

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA TAMPA DIVISION**

In re:

THE CENTER FOR SPECIAL NEEDS TRUST
ADMINISTRATION, INC.,

Debtor.

Chapter 11

Case No. 8:24-bk-00676-RCT

Ref. Docket No. 529

CERTIFICATE OF SERVICE

I, WING LAI-CHAN, hereby certify that:

1. I am employed as a Case Manager by Epiq Corporate Restructuring, LLC, with their principal office located at 777 Third Avenue, New York, New York 10017. I am over the age of eighteen years and am not a party to the above-captioned action.
2. On May 9, 2025, I caused to be served the:
 - a. “Chapter 11 Trustee’s Fifth Motion to Further Extend Time for Beneficiaries to File Proofs of Claim to July 31, 2025 and to Establish Amount of Beneficiaries’ Claims,” dated May 9, 2025 [Docket No. 529], (the “Redacted Extension Motion”), and
 - b. “Chapter 11 Trustee’s Fifth Motion to Further Extend Time for Beneficiaries to File Proofs of Claim to July 31, 2025 and to Establish Amount of Beneficiaries’ Claims,” dated May 9, 2025, *related to Docket No. 529*, a copy of which is annexed hereto as Exhibit A, (the “Extension Motion”),

by causing true and correct copies of the:

- i. Redacted Extension Motion to be enclosed securely in separate postage pre-paid envelopes and delivered via first class mail to those parties listed on the annexed Exhibit B,
- ii. Extension Motion to be enclosed securely in separate postage pre-paid envelopes and delivered via first class mail to those parties listed on the annexed Exhibit C and to 254 parties whose names and addresses are confidential and therefore not included, and
- iii. Redacted Extension Motion to be delivered via electronic mail to those parties listed on the annexed Exhibit D.

3. All envelopes utilized in the service of the foregoing contained the following legend:
“LEGAL DOCUMENTS ENCLOSED. PLEASE DIRECT TO THE ATTENTION OF
ADDRESSEE, PRESIDENT, OR LEGAL DEPARTMENT.”

/s/ Wing Lai-Chan
Wing Lai-Chan

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

In re:

THE CENTER FOR SPECIAL NEEDS
TRUST ADMINISTRATION, INC.,

Case No. 8:24-bk-00676-RCT

Chapter 11

Debtor.

**CHAPTER 11 TRUSTEE'S FIFTH MOTION TO FURTHER EXTEND
TIME FOR BENEFICIARIES TO FILE PROOFS OF CLAIM TO
JULY 31, 2025 AND TO ESTABLISH AMOUNT OF BENEFICIARIES' CLAIMS**

Michael Goldberg, Chapter 11 Trustee (the "Chapter 11 Trustee"), by and through undersigned counsel, files this motion (the "Fifth Extension Motion") respectfully requesting the entry of an order (i) further extending the deadline for Beneficiaries (as defined below) to file proofs of claim for an additional 79 days through July 31, 2025 and (ii) to establish the amount of the Beneficiaries' claims based on the Chapter 11 Trustee's Forensic Accountants' Loss Analysis (as defined below). In support of the Fifth Extension Motion, the Chapter 11 Trustee respectfully represents as follows:

1. As this Court is aware, the Debtor is a 501(c)(3) non-profit Florida corporation that administers pooled trusts and special needs trusts. The Debtor is the trustee or co-trustee of numerous special needs trusts, including both stand-alone trusts and pooled trusts (the "Trusts") for approximately 2,000 beneficiaries who suffer from various levels of disability (the "Beneficiaries").

2. As the Court is also aware, prior to the Petition Date, the Debtor's leadership discovered that approximately \$100,000,000 of funds from beneficiaries and the Center itself was allegedly loaned to Boston Financial Group ("BFG"), a group controlled by the Center's founder

Leo Govoni. (“Govoni”), which loan remains outstanding. The improper transfers of these trust funds have left over a thousand trust accounts either partially or fully compromised. On January 17, 2025, the Court entered an Amended Final Judgment As to Counts 1 and II of the Adversary Complaint awarding the Chapter 11 Trustee judgment in the amount of \$120,324,391.07 against BFG and Govoni in the adversary proceeding filed by the Chapter 11 Trustee designated Adversary Proceeding Number 8:24-ap-00139-RCT.

3. On March 27, 2024, the Chapter 11 Trustee filed an Application for Employment of Soneet R. Kapila and KapilaMukamal (the “Forensic Accountants”) as Forensic Accountant for Chapter 11 Trustee (Doc. 124) which was granted by the Court on April 2, 2024 (Doc. 138).

4. Since their retention, the Forensic Accountants worked diligently to trace the Trusts’ funds and determine the extent to which the Trusts have been compromised. That work was extremely time consuming and required a number of subpoenas to obtain bank and other records from third parties, consisting primarily of entities owned or controlled by Govoni. The Govoni controlled entities were slow to respond to the subpoenas or did not respond at all.

5. The Debtor filed its Schedules and Statement of Financial Affairs (Doc. 66) (the “Schedules”) on February 27, 2024. In its Schedules, the Debtor listed claims of Beneficiaries of Compromised Trust Accounts totaling \$104,889,321.69 (the “Beneficiary Claims”). The Debtor listed each claimant’s claim amount based on the Debtor’s analysis of its books and records. The Debtor *did not* list any of the Beneficiary Claims as contingent, unliquidated, or disputed.

6. However, after review of the Debtor’s books and records, the Forensic Accountants determined that the amounts listed by the Debtors in its Schedules for the Beneficiary Claims may not be accurate.

7. After significant and pain-staking work, the Forensic Accountants were able to complete their analysis of the losses incurred by the Trusts and establish the amount of Beneficiary Claims. The Forensic Accountants' Trust Claim Loss Analysis (the "Loss Analysis") is attached hereto as **Exhibit A**.¹

8. The Loss Analysis lists the amount each Trust administered by the Debtor lost as a result of the improper transfer of funds to Govoni-controlled entities. Through this Motion, the Chapter 11 Trustee seeks entry of an order establishing the amount of each Beneficiaries' claim in this case as the amount listed on the attached Loss Analysis, unless a Beneficiary objects by July 31, 2025.

9. **IF A BENEFICIARY AGREES WITH THE AMOUNT LISTED FOR HIS OR HER TRUST ON THE LOSS ANALYSIS ATTACHED AS EXHIBIT A, THE BENEFICIARY WILL NOT BE REQUIRED TO FILE A PROOF OF CLAIM IN THIS CASE AND WILL RECEIVE A PRO RATA DISTRIBUTION BASED UPON THE AMOUNT LISTED ON THE LOSS ANALYSIS.**

10. On February 14, 2024, the Court entered its Notice of Chapter 11 Bankruptcy Case (Doc. 35), which set a deadline for creditors to file proofs of claim by April 19, 2024 (the "Bar Date").

11. On April 4, 2024, the Chapter 11 Trustee filed his Motion to (I) Extend Time for Filing Proof of Claim by Non-Governmental Creditors to July 18, 2024 and (II) Approve Claim Submission Procedures (Doc. 147) (the "First Extension Motion"). The Court granted the First

¹ The names of each beneficiary have been redacted on Exhibit A for privacy considerations but the full unredacted version of the Loss Analysis is being served on the Beneficiaries with this Motion.

Extension Motion by order dated April 18, 2024 (Doc. 177) which extended the deadline for non-governmental creditors to file proofs of claim to July 18, 2024.

12. On June 20 2024, the Chapter 11 Trustee filed his Second Motion to Extend Time for Filing Proofs of Claim by Non-Governmental Creditors to October 26, 2024 (Doc. 271) (the “Second Extension Motion”). The Court granted the Second Extension Motion by order dated July 8, 2024 (Doc. 286) which extended the deadline for non-governmental creditors to file proofs of claim to October 16, 2024.

13. On October 9, 2024, the Chapter 11 Trustee filed his Third Motion to Extend Time for Filing Proofs of Claim by Non-Governmental Creditors to February 13, 2025 (Doc. 378) (the “Third Extension Motion”). The Court granted the Third Extension Motion by order dated October 11, 2025 (Doc. 381) which extended the deadline for non-governmental creditors to file proofs of claim to February 13, 2025.

14. On January 31, 2025, the Chapter 11 Trustee filed his Fourth Motion to Extend Time for Filing Proofs of Claim by Non-Governmental Creditors to May 14, 2025 (Doc. 478) (the “Fourth Extension Motion”). The Court granted the Fourth Extension Motion by order dated February 3, 2025 (Doc. 479) which extended the deadline for non-governmental creditors to file proofs of claim to May 14, 2025.

15. By this Motion, the Chapter 11 Trustee is only seeking to extend the Bar Date for Beneficiaries on account of their losses related to their Trusts, and the Bar Dates for any other governmental or nongovernmental creditors shall remain August 7, 2024 and October 16, 2024, respectfully.

16. Since the Forensic Accountants only recently completed their accounting and reconciliation of all of the Trusts resulting in the Loss Analysis which is being served on the

Beneficiaries for the first time by this Motion, the Chapter 11 Trustee feels that it is prudent to further extend the deadline **for Beneficiaries only** to file proofs of claim by an additional 79 days through July 31, 2025 (the “Further Extended Bar Date”) **or to object to the claim amount listed on the Loss Analysis for the Beneficiary’s trust.**

17. If a Beneficiary agrees with the amount listed for his or her trust on the Loss Analysis, the Beneficiary will not be required to file a proof of claim in this case and will be paid his or her pro rata share of the recoveries in this case consistent with the amounts listed on the Loss Analysis.

Basis for Relief and Memorandum of Law

18. Bankruptcy Rule 3003(c)(1) authorizes the Court, for cause shown, to extend the time within which proofs of claim may be filed. Likewise, Rule 9006(b) states that the Court, for cause shown, may order a period enlarged if the request to do so is made before the expiration of the period originally prescribed. And 11 U.S.C. § 105(a) authorizes the Court to “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions” of the Bankruptcy Code.

19. The Further Extended Bar Date in the underlying Motion will provide additional time for Beneficiaries to file a claim or to object to the Loss Analysis. Under the circumstances of this Chapter 11 Case, the Further Extended Bar Date is reasonable and necessary for the efficient administration of the Chapter 11 Case.

WHEREFORE, Michael Goldberg, Chapter 11 Trustee, respectfully requests that this Court enter an order substantially in the form as **Exhibit B**, further extending the deadline for Beneficiaries to file proofs of claim or object to the Loss Analysis to July 31, 2025 and grant such other relief as is just and proper.

DATED: May 9, 2025.

AKERMAN LLP

By: /s/ Steven R. Wirth

Steven R. Wirth

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Telephone: (813) 223-7333

Facsimile: (813) 223-2837

Counsel for Chapter 11 Trustee,

Michael Goldberg

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished on this 9th day of May, 2025, by the Court's CM/ECF electronic mail system to all parties receiving electronic noticing. Additionally, Epiq Corporate Restructuring, LLC will cause a true and correct copy of the foregoing document to be served on all trust beneficiaries and all parties required to be served, including the Local Rule 1007-2 Parties in Interest List, and will file a certificate or affidavit of service.

/s/ Steven R. Wirth

Attorney

EXHIBIT B

Name	Address
BENEFICIARY 23-12268	ADDRESS ON FILE
BYRON WRIGHT III	(COUNSEL TO CREDITOR JIMMIE CRIM JR) 2810 REMINGTON GREEN CIRCLE TALLAHASSEE FL 32308
CREDITOR 18-10862	C/O MARK D. MUNSON, ESQ. 500 N. FIRST STREET, SUITE 800 PO BOX 8050 WAUSAU WI 54402
INTERNAL REVENUE SERVICE	INSOLVENCY UNIT 7850 SW 6TH COURT MAIL STOP 5730 PLANTATION FL 33324
INTERNAL REVENUE SERVICE LOCAL OFFICE	600 ARCH STREET PHILADELPHIA PA 19106
INTERNAL REVENUE SERVICE LOCAL OFFICE	CENTRALIZED INSOLVENCY OPERATIONS PO BOX 7346 PHILADELPHIA PA 19101-7346
STATE OF FLORIDA ATTORNEY GENERAL	THE CAPITOL, PL 01 TALLAHASSEE FL 32399-1050
TENNCARE	(C/O TN ATTORNEY GEN OFF BANKRUPTCY DIV) ATTN: STUART WILSON-PATTON PO BOX 20207 NASHVILLE TN 37202-0207
UNITED STATES ATTORNEYS OFFICE	FOR THE MIDDLE DISTRICT OF FLORIDA 400 NORTH TAMPA STREET, SUITE 3200 TAMPA FL 33602

Total Count: 9

EXHIBIT C

Claim Name	Address Information
BENEFICIARY 02-0053	ADDRESS ON FILE
BENEFICIARY 02-0064	ADDRESS ON FILE
BENEFICIARY 02-0075	ADDRESS ON FILE
BENEFICIARY 02-0083	ADDRESS ON FILE
BENEFICIARY 02-0131	ADDRESS ON FILE
BENEFICIARY 02-0142	ADDRESS ON FILE
BENEFICIARY 02-0157	ADDRESS ON FILE
BENEFICIARY 02-0171	ADDRESS ON FILE
BENEFICIARY 02-0172	ADDRESS ON FILE
BENEFICIARY 02-0189	ADDRESS ON FILE
BENEFICIARY 02-0219	ADDRESS ON FILE
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BENEFICIARY 02-0241	ADDRESS ON FILE
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BENEFICIARY 02-0250	ADDRESS ON FILE
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Claim Name	Address Information
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Claim Name	Address Information
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Claim Name	Address Information
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Claim Name	Address Information
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Claim Name	Address Information
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Claim Name	Address Information
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Claim Name	Address Information
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Claim Name	Address Information
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Claim Name	Address Information
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Claim Name	Address Information
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Claim Name	Address Information
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Claim Name	Address Information
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Claim Name	Address Information
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Claim Name	Address Information
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Claim Name	Address Information
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BENEFICIARY 24-12373	ADDRESS ON FILE

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