

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
Ft. Lauderdale Division
www.flsb.uscourts.gov

In re:

1 GLOBAL CAPITAL LLC. *et al.*,
Debtors.

Case No. 18-19121-RAM
Chapter 11

**OBJECTION OF CHRISTOPHER BLACKSTONE TO MOTION FOR
(A) APPROVAL OF SETTLEMENT AND COMPROMISE WITH CERTAIN
INVESTMENT ADVISORS/AGENTS AND REQUEST FOR ENTRY OF BAR
ORDER; AND (B) APPROVAL OF PAYMENT OF EARNED CONTINGENCY FEE**

CHRISTOPHER BLACKSTONE (“**Blackstone**”), creditor and party in interest, by and through undersigned counsel, hereby objects to the *Motion For (A) Approval of Settlement and Compromise With Certain Investment Advisors/Agents and Request For Entry of Bar Order; and (B) Approval of Payment of Earned Contingency Fee* [D.E. # 1315] (the “**Motion**”), and in support of his objection states as follows:

BACKGROUND

1. On July 27, 2018, 1 Global Capital LLC (“**1 Global**”) and 1 West Capital, LLC (collectively, the “**Debtors**”) filed voluntary petitions for relief under chapter 11 of title 11, United States Code (the “**Bankruptcy Code**”) to commence these chapter 11 cases.
2. On September 7, 2018, the Office of the United States Trustee appointed an Official Committee of Unsecured Creditors (the “**Committee**”) [D.E.# 138]. Blackstone served as the chairman of the Committee.
3. On September 20, 2019, the Bankruptcy Court entered an *Order Confirming First Amended Joint Plan of Liquidation of 1 Global Capital LLC and 1 West Capital LLC Under*

Chapter 11 of the Bankruptcy Code Proposed by the Debtors and the Official Committee of Unsecured Creditors [D.E. #1197] (the “**Confirmation Order**”).

BLACKSTONE’S 1 GLOBAL INVESTMENTS

4. Chris Dantin Financial Services, LLC and Chris D. Dantin (the “**Dantin Financial Parties**”) acted as investment advisors or investment advisor representatives to Blackstone by directly counseling him as to the advisability of investing in, purchasing, or selling securities as part of their regular business, and Blackstone considered the Dantin Financial Parties to be his financial advisors.

5. Based upon representations made by the Dantin Financial Parties to Blackstone, Blackstone made a series of investments in 1 Global totaling in excess of \$1.5 million, plus interest of \$254,902.75 that accrued through June 30, 2018. The investment vehicles utilized by Blackstone to invest in 1 Global are considered securities pursuant to Louisiana law.

6. The Dantin Financial Parties were not, and since 2011 have not been, registered in the Louisiana Office of the Commissioner of Financial Institutions, as dealers or salespersons, to sell securities pursuant to LSA-R.S. 51:703, which is required by Louisiana to sell the type of securities purchased by Blackstone.

BLACKSTONE’S CLAIMS AGAINST DANTIN FINANCIAL PARTIES

7. As a result of the foregoing, and a result of their breach of fiduciary duties to Blackstone, the negligent misrepresentations made to Blackstone and their unjust enrichment at Blackstone’s expense, Blackstone commenced an action against the Dantin Financial Parties, among others, in the State of Louisiana, 19th Judicial District Court, Parish of East Baton Rouge, under suit no. 680555 section 23 (the “**Louisiana Action**”).

8. Blackstone has filed a motion for partial summary judgment against, among others, the Dantin Financial Parties in the Louisiana Action. Based upon applicable Louisiana law, the Dantin Financial Parties are liable to Blackstone for the amount invested, plus interest, attorney's fees and costs. The Dantin Financial Parties have admitted the relevant allegations and Blackstone anticipates that he will prevail on the summary judgment motion.

BLACKSTONE' OBJECTIONS TO THE MOTION

9. As a preliminary matter, Blackstone is unaware of what, if any, financial information related to the Dantin Financial Parties has been reviewed in evaluating the adequacy of the \$127,5000 that the settlement contemplates will be paid by the Dantin Financial Parties over a five-year period. To date, the Dantin Financial Parties have paid nothing to Blackstone in respect of the \$1.5 million in securities of 1 Global sold to him through the Dantin Financial Parties in contravention of Louisiana's securities laws. Blackstone believes that the relatively small amount to be paid by the Dantin Financial Parties over an extended period of time represents only a very small portion of their actual financial wherewithal. There is no indication in the Motion of the extent of the financial information reviewed and the processes used to verify the financial information.

10. The Motion seeks approval of a settlement and imposition of a bar order related to the settlement of two very different and disparate types of claims – (i) the claims of individual and independent creditor/investors against the various financial advisors who sold them unregistered securities in the 1 Global set forth in class action lawsuit filed in the Circuit Court for the Eleventh

Judicial Circuit in Miami-Dade County, Florida and defined in the Motion as the “**Class Action**”,¹ and (ii) the claims of the bankruptcy estate against the various financial advisors to avoid and recover the commissions paid to the financial advisors by 1 Global.

11. While settlement of the estate’s particular avoidance actions against the various financial advisors with respect to the payment of commissions by the estate may be appropriate, it is inappropriate to combine that settlement with the settlement of independent claims by individual creditor/investors against their specific financial advisors for the sale of unregistered securities by unregistered advisors in violation of the securities laws of a particular state.

12. Blackstone objects to the Motion because, among other things, it imposes a bar order on him that prevents him from proceeding against the Dantin Financial Parties in the Louisiana Action, which was commenced on March 11, 2019, prior to the Class Action.

13. A bar order is simply inappropriate under these circumstances. As stated above, the settlement described in the Motion is not really a single settlement, but two different settlements of very distinct causes of action by different entities with different agendas. Issuance of a bar order would prevent Blackstone from pursuing his very distinct causes of action against the Dantin Financial Parties, a process which he has already commenced through the filing of a separate suit and alternatively, through opting out of the class action litigation.

14. Blackstone’s causes of action against the Dantin Financial Parties are all based on the violation of Louisiana state securities laws. As such, those causes of action are of a type that are non-dischargeable under §523(a)(19) of the Bankruptcy Code and, for that reason alone, should

¹ Although Blackstone is not a member of the class, in an abundance of caution, Blackstone has already submitted the appropriate paperwork to opt out of the class in the Class Action.

not be subject to a bar order. It is simply inequitable and against public policy to provide any of the Dantin Financial Parties with a de facto discharge of a debt that is patently non-dischargeable.

15. Blackstone further objects to the Motion because he is not a member of the class in the Class Action because he never received a Memorandum of Indebtedness (“MOI”), but instead was given a different contract, a Syndicated Partner Agreement, with terms different than those in the MOI. Equity dictates that Blackstone be excluded from the bar order as he is not a member of the Class Action.

16. The various financial advisors participating in this settlement are simply attempting to utilize the possibility of a Bankruptcy Court bar order to do an end run around the creditor/investors who have separate and distinct claims against their financial advisors. With respect to Blackstone, he has viable claims against the Dantin Financial Parties because they sold securities to him without proper registration in violation of Louisiana securities laws. Whether or not the Dantin Financial Parties received a commission from 1 Global for selling securities that is recoverable as an avoidable transfer is separate and distinct from the absolute liability of the Dantin Financial Parties to Blackstone under Louisiana securities laws. As such, the Motion should be denied so that Blackstone’s independent rights to pursue the Dantin Financial Parties are preserved.

WHEREFORE, Blackstone respectfully requests that this Honorable Court enter an order: (i) denying the Motion; and (ii) or declining to approve the settlement described in the Motion; and (iii) granting such other and further relief as this Court deems just and proper.

Respectfully submitted,

Furr and Cohen, P.A.
Attorneys for Christopher Blackstone
2255 Glades Road, Suite 301E
Boca Raton, FL 33431
(561) 395-0500/(561)338-7532-fax

By /s/Robert C. Furr
Robert C. Furr
Florida Bar No. 210854
E-mail: rfurr@furrcohen.com
Alvin S. Goldstein, Esq
Florida Bar No. 210854
E-mail: agoldstein@furrohen.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on the 15th day of November 2019 via electronic mail through the Court's CM/ECF System upon all parties registered to receive electronic notice and by U.S. Mail on all the parties listed below on the master service list pursuant to Local Rule 2002-1(H)(1).

By: /s/ Robert C. Furr
Robert C. Furr, Esq.

SERVED VIA ECF NOTICE

- **Kristopher Aungst** kaungst@wargofrench.com, lcruz@wargofrench.com;cpatterson@wargofrench.com;flservice1@wargofrench.com
- **David W Baddley** baddleyd@sec.gov
- **Javier Banos-Machado** jbanos@msn.com, lawservicespa@gmail.com
- **Paul J. Battista** pbattista@gjb-law.com, gjbecf@gjb-law.com;chopkins@gjb-law.com;jzamora@gjb-law.com;gjbecf@ecf.courtdrive.com;vlambdin@gjb-law.com
- **Russell M. Blain** rblain.ecf@srbp.com, rblain@srbp.com
- **Mark D. Bloom** bloomm@gtlaw.com, MiaLitDock@gtlaw.com;miaecfbky@gtlaw.com
- **Scott N Brown** sbrown@bastamron.com, hharrison@bastamron.com;jmiranda@bastamron.com;kjones@bastamron.com

- **Michael S Budwick** mbudwick@melandrussin.com, ltannenbaum@melandrussin.com; mrbnefs@yahoo.com; mbudwick@ecf.courtdrive.com; ltannenbaum@ecf.courtdrive.com; phornia@ecf.courtdrive.com
- **Robert P. Charbonneau** rpc@agentislaw.com, nsocorro@agentislaw.com; bankruptcy@agentislaw.com; bankruptcy.ecc@ecf.courtdrive.com
- **Aaron R Cohen** acohen60@bellsouth.net
- **Patrick L Cordero** ecfmail@pcorderolaw.com, corderopr93260@notify.bestcase.com
- **Michael R Dal Lago** mike@dallagolaw.com, kim@dallagolaw.com
- **John R. Dodd** doddj@gtlaw.com, miaecfbky@gtlaw.com; mialitdock@gtlaw.com
- **Adela D. Estopinan** Adela@nelawfl.com, manager@nelawfl.com; adaudestop@yahoo.com; LTGnelaw@gmail.com; jfbnelaw@gmail.com
- **Jonathan S. Feldman** jfeldman@pbyalaw.com, eservicemia@pbyalaw.com
- **G Steven Fender** steven.fender@fender-law.com, lm910@aol.com
- **Daniel R Fogarty** dfogarty.ecf@srbp.com
- **Michael Foster** mfoster@wargofrench.com, lcruz@wargofrench.com; cpatterson@wargofrench.com; flservice1@wargofrench.com
- **Joseph D Frank** jfrank@fgllp.com, mmatlock@fgllp.com; csmith@fgllp.com; jkleinman@fgllp.com; csucic@fgllp.com
- **Robert C Furr** ltitus@furrcohen.com, atty_furrcohen@bluestylus.com; cworkinger@furrcohen.com
- **Solomon B Genet** sgenet@melandrussin.com, ltannenbaum@melandrussin.com; mrbnefs@yahoo.com; sgenet@ecf.courtdrive.com; ltannenbaum@ecf.courtdrive.com; phornia@ecf.courtdrive.com
- **Anthony F. Giuliano** afg@pryormandelup.com
- **Kevin C Gleason** kgpaecmf@aol.com
- **Larry I Glick** lglick@shutts.com, dsuengas@shutts.com
- **Darla L Grondin** dgrondin@pbyalaw.com, eservice1gc@pbyalaw.com
- **Christopher P Hahn** litigation@mauricewutscher.com, chahn@mauricewutscher.com
- **Matthew B Hale** mhale.ecf@srbp.com
- **Barbara A Hart** bhart.ecf@srbp.com
- **Andrew R Herron** aherron@homerbonner.com, jyanes@homerbonner.com
- **Alan C Hochheiser** ahochheiser@mauricewutscher.com, 8371350420@filings.docketbird.com
- **Robert L. Jennings** hbrj@aol.com, service.rljp@gmail.com
- **Monique D. Jewett-Brewster** mjb@hopkinscarley.com, eamaro@hopkinscarley.com
- **Jason Z. Jones** jjones@joneslawpa.com
- **Ronald S Kaniuk** ron@kaniuklawoffice.com
- **Brian Karpuk** sgarabato@epiqsystems.com, rjacobs@ecf.epiqsystems.com
- **Paul J. Keenan, Jr.** keenanp@gtlaw.com, mialitdock@gtlaw.com; miaecfbky@gtlaw.com
- **Mahira Q Khan** mkhan@bakerdonelson.com, tgoff@bakerdonelson.com; emcfadden@bakerdonelson.com

- **Eric A Lee** lee@leeamlaw.com,
leeamlaweservice@outlook.com;zivaallen@leeamlaw.com;dsmith@leeamlaw.com
- **Derek E Leon** dleon@leoncosgrove.com
- **Hector E Lora** hlora@mwblp.com, litigation@mwblp.com
- **Jerry M Markowitz** jmarkowitz@mrthlaw.com,
ycandia@mrthlaw.com,rrubio@mrthlaw.com,mrthbkc@gmail.com,gruiz@mrthlaw.com,
markowitzjr73991@notify.bestcase.com,jmarkowitz@ecf.courtdrive.com
- **Stephen A Mendelsohn** mendelsohns@gtlaw.com, hasenh@gtlaw.com
- **James B Miller** bkcmiami@gmail.com
- **Glenn D Moses** gmoses@gjb-law.com, gjbecf@gjb-law.com;chopkins@gjb-law.com;vlambdin@gjb-law.com;jzamora@gjb-law.com;gjbecf@ecf.courtdrive.com;ecastellanos@gjb-law.com
- **Melissa A Murray** melissa@melissamurraylaw.com
- **Melissa A Murray** melissa@cmolawgroup.com
- **Anthony Narula** anthony@axslawgroup.com
- **Ned R Nashban** NNashban@baritzcolman.com, service@baritzcolman.com
- **Ari Newman** newmanar@gtlaw.com,
crossmann@gtlaw.com;mialitdock@gtlaw.com;miaecfbky@gtlaw.com
- **Office of the US Trustee** USTPRegion21.MM.ECF@usdoj.gov
- **Claudia Ojeda** ojedad@gtlaw.com
- **John E Page** jpage@slp.law, dwoodall@slp.law;dlocascio@slp.law;pmouton@slp.law
- **Christian Panagakos** cp@FloridaBankruptcyAdvisors.com,
bp@FloridaBankruptcyAdvisors.com;fbaecf@gmail.com;r55828@notify.bestcase.com
- **Paul J Pascuzzi** ppascuzzi@ffwplaw.com, phillip@telehilladvisors.com
- **Kristopher E Pearson** kpearson@stearnsweaver.com,
rross@stearnsweaver.com;larrazola@stearnsweaver.com;Atty_arrazola@bluestylus.com;
cgraver@stearnsweaver.com
- **Eric S Pendergraft** ependergraft@slp.law,
dwoodall@slp.law;dlocascio@slp.law;bshraibergecfmail@gmail.com;pmouton@slp.law
- **Stephanie Peral** perals@gtlaw.com
- **Chad P Pugatch** cpugatch.ecf@rprslaw.com
- **Harley E. Riedel** hriedel.ecf@srpb.com
- **Kenneth B Robinson** krobinson.ecf@rprslaw.com
- **Damaris D Rosich-Schwartz** Damaris.D.Rosich-Schwartz@usdoj.gov
- **Neil S. Sader** nsader@saderlawfirm.com, sadernr42111@notify.bestcase.com
- **Luis Salazar** Luis@Salazar.Law, Ceide@salazar.law;Lee-Sin@Salazar.Law
- **Joseph E Sarachek** joe@saracheklawfirm.com
- **Adam A Schwartzbaum** adams@moskowitz-law.com, dione@moskowitz-law.com;rejane@moskowitz-law.com
- **Susan H Sharp** ssharp.ecf@srpb.com
- **James D. Silver** jsilver@kelleykronenberg.com,
RAldama@kelleykronenberg.com;jsilver@kklaw.com
- **Ruel W Smith** rsmith@hinshawlaw.com,
vtorres@hinshawlaw.com;mmorales@hinshawlaw.com

- **Jeffrey R Sonn** jsonn@sonnerez.com
- **Eva Spahn** spahne@gtlaw.com
- **Scott A Stichter** sstichter.ecf@srbp.com
- **Richard B. Storfer** rstorfer@rprslaw.com
- **Joel L Tabas** jtabas@tabassoloff.com,
jcepero@tabassoloff.com;kborrego@tabassoloff.com
- **Charles M Tatelbaum** cmt@trippscott.com,
hbb@trippscott.com;cvp@trippscott.com;eservice@trippscott.com
- **Annette Urena Tucker** Annette.Tucker@kaplanzeena.com,
cheryl.mingo@kaplanzeena.com,service@kaplanzeena.com,maria.escobales@kaplanzeena.com,elizabeth.salom@kaplanzeena.com
- **Chad T Van Horn** Chad@cvhlawgroup.com,
Chad@ecf.inforuptcy.com,g2320@notify.cincompass.com,notices@nextchapterbk.com,chapter7@cvhlawgroup.com,chapter13@cvhlawgroup.com,chapter11@cvhlawgroup.com
- **Anthony G Woodward** tony@anthonywoodwardpa.com,
litigation@anthonywoodwardpa.com
- **Melissa Youngman** melissayoungman@melissayoungman.com,
melissayoungman@mac.com

**MASTER SERVICE LIST
(Local Rule 2002-1(H)(1))
November 1, 2019**

Office of the US Trustee (via CM/ECF)

Office of the United States Trustee
Attn: Steven D. Schneiderman
51 S.W. 1st Ave., Suite 1204
Miami, FL 33130
Email: USTPRegion21.MM.ECF@usdoj.gov
Steven.D.Schneiderman@usdoj.gov

Debtors and Debtors' Counsel (via CM/ECF)

1 Global Capital LLC
c/o Greenberg Traurig, P.A.
Attn: Paul J. Keenan Jr., Esq.
333 S.E. 2nd Avenue, Suite 4400
Miami, FL 33131
Email: bloomm@gtlaw.com
keenap@gtlaw.com
doddj@gtlaw.com
newmanar@gtlaw.com
crossmann@gtlaw.com
MiaLitDock@gtlaw.com
miaecfbky@gtlaw.com
ojedac@gtlaw.com
spahne@gtlaw.com
perals@gtlaw.com

1 Global Capital LLC d/b/a 1 GC Collections
1 West Capital LLC d/b/a/ 1 West Collections
c/o Greenberg Traurig, P.A.
Attn: Paul J. Keenan Jr. and Stephen A Mendelsohn
333 S.E. 2nd Avenue, Suite 4400
Miami, FL 33131
Email: keenap@gtlaw.com
mendelsohns@gtlaw.com
hasenh@gtlaw.com
MiaLitDock@gtlaw.com
miaecfbky@gtlaw.com
ojedac@gtlaw.com

Special Counsel to the Debtors (via CM/ECF)

Genovese Joblove & Battista, P.A.
Special Conflicts Counsel to the Debtors
Attn: Paul J. Battista
Miami Tower
100 Southeast Second Street, Suite 4400
Miami, FL 33301

Genovese Joblove & Battista, P.A.
Special Conflicts Counsel to the Debtors
Attn: Paul J. Battista
100 N. Tampa Street, Suite 1645
Tampa, FL 33602
Email: pbattista@gjb-law.com
gjbecf@gjb-law.com
chopkins@gjb-law.com
jzamora@gjb-law.com
vlambdin@gjb-law.com
gmoses@gjb-law.com
ecastellanos@grb-law.com

Special Litigation Counsel to Debtors in Possession (via CM/ECF)

Perlman, Bajandas, Yevoli & Albright, P.L.
Special Litigation Counsel to Debtors in Possession
Attn: Jonathan S. Feldman & Darla L. Grondin
283 Catalonia Avenue, Suite 200
Miami, FL 33134
Email: jfeldman@pbyalaw.com
eservicemia@pbyalaw.com
dgrondin@pbyalaw.com
eservice1gc@pbyalaw.com

Special Insurance Counsel to Debtors in Possession (via CM/ECF)

Leon Cosgrove, LLP
Special Insurance Counsel to Debtors in Possession
Attn: Derek E. Leon
255 Alhambra Cir.
Suite 800
Coral Gables, FL 33134
Email: dleon@leoncosgrove.com

Counsel to the Official Committee of Unsecured Creditors (via CM/ECF)

Stichter, Riedel, Blain & Postler, P.A.
Attn: Russell M Blain, Daniel R Fogarty,
Matthew B Hale, Barbara A Hart, Harley E
Riedel, Susan H Sharp, Scott A Stichter
110 East Madison St., Ste. 200
Tampa, FL 33602
Email: rblain@srbp.com
dfogarty@srbp.com

mhale@srbp.com
bhart@srbp.com
hriedel@srbp.com
ssharp@srbp.com
sstichter@srbp.com

Official Committee of Unsecured Creditors (via U.S. Mail)

Christopher Blackstone
19630 Southern Hills Avenue
Baton Rouge, LA 70809

James A. Lochtefeld
7900 East 800 S
Union City, IN 47390

Steven Ross Shelton IRA
c/o Steve Ross Shelton
6425 Seaside Dr.
Loveland, CO 80538

Khosrow Sohraby
11506 West 164 Terr.
Overland Park, KS 66221

Donald Stec IRA
c/o Donald Stec
2609 Oleander Way, Apt. #125
Knoxville, TN 37931

Charles Carpenter IRA
c/o Charles Carpenter
299 Cardinal Street
Maryville, TN 37903

Geoffrey Lipman
5 Arthur Grumiaux
1640 Rhode St. Genis
Belgium

The United States and its Agencies (via U.S. Mail unless otherwise noted)

Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

U.S. Attorney's Office
500 E. Broward Blvd.
Ft. Lauderdale, FL 33394

U.S. Attorney's Office
Attn: Jerrob Duffy, Esq.
99 N.E. 4th Street
Miami, FL 33132

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

U.S. Securities and Exchange Commission
Miami Regional Office
Attn: Christopher E. Martin
801 Brickell Avenue, Suite 1800
Miami, FL 33131

U.S. Securities and Exchange Commission
Atlanta Regional Office
Attn: David W. Baddley
950 East Paces Ferry Road, N.E.
Suite 900
Atlanta, GA 30326-1382
Email: baddleyd@sec.gov (*via CM/ECF*)

Receiver for Bright Smile Financing, LLC; BRR Block Inc.; Digi South LLC; Ganador Enterprises, LLC; Media Pay LLC; Pay Now Direct LLC; the Ruderman Family Trust; and Bright Smile Trust

Nelson Mullins Broad and Cassel
Attn: Jon A. Sale, Esq.
2 South Biscayne Blvd.
21st Floor
Miami, FL 33131 (*via U.S. Mail*)

Nelson Mullins Broad and Cassel
Attn: Daniel S. Newman, Gary Freedman & Jonathan Etra, Esqrs.
One Biscayne Tower, 21st Floor
2 S. Biscayne Blvd.
Miami, FL 33131 (*via U.S. Mail and e-mail*)
Email: dan.newman@nelsonmullins.com
gary.freedman@nelsonmullins.com
jonathan.etra@nelsonmullins.com

**Those Parties and Attorneys Formally
Requesting Notice (via CM/ECF unless
otherwise noted)**

Commonwealth of Pennsylvania
c/o Deb Secrest
651 Boas St #702
Harrisburg, PA 17121 (*via U.S. Mail*)

Western Alliance Bank
c/o Tabas & Soloff, P.A.
Attn: Joel L. Tabas
Ingraham Building, Suite 248
25 SE Second Avenue
Miami, FL 33131
Email: jtabas@tabassoloff.com
jcepero@tabassoloff.com
kborrego@tabassoloff.com

Western Alliance Bank
c/o Hopkins & Carley ALC
Attn: Monique D. Jewett-Brewster
70 S. First St.
San Jose, CA 95113
Email: mjb@hopkinscarley.com
eamaro@hopkinscarley.com

Shulamith Fleischer
c/o The Sarachek Law Firm
Attn: Joseph E. Sarachek
101 Park Avenue, 27th Floor
New York, NY 10178
Email: joe@saracheklawfirm.com

Marlene Gordon
c/o The Sarachek Law Firm
Attn: Joseph E. Sarachek
101 Park Avenue, 27th Floor
New York, NY 10178
Email: joe@saracheklawfirm.com

Kurt Faudel
c/o The Sarachek Law Firm
Attn: Joseph E. Sarachek
101 Park Avenue, 27th Floor
New York, NY 10178
Email: joe@saracheklawfirm.com

Pinnacle Plus Financial, LLC,
Pinnacle Plus Capital, LLC and Pinnacle
Wealth Management, LLC
c/o Agentis PLLC
Attn: Robert P. Charbonneau
55 Alhambra Plaza, Suite 800
Miami, FL 33134
Email: rpc@agentislaw.com
nsocorro@agentislaw.com
bankruptcy@agentislaw.com

Pinnacle Plus Financial, LLC
c/o Sader Law Firm
Attn: Neil S. Sader
2345 Grand Blvd., Suite 2150
Kansas City, MO 64108
Email: nsader@saderlawfirm.com
sadernr42111@notify.bestcase.com

Collins Asset Group, LLC
c/o Maurice Wutscher LLP
Attn: Alan C. Hochheiser &
Christopher P. Hahn
23611 Chagrin Blvd. Suite 207
Beachwood, OH 44129
Email: ahochheiser@mauricewutscher.com
litigation@mauricewutscher.com
chahn@mauricewutscher.com
hlora@mwblp.com
8371350420@filings.docketbird.com

Life Co Insurance Services & Retirement
Planning, Inc.
c/o Felderstein Fitzgerald Willoughby &
Pascuzzi LLP
Attn: Paul J. Pascuzzi, Lori N. Lasley
400 Capitol Mall, Suite 1750
Sacramento, CA 95814
Email: ppascuzzi@ffwplaw.com
phillip@telehilladvisors.com

Epiq Corporate Restructuring, LLC
Attn: Brian Karpuk
777 Third Ave, 12th Floor
New York, NY 10017
Email: sgarabato@epiqsystems.com
rjacobs@ecf.epiqsystems.com

Andrew Washor and Nancy Washor
c/o Sonn Law Group, P.A.
Attn: Jeffrey R Sonn
One Turnberry Place
19495 Biscayne Blvd., Suite 607
Aventura, FL 33180
E-mail: jsonn@sonnerez.com

First Premier Bank
c/o Stearns Weaver Weissler
Alhadeff & Sitterson
Attn: Kristopher Pearson
150 West Flagler Street
Museum Tower, Suite 2200
Miami, FL 33130
Email: kpearson@stearnsweaver.com
rross@stearnsweaver.com
larrazola@stearnsweaver.com
cgraver@stearnsweaver.com
Atty_arrazola@bluestylus.com

Irving and Ashland, LLC
c/o Baritz & Colman LLP
Attn: Ned R. Nashban
1075 Broken Sound Parkway, NW
Suite 102
Boca Raton, FL 33487
Email: nnashban@baritzcolman
service@baritzcolman.com

Capital Stack, LLC
c/o Shraiberg, Landau & Page, P.A
Attn: Eric S Pendergraft, John E Page
2385 NW Executive Center Drive, #300
Boca Raton, FL 33431
Email: ependergraft@slp.law
dwoodall@slp.law
jpage@slp.law
msmith@slp.law
dlocascio@slp.law
pmouton@slp.law

A Top Line Charter, LLC & Mr Didar Singh
c/o AXS Law Group, PLLC
Attn: Anthony V. Narula, Esq.
2121 NW 2nd Ave, Suite 201
Wynwood, FL 33127
Email: anthony@axslawgroup.com

Alberto Mendoza & Evelyn Mendoza
Revocable Trust Dated October 23, 2014
c/o Baritz & Colman LLP
Attn: Ned R. Nashban
1075 Broken Sound Parkway, NW
Suite 102
Boca Raton, FL 33487
Email: nnashban@baritzcolman.com
service@baritzcolman.com

Certain Underwriters at Lloyd's, London
c/o Wargo & French, LLP
Attn: Kristopher E Aungst and Michael C.
Foster
201 S. Biscayne Blvd., Suite 1000
Miami, FL 33131
Email: lcruz@wargofrench.com
cpatterson@wargofrench.com
flservice1@wargofrench.com
mfoster@wargofrench.com
kaungst@wargofrench.com

Sarah Foster
c/o Meland Russin & Budwick, PA
Attn: Michael S. Budwick & Solomon B.
Genet
3200 Southeast Financial Center
200 South Biscayne Boulevard
Miami, FL 33131
Email: mbudwick@melandrussin.com
ltannenbaum@melandrussin.com
mrbnefs@yahoo.com
sgenet@melandrussin.com

Karen Hancock, Karen Hancock IRA, and
Robert Hancock, IRA
c/o Jennings & Valancy, P.A.
Attn: Robert L. Jennings
306 SE Detroit Avenue
Stuart, FL 34994
Email: hbrj@aol.com
service.rljp@gmail.com

Carl Ruderman
c/o Jones Law Office, PA
Attn: Jason Z. Jones, Esq.
9130 S Dadeland Blvd., Suite 1209
Miami, FL 33156
Email: jjones@joneslawpa.com

Sarah Foster
c/o The Moskowitz Law Firm, PLLC
Attn: Adam A Schwartzbaum, Esq.
2 Alhambra Plaza, Suite 601
Coral Gables, FL 33134
Email: adams@moskowitz-law.com
dione@moskowitz-law.com
rejane@moskowitz-law.com

Dale Ledbetter
c/o Tripp Scott, P.A.
Attn: Charles M. Tatelbaum
110 Southeast 6th Street, 15th Floor
Fort Lauderdale, FL 33301
Email: hbb@trippscott
cvp@trippscott
eservice@trippscott.com
cmt@trippscott.com

AFK Inc. dba FundKite
c/o Pryor & Mandelup, L.L.P.
Attn: Anthony F. Giuliano
675 Old Country road
Westbury, NY 11590
Email: afg@pryormandelup.com

Barbara A. Hart; John T. Young, Jr.; and
Matthew Dundon
c/o Stichter, Riedel, Blain & Postler, P.A.
Attn: Barbara A Hart
110 East Madison St., Ste. 200
Tampa, FL 33602
Email: bhart@srbp.com

Marcus Neiman Rashbaum LLP
c/o Jones Law Office, PA
Attn: Jason Z. Jones, Esq.
9130 S Dadeland Blvd., Suite 1209
Miami, FL 33156
Email: jjones@joneslawpa.com

Kopelowitz Ostrow P.A.
c/o Kaplan Zeena LLP
Attn: Annette Urena Tucker
2 South Biscayne Boulevard
One Biscayne Tower, Suite 3050
Miami, FL 33131
Email: annette.tucker@kaplanzeena.com
service@kaplanzeena.com
maria.escobales@kaplanzeena.com
cherly.mingo@kaplanzeena.com
elizabeth.salom@kaplanzeena.com

Vicki, IRA S Popple
c/o Woodward Law Group
Attn: Anthony G Woodward
20727 Sterlington Drive
Land O'Lakes, FL 34638
Email: tony@anthonywoodwardpa.com
litigation@anthonywoodwardpa.com

Platinum Rapid Funding Group, Ltd.
c/o Dal Lago Law
Attn: Michael R Dal Lago
999 Vanderbilt Beach Road
Suite 200
Naples, FL 34108
Email: mike@dallagolaw.com
kim@dallagolaw.com

RMH III, Inc.
c/o Rice Pugatch Robinson Storfer & Cohen
Attn: Chad P Pugatch, Esq.
Fort Lauderdale Office
101 NE 3rd Ave., Suite 1800
Fort Lauderdale, FL 33301
Email: cpugatch@rprslaw.com

Rahim Majid Hassanally
c/o James B Miller, Esq.
19 W Flagler St. #416
Miami, FL 33130
Email: bkcmiami@gmail.com

Global Merchant Cash, Inc.
D/B/A Wall Street Funding
c/o Rice Pugatch Robinson Storfer & Cohen
Attn: Kenneth B. Robinson
Fort Lauderdale Office
101 NE 3rd Ave., Suite 1800
Fort Lauderdale, FL 33301
Email: krobison@rprslaw.com
rstorfer@rprslaw.com

Experian, Inc.
c/o FrankGecker LLP
Attn: Joseph D. Frank
1327 W. Washington Boulevard
Suite 5G-H
Chicago, IL 60607
Email: jfrank@fgllp.com
mmatlock@fgllp.com
csmith@fgllp.com
jkleinman@fgllp.com
csucic@fgllp.com

Darice Lang
c/o Homer Bonner Jacobs, P.A.
Attn: Andrew R. Herron, Esq.
1200 Four Seasons Tower
1441 Brickell Avenue
Miami, FL 33131
Email: aherron@homerbonner.com
jyanes@homerbonner.com

George Gille
c/o Agentis PLLC
Attn: Robert P. Charbonneau
55 Alhambra Plaza, Suite 800
Miami, FL 33134
Email: rpc@agentislaw.com
nsocorro@agentislaw.com
bankruptcy@agentislaw.com

Matthew Walker
c/o Agentis PLLC
Attn: Robert P. Charbonneau
55 Alhambra Plaza, Suite 800
Miami, FL 33134
Email: rpc@agentislaw.com
nsocorro@agentislaw.com
bankruptcy@agentislaw.com

Travis Horn
c/o Agentis PLLC
Attn: Robert P. Charbonneau
55 Alhambra Plaza, Suite 800
Miami, FL 33134
Email: rpc@agentislaw.com
nsocorro@agentislaw.com
bankruptcy@agentislaw.com

RADIUM2 CAPITAL, INC.
c/o Shutts & Bowen
Attn: Larry I. Glick, Partner
200 South Biscayne Boulevard, Suite 4100
Miami, FL 33131
Email: lglick@shutts.com
dsuengas@shutts.com

Travis Portfolio, LLC, Oliphant Financial
LLC and Collins Asset Group, LLC
c/o G. Steven Fender, Esq. and Steven
Fender PA
Attn: G. Steven Fender, Esq.
P.O. Box 1545
Ft. Lauderdale, FL 33302
Email: steven.fender@fender-law.com
Lm910@aol.com

John T. Young, Jr., and Matthew Dundon
c/o Stichter, Riedel, Blain & Postler, P.A.
Attn: Matthew B Hale
110 East Madison St., Ste. 200
Tampa, FL 33602
Email: mhale@srbp.com

Travis Portfolio, LLC, Oliphant Financial
LLC and Collins Asset Group, LLC
c/o Maurice Wutscher LLP
Attn: Hector E Lora
23611 Chagrin Blvd. Suite 207
Beachwood, OH 44129
Email: hloramwblp.com
litigation@mwbllp.com

George T. Iwahiro and Charlene M. Iwahiro
c/o Bast Amron LLP
Attn: Scott N. Brown
SunTrust International Center
One Southeast Third Avenue
Suite 1400
Miami, FL 33131
Email: sbrown@bastamron.com
hharrison@bastamron.com
jmiranda@bastamron.com
kjones@bastamron.com

Steven Mitnick, as Assignee for the Benefit
of Creditors of SHOPBEYONDLIMITS, LLC
c/o Aaron R. Cohen, P.A.
Attn: Aaron R. Cohen
Post Office Box 4218
Jacksonville, FL 32201
Email: acohen60@bellsouth.net

Barbara E. Shore, Maurice Shore
c/o Sonn Law Group, P.A.
Attn: Jeffrey R Sonn
One Turnberry Place
19495 Biscayne Blvd., Suite 607
Aventura, FL 33180
E-mail: jsonn@sonnerez.com

Certains Underwriters at Lloyd's, London,
(PROF. LIAB. POL)
c/o Kelley Kronenberg
Attn: James D. Silver
8201 Peters Road, Suite 4000
Fort Lauderdale, FL 33324
Email: jsilver@kelleykronenberg.com
raldama@kelleykronenberg.com
jsilver@kklaw.com

American Alternative Insurance Corporation
c/o Hinshaw & Culbertson, LLP
Attn: Ruel W. Smith
One East Broward Blvd., Suite 1010
Fort Lauderdale, FL 33301
Email: rsmith@hinshawlaw.com
vtorres@hinshawlaw.com
mmorales@hinshawlaw.com

Clark's Corner Investments, LLC and
Kraig Clark
c/o Lee & Amtzis, P.L.
Attn: Eric A Lee
5550 Glades Road, Suite 401
Boca Raton, FL 33431
Email: lee@leeamlaw.com
leeamlaweservice@outlook.com
zivaallen@leeamlaw.com
dsmith@leeamlaw.com

Daniel R. Bruns, Thomas R. Doseck, Karen
M. Doseck, Todd G. Homan, Michele R.
Homan, Daniel R. Lennartz, Theresa L.
Lennartz, Jack E. Link, Kimbal H. Ragan,
Julie B. Ragan, Rick J. Round, Jane C.
Round, Edward E. Shuret, Anthony F.
Ungruhn, Diane L. Ungruhn, Scott R.
Wendel, Kimberly A. Wendel & Connie
Wharton-Burns
c/o The Law Offices of Melissa Anne
Murray, PA
Attn: Melissa Anne Murray
1615 South Congress Avenue, Suite 103
Delray Beach, FL 33445
Email: melissa@melissamurraylaw.com
melissa@cmolawgroup.com

Grapevine Group Concrete Contractors, Inc.
and Brenda Houchens
c/o Van Horn Law Group, P.A.
Attn: Chad T Van Horn
330 N. Andrews Ave., Suite 450
Fort Lauderdale, FL 33301
Email: chad@cvhlawgroup.com
g2320@notify.cincompass.com
notices@nextchapterbk.com
chapter7@cvhlawgroup.com
chapter13@cvhlawgroup.com
chapter11@cvhlawgroup.com

Jason Romero
c/o The Law Offices of Patrick L. Cordero
Attn: Patrick L. Cordero
7333 Coral Way
Miami, FL 33155
Email: ecfmail@pcorderolaw.com
corderopr93260@notify.bestcase.com

Chris Blackstone
c/o Furr and Cohen, P.A.
Attn: Robert C. Furr
2255 Glades road, Suite 301E
Boca Raton, FL 33431
Email: ltitus@furrcohen.com
atty_furrcohen@bluestylus.com
cworkinger@furrcohen.com

JAG Interior Solutions, L.L.C. & Julie A.
Gowen
c/o Kevin Gleason, P.A.
Attn: Kevin C. Gleason, Esq.
4121 North 31st Avenue
Hollywood, FL 33021-2011
Email: kgpaecmf@aol.com

Bramlett Mechanical Company Inc. and
Steven M. Bramlett
c/o Kaniuk Law Office, P.A.
Attn: Ronald S Kaniuk
1615 S. Congress Avenue, Suite 103
Delray Beach, FL 33445

Jonathan Lee
c/o Baker Donelson
Attn: Mahira Khan
100 S.E. Third Avenue, Suite 1620
Fort Lauderdale, FL 33394
Email: mkhan@bakerdonelson.com
tgoff@bakerdonelson.com
emcfadden@bakerdonelson.com

Jerry M. Markowitz
9130 South Dadeland Boulevard
Two Datan Center, Suite 1800
Miami, FL 33156-7849
Email: jmarkowitz@mrthlaw.com
ycandia@mrthlaw.com
rrubio@mrthlaw.com
mrthbkc@gmail.com
gruiz@mrthlaw.com
markowitzjr73991@notify.bestcase.com

ER Homes LLC and Kevin Matos
c/o Florida Bankruptcy Advisors, P.L.
Attn: Christian Panagakos
120 E. Oakland Park Blvd., Suite 207
Fort Lauderdale, FL 33334
Email: cp@FloridaBankruptcyAdvisors.com
bp@FloridaBankruptcyAdvisors.com
fbaecf@gmail.com
r55828@notify.bestcase.com

Stoltmann Law Offices, P.E.
c/o Rice Pugatch Robinson Storfer & Cohen
Attn: Chad P Pugatch, Esq.
Fort Lauderdale Office
101 NE 3rd Ave., Suite 1800
Fort Lauderdale, FL 33301
Email: cpugatch@rprslaw.com

Joseph Garcia
c/o Law Office of Melissa A. Youngman, PA
Attn: Melissa Youngman
721 Maitland Ave.
Altamonte Springs, FL 32701
Email: melissayoungman@melissayoungman.com
melissayoungman@mac.com