fiduciary claims against officers and directors of private equity companies, banks, attorneys, accountants and other parties. Forensic examinations of corporate books and financial records total over 300 and include hundreds of interviews.
- Appointed Receiver by the U.S. District Court for the District of Maryland, *Federal Trade Commission v. American Industrial Enterprises, LLC, et al.* Case No. 1:16-cv-00281-GLR.
- Appointed Special Master by Judge Peter Messitte, U.S. District Court for the District of Maryland, *Payam Tabibian v. Mohammad Esfahani, et al.* Case No. 8:14-cv-03227-PJM.
- Appointed Receiver by the U.S. District Court for the District of Maryland, *SEC v. Colonial Tidewater Realty Income Partners, LLC, et al.* Case No. 1:15-cv-02401-ELH.
- Appointed Receiver by the U.S. District Court for the District of Columbia, *SEC v. Lawrence P. Schmidt, et al.*, Case No. 1:14-cv-01002-CRC.



- Engaged by Receiver Claire Schenk, Esq., to provide tax, accounting and forensic services for the Receivership Estates of Acartha Group, LLC, et al., *SEC v. Morriss, et al.* Case No. 4:12-cv-00080-CEJ.
- Appointed Receiver by the U.S. District Court for the Eastern District of New York (Brooklyn), *SEC v. Garth Ronald Peterson*, Case No. 1:12-cv-02033-JBW / CR 12-224.
- Lead engagement where CLA was appointed by Court Order (dated December 15, 2011) to assist Receiver by providing investigative accounting, financial analyses, data analytics and other support as requested with respect to over 100 entities under the control of Laurance Freed and/or DDL, LLC in *Bank of America v. 108 N. State Street Retail*, Case No. 09-CH39930, Circuit Court of Cook County Illinois, Chancery Division, Mortgage Foreclosure Division.
- Appointed Receiver in the United States District Court for the Eastern District of Pennsylvania in a joint civil prosecution by the Securities Exchange Commission and the Commodity Futures Trading Commission concerning a \$70+ million dollar Ponzi scheme (*SEC v. Joseph S. Forte, et al.*, Case No. 2:09-cv-00063-PD / cv 00064).
- Appointed by the U.S. Bankruptcy Court for the District of Maryland (In Re Minh Vu Hoang, Case No. 05-21078 – 2006) as the forensic fraud expert on bankruptcy fraud and money laundering (hundreds of affiliated and fictitious entities involving close to 1,000 foreclosure actions and flipping of real estate).
- Appointed Examiner in the U.S. Bankruptcy Court for the District of Maryland to investigate allegations of improper insider dealing (In Re Progressive Baptist Church, Case No. 07-21183 - 2008).
- Expert testifying in “Piercing the Corporate Veil” fraud litigation.
- CFO of an international environmental venture capital company.
- Principal Agent for the U.S. Small Business Administration in its capacity as a federal court-appointed Receiver for Small Business Investment Companies (SBICs), and managed 18 such receiverships. Responsible for the management, liquidation and dissolution of SBICs, together with the development of the litigation strategy on all receivership claims. Resolved over \$100,000,000 in litigation and claims.
- Conducted off-shore investigations in South Korea, United Kingdom, India and the Caribbean in support of domestic SBIC receivership litigation.
- Retained by NCUA on a sensitive multi-billion dollar sub-prime lending investigation that resulted in the issuance of a Risk Alert for Credit Unions.
- Top Secret Security Clearance through U.S. Department of Defense.
- 2009 Washington SmartCEO SmartCPA Award Winner.

Goodman & Company, March 2009 – April 2011 (UHY Advisors FLVS, Inc. DC office was acquired by Goodman in March 2009)

- Managing Director
- Directed large complex fraud and financial investigations. Retained as the expert in numerous government, civil and martial matters.

UHY Advisors FLVS, Inc., December 2005 to February 2009

- Managing Director
- Directed large complex fraud and financial investigations. Retained as the expert in numerous government, civil and martial matters.



Watkins Meegan Drury & Co., LLC, February 2004-December 2005

- Directed large complex forensic fraud and financial investigations regarding fiduciary funds and insider dealing for multi-tiered entities. Analyzed financial activity through 200 accounts for 50 insiders.
- Managed and performed Sarbanes-Oxley Section 404 engagements for public companies to assess the effectiveness of internal control structures and procedures for financial reporting. Reported to the Controller and CFO on deficiencies noted.

U.S. Small Business Administration as Receiver for Small Business Investment Companies, 1989-February 2000 and January 2002-February 2004

- Principal Agent– Consultant retained as CRO/CFO/COO for 18 Small Business Investment Companies (SBICs) in receivership.
- Deposition, mediation and trial testimony.
- Performed fraud, financial and corporate examinations. Investigated and analyzed fraudulent conveyances and preferences.
- Mentored and trained venture capitalists, government program executives, and other professionals on regulatory/compliance issues, internal controls, and liquidation/receivership procedures.
- Managed and restructured debt, equity and real estate assets.
- Investigated and documented professional negligence, fraud, fiduciary violations, corporate malfeasance, compliance and regulatory deficiencies and breaches of duty that led to claims against officers/directors of SBICs, financial institutions, insurance companies, attorneys, CPAs, and other parties. Resolved claims exceeding \$100,000,000

Environmental Enterprises Assistance Fund (EEAF), July 2000-December 2001

- Chief Financial Officer and Fund Manager and Secretary/Treasurer, Corporacion Financier Ambiental

Navigant Consulting, Inc., February 2000-July 2000

- Analyzed and valued multi-million financial claims (Winstar) brought by financial institutions against the U.S. government in the U.S. Court of Federal Claims. Developed deposition questions, negotiation strategies, and reviewed/edited expert reports. Presented evidence to the U.S. Department of Justice in support of the resolution of a \$30,000,000 claim.

Irving Burton Associates, 1987-1989

- Researched, designed, and implemented collateral control and compliance procedures for a government bond program. Established reporting systems for senior management.

Education/professional involvement

- M.B.A., Executive MBA Program, Loyola College, Baltimore, MD - Beta Gamma Sigma
- B.S. in Business Administration, Columbia Union College, Takoma Park, MD
- Certified Fraud Examiner, 1997
- Certified Public Accountant, 1999
- Certified Insolvency and Restructuring Advisor, 2007
- Certified in Financial Forensics, 2008
- Pepperdine University School of Law, Straus Institute for Dispute Resolution, completed 42 hours of training in “Mediating the Litigated Case”, 2013
- Board of Directors, National Association of Federal Equity Receivers, 2012-2013
- Board of Directors, International Women's Insolvency & Restructuring Confederation, 2014-2016



- Co-Chair, Commercial Fraud Committee, American Bankruptcy Institute, 2014-2016 (former Education Director)
- Chair of International Committee, National Association of Federal Equity Receivers, 2015
- Member, ABA Working Group on White Collar Crime Asset Forfeiture and Business Bankruptcy, 2012-2015
- Member, American Bankruptcy Institute
- Member, Virginia Society of CPAs and AICPA
- Member, Association of Certified Fraud Examiners and Washington Metro Chapter of CFEs
- Member, Women in Technology
- Member, Association of Insolvency and Restructuring Advisors
- Former Director, Virginia Society of CPAs Education Foundation (May 2002 to April 2003)
- Former Director, Washington Chapter of Certified Fraud Examiners

Speaking engagements

- American Bankruptcy Institute webinar, panelist – “Fraud and Forensics Webinar: How Lawyers and Forensic Accountants Work Together”, February 26, 2016
- National Association of Federal Equity Receivers, panel member – “Things that Cause Receivers to Have Sleepless Nights”, October 16, 2015
- Author of Chapter 16 “Qualifications and Traits of a Good Forensic Accountant”, and co-author of Chapter 7 “Collecting and Using Electronically Stored Information in a Fraud Case” – *Fraud and Forensics: Piercing Through the Deception in a Commercial Fraud Case*, July 2015
- Venable and CliftonLarsonAllen Second Annual Nonprofit Executive Summit, panel member – “Fraud and Embezzlement: The Executive Team’s Role in Detecting, Reporting and Preventing Fraud”, October 2, 2014
- National Association of Bankruptcy Trustees Fall Conference, co-presentation with Kathy Bazoian Phelps, Esq. – “Reconstructing the Fraud: E-Discovery Issues for Trustees and Their Professionals”, September 11, 2014
- National Association of Bankruptcy Trustees Fall Conference, panel member – “Picking the Bones Clean: A Trustee’s Guide to Uncovering the Treasure of Dead 11’s and 13’s”, September 12, 2014
- American Bankruptcy Institute Central States Conference, panel member – “Tough & Duped v. Bigbank: A Ponzi Scheme Mock Trial”, June 14, 2014
- American Woman’s Society of Certified Public Accountants, co-presentation with Jeremy Rachlin, Esq. – “A Litigation Primer for the Wary Accountant”, June 5, 2014
- District of Columbia Chapter of the Accounting & Financial Women’s Alliance, co-presentation with Jeremy Rachlin, Esq. – “A Litigation Primer for the Wary Accountant”, May 30, 2014
- AICPA/AAML National Conference on Divorce, co- presentation with Michelle F. Gallagher and Jody Frantz – “Hunting for Gold with Forensic Analysis and Data Analytics: The New Age of Uncovering Hidden Marital Assets”, April 24, 2014
- National Association of Federal Equity Receivers, panel member – “Mock Trial: Receiver and Investor Class v. Big Bank”, September 28, 2013



- Federal Judicial Center e-Discovery Seminar for Federal Judges, Chief Bankruptcy Judge Rosemary Gambardella, moderator, presentation with Kathy Bazoian Phelps, Esq. – “Use of ESI in Forensic Investigations”, September 12, 2013
- Wiley Rein LLP, presentation with George R. Pitts, Esq. and Rebecca L. Saitta, Esq. - “Back to the Future: Employment of Creditor’s Bills in Equity and Receiverships in the Resolution and Collection of Problem Loans”, July 2013
- Federal Trade Commission Bureau of Consumer Protection, presentation - “Hide and Seek – Obfuscation Schemes”, May 2013
- American Bankruptcy Institute 24th Annual Winter Leadership Conference, panel presentation - “Phelps & Rhodes Productions Presents: *Trustee and the Badoff Investor Class v. Bigbank* – a Mock Trial”, November 2012
- AICPA Forensic & Valuation Services Conference, presentation - “How Accountants Can Help in Receivership Situations”, November 11, 2012
- Co-Author with John A. Shutkin, Esq. of “Piercing the Corporate Veil” – *ACC Docket*, Association of Corporate Counsel, September 2012
- American Bankruptcy Institute 30th Annual Meeting, panel presentation – “Liquidating Trustees, Fraud and Computer Forensics”, April 20, 2012
- “Preventing Construction Fraud” – *Constructor Magazine*, January/February 2012
- “Piercing the Corporate Veil” – *AIRA Journal*, January 2012
- “Unveiling the Mystery of Forensic Accounting” – *IWIRC Newsletter*, International Women’s Insolvency & Restructuring Confederation, December 2010
- International Moore Stephens Conference, presentation on basics of forensic services, November 2010
- Montgomery County Bar Association, presentation with Gabrielle Duvall, Esq. – “Fraudulent Transfers: How Clawbacks and Constructive Trusts Can Impact Your Clients and Practice Tips for Avoiding Liability in Lending and Investment Transactions”, September 14, 2010
- “Tone at the Top – Setting a Proper Environment to Mitigate Fraud” – *Developments Magazine*, American Resort Development Association, August 2010
- “Fighting Corruption with Integrity Dividends and Forensic Accountants” – *The Networker, Moore Stephens North America*, Summer 2010
- “Fighting Corruption with Integrity Dividends and Forensic Accountants” – *Forensic Update, Moore Stephens*, Summer 2010
- Forensics and Fraud Issues in Real Estate, presentation at 2010 Commercial Real Estate Symposium sponsored by RICS Americas and IAAO, March 18, 2010
- AICPA National Real Estate Conference, presentation - “Forensics and Fraud Issues in Real Estate”, November 9, 2009
- 14th Annual Goodman & Company Government Contracting Seminar, presentation - “Cooking the Books & Financial Statement Fraud”, October 22, 2009
- Forensic Accounting, Money Laundering & Bankruptcy Fraud, presentation to Moore Stevens Latin America Cartagena, Colombia, September 5-9, 2009



- D.C. Chapter of Certified Fraud Examiners, panel presentation on issues in bankruptcy fraud, February 12, 2009
- "Looking for the Smoking Gun" – *Accounting Today*, August 18, 2008
- Polaris International, panel presentation to Managing Directors to discuss similarities between the US Chapter 11 Bankruptcy and the new German Solvency Act, Dusseldorf, Germany, September, 2006
- Panel member for several White Collar Investigations at local universities sponsored by the Washington Chapter Certified Fraud Examiners, 2006
- Forensic Investigation Toolkit, Watkins, Meegan, Drury & Company LLC, 2005
- Corporate and Financial Investigations from the Perspective of a CFE, First Small Business Investment Company CFO Conference sponsored by National Association of SBICs, 2004

Selected Examples of SBIC Receivership Experience

Wisconsin Capital Corporation

Documented evidence of fraud, self-dealing, breach of fiduciary duty, and misuse of federal funds. Developed claims against the former officers and directors for fraudulent conveyance of real estate assets to affiliated companies. Obtained cash settlement from defendants.

VenCap, Inc.

Developed claims exceeding \$1 million for breach of fiduciary duty, violation of the SBA regulations, self-dealing and ultra-vires actions against the former president of VenCap, Inc. Acting as the Receiver's expert witness, held meetings with designated shareholders who held right of first refusal on disposition of assets. Liquidated all assets and returned the company to shareholders.

Tennessee Equity Capital Corporation

Expert and fact witness in formal and informal proceedings. Performed due diligence on creditor, shareholder and EEOC claims, totaling more than \$9 million. Developed a litigation strategy and provided litigation support for local counsel. Conducted due diligence on a \$22mm RICO claim. Evaluated lost profits, conversion of assets and supervised the reconstruction of accounting/financial records. Liquidated all assets and defended litigation against the Receiver resulting in Summary Judgment in favor of the Receiver.

Tri-Star Cablevision, Inc., Starvision Cable, Inc., Floridavision, Inc.

Tri-Star Cable Fund 1, Tri-Star Cable Fund 2, Tri-Star Cable Fund 3

Reviewed adversarial claims by six related cable companies. Managed the re-construction of records and due diligence. Participated in the sale of non-cash assets of operating companies. Conducted due diligence and litigation support for numerous civil claims, including breach of contract, conversion of capital stock, guaranteed payments and EEOC claims. Appeared as the expert witness in U.S. District Court and negotiated settlement whereby parent company, Tri-Star Cablevision, Inc., was awarded the assets of the partnership companies.



Vinh An Capital Investment, Inc.

Uncovered and documented fraud, kiting, kickbacks and regulatory violations. Collected in excess of \$1 million from the former SBIC president. Paid all creditors and made a distribution to shareholders.

Helio Capital, Inc.

Conducted a forensic examination, documented and prepared claims for over \$2 million against former officers and directors for fraud, self-dealing, misuse of federal funds, breach of fiduciary duty, negligence, violations of SBA regulations and making loans to passive businesses against public policy. Worked with the Office of Civil Foreign Litigation, U.S. Department of Justice, on off-shore investigation in Seoul, South Korea, including travel to South Korea. Documented all claims against former president of Helio Capital, an heir to one of the five largest chaebols in South Korea and made presentation in South Korea. Litigation resolved after I departed from my consulting role.

Falcon Capital Corporation

Conducted fraud examination of the activities of the former president of Falcon Capital Corporation and documented claims exceeding \$1 million for fraud, misuse of federal money, conversion of assets, self-dealing and negligence. SBA obtained a \$22 million senior judgment against the former president. Unraveled the fraud involving the pledge of a Nobel Peace medallion in the hands of the Receiver for BCCI. Negotiated a mutually agreeable settlement with the BCCI Liquidator, Robb Evans, and the Nobel Laureate.

Preferential Capital Corporation

Documented claims against former president and counsel for fraud, self-dealing, breach of contract, misuse of federal funds. Case settled out of court.

San Joaquin Business Investment Group, Inc.

Liquidated all debt/equity investments in record time. Developed claims against the parent, the largest non-profit in the area. Performed due diligence on a \$1.6 million claim filed against the SBIC. Collected \$2 million in less than a year through mediation, lawsuits and settlements. The \$1.6 million claim against the SBIC was withdrawn after my identification of counter claim.

All State Venture Capital Corporation

Documented claims in excess of \$2 million against the former officers and directors for seal dealing, fraud, misuse of federal funds, conversion and negligence. This litigation as did many of the receivership actions, involved multi-tiered entities. Identified a breach of transferor liability contract for over \$1 million that involved the estate of a former US Ambassador. Receiver and the estate of the former ambassador settled out of court.

Acorn Technology Fund, LP

Assisted the SBA Offices of Liquidation and General Counsel with management and liquidation of this \$48 million SBIC. Trained venture capitalists on receivership and liquidation best practices. Identified the flow of government and private funds and provided information to special agents from the FBI and SBA Inspector General, and several US Attorney offices. Supervised investigation leading to filing of breach of contracts claims totaling in excess of \$4.5 million against unfunded limited partners; two separate \$2 million claims



against financial institutions for breach of fiduciary duty, and multi-million dollar claims against law firms and other parties. Retained as the fraud expert.

Civic organizations

- Women's Group, St. John the Beloved Church
- Organizational Committee, Yuma Center





Timothy S. O'Shaughnessy, CPA

CliftonLarsonAllen LLP

Managing Principal of Office
St. Louis, MO

314-925-4324
tim.oshaughnessy@CLAconnect.com

Profile

Tim is the Managing Principal of the St. Louis office. He specializes in business and individual tax planning and compliance as well as identifying and implementing tax savings solutions for small to mid size businesses. He has over 16 years of public accounting experience with International and National accounting firms.



Technical experience

Tim's experience includes serving a broad range of companies from the small, closely held businesses to the Fortune 500. His primary focus is in the real estate and construction areas. He has also spent time working with clients in the retail, manufacturing, wholesale, and telecommunications fields as well. He works closely with Senior Management to ensure that the tax strategy is aligned with the Company's goals and objectives. Tim has experience assisting companies with many of their day-to-day tax needs including Federal and state tax return compliance and tax planning opportunities.

Education/professional involvement

- Bachelor's of science in accounting from Fontbonne University, St. Louis, Missouri
- American Institute of Certified Public Accountants (AICPA)
- Certified Public Accountant in the state of Missouri
- Missouri Society of Certified Public Accountants (MSCPA)

Civic organizations

- Young Friends of St. Louis Children's Hospital, former board member





Claire M. Schenk
P 314.552.6462
F 314.552.7000

cschenk@thompsoncoburn.com

October 17, 2016

VIA EMAIL AND REGULAR MAIL

Marion Hecht
Principal, Fraud & Forensic Investigations, Receivership & Litigation
CliftonLarsonAllen LLP
4250 North Fairfax Drive, Suite 1020
Arlington, VA 22203

Re: *Federal Trade Commission v. Global Access Technical Support, LLC, et al.*,
4:16-cv-1556 HEA

Dear Marion:

Thank you for agreeing to provide accounting services for (Global Access Technical Support, LLC, d/b/a Global S Connect, Yubdata Tech and Technolive; Global Smind LLC d/b/a Global S Connect; Source Pundit, LLC d/b/a OneSource Tech Support; and Helios Digital Media, LLC) ("the Receivership entities") as outlined in CliftonLarsonAllen's ("CLA") proposal of October 12, 2016 and subject to the terms delineated in this engagement letter. To be clear, you and your colleagues at CLA understand that each of you is working as an independent contractor in order to provide services for the benefit of the Receivership entities and that you do not have a direct or indirect contractual arrangement with Thompson Coburn LLP. You have agreed to work on the basis of a fee application to the Court subject to the availability of Receivership funds and have agreed to submit a monthly statement of your fees in accordance with the Receivership Order. We will assist you with the submission of your fees to the Court, however, all monthly statements will be initially submitted to me for my preliminary review and approval. I will coordinate with the FTC to the extent that it is required prior to submission to the Court. I will submit this arrangement for the approval of the Court as part of my first interim Receiver's Report.

Your fees are set forth in your proposal of October 12, 2016. Any additional fees, *e.g.*, travel or other expert assistance, will require prior advance approval. Additionally, you have been provided a list of names of individuals and entities and searched your records for previous relationships and conflicts. Based upon your review, you are not aware of any conflicts or relationships requiring disclosure or further discussion. Finally, you are aware that the work that you are performing is of a privileged and/or sensitive and confidential nature and have signed the enclosed Non-Disclosure Agreement on behalf of CLA.

We have discussed the specific accounting services which are required and which CLA is able to provide. Regarding tax matters, Tim O'Shaughnessy will be my primary contact, while you will be my primary contact if forensic services are required. You and Tim have agreed to work subject to my direction so that we have very clear communications regarding the nature and scope of the services which CLA will provide. Regarding tax services, we have agreed that tax return preparation will be billed up to the flat rate outlined in your proposal and supported by

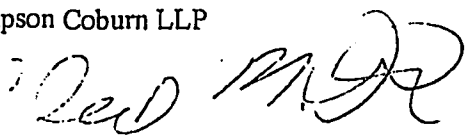
October 17, 2016
Page 2

billings which include an hourly statement describing the services rendered. If the tax return preparation services rendered are completed for a sum less than the permissible flat rate, the lesser sum will be billed. Approval for any additional services above and beyond the flat rate (e.g., for preparation of the tax returns, bookkeeping services or forensic work) must be approved by me and agreed upon in a written exchange which evidences my written approval and delineates the time approved for completion of the project or task. Accounting, tax, and forensic services that you request that do not fall under the scope of the tax return preparation will be billed at the rates in the CLA proposal. Additionally, you have represented that, accounting functions will be performed by the individual possessing the lowest hourly rate so long as the service can be reasonably and efficiently performed by that individual. We have discussed the fact that the needs of the Receivership may change over time and that this understanding may be terminated by the Receiver, subject to payment as outlined above for services rendered prior to the time that notice is given of termination of the agreement.

Please let me know if you have any questions or concerns regarding any of the points addressed in this letter. I look forward to working with you.

Very truly yours,

Thompson Coburn LLP


By
Claire M. Schenk

Enclosure

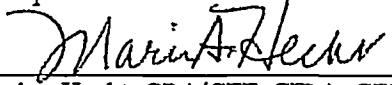
CONFIRMATION

I agree to provide services under the terms of this Engagement Letter.

Accepted:

Dated:

10/19/16


Marion Hecht, CPA/CFF, CIRA, CFE, MBA
Principal
CliftonLarsonAllen LLP

October 2016 Financial Summary for Source Pundit, LLC

Incoming	
Invoice 2027 for contractors	\$ 149,129.64
Total Income	\$ 149,129.64

Expenses	
Payments to Contractors	\$ 122,255.13
Total Expenses	\$ 122,255.13

Total Operating Income (Loss)	\$ 26,874.51
Statement Balance (Commerce)	\$ 26,425.87
Statement Balance (First Community Credit Union)	<u>\$18,031.98</u>
TOTAL	\$ 71,332.36

November 2016 Financial Summary for Source Pundit, LLC

Incoming	
Invoice 2029 for contractors	\$ 136,390.25
Invoice 2030 for reimburseable SP Expenses	\$ 2,283.01
Total Income	\$ 138,673.26
Expenses	
Payments to Contractors	\$ 112,407.03
Source Pundit India - September and October Invoices	\$ 8,770.00
Source Pundit Japan - October invoice	\$ 1,500.00
HL Date Change of Air Ticket for contractor R.B. - INR 5000	\$ 72.81
HL Air Ticket for contractor As.K.- INR 51500	\$ 749.91
HL Air Ticket for contractor Am. K. - INR 51122	\$ 769.53
Demob Air Ticket for contractor M.G. - JPY 68610	\$ 662.93
Total Expenses	\$ 124,932.21
Total Operating Income (Loss)	\$ 13,741.05
Bank Account Balance (as of 11/18/2016)	\$71,332.36
EOM TOTAL	\$ 85,073.41

December 2016 Projected Financial Summary for Source Pundit LLC

Incoming	
Invoice ____ for contractors (estimated)	\$ 131,992.80
Invoice ____ for reimburseable SP Expenses	\$ -
Total Income	\$ 131,992.80
Expenses	
Payments to Contractors	\$ 122,302.00
Source Pundit India - November Invoice	\$ 4,385.00
Source Pundit Japan - November Invoice	\$ 1,500.00
Total Expenses	\$ 128,187.00
Total Operating Income (Loss)	\$ 3,805.80
Projected Bank Account Balance as of 12/1	\$ 85,073.41
EOM TOTAL	\$ 88,879.21

Source Pundit, LLC

Year	Gross Sales	Cost of Goods Sold	Gross Income
2012	\$647,878	\$518,049	\$129,829
2013	\$1,685,928	\$1,429,043	\$256,885
2014	\$4,893,621	\$4,326,699	\$566,922
2015	\$4,101,188	\$3,553,071	\$548,117

Accounts of Receivership Defendants transferred to East West Bank*

Bank	Account #	Company	Amount	Status
Central Bank	xxxxx1540	Global Access Technical Support LLC	\$ 4,365.09	Transferred
Central Bank	xxxxx5774	Global Smind LLC	\$ 1,900.92	Transferred
Central Bank	xxxxx2983	Global Smind LLC	\$ 1,353.46	Transferred
Central Bank	xxxxx7306	Global Smind LLC	\$ 562.51	Transferred
Commerce Bank	xxxxx6677	Global Access Technical Support LLC	\$ 473.92	Transferred
Commerce Bank	xxxxx1005	Global Access Technical Support LLC	\$ -	N/A
Commerce Bank	xxxxx9953	Global Access Technical Support LLC GATS Reserves	\$ 87,673.83	Transferred
Commerce Bank	xxxxx3368	Global Access Technical Support LLC GATS - VGBL	\$ 25,001.02	Transferred
Commerce Bank	xxxxx0472	Global Access Technical Support LLC dba Wizard Squad	\$ 1,218.28	Transferred
Commerce Bank	xxxxx7880	Global Access Technical Support LLC Reserves	\$ 156.86	Transferred
Commerce Bank	xxxxx3716	Global Access Technical Support LLC	\$ 2,721.27	Transferred
Commerce Bank	xxxxx0626	Global sMind LLC	\$ -	N/A
Commerce Bank	xxxxx7909	Global sMind LLC	\$ 613.59	Transferred
Commerce Bank	xxxxx8554	Helios Digital Media	\$ 12,612.13	Transferred
Commerce Bank	xxxxx8958	Source Pundit LLC	\$ 53,300.38	Transferred
Carrollton Bank	xxxxx4003	Global sMind LLC Operating Account	\$ 1,838.05	Transferred
Carrollton Bank	xxxxx4135	Global sMind LLC Merchant Account	\$ 1,725.76	Transferred
Carrollton Bank	xxxxx4127	Global sMind LLC Reserve Account	\$ 10.00	Transferred
Evo Payments	mx4180	Global Access Technical Support LLC (Merchant Acct)	\$ 62.75	Transferred
Evo Payments	mx8286	Global Access Technical Support LLC (Merchant Acct)	\$ 2,859.58	Transferred
PaySafe	mx2463	Global Access Technical Support LLC (Merchant Acct)	\$ 11,771.56	Transferred
Clearant	mx8807	Global Smind LLC (Merchant Acct)	\$ 5,886.74	Transferred
Humboldt Merchant Services	x2885	Global Access Technical Support LLC (Merchant Acct)	\$ 2,710.57	Transferred
ClaimsXpress Group		Global Access Technical Support LLC (Merchant Acct)	\$ 35,069.64	Transferred
First Community Credit Union	xxxxx6885	Source Pundit LLC	\$ 18,031.98	Transferred
PNC Bank	x3086	Helios Digital Media	\$ 101.00	Transferred
TOTAL \$			272,020.89	

*Funds listed here reflect balances at the time of transfer and do not reflect monies received from the ongoing business operations of Source Pundit