

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 18-61017-CIV-ALTONAGA/SELTZER

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

POINTBREAK MEDIA, LLC, *et al.*,

Defendants.

RECEIVER JONATHAN E. PERLMAN'S SECOND INTERIM REPORT

January 7, 2019
Miami, Florida

Jonathan E. Perlman, Esq.
Florida Bar No. 773328
jperlman@gjb-law.com
Receiver for the Receivership Entities

-and-

GENOVESE JOBLOVE & BATTISTA, P.A.
Gregory M. Garno, Esq.
Florida Bar No. 87505
ggarno@gjb-law.com
Michael Bild, Esq.
Florida Bar No. 1003841
mbild@gjb-law.com
Attorneys for Jonathan E. Perlman, Esq.,
Receiver for the Receivership Entities
100 Southeast 2nd Street, 44th Floor
Miami, FL 33131
Tel: (305) 349-2300
Fax: (305) 349-2310

TABLE OF CONTENTS

	Page
EXECUTIVE SUMMARY	1
THE RECEIVER’S SECOND INTERIM REPORT	2
I. BACKGROUND	2
II. WORK OF RECEIVER SINCE FIRST INTERIM REPORT	5
A. General Summary of Activities Since the First Interim Report.....	5
B. Storage and Sale of Receivership Property.....	6
C. The Receiver’s Actions to Enforce the Court’s Asset Freeze and Obtain the Return of Receivership Property Taken by Dustin Pillonato and Justin Ramsey.....	6
D. The Receiver’s Actions to Obtain the Return of Cash, Watches, and other Property that Dustin Pillonato Transferred out of the Southern District of Florida in Violation of the Court’s Asset Freeze.....	8
E. Asset Freeze/Turnover and Preservation Letters and Financial Demand Letters.....	9
F. The Receiver’s Website, 1-800 Hotline and Customer Relations	10
G. Monies the Receiver Has Successfully Brought Back to the Receivership Estate.....	10
H. Depositions	11
III. THE RECEIVER’S CONTINUING WORK	12

EXECUTIVE SUMMARY

1. The Court appointed Jonathan E. Perlman as Temporary Receiver on May 8, 2018 and Permanent Receiver on June 7, 2018, over a scam telemarketing operation that sold claiming and verification of listing services relating to Google and other search engines. This Second Interim Report describes the Receiver and his team's efforts and results, since his filing of the First Interim Report on June 6, 2018.
2. The Court ultimately appointed Mr. Perlman as Receiver over the following entities: Pointbreak Media, LLC; DCP Marketing, LLC; Modern Spotlight LLC; Modern Spotlight Group LLC; Modern Internet Marketing LLC; Modern Source Media; Perfect Image Online LLC; Allstar Data, LLC; National Business Listings, LLC; and Pinnacle Presence, LLC; and each of their subsidiaries, affiliates, successors, and assigns.
3. Since being appointed and filing the First Interim Report, the Receiver opened fiduciary accounts, and has recovered approximately \$256,000. The Receiver's fiduciary bank accounts have a current total balance of \$110,540.38. The Receiver also anticipates the turnover of \$109,020 that was seized by the Department of Homeland Security. A copy of the Receiver's accounting is attached as Exhibit A. Additionally, the Receiver demanded the turnover and obtained possession of seven luxury watches valued approximately at \$96,500 as a result of Defendant Pillonato's violation of the Court's Asset Freeze.
4. The Receiver's team has interviewed a total of 46 supervisory and staff-level employees, vendors and outside professionals, including participation in 6 depositions. The Receiver's team has also spoken to over 100 consumers and interviewed approximately 52 of those consumers.
5. The Receiver has to date sent 96 turnover and preservation letters to vendors, professionals, potential litigation targets and financial institutions, as well as numerous demands for financial information from financial institutions and others.
6. The Receiver has secured and maintains 25 gigabytes worth of electronically stored information and is acting as the centralized repository for such data. The Receiver also has secured many gigabytes of call-recordings that are being hosted by Ytel, Inc.
7. The Receiver also secured the Receivership Defendants' offices in Deerfield Beach and Boca Raton, Florida, while ensuring that a related operation in the Dominican Republic was closed down, and that property from these offices has been secured or sold with court approval.
8. In order to fulfill his obligations, the Receiver has filed eleven motions for relief, all of which the Court granted. The Receiver continues to investigate, secure, and preserve assets of the Receivership Defendants, and is in the process of identifying claims for additional recovery the Receiver may bring against third parties.

THE RECEIVER'S SECOND INTERIM REPORT

Jonathan E. Perlman, Receiver for the Receivership Defendants/Entities¹ pursuant to this Court's Preliminary Injunction Orders, files his Second Interim Report to describe his continuing investigation and completion of tasks as the Court directed.

I. BACKGROUND

1. On May 7, 2018, the U.S. Federal Trade Commission (the "FTC" or "Plaintiff") commenced this action by filing a complaint for permanent injunction and other relief and a motion for a temporary restraining order and other equitable relief (the "TRO") alleging that Defendants Dustin Pillonato ("Pillonato"), Justin Ramsey ("Ramsey"), Aaron Michael Jones ("Jones"), Ricardo Diaz ("Diaz"), Michael Pocker ("Pocker"), and Steffan Molina ("Molina") (collectively, the "Individual Defendants"), and the corporate defendants, (the Individual Defendants and the corporate defendants may be referred to herein collectively as "Defendants"), violated and were likely to violate Section 5(a), of the FTC Act, 15 U.S.C. § 45(a).² [ECF No. 1, "Compl."].

2. Plaintiff alleged that since approximately November 2016, Defendants operated their common enterprise through a series of business aliases and limited liability companies. These entities all performed functions related to the unfair and deceptive practices outlined

¹ The Second Interim Report uses the terms "Receivership Defendants" and "Receivership Entities" interchangeably. Pursuant to the Order granting the Receiver's Motion for Order of Reappointment [ECF No. 174], the "Receivership Defendants" or "Receivership Entities" shall mean Pointbreak Media, LLC; DCP Marketing, LLC; Modern Spotlight LLC; Modern Spotlight Group LLC; Modern Internet Marketing LLC; Modern Source Media; Perfect Image Online LLC, Allstar Data, LLC; National Business Listings, LLC; Pinnacle Presence, LLC; and their divisions, subsidiaries, affiliates, predecessors, successors, assigns, and any fictitious business entities or business names created or used by these entities, or any of them. [ECF No. 175].

² Subsequently, the FTC amended its Complaint, added new counts and named Vincent Yates and Daniel Carver as additional defendants, and added Stephanie Watt and Jennefer Ramsey as "Relief Defendants." [ECF No. 109].

below. They had shared owners, managers, office space, and employees, and had commingled funds. [ECF No. 1, Compl. at ¶ 88].

3. Specifically, Plaintiff alleged that Defendants' false, deceptive or unfair practices (the "Sales Practices") included:

a. Defendants represent or have represented, expressly or by implication, that:

i. Defendants are authorized by, or affiliated with, Google;

ii. Consumers' businesses are in imminent danger of being marked permanently closed by Google or removed from Google's search results because consumers have not "claimed and verified" those businesses with Google;

iii. Defendants, as part of claiming and verifying the consumers' businesses, can assign certain keywords to those businesses that will result in the prominent display of the businesses' websites or listings; and

iv. Defendants can guarantee prominent, first-page, or first-place placement in Google search results to consumers who pay for Defendants' Citation Program.

b. Defendants have obtained consumers' bank account information and caused billing information to be submitted for payment on those accounts without consumers' authorization. [ECF No. 1, Compl. at pp. 28-29].

4. The Court granted Plaintiff's Motion for TRO, entered an Order freezing assets belonging to any of the Defendants, and appointed Mr. Perlman Temporary Receiver on May 8, 2018. [ECF No. 12].

5. On May 25, 2018, the Court entered a Stipulated Preliminary Injunction as to Defendant Ricardo Diaz. [ECF No. 40].

6. On June 6, 2018, the Receiver filed his First (Corrected) Interim Report. [ECF No. 57]. The same day, the Court heard evidence and argument on Plaintiff's motion for preliminary injunction as to other Defendants, and the Court also entered a Stipulated Preliminary Injunction as to Defendants Steffan Molina and Perfect Image Online LLC on June 6, 2018. [ECF No. 58].

7. On June 7, 2018, the Court entered a Preliminary Injunction as to Defendants Dustin Pillonato; Justin Ramsey; Aaron Michael Jones; Michael Pocker; Pointbreak Media, LLC; DCP Marketing, LLC; Modern Spotlight LLC; Modern Spotlight Group LLC; Modern Internet Marketing LLC; and Modern Source Media, LLC. [ECF No. 64].

8. On August 30, 2018, the Court granted Plaintiff's August 2 motion for preliminary injunction and entered a Preliminary Injunction as to Defendants Allstar Data, LLC; National Business Listings, LLC; Pinnacle Presence LLC; Vincent Yates; and Daniel Carver. [ECF No. 169].

9. On August 31, 2018, the Court entered a Stipulated Preliminary Injunction as to Relief Defendants Stephanie Watt and Jennefer Ramsey. [ECF No. 170].

10. The Preliminary Injunctions directed Mr. Perlman, as Permanent Receiver, to take exclusive custody, control and possession of all property of the Receivership Entities, wherever situated; to conserve, hold, and manage all assets and documents of the Receivership Entities; to conduct discovery; and to institute such actions as the Receiver deems advisable to recover additional assets. [See, e.g., ECF No. 64 at pp. 14-16]. The PI also directed the Receiver to file reports with this Court. [*Id.* at p. 20].

11. The following is a summary of the Receiver and his team's efforts and accomplishments since filing the First Interim Report on June 6, 2018.

II. WORK OF RECEIVER SINCE FIRST INTERIM REPORT

A. General Summary of Activities Since the First Interim Report

12. After taking possession of the Receivership Entities' offices located at 550 Fairway Drive, #104, Deerfield Beach, Florida (the "Deerfield Beach Office") and 4730 N.W. 2nd Avenue, Boca Raton, Florida (the "Boca Raton Office"), the Receiver secured, stored, and sold certain property from those locations.

13. The Receiver has to date also served a total of 96 demand letters on third parties, reviewed voluminous document productions, and made additional follow up requests for documents and information as part of his ongoing analysis in identifying additional Receivership assets and evaluating third-party litigation claims. The Receiver and his counsel also continued to review and analyze thousands of documents, bank records, and electronic communications.

14. The Receiver and his team also conducted 46 interviews of staff-level employees, vendors and outside professionals and participated in 6 depositions. The Receiver's team has also spoken to over 100 consumers and interviewed approximately 52 of those consumers.

15. The Receiver also secured and now maintains 25 gigabytes of electronically stored information from servers, computers, and phones belonging to the Defendants. The Receiver has also secured numerous gigabytes of voice recording data that is being hosted by Ytel, Inc.

16. On September 11, 2018, the Receiver filed a Motion for Order of Reappointment, reappointing Perlman as Receiver over all Receivership Entities, which the Court granted the next day. This order created a singular deadline relating to all Receivership Entities for

registering the PI in other district courts where the Receiver's investigation indicated that assets related to the Receivership Entities and other Defendants may be located, pursuant to 28 U.S.C. §§ 754, 1692. [ECF No. 175]. Thereafter, the Receiver timely registered this Court's order and PI in District Courts where Receivership Entities' assets may be located.

B. Storage and Sale of Receivership Property

17. The Receiver rented a climate controlled storage unit in Pompano Beach, Florida to secure the property from the Deerfield Beach and Boca Raton Offices.

18. On September 29, 2018, the Receiver's movers, Beltman Relocation Group, moved the property located at the Deerfield Beach Office to the Pompano Beach storage unit.

19. On October 4, 2018, the Receiver moved certain property from the Boca Raton Office to the Pompano Beach storage unit as well.

20. In November and December 2018, the Receiver negotiated the sale of other property located at the Boca Raton office to MG Media Solutions, Inc. On December 21, 2018, the Receiver filed a Motion for approval to sell such property [ECF No. 230], which the Court granted on December 26, 2018 [ECF No. 231]. On January 4, 2019, the Receiver received \$3,200 for a laser network printer, a credenza and desk, office chairs, office cubicles, and a conference room table from the Boca Raton Office. The Receiver also moved the remaining unsold Boca Raton property to the Pompano Beach storage unit.

C. The Receiver's Actions to Enforce the Court's Asset Freeze and Obtain the Return of Receivership Property Taken by Dustin Pillonato and Justin Ramsey

21. On May 8, 2018, minutes after being served with the TRO, Defendants Pillonato and Ramsey fled Ramsey's home with laptop computers and several Louis Vuitton backpacks purchased by Defendant DCP Marketing, LLC.

22. On June 4, 2018, the Receiver filed a Motion to Compel Turnover and for an Order to Show Cause [ECF No. 49], requiring Pillonato and Ramsey to turn over the laptop computers and cellphones for imaging, provide all passwords and access codes to business computers and cellphones, and turn over the Louis Vuitton backpacks. Pillonato and Ramsey opposed this motion, claiming protection under the Fourth and Fifth Amendments of the U.S. Constitution.

23. On June 7, 2018, the Court granted in part the Receiver's Motion to Compel Turnover [ECF No. 62], ordering Pillonato and Ramsey to turn over their laptop computers and cellphones to the Clerk's Office, which would maintain control of the property while the parties briefed issues relating to Defendants' constitutional claims. The Court also ordered Pillonato and Ramsey to turn over to the Receiver the passwords and access codes for the desktop computers and cellphones, the Louis Vuitton backpacks, and the identity and contact information for the third unidentified person.

24. On July 17, 2018, the Receiver filed his Reply to Defendants' Dustin Pillonato and Justin Ramsey's Response and Objections to Turnover. [ECF No. 129]. And on August 9, 2018, the Receiver filed a Notice of Filing Newly Discovered Evidence. [ECF No. 146].

25. Following a hearing, Magistrate Judge Barry S. Seltzer entered his Report and Recommendation [ECF No. 176] on September 12, 2018 recommending that the Court grant the Receiver's motion to turn over the laptop computers and cellphones in order to download and secure the relevant data. On October 3, 2018, the Court affirmed Magistrate Judge Seltzer's Report and Recommendation. [ECF No. 181].

26. Following the Clerk of Court's turnover of the laptop computers and cellphones to the Receiver, the Receiver created forensic images and returned the laptop computers and

cellphones to Pillonato and Ramsey. [See ECF No. 226].

D. The Receiver's Actions to Obtain the Return of Cash, Watches, and other Property that Dustin Pillonato Transferred out of the Southern District of Florida in Violation of the Court's Asset Freeze

27. In July 2018, Defendant Dustin Pillonato, in contravention of the Court's asset freeze, gave his step-brother Jeremy Drob seven luxury watches valued approximately at \$96,500,³ \$109,020 in cash wrapped in tin foil and two all-terrain vehicles, which Pillonato directed Drob to drive to Pennsylvania and deliver to their father, Ray Pillonato. During the drive, an officer from the Sumter County, South Carolina, Sheriff's Office, pulled Drob over at a routine traffic stop.

28. During Drob's interviews with the Sumter County Sheriff's Deputy and Homeland Security agents, Drob stated that the cash, watches, and ATVs belonged to Pillonato, and that Pillonato had purchased a plane ticket for Drob to fly to South Florida for the purpose of having him transport the property to their father in Pennsylvania. Drob also stated that Pillonato had told him that he had converted the money to cash by cashing multiple checks at a check cashing store, always in amounts under \$10,000. When Drob called Pillonato from the Sheriff's office to tell him what had happened, Pillonato asked Drob to tell law enforcement that the money and property all belonged to Drob, not Pillonato. Drob refused. During the law enforcement interview, Drob also stated that three weeks earlier, Pillonato's father, Ray Pillonato, at Pillonato's direction, likewise drove a jeep and a trailer containing more of Pillonato's assets to Pennsylvania. The Receiver has made demand upon Ray Pillonato for information relating to this incident. Pillonato has asserted his Fifth Amendment Privilege against incrimination in response to all questions.

³ The \$96,500 valuation is an approximation that the Sumter County Sheriff's Office listed in its Incident/Investigation Report and is therefore subject to change pending further investigation.

29. On October 11, 2018, the Receiver filed his Motion to Compel Turnover of Watches by Sumter County, South Carolina, Sheriff's Office [ECF No. 187], which the Court granted on October 12, 2018 [ECF No. 190]. A bonded courier retained by the Receiver delivered the watches to the Receiver on November 2, 2018.

30. The seven watches consist of one gold Rolex Day-Date, two silver Breitlings model 1884, one silver Rolex Oyster Perpetual, one silver Panerai Luminor Marina, one Cartier and one silver Breitling Bentley.

31. On November 2, 2018, the Receiver also filed a Motion for Determination of Applicability of Asset Freeze to \$109,020 in Cash Held by the Department of Homeland Security [ECF No. 201], which the Court granted on November 5, 2018 [ECF No. 202]. The Court retained jurisdiction to adjudicate any claims, including those made by third party claimant, Jeremy Valentino,⁴ who has filed a Civil Asset Forfeiture Reform Act claim for the funds.

32. Based upon Homeland Security representations, the Receiver anticipates the turnover of the \$109,020 in the next 30 days.

E. Asset Freeze/Turnover and Preservation Letters and Financial Demand Letters

33. In total, the Receiver's team sent 96 turnover and preservation letters to known vendors, professionals, transferees and financial institutions as well as numerous demands for financial information to financial institutions and others.

34. The Receiver's team also sent turnover and preservation letters to all of the named Defendants and Relief Defendants. The Receiver continues to follow up with those who have

⁴ Valentino worked at a number of the Receivership Entities and was co-manager of the entity that leased 951 Broken Sound Parkway, Suite 188 where Pointbreak Media and Modern Spotlight Group were once located.

not sufficiently responded to the turnover demands and those who the Receiver believes to have property traceable to the Receivership Entities.

F. The Receiver's Website, 1-800 Hotline and Customer Relations

35. The Receiver created a website, www.pointbreakreceivership.com, to disseminate to the Receivership Defendants' customers and others up-to-date information on the progress of this case. The website is also the customers' easiest point of contact with the Receiver. Besides case updates and links to court documents, it has a link to send the Receiver e-mails to info@pointbreakreceivership.com and lists the Receiver's 1-800 hotline number of 1 (844) 635-1608.

36. As of the filing of this Report, the Receiver's staff has spoken to approximately 100 customers and updated the call log with summaries of each call.

G. Monies the Receiver Has Successfully Brought Back to the Receivership Estate

37. Since being appointed, the Receiver opened fiduciary accounts, and increased the cash balance of the Receivership by expanding the Receivership, enforcing the Court's asset freeze and demanding turnover of funds held by third parties. *See* Exhibit A (Income and Expenses).

38. As a result of the Receiver's and his professionals' efforts, the Receiver has recovered to date \$257,097.62 in cash, plus valuable watches, luggage and other personal property and is awaiting receipt of \$109,020 from Homeland Security. The Receiver's fiduciary bank accounts have a current total balance of \$110,540.38. Additionally, the Receiver has aided the parties who have settled to date, which proposed settlement agreements will require the settling defendants to pay and turn over property to the Plaintiff and/or the Receivership for the benefit of victims. [*See* ECF Nos. 209, 211, 214 and 225]. As a result of the pending settlement

with Defendant Ricardo Diaz, the Receiver has obtained a Rolex Datejust watch valued approximately at \$11,000 and a Hublot watch valued approximately at \$13,488.82.

H. Depositions

39. On November 13, 2018, the Receiver attended the deposition of Defendant Pillonato. Receiver's counsel deposed Pillonato regarding the sworn financial statements he submitted to this Court and various financial transactions. Defendant Pillonato asserted his Fifth Amendment privilege against self-incrimination in response to questions at his deposition.

40. On November 14, 2018, the Receiver attended the deposition of Defendant Ramsey where Receiver's counsel likewise deposed Ramsey regarding his sworn financial statements and financial transactions. Defendant Ramsey also asserted his Fifth Amendment privilege against self-incrimination in response to questions at his deposition.

41. On November 16, 2018, Receiver's counsel, by video conference, attended the FTC's deposition of Dr. Alex Benton, the 30(b)(6) representative of Google LLC.

42. On October 9, 2018, the Receiver's counsel telephonically attended the FTC's deposition of Bernadette Coleman. The deposition took place at the FTC's Southwest Region in Dallas, Texas.

43. On October 9, 2018, the Receiver's counsel also telephonically attended the FTC's deposition of Justin Liles at the FTC's Southwest Region Office in Dallas.

44. On November 8, 2018, the Receiver's counsel attended the FTC's deposition of Beau Strickland. The deposition took place at the offices of Genovese Joblove & Battista, P.A., 200 East Broward Blvd., Suite 1110, Fort Lauderdale, Florida 33301.

III. THE RECEIVER'S CONTINUING WORK

45. The Receiver and his team continue to investigate, secure, and preserve assets of the Receivership Defendants to identify and bring claims for recovery the Receiver may have against third parties.

46. Consistent with the Court's findings in the PI, the Receiver continues to be of the opinion that the Receivership Defendants' operation should remain closed and that they cannot be operated profitably, while also lawfully.

Date: January 7, 2019

Respectfully submitted,

s/ Jonathan E. Perlman
Jonathan E. Perlman, Esq.
Florida Bar No. 773328
jperlman@gjb-law.com
Receiver for the Corporate Defendants
-and-
GENOVESE JOBLOVE & BATTISTA, P.A.

s/ Gregory M. Garno
Gregory M. Garno, Esq.
Florida Bar No. 87505
ggarno@gjb-law.com
Michael Bild, Esq.
Florida Bar No. 1003841
mbild@gjb-law.com
*Attorneys for Jonathan E. Perlman, Esq.,
Receiver for the Receivership Entities
100 Southeast 2nd Street, 44th Floor
Miami, FL 33131
Tel: (305) 349-2300
Fax: (305) 349-2310*

CERTIFICATE OF SERVICE

I HEREBY certify that on January 7, 2019, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

s/ Jonathan E. Perlman .

Jonathan E. Perlman

SERVICE LIST

Federal Trade Commission v. PointBreak Media, LLC, et al.
USDC, SD Fla., Case No. 18-61017-CIV-ALTONAGA

Evan M. Mendelson
Christopher J. Erickson
Brian M. Welke
Federal Trade Commission
600 Pennsylvania Ave. NW
Mailstop CC-9528
Washington, DC 20580
(202) 326-3320; emendelson@ftc.gov
(202) 326-3671; cerickson@ftc.gov
(202) 326-2897; bwelke@ftc.gov
Fax: (202) 326-3197
Attorneys for Plaintiff Federal Trade Commission

Defendant Dustin Pillonato
pillonatodc@gmail.com
7411 Bristol Lane
Parkland, FL 33067
Pro Se Defendant
(via email)

Defendant Justin Ramsey
Jramsey9799@gmail.com
19149 Skyridge Circle
Boca Raton, FL 33498
Pro Se Defendant
(via email)

Aaron M. Cohen
amc@aaronmcohenpa.com
Aaron M. Cohen, PA
Grand Bahamas Professional Park
955 NW 17th Ave. Bldg. D
Delray Beach, FL 33445
Telephone: (561) 665-8020
Facsimile: (561) 665-8021
*Counsel for Defendants Steffan Molina, Perfect Image Online LLC,
and Pinnacle Presence LLC*
(via CM/ECF)

Kenneth Joseph Ronan
kenronan@lavallebrown.com
Lavalle Brown & Ronan, P.A.
750 South Dixie Highway
Boca Raton, FL 33432
Telephone: (561) 395-0000
Facsimile: (561) 395-9093
*Counsel for Defendants Michael Pocker, Modern Spotlight LLC,
Modern Internet Marketing LLC, and Modern Spotlight Group LLC*
(via CM/ECF)

Chad Gottlieb
CGottlieb@DarrowEverett.com
DarrowEverett LLP
101 NE Third Avenue, Suite 1500
Fort Lauderdale, FL 33301
Telephone: (954) 278-8355
Facsimile: (401) 453-1201
Counsel for Defendant Ricardo Diaz
(via CM/ECF)

Andrew N. Cove
anc@covelaw.com
Cove Law
225 South 21st Avenue
Hollywood, FL 33020
Telephone: (954) 921-1121
Facsimile: (954) 921-1621
*Counsel for Relief Defendants Jennefer Ramsey
and Stephanie Watt*
(via CM/ECF)

Mitchell N. Roth
mroth@rothjackson.com
Roth Jackson Gibbons Condlin, PLC
8200 Greensboro Drive, Suite 820
McLean, VA 22102
Telephone: (703) 485-3535
Facsimile: (703) 485-3523
*Counsel for Relief Defendants Jennefer Ramsey
and Stephanie Watt*
(via CM/ECF)

[10675-007/2963582/2]

EXHIBIT A

**Pointbreak Media LLC Receivership
Income and Expenses
2018**

	Total
Income	
Receivership account interest	805.33
Recovered funds	251,892.29
Cost Reimbursement	1,200.00
Sale of personal property	3,200.00
Total Income	\$ 257,097.62
Expenses	
Data recovery and management	3,485.00
Moving and storage	5,389.00
Professional expenses	7,653.94
Professional fees	127,959.75
Website	1,380.00
Miscellaneous charges	689.55
Total Expenses	\$ 146,557.24
Net Income	\$ 110,540.38

Receivership account interest

6/30/2018 deposit	120.54	Biscayne Bank
7/31/2018 deposit	173.82	Biscayne Bank
8/31/2018 deposit	125.00	Biscayne Bank
9/30/2018 deposit	73.72	Biscayne Bank
10/31/2018 deposit	97.02	Biscayne Bank
11/30/2018 deposit	92.00	Biscayne Bank
12/10/2018 deposit	27.00	Biscayne Bank
12/31/2018 deposit	96.23	Biscayne Bank
	<u>805.33</u>	

Cost Reimbursement 1/02/2019 deposit 1,200.00 Reimbursement from FTC for YTEL

Sale of personal property 1/07/2019 deposit 3,200.00 Sold Certain Boca Raton Personal Property to Tenant

Recovered funds

6/5/2018 deposit	60,000.00	Roth Jackson Trust Account
6/5/2018 deposit	7,273.72	Perfect Image Online LLC
6/11/2018 deposit	12,918.10	Stripe, Inc.
6/12/2018 deposit	112,773.29	Modern Source Media LLC
6/12/2018 deposit	16,244.13	Pinnacle Presence, LLC
6/12/2018 deposit	64.92	Pinnacle Presence, LLC
7/12/2018 deposit	257.56	Allstar Data LLC
7/31/2018 deposit	3,014.45	Forte Payment Systems, Inc.
8/7/2018 deposit	10,000.00	Nearshore Call Center Services LTD
9/26/2018 deposit	29,346.12	National Account Services
	<u>251,892.29</u>	

Data Recovery and management	10/31/2018 ck 1002	1,700.00	Bradeen Digital Forensics
	11/30/2018 ck 1006	585.00	E-Hounds, Inc.
	12/11/2018 ck 1008	1,200.00	Ytel, Inc.
		<u>3,485.00</u>	

Moving and storage	10/31/2018 ck 1003	4,025.00	Beltmann Group
	1/3/2019 ck 1009	1,364.00	Beltmann Group
		<u>5,389.00</u>	

Professional expenses	8/16/2018 ck 1001	4,561.95	Genovese, Joblove & Battista
	11/30/2018 ck 1004	3,091.99	KapilaMukamal, LLP
		<u>7,653.94</u>	

Professional fees	8/16/2018 ck 1001	127,959.75	Genovese, Joblove & Battista
		<u>127,959.75</u>	

Website	6/26/2018 ck 1000	1,380.00	Zielinski Creative
		<u>1,380.00</u>	

Miscellaneous charges	8/16/2018 ck 1001	429.78	Broward Century Locksmith
	8/16/2018 ck 1001	194.82	Google
	11/30/2018 ck 1005	65.00	Arrow Express
	Miscellaneous Adj.	(.05)	
		<hr/>	
		689.55	